



**COUNCIL  
AGENDA**  
for the meeting  
on  
13 December 2021  
at  
6.30 pm

To: To All Members of the Council

Date: 3 December 2021

A meeting of the **COUNCIL** which you are hereby summoned to attend, will be held on **Monday, 13 December 2021** at **6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

JOHN JONES  
Monitoring Officer  
London Borough of Croydon  
Bernard Weatherill House  
8 Mint Walk, Croydon CR0 1EA

Cliona May  
Cliona.May@croydon.gov.uk  
[www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)  
3 December 2021

Residents are able to attend this meeting in person, however we recommend that you watch the meeting remotely via the following link:

<https://webcasting.croydon.gov.uk/croydon/13925-Council>

If you would like to attend in person please note that spaces are extremely limited and are allocated on a first come first served basis. If you would like to attend in person please email [democratic.services@croydon.gov.uk](mailto:democratic.services@croydon.gov.uk) by 5pm the day prior to the meeting to register your interest.

The agenda papers for all Council meetings are available on the Council website [www.croydon.gov.uk/meetings](http://www.croydon.gov.uk/meetings)

If you require any assistance, please contact the person detailed above, on the righthand side.

## **AGENDA – PART A**

**1. Apologies for Absence**

To receive any apologies for absence from any Members.

**2. Disclosure of Interests**

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

**3. Urgent Business (if any)**

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

**4. Announcements**

To receive Announcements, if any, from the Mayor, the Leader, Head of Paid Service and Returning Officer.

**5. The Croydon Debate (Pages 7 - 8)**

For Members to debate a Borough Petition and a Local Petition.

**6. Croydon Question Time (Pages 9 - 12)**

**a) Public Questions (30 minutes)**

To receive questions from the public gallery and questions submitted by residents in advance of the meeting.

**b) Leader and Cabinet Member Questions (105 minutes)**

To receive questions from Councillors.

**7. Council Debate Motions**

To debate any motions submitted in accordance with Council Procedure Rules.

**8. Health & Wellbeing Board Annual Report (Pages 13 - 22)**

To receive the annual report for the Health & Wellbeing Board for 2020-2021.

**9. Director of Public Health Report 2020/21 (Pages 23 - 28)**

To receive the independent annual report from the Director of Public Health.

**10. Polling Places and Polling Districts**

*Report to follow.*

**11. Recommendations of Cabinet or Committees to Council for decision (Pages 29 - 1074)**

To consider the recommendations made by Cabinet or Committees since the last ordinary Council meeting relating to the following matters:

- (i) Report in the Public Interest – Quarter 2 Update
- (ii) Community Safety Strategy
- (iii) 2022/23 Budget and Three-Year Medium Term Financial Strategy
- (iv) Croydon Local Plan Review – publication of the Proposed Submission draft
- (v) The Gambling Act 2005 – Review of London Borough of Croydon Statement of Principles

**12. Exclusion of the Press and Public**

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

**PART B**

<b>REPORT TO:</b>	<b>COUNCIL</b> <b>13 DECEMBER 2021</b>
<b>SUBJECT:</b>	<b>THE CROYDON DEBATE</b>
<b>LEAD OFFICER:</b>	<b>John Jones, Monitoring Officer</b>
<b>WARDS:</b>	<b>ALL</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT:</b> This report is prepared in keeping with paragraph 3.18 of the Council Procedure Rules at Part 4A of the Constitution.	

## 1. EXECUTIVE SUMMARY

- 1.1 In accordance with Part 4A of the Council's Constitution, one borough-wide petition and one local petition can be debated under the Croydon Debate item. A Borough-wide Petition and a Local Petition have been received and the wording is presented below at para 2 and para 3 in the body of this report.

## 2. BOROUGH PETITION

- 2.1 A Borough-wide Petition was received by the Monitoring Officer as follows: "*Croydon Council please re-open Purley Leisure Centre*".

As required by the Constitution, in order to be valid, it was reviewed in accordance with the provisions detailed in Part 4A, para 3.13.5 and determined to be valid.

- 2.2 The rules for debate for a Borough Petition are set out in paragraph 3.13.5(b) and are set out below:
- i. The Lead Petitioner or their representative may address the Council on the Petition for up to three minutes from the public gallery;
  - ii. A member of the Majority Group may then speak for up to three minutes;
  - iii. A member of the Opposition Group may then speak for up to three minutes;
  - iv. A second member from the Majority Group may address the Council for up to three minutes;
  - v. A second member of the Opposition Group may address the Council for up to three minutes;
  - vi. The Lead Petitioner or their representative may address the Council for a further three minutes;
  - vii. A member of the Majority Group may then make a final response for up to one minute and summarise the next steps to be taken in the matter;
  - viii. No further debate shall take place on the Borough Petition thereafter.

2.3 After the procedural steps stated in paragraph 2.2 have been completed, there shall be no further debate and no vote taken.

### 3. LOCAL PETITION

3.1 A Local Petition was received by the Monitoring Officer as follows: *“We call on Croydon Council to allow access for all. We demand the removal of the road blocks on Holmesdale Road and Albert Road and no replacement with ANPR cameras across South Norwood, Woodside, Addiscombe and Crystal Palace.”*.

As required by the Constitution, in order to be valid, it was reviewed in accordance with the provisions detailed in Part 4A, para 3.13.6 and determined to be valid.

3.2 The rules for debate for a Local Petition are set out in paragraph 3.13.6(b) and are set out below:

- i. The Lead Petitioner or their representative may address the Council on the Petition for up to 3 minutes from the public gallery;
- ii. A Member of the Majority Group may then speak for up to three minutes
- iii. A Member of the Opposition Group may then speak for up to three minutes;
- iv. A Member of the Majority Group may then make a final response for up to one minute and summarise the next steps to be taken in the matter;
- v. No further debate shall take place on the Local Petition thereafter.

3.3 After the procedural steps stated in paragraph 3.2 have been completed, there shall be no further debate and no vote taken.

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**CONTACT OFFICER:** Cliona May, Senior Democratic Services and Governance Officer

**BACKGROUND DOCUMENTS:** None

# Agenda Item 6

<b>REPORT TO:</b>	<b>COUNCIL</b> <b>13 DECEMBER 2021</b>
<b>SUBJECT:</b>	<b>CROYDON QUESTION TIME:</b> <b>PUBLIC QUESTIONS</b> <b>LEADER AND CABINET QUESTIONS</b>
<b>LEAD OFFICER:</b>	<b>John Jones, Monitoring Officer</b>
<b>WARDS:</b>	<b>ALL</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT:</b> The business reports of the Leader and Cabinet are prepared in accordance with the Council Procedure Rules at Part 4A of the Constitution.	

## 1. EXECUTIVE SUMMARY

- 1.1 This report outlines the process for:
- a) public questions; and
  - b) questions to the Leader and Cabinet from Councillors.

## 2. BACKGROUND

- 2.1 Part 4A of the Constitution details the process that allows for the Leader and Cabinet Members to take oral questions. Question Time is split into two part; public questions and Councillors' questions to the Leader and Cabinet.

### Public Questions

- 2.2 Public questions can be asked of the Leader or Cabinet Members on issues of policy at the Meeting as set out within the Constitution Part 4A, Sections 3.12 – 3.15. Any questions of a purely factual or of a detailed nature that cannot be answered on the evening shall be noted and shall receive a written response within three weeks following the meeting. The responses shall be published on the Council's website.
- 2.3 Public Questions shall only be taken at Ordinary Council meetings and shall be allocated a total time of 30 minutes. This timeframe shall include both the questions and responses by the relevant Cabinet Members or Leader.
- 2.4 The Mayor has absolute discretion to decline to allow any question to be dealt with under this procedure on the grounds that it addresses matters that would be inappropriate to consider at the meeting, including where the questions being asked are repetitive or have already been addressed.

- 2.5 Following advice from the Government and Public Health England to enforce social distancing and prevent the spread of Coronavirus, the Council is holding public meetings in the Town Hall under strict conditions to limit the risk of all those attending public meetings. As a result, attendance in the public gallery is limited to 10 persons and any residents wishing to ask questions in person are encouraged to register their attendance in advance to avoid disappointment.
- 2.6 However, in accordance with Part 4A, paragraph 3.15(ii), the Mayor may also accept questions from Members of the Public submitted by email to the designated email address by 12 noon on the Friday prior to an ordinary Council meeting. The Mayor will put questions received by email to the Leader or the relevant Cabinet Member and, where a number of questions are received on the same subject, the Mayor may put a summary of those questions instead.

**Leader and Cabinet Questions:**

- 2.7 This item is to enable Members to ask questions of the Leader and Cabinet on issues of policy. Any questions of a purely factual or of a detailed nature that cannot be answered on the evening shall be noted and shall receive a written response within three weeks following the meeting. The responses shall be published on the Council’s website.
- 2.8 Questions which relate to a current planning or licensing matter or any matter relating to an individual or entity in respect of which that individual or entity has a right of recourse to a review or right of appeal conferred by or under any enactment shall not be permitted. In addition, questions shall not be received or responded to where they pertain to anticipated or ongoing litigation, conciliation or mediation or any employment or personnel related issues or disputes.
- 2.9 The Leader shall be the first to respond to questions under this item and the total time allocated to questions by Members to, and responses from the Leader, shall be 15 minutes. The first two minutes of the Leader’s 15 minute slot may be used by the Leader to make any announcements.
- 2.10 Cabinet Members, divided up into three ‘pools’ of three Members each, shall thereafter respond to questions by other Members of the Council. The total time allocated to each ‘pool’ of Cabinet Members shall be 30 minutes. The three Cabinet Members shall each be permitted to use two minutes of this 30 minute slot to make announcements.
- 2.11 The ‘pools’ for this meeting will be as follows:

**Pool 1**

Name	Portfolio
Stuart King	Deputy Leader and Cabinet Member for Croydon Renewal
Callton Young	Cabinet Member for Resources & Financial Governance



## Pool 2

Name	Portfolio
Janet Campbell	Cabinet Member for Families, Health & Social Care
Oliver Lewis	Cabinet Member for Culture & Regeneration
Alisa Flemming	Cabinet Member for Children, Young People & Learning

## Pool 3

Name	Portfolio
Patricia Hay-Justice	Cabinet Member for Homes
Manju Shahul-Hameed	Cabinet Member for Communities, Safety & Business Recovery
Muhammad Ali	Cabinet Member for Sustainable Croydon

- 2.12 Representatives of political groups may give advance notice to the Council Solicitor by 12 noon on the Friday preceding an ordinary Council Meeting, the names of the first two Members of their respective political group that they wish the Mayor to call to ask a question of each Member of the Cabinet, including the Leader of the Council.
- 2.13 After those Members have been called, the Mayor will call Members that indicate they have a question, with a presumption of inviting questions from as many different Members as possible. Each Member asking a question will also be allowed to ask a supplementary questions.

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**CONTACT OFFICER:** Cliona May  
Senior Democratic Services and Governance Officer –  
Council & Regulatory

**BACKGROUND DOCUMENTS:** None

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# Agenda Item 8

<b>REPORT TO:</b>	<b>COUNCIL</b> <b>13 DECEMBER 2021</b>
<b>SUBJECT:</b>	<b>HEALTH &amp; WELLBEING BOARD</b> <b>ANNUAL REPORT</b>
<b>LEAD OFFICER:</b>	<b>STEPHEN ROWAN, HEAD OF DEMOCRATIC SERVICES</b> <b>AND SCRUTINY</b>
<b>WARDS:</b>	<b>ALL</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT:</b> This report is prepared in keeping with paragraphs 3.46 – 3.49 of the Council Procedure Rules at Part 4A of the Constitution.	

## **1. RECOMMENDATIONS**

- 1.1 The Council is asked to receive and consider the Health & Wellbeing Board's 2020-21 Annual Report.

## **2. EXECUTIVE SUMMARY**

- 2.1 In accordance with Part 4A of the Council's Constitution, Council can receive Annual Reports from Committees. The Constitution also prescribes how these Annual Reports are treated by Council.

## **3. PROCEDURE FOR ANNUAL REPORTS**

- 3.1 In accordance with para 3.47 of Part 4A of the Council's Constitution, the overall time which may be devoted to question the Health & Wellbeing Board Annual Report shall be not more than 10 minutes. The Chair of the Board (or in absence of the Chair, the Vice-Chair) shall introduce and answer questions on the report. The Chair of the Committee shall not have more than 3 minutes speaking time to introduce the report.
- 3.2 For the remaining time available, the report will be open to questions.
- 3.3 Any Member, except the Secunder of the Report, may ask the Chair or Vice-Chair, as appropriate, not more than two questions on each paragraph of the report.

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**CONTACT OFFICER:**

Cliona May  
Senior Democratic Services and Governance  
Officer – Council & Regulatory

**APPENDIX 1:**

Health & Wellbeing Board's Annual Report 2020-  
2021

**BACKGROUND DOCUMENTS:**

None

<b>REPORT TO:</b>	<b>Health and Wellbeing Board 20 October 2021</b>
<b>SUBJECT:</b>	<b>Annual Report of the Health and Wellbeing Board 2020/2021</b>
<b>BOARD SPONSOR:</b>	<b>Councillor Janet Campbell Cabinet Member for Families, Health and Social Care</b>
<b>PUBLIC/EXEMPT:</b>	<b>Public</b>

**SUMMARY OF REPORT:**

This report summarises the work undertaken by Croydon Health and Wellbeing Board from June 2020 to June 2021.

**BOARD PRIORITY/POLICY CONTEXT:**

Health and Wellbeing Board is required to report to Full Council annually on the work undertaken throughout the preceding civic year. In addition, the Health and Wellbeing Strategy is part of the Council's policy framework, the approval of which, full Council has reserved to itself

Health and Wellbeing is relevant to all of the Council's corporate priorities but the key priorities that the work of the Board aligns to are:

- People live long, healthy, happy and independent lives

Our children and young people thrive and reach their full potential.

**FINANCIAL IMPACT:**

There is no financial impact of this report.

**1. RECOMMENDATIONS:**

This report recommends that the Health and Wellbeing Board:

1.1 Report to Full Council the outcome of the Board's monitoring of the delivery plans in fulfilment of the Health and Wellbeing Strategy as part of its annual report.

1.2 Note the contents of the Annual report in the Appendices Report.

## **2. BACKGROUND**

- 2.1 In accordance with Part 4A of the Council's Constitution, Council can receive Annual Reports from Committees, including Overview and Scrutiny. The Health and Wellbeing Board are a non-executive Committee of the Council. The Constitution also prescribes how these Annual Reports are treated by Council.
- 2.2 The report included as an appendix to this cover report summarises the work undertaken by Croydon Health and Wellbeing Board from June 2020 to June 2021. The Board had to postpone the March 2021 Health and Wellbeing Board due to the measures taken in response to COVID-19.

## **3 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 3.1 There is no direct financial impact relating to this paper. We expect to work within existing resources, seeking improvements through more efficient and effective partnership working.
- 3.2 Approved by: Richard Ennis, Corporate Director of Resources

## **4 LEGAL CONSIDERATIONS**

- 4.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the Health and Wellbeing Board are required to report to Council the outcome of the Board's monitoring of the delivery plans in fulfilment of the Health and Wellbeing Strategy as part of its annual report. (Terms of Reference paragraph 1.8).
- 4.2 Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance and Deputy Monitoring Officer.

## **5 HUMAN RESOURCES IMPACT**

- 5.1 There are no human resources impacts from this report
- 5.2 Approved by: Debbie Calliste, Head of HR for Health, Wellbeing and Adults.

## **6 EQUALITIES IMPACT**

- 6.1 The report provides a summary of the work of the Health & Wellbeing Board over the past year. It has been a significantly challenging year due to the Covid pandemic and there is clear evidence that the impact of Covid has exacerbated existing health and social inequalities. There is an overriding principle within the Croydon Health and Wellbeing Strategy to reduce health inequalities. As

set out in the report, this will continue to be a key focus for the Health & Wellbeing Board going forward.

6.2 Approved by: Gavin Handford, Director of Policy & Partnership

## **7 DATA PROTECTION IMPLICATIONS**

**WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**NO**

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### **CONTACT OFFICER:**

Rachel Flowers, Director of Public Health, Croydon Council  
[Rachel.flowers@croydon.gov.uk](mailto:Rachel.flowers@croydon.gov.uk)

### **APPENDICES TO THIS REPORT:**

Appendix 1 – Health and Wellbeing Annual Report 2020-2021

### **BACKGROUND DOCUMENTS:**

None.

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## **1. Health and Wellbeing Board Annual Report 2020/21**

This report summarises the work undertaken by Croydon Health and Wellbeing Board from June 2020 to June 2021. The Board was established on 1 April 2013 as a committee of Croydon Council.

The Board had to postpone the March 2021 Health and Wellbeing Board due to the measures taken in response to COVID-19.

The report sets out the functions of the Board and gives examples of how the Board has discharged those functions. This Annual Report contains the outcomes of the Board's monitoring of the delivery plans in fulfilment of the Health and Wellbeing Strategy available [here](#).

Examples of key achievements of the Board are described, including the encouragement of greater integration and partnership working, tackling health inequalities, and increasing focus on prevention of ill health.

## **2. Functions of the Health and Wellbeing Board**

The Health and Social Care Act 2012 created statutory health and wellbeing boards as committees of the local authority. Their purpose, as set out in the Act, is 'to secure better health and wellbeing outcomes for the whole population, better quality of care for all patients and care users, and better value for the taxpayer'. Part 4L of the Council's Constitution provides that, the functions of the Board are:

1. To encourage, for the purpose of advancing the health and wellbeing of people in Croydon, persons who arrange for the provision of any health or social care services in Croydon to work in an integrated manner.
2. To provide such advice, assistance or other support as appropriate for the purpose of encouraging partnership arrangements under section 75 of the National Health Service Act 2006 between the Council and NHS bodies in connection with the provision of health and social care services.
3. To encourage persons who arrange for the provision of health-related services (i.e. services which are not health or social care services but which may have an effect on the health of individuals) to work closely with the Board and with persons providing health and social care services.
4. To exercise the functions of the Council and its partner Clinical Commissioning Groups in preparing a joint strategic needs assessment under section 116 of the Local Government and Public Involvement in Health Act 2007 and a joint health and wellbeing strategy under section 116A of that Act.

5. To give the Council the opinion of the Board on whether the Council is discharging its duty to have regard to the joint strategic needs assessment and joint health and wellbeing strategy in discharging the Council's functions.
6. To agree the delivery plans of the Health and Wellbeing Strategy.
7. To monitor the delivery plans in fulfilment of the Health and Wellbeing Strategy.
8. To report to Council the outcome of the Board's monitoring of the delivery plans in fulfilment of the Health and Wellbeing Strategy as part of its annual report.
9. To exercise such other Council functions which are delegated to the Board under the Constitution.

Councillor Janet Campbell took over the Chair following the Annual Council meeting on 4 May 2021.

### **3. Croydon Health and Wellbeing Strategy**

The current Health and Wellbeing Strategy is structured around the following 8 Priorities:

- Priority 1 - A better start in life
- Priority 2 - Strong, engaged, inclusive and well connected communities
- Priority 3 - Housing and the environment enable all people of Croydon to be healthy
- Priority 4 – Mental wellbeing and good mental health are seen as a driver of health
- Priority 5 – A strong local economy with quality, local jobs
- Priority 6 – Get more people more active, more often
- Priority 7 – A stronger focus on prevention
- Priority 8 – The right people, in the right place, at the right time

4. The following report (paragraphs 5-11) covers the work of Croydon Health and Wellbeing Board from June 2020 to June 2021 and links this to the Priority in the Health and Wellbeing Strategy.

### **5. Integrated Care System update – All priorities**

The Board received an update on the work being undertaken to deliver the reforms set out in the [white paper](#) published by the government 11 February 2021. The white paper sets out that all NHS and Local Authorities will have a duty to collaborate across the healthcare, public health and social care system. The Integrated Care System (ICS) will work closely with local Health and Wellbeing Boards – as 'place-based' planners - , the ICS NHS Body will be

required to have regard to the Joint Strategic Needs Assessment (JSNAs) / Joint Health and Wellbeing Strategies.

Each of SWL's six boroughs have been asked to identify a 'Transition Team'. In Croydon, the new Senior Executive Group (reporting to the Shadow Health and Care Board) have carried out this function alongside its other duties.

In Croydon Place-based working is already well-advanced through the One Croydon Alliance.

Place	NHS Primary Care Lead	NHS Acute Care Lead	NHS Community Lead	Local Authority Lead	NHS Mental Health Lead	NHS Transition Place based lead
Croydon	Agnelo Fernandez/ Bill Jasper	Mathew Kershaw	Mathew Kershaw	Annette McPartland	James Lowell (Chief Operating Officer, SLAM)	<b>Mathew Kershaw</b>

The Board heard that Croydon Place-based working will be continuing to deliver:

- Transformation of health and care on the ground
- Refreshing/clarifying the outcomes we want to achieve, as these will form the basis of our contract with the ICS in the future.

Croydon Transition Team have been asked to focus on the following key development areas:

1. Begin work across each local placed based partnership to **identify and develop a 6, 12-and 18-month programme** to deliver place requirements outlined in the White paper.
2. Reviewing and developing **revised Local Health and Care Plans** built on locally identified priorities and linked to expected national planning guidance.
3. Set **clear expected outcomes** for place priorities and actions so that their impact may be tracked.
4. Engaging in the **Strengthening Communities Programme Group** to think through in more detail the approach to place-based development, share learning and support the system wide development of place-based arrangements.

## 6. Health and Care Plan Refresh update – all priorities

The Board received a progress update on the Health and Care Plan, delivery plan of the Health and Wellbeing Strategy, expected to be refreshed by 1<sup>st</sup> October 2021. The update in particular is responding to the impacts of Covid-19

on increasing inequalities in the community and increased pressures on the health and care system.

**7. One Croydon – Integrated Community Networks update – priority 2,7,8**

The Board received a progress update on the Integrated Community Networks Plus (ICN+). The model of care has gone live in the early adopter site of Croydon North East (Thornton Heath) and a process is in place to rollout the programme in the other 5 networks.

**8. Autism strategy update and discussion – priority 2,4**

The Board received a report for discussion from the Council Autism Champion, Cllr Jerry Fitzpatrick, and the council Autism Inclusion Lead who lead a discussion in relation to autism, the Croydon autism strategy and how we can improve the experience of autistic residents in Croydon. In particular the work highlighted the need for improved data collection to understand the needs and experience of our autistic residents.

**9. Mental Health First Aid – priority 4,7,2**

The Board discussed the mental health first aid training being undertaken in the borough and the development of the Croydon Mental Health First Aid Network. The training program is both training individuals as mental health first aiders and as mental health first aid instructors, developing a long term capability in the community to provide ongoing support and understanding of mental health issues.

**10. Health Inequalities – All priorities**

Reducing Health inequalities is one of the overriding principles of the Croydon Health and Wellbeing Strategy. The Board discussed the increased opportunity to tackle structural causes of health inequalities across all partner organisations. The board also discussed and agreed to support the development of the Croydon prevention framework and population health management work streams at Croydon level and within South West London to focus further on reducing inequalities.

**11. Croydon Mental Health Transformation update – priority 4**

The Board received a progress update on Croydon Mental Health Transformation. The strategic aim for 2019/20 – 2020/21 was to meet the ambitions set-out in the 5yr Forward View (FYFW). Due to COVID-19 there was a delayed in the start of this Phase 1. A key delivery is the establishment of a Recovery space due to launch October 2021.

<b>REPORT TO:</b>	<b>Full Council</b> <b>13 December 2021</b>
<b>SUBJECT:</b>	<b>Director of Public Health annual report: The Magnificence of Croydon during the COVID-19 pandemic</b>
<b>LEAD OFFICER:</b>	<b>Elaine Jackson – Assistant Chief Executive</b> <b>Rachel Flowers – Director of Public Health</b>
<b>WARDS:</b>	<b>All</b>
<b>COUNCIL PRIORITIES 2020-2024</b>	
<ul style="list-style-type: none"> <li>• The recommendations of the report will address opportunities to reduce inequalities within Croydon. The video report is for the public and will reflect the diverse range of residents within Croydon.</li> <li>• Eighteen percent of Croydon’s population live in areas identified as the 20% most deprived areas of the country and an estimated 43% of residents are within the Black or Asian ethnic group. The risk of severe outcomes and death from COVID is higher in those living in more deprived areas, and in Black, Asian and Minority Ethnic groups.</li> <li>• The message of the video will have a broad reach and will be accessible throughout the community. This will mitigate the risk that the public may overlook the learning of the 19 months and become complacent in their health related decision making, potentially leading to further infections and COVID-related deaths.</li> </ul>	
<b>FINANCIAL IMPACT</b>	
There is no direct financial impact of this report.	

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

**1. RECOMMENDATIONS**

Council is recommended to:

1.1 Note the content of the Director of Public Health’s independent Annual Report; and

1.2 Approve the publication of the Annual Report.

**2. EXECUTIVE SUMMARY**

2.1 The Director of Public Health has a statutory duty to produce an independent annual report to advise and make recommendations to professionals and the public, to improve population health. The Council also has a statutory responsibility to publish the Annual Report. Due to the unequivocal impact of COVID -19, the focus of this year’s report is, the impact of COVID-19 on

inequalities through the experience of Croydon residents, with recommendations on how we in Croydon can best protect ourselves, keep healthy and tackle inequalities together.

- 2.2 This year's report is in video format which will allow for the widest reach, it is easily understandable, can be shared through multiple social media channels, and can be easily translated to support wider dissemination. The video report aligns with the Council's communications strategy to use a variety of communications and engagement channels and platforms to inform and reach out to as many people as possible about the health of our residents across the borough. There is a brief data addendum to the video which provides a brief overview of the data to support the recommendations made within the report.

### **3. DETAIL**

#### **Covid-19 in Croydon**

- 3.1 Over the last 18 months approximately 1 in every 8 Croydon residents have tested positive for COVID-19 (over 46,000 people). This figure is likely to be an underestimate. The most recent figures reveal that during this time Croydon has experienced over 1,000 COVID-related deaths; accounting for almost 1 in every 4 deaths in the borough.
- 3.2 The report is focused on Croydon's experience of the pandemic over the last 19 months based on the lived experiences of its residents. It looks at the impact of Covid-19, how residents were supported, how inequalities were impacted on and aims to highlight how Croydon can emerge fairer, more connected and more resilient from the pandemic.

#### **Format of the Director of Public Health's report to the public**

- 3.3 Video has been chosen as the best medium for this year's annual report. This is both pragmatic and because it best serves the purpose of the report. It is pragmatic as it means that it requires the least amount of input from the public health team, as our resources are stretched due to ongoing pressures in response to Covid, it is also quicker, cheaper and more straightforward than commissioning a written report.
- 3.4 Video also has the benefit of having the widest reach, is easily understandable, can be shared through social media channels, and easily translated to support wider dissemination. In July the Director of Public Health did a video message which was well received by residents with positive feedback saying how important people felt it was to be seeing the Director of Public Health speaking directly in this manner and the Council communicating openly. The use of video also allows us to ensure the report is accessible, as it is able to include British Sign Language (BSL), a language group which is unable to be catered for in a written report, and the audio focus means it is also more accessible to our residents with sight loss. In addition, the video will have closed captions which would allow those with hearing impairments who do not use BSL to access the video. This means we are demonstrating reasonable adjustments to allow access to these individuals who themselves are likely to suffer the impacts of widening health inequalities. Being a video with closed captions also increases the ability to translate the report into multiple languages.

- 3.5 The video has been produced in a manner to reflect the diversity of Croydon residents in a way which cannot be captured in a written report, allowing their experiences and stories to be used to augment all ongoing Covid communication over the next year, and depending on the content of the interviews will provide footage for wider ongoing health communication too.

#### **4. CONSULTATION**

- 4.1 The Director of Public Health's annual report has been created with Croydon resident's voice throughout and is an independent report that others can then use to inform and shape any subsequent consultations. Voices from the Asian, Caribbean, African and European communities will be reflected within the video report.

#### **5 PRE-SCRUTINY REPORT**

- 5.1 This report has not yet been to scrutiny. The Director of Public Health will discuss the report and plans for scrutiny with Councillor Sean Fitzsimons and propose that this would come in early 2022.

#### **6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 6.1 The cost of designing and producing the video report is funded through the COVID-19 Contain Outbreak Management Fund. Spend against the COVID-19 Contain Outbreak Management Fund grant is reported back to the Ministry of Housing, Communities and Local Government to ensure that it is used for the correct purposes, this is an appropriate use of this grant.
- 6.2 There are no direct financial implications arising from this report.

Approved by: Mirella Peters, Head of Finance

#### **7. LEGAL CONSIDERATIONS**

- 7.1 The Head of Litigation and Corporate Law comments on behalf of the interim Director of Law and Governance that under the Health and Social Care Act 2012 section 31(5) the Director of Public Health for a local authority must prepare an annual report on the health of the people in the area of the local authority which by section 31(6) the local authority is required to publish.
- 7.2 There are no additional legal considerations arising directly as a result of recommendations in this report.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the interim Director of Law and Governance & Deputy Monitoring Officer

## **8. HUMAN RESOURCES IMPACT**

- 8.1 There are no immediate HR issues arising from this report for Croydon Council employees or staff.

Approved by: Gillian Bevan, Head of HR Resources, on behalf of the Director of Human Resources

## **9. EQUALITIES IMPACT**

- 9.1 The purpose of this report is to understand the impact of the pandemic on Croydon through the lived experiences of Croydon residents. The report will address the inequalities that exist and is aimed at supporting discussions and action to reduce this inequalities. This report will also highlight how Croydon can emerge as a more connected, fairer and resilient community.

Approved by: Denise McCausland; Equalities Manager on behalf of Director of Policy, Programmes and Performance

## **10. ENVIRONMENT AND CLIMATE CHANGE IMPACT**

- 10.1 There are no environmental or climate change implications of this report.

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

- 11.1 There are no implications of this report for the reduction or prevention of crime and disorder.

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

- 12.1 There is a statutory requirement for the Director of Public Health to produce an annual report which the Council is required to publish.

## **13. OPTIONS CONSIDERED AND REJECTED**

- 13.1 The recommendations are required to meet statutory requirements.

## **14. DATA PROTECTION IMPLICATIONS**

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**



**NO**

There is no personal identifiable data that has been used in the video or within the written addendum. Residents have told their stories however their personal identifiable information has not been used for the purpose of this report. All residents interviewed are over the age of 18 years and have signed the Council's media release form giving permission for their images captured to be used.

**14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**NO**

There are no data protection implications in this report. Rachel Flowers will sign off the final video report. All residents interviewed are over the age of 18 years and have signed the Council's media release form giving permission for their images captured to be used.

**Rachel Flowers, Director of Public Health**

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**CONTACT OFFICER: Denise Dixon, Public Health Principal**

**APPENDICES TO THIS REPORT: None**

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<b>REPORT TO:</b>	<b>COUNCIL</b> 13 December 2021
<b>SUBJECT:</b>	<b>RECOMMENDATIONS OF CABINET REFERRED TO THE COUNCIL FOR DECISION</b>
<b>LEAD OFFICER:</b>	<b>John Jones, Monitoring Officer</b>
<b>WARDS:</b>	<b>ALL</b>

**CORPORATE PRIORITY/POLICY CONTEXT:**

The Recommendations of Cabinet referred to the Council for decision report is prepared in accordance with the Council Procedure Rules at Part 4A of the Constitution.

The Council is asked to approve the following recommendations:

**RECOMMENDATIONS FROM CABINET APPOINTMENTS COMMITTEE  
HELD ON 18 OCTOBER 2021**

**Report in the Public Interest – Quarter 2 Update**

- 1.1 Note and agree on the progress the Council has made in regard to achieving the recommendations set out by external auditor in the Report in the Public Interest in Appendix 2 [Appendix 1 of the Cabinet report] with 62 out of 99 actions complete;
- 1.2 Note the outcome of the first tranche of work to properly evidence what has been achieved so far following the initial internal audit of actions delivered to provide full assurance to members and residents on the changes achieved;
- 1.3 Agree the Refreshed Action Plan including actions marked complete, progress updates against open actions and identification of actions to be embedded going forward as business as usual.

**RECOMMENDATIONS FROM CABINET HELD ON 15 NOVEMBER 2021**

**Community Safety Strategy**

- 1.4 To adopt the Community Safety Strategy, Appendix 5 [Appendix 1 of the Cabinet report] hereto.

**RECOMMENDATIONS FROM CABINET HELD ON 6 DECEMBER 2021**

**2022/23 Budget and Three-Year Medium Term Financial Strategy**

- 1.5 To approve the growth and savings schedules included at Appendix 7 [Appendix 1 of the Cabinet Report] as part of the budget approval process. To note that officers will commence planning for the implementation from April 2022 where appropriate, but that any such proposals are subject to approval at February Council.

**Croydon Local Plan Review – publication of the Proposed Submission**

**draft**

- 1.6 Approve the submission of the Proposed Submission draft of the Croydon Local Plan review (Appendix 1) to the Secretary of State following the conclusion of the statutory 6-week publication period in accordance with Section 20(1) of the Planning and Compulsory Purchase Act 2004;
- 1.7 Delegate the agreement of any Main Modifications required by the appointed Planning Inspector to make the Croydon Local Plan Review sound to the Cabinet Member for Culture and Regeneration, in consultation with the Director of Planning and Sustainable Regeneration;
- 1.8 Delegate the publication of any Main Modifications required by the appointed Planning Inspector for formal consultation to the Cabinet Member for Culture and Regeneration, in consultation with the Director of Planning and Sustainable Regeneration; and
- 1.9 Delegate minor modifications and factual corrections (that are not required to make the draft Croydon Local Plan Review sound) to the Director of Planning and Sustainable Regeneration in consultation with the Cabinet Member for Culture and Regeneration.

**RECOMMENDATIONS FROM LICENSING COMMITTEE HELD ON 23 NOVEMBER 2021**

**The Gambling Act 2005 – Review of London Borough of Croydon Statement of Principles**

- 1.10 To adopt the Statement of Principles in Appendix 11 [Appendix 5 to the Licensing Committee report].

**2. EXECUTIVE SUMMARY**

- 2.1. The Recommendations of Cabinet and Committees referred to the Council for decision report comprises of matters of business formally undertaken by the Leader and Cabinet as well as Committees since the last ordinary meeting of the Council that require Full Council approval.
- 2.2. Appendix 4 to this report, the Community Safety Strategy report, which was considered at Cabinet on 15 November 2021, has been amended. Paragraph 9 of the report includes information on the Pre-Decision Scrutiny which took place on 7 September 2021.
- 2.3. Recommendations 1.5-1.9 from Cabinet are subject to the meeting being held on 6 December 2021.

**3. BACKGROUND**

- 3.1. Part 4A of the Constitution requires that Cabinet and Committees include any recommendations that it has made to Council within this report.

- 3.2. These rules do not apply to any recommendations contained in the Annual Report of the Scrutiny and Overview Committee.
- 3.3. The Leader or Chair of the Committee making the recommendation may exercise a right to introduce the recommendation; in so doing the Leader or Chair of the Committee shall speak for a maximum of 3 minutes.
- 3.4. The recommendation shall be seconded without any further speakers and if not deferred for debate shall immediately be put to the vote.
- 3.5. Any Member supported by a seconder, may ask that a recommendation be deferred for debate and the recommendation shall immediately stand deferred.
- 3.6. In the event that any Cabinet or Committee recommendations have not been reached when the time limit for the meeting has expired, those recommendations shall immediately be put to the vote without further debate.

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<b>CONTACT OFFICER:</b>	Cliona May Senior Democratic Services and Governance Officer – Council & Regulatory
<b>APPENDIX 1:</b>	Report in the Public Interest – Quarter 2 Update – Cabinet Report
<b>APPENDIX 2:</b>	Report in the Public Interest – Quarter 2 Update – Appendix 1 to the Cabinet Report
<b>APPENDIX 3:</b>	Report in the Public Interest – Quarter 2 Update – Appendix 2 to the Cabinet Report
<b>APPENDIX 4:</b>	Community Safety Strategy – Cabinet Report
<b>APPENDIX 5:</b>	Community Safety Strategy – Appendix 1 to the Cabinet Report
<b>APPENDIX 6:</b>	2022/23 Budget and Three-Year Medium Term Financial Strategy – Cabinet Report
<b>APPENDIX 7:</b>	2022/23 Budget and Three-Year Medium Term Financial Strategy – Appendix 1 to the Cabinet Report
<b>APPENDIX 8:</b>	Croydon Local Plan Review – publication of the Proposed Submission draft – Cabinet Report
<b>APPENDIX 9:</b>	Croydon Local Plan Review – publication of the Proposed Submission draft – Appendix 1 to the Cabinet Report
<b>APPENDIX 10:</b>	The Gambling Act 2005 – Review of London Borough of Croydon Statement of Principles – Licensing Committee Report

**APPENDIX 11:**

The Gambling Act 2005 – Review of London  
Borough of Croydon Statement of Principles –  
Appendix 5 to the Licensing Committee Report

**BACKGROUND DOCUMENTS:** None

<b>REPORT TO:</b>	<b>Cabinet 18 October 2021</b>
<b>SUBJECT:</b>	<b>Report in the Public Interest – Quarter 2 Update</b>
<b>LEAD OFFICER:</b>	<b>Richard Ennis, Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</b>
<b>CABINET MEMBER:</b>	<b>Cllr Hamida Ali, Leader of the Council</b>
<b>WARDS:</b>	<b>All</b>

**SUMMARY OF REPORT:**

The report provides the Quarter 2 update of progress made responding to the Council's Report in the Public Interest. It gives a high-level summary of actions taken to date informed by updates received across all services in the Council.

**COUNCIL PRIORITIES 2020-2024**

This covering report provides an overview of the work that has been progressed to achieve the recommendations as set out in the Report in the Public Interest. It focuses on the actions that have been progressed since the update that went to Cabinet on the 7<sup>th</sup> June 2021.

The Action Plan for the Report in the Public Interest has been incorporated into the Croydon Renewal Plans and represents one of the 11 programmes of work being delivered.

The action plan covers a wide range of areas including financial management, governance, staff training, assets and budget development all of which are core elements of any strategy to ensure services are delivered responsively with a focus on value for money for our residents.

**FEEDBACK FROM SCRUTINY AND OVERVIEW COMMITTEE**

The Scrutiny & Overview Committee was pleased to note the progress that had been made with implementing the recommendations arising from the Report in the Public Interest (RIPI). However, there was concern that some items in the reporting framework were marked as complete, when they still needed to be embedded in the organisation as 'business as usual'.

Looking forward, the Chair of the Committee gave a commitment to working with the new Independent Chair of the General Purposes and Audit Committee, to ensure that the reason for each committee reviewing the RIPI updates was clear, in order to reduce duplication of effort.'

**FEEDBACK FROM GENERAL PURPOSES AND AUDIT COMMITTEE**

The Committee agreed the recommendations and requested the following:

- Transformation Funding – That the report on the review of schemes previously funded from Transformation funds is presented to the meeting of the General Purposes and Audit Committee in October 2021.
- CareCubed tool – That a briefing on the effectiveness of the CareCubed tool in procuring and managing delivery of specialist care placements in line with projected costs is provided to the meeting of the General Purposes and Audit Committee in October 2021.
- Croydon Park Hotel – That the report on lessons learned from the purchase of Croydon Park Hotel is presented to General Purposes and Audit Committee in November 2021.

**FINANCIAL IMPACT:**

This report will have no direct financial impact on the borough as its focus is on updating against the recommendations as accepted by the Council in November 2020. Some of the recommendations implemented will have an attached financial cost. This will be included in the costs of the overall improvement plan being developed for the Council

Any costs incurred previously or in the future to deliver the action plan have or will have gone through the Council's existing controls to ensure the spend is essential and represents good value for Croydon. Any costs will need to be contained within the existing approved budget for 2021/2022 to ensure Members are sighted.

The external auditor's costs have totalled £98,275 to 30 September 2021.

**KEY DECISION REFERENCE NO.: Not a key decision**

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

**1. RECOMMENDATIONS:**

- 1.1 Note and agree on the progress the Council has made in regard to achieving the recommendations set out by external auditor in the Report in the Public Interest (appendix 1) with 62 out of 99 actions complete;
- 1.2 Note the outcome of the first tranche of work to properly evidence what has been achieved so far following the initial internal audit of actions delivered to provide full assurance to members and residents on the changes achieved;
- 1.3 Agree the Refreshed Action Plan including actions marked complete, progress updates against open actions and identification of actions to be embedded going forward as business as usual.



## **2. EXECUTIVE SUMMARY**

- 2.1 On 23<sup>rd</sup> October 2020 the Council’s external auditor, Grant Thornton, issued a Report in the Public Interest (RIPI) concerning the Council’s financial position and related governance arrangements. In line with the statutory framework for the RIPI, the Council held an Extraordinary Council meeting on 19<sup>th</sup> November 2020 to discuss the report and the proposed action plan to address it.
- 2.2 The April 12<sup>th</sup> update, approved by Cabinet, provided a comprehensive progress update across all recommendations and also agreed the refreshed RIPI Action Plan having incorporated views from both the Scrutiny and Overview Committee (SOC) and General Purposes and Audit Committee (GPAC). This was then updated with the first quarterly update which went to Cabinet on the 7<sup>th</sup> June, GPAC on the 10<sup>th</sup> June and SOC on the 15<sup>th</sup> June. This report noted that the Council had completed 55/99 actions in the RIPI Action Plan and provided progress updates against all remaining actions.
- 2.3 This covering report represents the second quarterly update on the RIPI response based on activity this financial year. It focuses on actions that were set to be complete by close of June, July and August 2021, as well as updating against actions set to be delivered by the end of September 2021.
- 2.4 Section 5 of this report provides feedback on the outcome of the Internal Audit to date focusing on the 35 actions marked complete in the April 12<sup>th</sup> Cabinet report. It notes where some concerns have been identified in that round of reporting and outlines the mitigating actions that are being undertaken to resolve these.

## **3. HIGH-LEVEL UPDATE ON THE ACTION PLAN**

- 3.1 Statistics on the number of actions complete and outstanding are below. Full detail can be seen in appendix 1.

Number of actions	Number of actions completed	Number of actions outstanding
99	62	37

- 3.2 The Council has delivered 62 actions to date with 10 completed since the June 7<sup>th</sup> Cabinet Quarter 1 Update. Progress updates have been provided against a further 33 actions. The Council has re-opened 3 actions (see 3.6 section 5).
- 3.3 The Action Plan recognises that not every action can be marked “complete” and left. In some cases, actions will need to be embedded into business as usual (BAU) processes before being marked complete. Additionally, a number of the actions are representative of aspects of systemic and cultural shifts that will need to be continued going forward to embed sustained positive change and good practice. Some of these actions will remain open as the Council

acknowledges that achieving the desired outcome will be a long-term process (e.g. co-creating a working environment that respects and values all our staff and take positive action to ensure that this is the case” LBC 4 – IV). The Council is therefore committed to providing updates in further quarterly reports against these.

- 3.4 A further 2 actions are set to be finalised by the end of September. Progress updates are provided against all of these and all other outstanding actions in Appendix 1.
- 3.5 On review, recommendation LBC 2 – ii has been re-opened as whilst progress was made the full review and connected training stated in the action plan has not yet been fully delivered.
- 3.6 The Council recognises it must continue to push to deliver and progress the 37 outstanding actions to ensure momentum is not lost and that the Council’s response to the RIPI achieves the critical organisational change necessary.
- 3.7 The table below sets out the actions identified as high priority by the external auditor with a RAG rating.

High Priority Action	Actions Completed/Total Actions	Rag
R1a Children’s Social Care	5/5 Marked complete in 7 <sup>th</sup> June Quarter 1 Update	
R1b Adult Social Care	9/9 (was 8/9 per Q1 Update)	The outstanding action on training on the ASC Budget has now been completed. This was handled via a briefing to Members of the Health & Social Care Sub-Committee in June 2021.
R2 Adequacy of Council Reserves	2/4	The aspects of this recommendation as set by the External Auditor have been completed.  The 2 outstanding actions relate to Member training and assuring SOC on budget delivery. These have both been progressed with

		updates promised in future quarterly reports.
R3 Use of Transformation Funding	1/2	<p>The aspects of this recommendation as set by the External Auditor have been completed.</p> <p>The outstanding action relates to the offer and delivery of training to members. A training offer has been approved by the Member &amp; Learning Development Committee on the 13<sup>th</sup> July.</p>
R9 Budget Challenge/Rigour	5/5 – Marked complete in 12 <sup>th</sup> April Update	
R12 Revolving Investment Fund	3/3 – Marked complete in 12 <sup>th</sup> April Update	
R14 Treasury Management	2/2– Marked complete in 12 <sup>th</sup> April Update	
R18 Ongoing investment in Brick by Brick	1/1– Marked complete in 12 <sup>th</sup> April Update	
R20 Governance of subsidiaries	4/9 (was 0/9 in June Quarter 1 Update)	<p>Following Cabinet approval of the July 26<sup>th</sup> “Governance of Croydon Council Companies” Paper, The Croydon Companies’ Supervision and Monitoring Panel (CCSMP) has been set up. Its role is to ensure the Council’s strategic and good governance objectives are met across the Council’s subsidiaries.</p> <p>Through the introduction of this Panel, several actions have been</p>

		<p>completed that relate to ensuring good governance mechanisms to monitor and regulate the handling of Council companies have been introduced. The group will continue to deliver against these actions as BAU.</p> <p>The outstanding actions related to constitutional changes and training have been progressed, details of which can be seen in Appendix 1 and in section 4 below.</p>
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3.8 To ensure alignment with the wider Croydon Renewal Plan activities the following criteria were utilised as developed by the PMO Steering Group.

Rag Definitions used:

Green - no known challenges to delivery

Amber – Challenges to delivery identified with mitigations in place/planned

Red - Challenges to delivery identified with no resolution identified

#### 4. KEY MILESTONES ACHIEVED THIS UPDATE

4.1 A comprehensive summary of actions taken to date across all recommendations is contained within the refreshed action plan in appendix 1. This section provides some additional information on key achievements delivered since the Quarter 1 Update in June.

4.2 At the July 26<sup>th</sup> Cabinet, recommendations were given on the Governance of Croydon's Companies. These recommendations were informed by the actions of a working group who had engaged with relevant officers and directors of company boards. It was agreed by Cabinet to introduce the CCSMP to ensure the Council's strategic and good governance objectives and values are met across the Council's subsidiaries. Alongside the Panel itself, approval was given for an attached Terms of Reference to inform the running of the group and embed principles of good governance. In doing so, the Council has put in place appropriate governance mechanisms to achieve the remaining outstanding actions as set out in Recommendation 20, including a provisional process to bring regular updates to Cabinet.

4.3 The Council has been working with the Centre for Governance and Scrutiny to develop new ways of working for scrutiny in response to the Scrutiny Improvement Review and recommendations relating to scrutiny in the RIPI. On 7<sup>th</sup> September, the SOC is set to agree new systems to bring focus and prioritisation to their work. This approach will be supported by member and officer training and a more targeted system for sharing information with

councillors.

- 4.4 An outline training programme for all members was approved by the Members Learning & Development Panel on July 13<sup>th</sup> 2021. In developing this programme the Council considered the RIPI Action Plan to ensure all topics were included. Work is now being progressed to properly schedule and develop the training sessions with the view of delivery by March 2022 for all outstanding items. Work is also underway to plan a full induction training programme for Members elected in May 2022.
- 4.5 Alongside embedding the Guardians Programme detailed in the previous update, the Council has implemented a series of monthly Tea Talks to provide staff a means to share experiences and discuss sensitive issues in a safe space. Following the conference and additional staff roadshows held Spring 2021, further engagement events with staff are expected for Autumn 2021 to provide an update on the Croydon Renewal Plan and underline and continue to promote positive systemic and cultural changes. The Council is committed to creating a positive culture for all and continues to recognise it will take time to build staff trust and confidence.
- 4.6 At July 12<sup>th</sup> Cabinet, recommendations were approved to reject a purchase offer for Brick by Brick (BBB) and agree a modified build out scenario of 23 sites. Alongside this, important governance arrangements were agreed to ensure the Council maintains clear oversight of progress made. The Council will receive updates on BBB's financial position, sales, contractual issues and other relevant matters monthly. Summary updates on these will go to Cabinet on a quarterly basis with the first scheduled provisionally for November 2021.

## **5. PROGRESS UPDATE ON INTERNAL AUDIT**

- 5.1 To provide additional assurance on the delivery of the RIPI Action Plan as reported, Internal Audit was requested to review completed actions to confirm these had been actioned as reported and that, where appropriate, these now formed part of the Council's governance framework (appendix 2). For the initial review, the 35 actions marked complete as at the 12<sup>th</sup> April 2021 Cabinet report, were reviewed.
- 5.2 Internal Audit assurance was obtained through a combination of corroborative enquiry, examination of relevant documents (including meeting minutes) and interrogation of computer applications.
- 5.3 Internal Audit have confirmed that all reported completed actions were complete and where appropriate, these now formed part of the Council's governance framework, except for:
- 3 actions, which although significantly progressed were not fully actioned
  - 1 action, which was still in progress.
- 5.4 Detail of the actions not fully completed can be seen in Appendix 2. Where relevant, scheduling on the Forward Plan has now taken place to ensure

items go to all meetings as required. These items have been left marked as complete. 2 actions (13ii and 11iv) have been re-opened to allow for future updates.

- 5.5 Following their review, Internal Audit have noted that the high priority actions marked complete have been delivered as stated with no further comment or amendments suggested.
- 5.6 Internal Audit will continue to review evidence of progress captured in the RIPI action plan to give reasonable assurance that actions have been completed as expected and communicated. The RIPI Quarter 3 Update is aiming to share Internal Audit findings for actions marked complete as of this Quarter 2 Update.

## 6. FUTURE UPDATES ON THE REPORT IN THE PUBLIC INTEREST

- 6.1 The RIPI action plan has been incorporated into the wider Croydon Renewal Plan and forms 1 of the 11 programmes of work aiming to support the Council’s financial recovery, improve governance arrangements and drive operational improvement. The Croydon Renewal Plan currently consists of nearly 400 recommendations which are to be delivered within the next 4-5 years.
- 6.2 Per the action plan (appendix 1), quarterly RIPI updates are to be provided to GPAC, SOC, Council and Cabinet. This update will be presented directly to SOC on the 7<sup>th</sup> September, GPAC on the 16<sup>th</sup> September, Cabinet on the 18<sup>th</sup> October and Full Council on the 13<sup>th</sup> December.
- 6.3 The dates for the remaining updates this financial year are in the table shown below

<b>RIPI Update Report</b>	<b>SOC</b>	<b>Cabinet Date</b>	<b>Full Council</b>	<b>GPAC</b>
Q.3 Update	8 <sup>th</sup> February	24 <sup>th</sup> January	31 <sup>st</sup> January	3 <sup>rd</sup> Feb
Q.4 Update	29 <sup>th</sup> March	21 <sup>st</sup> March	28 <sup>th</sup> March	3 <sup>rd</sup> March

- 6.4 The previous Quarter 1 Update referred to the intention to review the RIPI’s reporting to minimise duplication across the 4 meetings. Following review, it has been determined to continue reporting across GPAC, SOC, Cabinet and Full Council to ensure that all Members have opportunity to be briefed on the Council’s RIPI Action Plan delivery progress and provide a chance for all Members to query the updates provided.

## **7. CONSULTATION**

- 7.1 The action plan has been previously reviewed by both GPAC and the SOC who made recommendations to enhance what was being progressed. These changes were approved by Cabinet on 12<sup>th</sup> April 2021. Services have been directly engaged with to ensure updates were recorded accurately and contained the most up to date information.

## **8. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 8.1 At 30 September 2021 external auditor's costs totalled £98,275. This is an increase of £33,275 on the amount (£65,000) reported in April 12 Cabinet paper and June Quarter 1 update.
- 8.2 The Council is working to deliver the overarching improvement plan, of which the RIPI action plan forms a key part. Costs will be incurred delivering many of the actions contained within the plan and these will be presented to Members as the Council's Improvement Journey progresses. Any costs will need to be contained within existing budget provisions.

Approved by: Matthew Davis, Interim Director of Finance (S151)

## **9. LEGAL CONSIDERATIONS**

- 9.1 The Head of Litigation and Corporate Law comments on behalf of the interim Director of Law and Governance that the Report in the Public Interest ("the Report") dated 23 October 2020 was issued under the provisions of the Local Audit and Accountability Act 2014 ("the Act"). The Council must comply with the requirements of the Act in responding to the Report.
- 9.2 Under the provisions of paragraph 5(5) and (6) of Schedule 7 to the Act, the Council must decide within one month whether the Report requires the authority to take any action or whether the recommendations are to be accepted. It must also decide what, if any, action is to be taken in response to the Report and its recommendations. The Report was considered at the Council meeting on 19 November when all of the Report's recommendations R1 – R20 and additional recommendations LBC1 – LBC3 was agreed together with an Action Plan in response to each of the recommendations. A further recommendation LBC4 was added following additional consultation. Paragraph 7 goes on to provide that the authority's functions under paragraph 5 are not to be the responsibility of the executive.
- 9.3 Paragraph 10(1) of the Act provides that after considering the Report and its response to it, the Council must notify the external auditor of its decisions, and publish a notice on its website containing a summary of those decisions which has been approved by the external auditor.

- 9.4 At the time of writing this report, all of the relevant requirements of the Act have been complied with.
- 9.5 Any additional legal considerations arising from individual workstreams will be assessed as projects and actions come forward.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law Deputy Monitoring Officer on behalf of the interim Director of Law and Governance and Deputy Monitoring Officer.

## **10. HUMAN RESOURCES IMPACT**

- 10.1 No human resource impacts are arising directly from the recommendations in this report. However, there will be impacts associated with the delivery of the improvement plan. The improvement plan is part of a range of measures relating to improving the Council's financial position and it is inevitable that this will ultimately impact on the Council's workforce when the Council's agreed Human Resources policies and procedures will be followed.
- 10.2 Human resources impacts will be appropriately reported to the relevant decision-making bodies as individual actions from the plan are implemented.

Approved by: Gillian Bevan, Head of HR

## **11. EQUALITIES IMPACT**

- 11.1 There are no equality impacts arising directly from the recommendations in this report. As such, an equality analysis has not been undertaken following the initial response to the external auditor's report. However, there will be impacts associated with the delivery of the improvement plan. The improvement plan is part of a range of measures relating to improving the Council's financial position and it is inevitable that this will ultimately impact on the Council's workforce and the communities it serves.
- 11.2 Consideration will be given as each of the individual actions included in the Action Plan are implemented as to whether they are relevant to equalities and will require an equalities impact assessment undertaken to ascertain the potential impact on vulnerable groups and groups that share protected characteristics.
- 11.3 Any improvements to governance that arise from the implementation of the recommendations in the action must pay due regard to ensuring that all residents in Croydon are able to understand the actions the Council takes in their name, the decisions it makes to spend resources on their behalf, and who is accountable for that action.
- 11.4 Close attention will need to be paid to ensure the Council is as transparent as possible and is as open and engaging with all its local communities through



this process of improvement and afterwards in the new governance practices that are established.

Approved by: Grace Addy, Head of Learning and Organisational Development

#### **14. ENVIRONMENTAL IMPACT**

14.1 There are no positive or negative impacts on the environment as a result of any of the recommendations of this report.

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

15.1 There are no implications in this report that would have an impact on crime prevention or reduction.

#### **16. DATA PROTECTION IMPLICATIONS**

16.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**NO**

16.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

NO, as the report contains no sensitive/personal data

Approved by Richard Ennis; Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive

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<b>CONTACT OFFICER:</b>	Norman Vaciannia, Business Improvement Officer, Policy Programmes and Performance
<b>APPENDICES TO THIS REPORT:</b>	Appendix 1 – RIPI Action Plan Appendix 2 – Internal Audit Results
<b>BACKGROUND DOCUMENTS:</b>	None

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1. The Council has fully accepted all recommendations made by the external auditor (R1-R20)
2. The Council has added additional recommendations LBC1-4.
3. There are 9 high priority recommendations from the external auditor for the Council to urgently address:
4. Actions marked as “GPAC/SOC” recommendation came from their input following consultation carried out in Dec 2020/Jan 2021

<b>High Priority Actions</b>	<b>High Priority Actions</b>
R1a Children’s Social Care	R12 Revolving Investment Fund
R1b Adult Social Care	R14 Treasury Management
R2 Adequacy of Council Reserves	R18 Ongoing investment in Brick by Brick
R3 Use of Transformation Funding	R20 Governance of subsidiaries
R9 Budget Challenge/Rigour	

A note has been made against actions that do not represent “one-off” measures but instead represent actions, principles and values that should be continually delivered or established as repeating tasks. These actions will be marked as Business as Usual (BAU) in the “Status/Updated Deadline” column.

**Overall accountability for the action plan rests with the Chief Executive**

**Recommendation 1a – HIGH PRIORITY**  
 The Executive Director Children Families and Education needs to address the underlying causes of social care overspends in children’s social care and take effective action to manage both the demand and the resulting cost pressures.

**Cabinet Member Accountability:** Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Progress made to date	Status/Updated Deadline	Accountability
i) Develop a strategy for managing demand and expected impact / outcome and set up panels to manage activity and cost: <ul style="list-style-type: none"> <li>- Weekly care panel to divert children from care</li> <li>- Bi-weekly Children Looked After review panel to identify children who can be supported to be reunited with families from care, and to systematically review higher cost placements</li> </ul>	The Care Panel was established in February 2021. Outcomes from the care panel & new entries to care are monitored weekly at DLT.  To build on this work further process maps are being refreshed to formalise challenge, authorisation and decision making for children in care or at risk of care. A scoping workshop to enhance multi-agency partnership provision has also been delivered in March 2021.	COMPLETE – Embedded into BAU	Interim Director, Early Help and Children’s Social Care
ii) Develop a monthly Corporate Finance, Performance and Risk report to progress, track and measure activity. Specifically for Children’s social care, this will monitor the effectiveness of actions to reduce the number of local children in care.  This progress report will bring together data on the monthly movement in numbers of children in care, the achievement of care outcomes, the financial impact	The June 7 <sup>th</sup> Corporate Finance, performance & Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.	COMPLETE – Embedded into BAU with updates to Cabinet monthly	Interim Corporate Director, Children Families and Education to ensure accurate data incorporated into monthly Performance reporting.

<p>including full year forecast, and benchmarking against best practice.</p>	<p>The monthly reports will develop over time as recommendations are progressed.</p>		
<p>iii) The progress report will be routinely presented to the Children’s Improvement Board, Executive Leadership Team, Cabinet, General Purposes and Audit Committee and Scrutiny &amp; Overview Committee which will bring a greater level of control and transparency (see Recommendation 5 which will also be incorporated into this process). The first report to members will be accompanied by detail outlining the statutory and non-statutory areas of service and the impact of demand management across the service.</p>	<p>The Corporate Finance, Performance and Risk report will provide an update on improvement actions across the Council including Children’s. (1a-ii)</p> <p>Training will be offered to members on the nature of statutory and non-statutory service (See LBC3 – i)</p>	<p>COMPLETE – Embedded into BAU with updates to Cabinet monthly</p> <p>Training offer to be picked up under Recommendation LBC-3</p>	<p>Interim Corporate Director, Children Families and Education to ensure accurate data incorporated into monthly Performance reporting.</p>
<p>iv) Secure independent external challenge through the Partners in Practice programme to enable valid judgements to be made about the correct level of funding to meet the needs of Croydon’s children in care.</p>	<p>Report from LB Camden received under Partners in Practice Programme – December 2020</p> <p>Independent Financial Adviser commissioned by the DFE to provide expert challenge and support commenced on 22/2/21 for a period of 9 months.</p>	<p>COMPLETE</p> <p>Ongoing support until November 2021</p>	<p>Interim Corporate Director, Children Families and Education</p>
<p>v) Data set used to inform progress report to be collated, updated and shared with GPAC to allow members to monitor progress on managing demand within social care.</p>	<p>Dataset developed and being progressed further.</p> <p>The Corporate Finance, Performance and Risk report draws upon this data and provides GPAC with the relevant information per this action.</p>	<p>COMPLETE - Embedded into BAU</p>	<p>Interim Corporate Director, Children Families and Education</p>

<b>Recommendation 1b – HIGH PRIORITY</b>			
The Executive Director Health, Wellbeing and Adults needs to address the underlying causes of social care overspends in adults social care and take effective action to manage both the demand and the resulting cost pressures.			
<b>Cabinet Member Accountability:</b> Councillor Campbell, Cabinet Member for Families, Health and Social Care			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) Commission a diagnostic of spend and opportunities to be carried out by the Local Government Association (LGA) National Care & Health Improvement Adviser Finance and Risks to inform future shape of transformation opportunities.	This was carried out and used during November 2020 to inform development of the Adult Social Care Improvement Plan	COMPLETE	Interim Corporate Director Adult Social Care and Health
ii) Review the current service delivery models of adult social care and gateway services to right size the budget and delivery model to benchmark with comparator Councils in relation to population and service outcomes.	Data has been collected which provides benchmarking of Croydon ASC care spend vs other Councils, this was factored in to the Adult Social Care Improvement Plan.  Budget modelling has been agreed for ASC for 21/22 budget. Service modelling forms part of adult's improvement plan.	COMPLETE	Interim Corporate Director Adult Social Care and Health
iii) To create a placements board to challenge the Council on current cost of placements, managing demand for new placements and ensuring value for money in procurement of placements	Placements boards have been implemented in the Council to challenge placements and reduce expenditure.  Daily challenge panel has been in place since S114 Notice. All spend is then promoted to the Spend Control Panel, as agreed with then S151 Officer.	COMPLETE - Embedded into BAU	Interim Corporate Director Adult Social Care and Health

	Placements programme is in place with an agreed scope. Funding also agreed for Care Cubed placements tool agreed at ELT on 8 March 21.		
iv) Use the output from the diagnostic review to remodel financial implications to help shape the Medium Term Financial Strategy (MTFS)	<p>Diagnostic review and benchmarking data has been used to shape the Adult Social Care Improvement plan.</p> <p>Croydon Adults Improvement plan has been fully developed and aligned to budget as signed off at March Cabinet. LBC delivery tracker being updated fortnightly.</p>	COMPLETE	Interim Director of Finance (S151)
v) Develop a monthly Corporate Finance, Performance and Risk report to progress, track and measure activity. This will include monitoring of the new service delivery model to track progress and challenge effectiveness of the plan.	<p>The June 7<sup>th</sup> Corporate Finance, performance &amp; Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>	COMPLETE - Embedded into BAU with updates to Cabinet monthly	Interim Corporate Director Adult Social Care and Health to ensure accurate data incorporated into monthly Performance reporting.
vi) Progress will be governed by reporting to the Executive Leadership Team, Cabinet, General Purposes and Audit Committee and Scrutiny & Overview Committee which will bring a greater level	The Corporate Finance, Performance and Risk report will provide an update on improvement	COMPLETE – Embedded into BAU with updates	Interim Corporate Director Adult Social Care and Health to ensure accurate data

<p>of control and transparency. The first report to members will be accompanied by detail outlining the statutory and non-statutory areas of service and the impact of demand management across the service.</p>	<p>actions across the Council including HWA's (1b-v).</p> <p>Training will be offered to members on the nature of statutory and non-statutory service (See LBC3 – i)</p>	<p>to Cabinet monthly</p> <p>Training offer to be picked up under Recommendation LBC-3</p>	<p>incorporated into monthly Performance reporting.</p>
<p>vii) Ensure that cost of care tool is used effectively to track all case expenditure to improve financial control, identify areas of focus for further improvement and to enable better decision making.</p>	<p>The Cost of Care tool referred to in has been utilised to help accurately forecast its spend to support budget setting, improve financial management and identify opportunities for further savings.</p> <p>A separate tool called CareCubed is in the process of being acquired. It is a benchmarking tool that allows adult social care to acquire an indicative cost of placing an individual aligned with their assessed care and support needs. This indicative amount is then used to aid contract negotiations with providers.</p> <p>The tool has successfully enabled savings in other Council's and will be tested in Croydon over the next 12 months. Training for staff to use tool is in planning.</p>	<p>COMPLETE Embedded into BAU</p>	<p>Interim Corporate Director Adult Social Care and Health</p>



<p>viii) Training to be provided to members to understand the budget for Adult Social Care and share rationale for persistent overspend in service. Training to also inform members on the complex health and care landscape in the borough.</p>	<p>A Training offer has been developed for all members including where appropriate, specific training for committee members. This was approved by the Members Learning &amp; Development Panel on July 13<sup>th</sup> 2021. It has been aligned with the actions in the RIPI action plan to ensure all aspects covered.</p> <p>Training on the Adult Social Care Budget was completed via a briefing to members of the Health &amp; Social Care Sub-committee in June 2021.</p> <p>Training for members will continue to be offered on annual basis as BAU. Consideration will be taken in the future about how and when best to inform on matters relevant to ASC.</p>	<p>COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>
<p>ix) Data set used to inform progress report to be collated, updated and shared with GPAC to allow members to monitor progress on managing demand within social care</p>	<p>A finance and performance workstream has been established and meets fortnightly. The key objectives for this workstream are to ensure dashboards are developed to enable the senior management team to track activity against the benchmarking</p>	<p>COMPLETE</p> <p>Embedded into BAU with updates to Cabinet monthly</p>	<p>Interim Corporate Director Adult Social Care and Health to ensure accurate data incorporated into monthly Performance reporting.</p>

	<p>forecasts set out in the adults improvement plan; and against the move towards both London (younger adults) and England (older adults) averages.</p> <p>Bettergov have been commissioned to help finalise dashboard and benchmarking modelling. 2 dashboards are to be utilised one focused on activity which is complete and another on finances which is in development.</p> <p>The MTFS tracker is currently updated weekly.</p> <p>The Corporate Finance, Performance and Risk report draws upon this data and provides GPAC with the relevant information per this action.</p>		
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<b>Recommendation 2 – HIGH PRIORITY</b>			
The Council (including Cabinet and Scrutiny and Overview Committee) should challenge the adequacy of the reserves assessment which should include a risk assessment before approving the budget.			
<b>Cabinet Member Accountability:</b> Councillor King, Cabinet Member for Croydon Renewal			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) Develop a reserves strategy as part of the Medium Term Financial Strategy (MTFS) and present it for approval with the Budget reports to Cabinet and Full Council. This needs to incorporate a clear assessment of risks and liabilities that demonstrate all current and future exposure has been thought through and factored into the recommendations. Strategy to map the financial governance process around agreeing additions to reserves to be included to reduce risk of duplication and that there were no gaps in approach.	The MTFS and 21/22 Budget agreed on 8 <sup>th</sup> March contains a clear strategy for growing the reserves base up to a level which by 23/24 would give a general fund reserve in excess of £60 million	COMPLETE - Embedded into BAU	Interim Director of Finance (S151)
ii) In considering future budget reports, Cabinet will assure itself that all risks and liabilities have been properly considered by requesting that the Scrutiny & Overview Committee and the General Purposes and Audit Committee review the adequacy of the strategy and its relationship to the MTFS prior to Cabinet taking a decision.	From April 2021 Financial Monitoring reports will be provided to Cabinet on a monthly basis to ensure Members have increased oversight on any emerging pressures or movements.  The 21/22 Budget was reported to Scrutiny on 16 <sup>th</sup> February 2021 and comments were verbally reported to cabinet on 8 <sup>th</sup> March 2021.  Future year’s timescales will need to include time for both this and reference to GPAC and Scrutiny	COMPLETE - Embedded into BAU with updates to Cabinet monthly	Interim Director of Finance (S151)
iii) Training to be delivered to relevant members to raise understanding of reserves	An outline Training programme for all members including where appropriate, specific training for	See recommendation	

	<p>committee members, was approved by the Members Learning &amp; Development Panel on July 13<sup>th</sup> 2021. It has been aligned with the actions in the RIPI action plan to ensure all aspects covered.</p> <p>See recommendation LBC3 – i for further detail.</p>	<p>LBC3 – i for detail.</p> <p>Training to be delivered by March 2022</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Director of HR / Head of Democratic Services</p>
<p>iv) Council to identify the most appropriate mechanism for the Scrutiny &amp; Overview Committee to monitor and assess progress made against delivering the budget throughout the year. As a part of this any update would need to provide reassurance that effective budget controls are in place to mitigate against potential pressures.</p> <p>Furthermore, the Council is to consider approach to providing reassurance to Members that effective budget controls were in place to mitigate against potential risks to the delivery of the budget</p>	<p>The Council has continued to maintain mechanisms to mitigate against potential budget risks and provide Scrutiny &amp; Overview Committee and wider Council Members with oversight of the Council’s Financial Performance. These mechanisms include the Spending Control Panel and Budget Tracker.</p> <p>The Council is now well into its periodic financial performance regime, with Period 3 going to August 16<sup>th</sup> Cabinet.</p> <p>On the Forward Plan, decisions are planned on an MTFS update (October) and budget development for next financial year (January/February).</p>	<p>Embedded as BAU</p> <p>Next quarterly update to be provided in January 2022</p>	<p>Interim Director of Finance (S151)</p>

	<p>A forensic financial audit has been commissioned. The report has been received by the section 151 officer and will inform the future structure of the Finance Function</p>		
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**Recommendation 3 – HIGH PRIORITY**  
 The Chief Executive should oversee a review of the outcomes achieved from the use of transformation funding to demonstrate that the funding has been applied in accordance with the aim of the scheme.

**Cabinet Member Accountability:** Councillor King, Cabinet Member for Croydon Renewal

Action	Progress made to date	Status/Updated Deadline	Accountability
i) A review of all schemes previously funded from transformation capital receipts be undertaken and a report produced that assesses whether the funding has been applied in accordance with the scheme.	This work is completed following discussions with the external auditor. An update will be made to GPAC as part of the report on the 2019/20 accounts.	COMPLETE	Interim Director of Finance (S151)
ii) Training to be delivered to relevant members on transformation funding to raise understanding.	An outline training programme has been developed for all members including where appropriate, specific training for committee members, was approved by the Members Learning & Development Panel on July 13 <sup>th</sup> 2021. It has been aligned with the actions in the RIPI action plan to ensure all aspects covered.  See recommendation LBC3 – i for further detail.	See recommendation LBC3 – i for detail.  Training to be delivered by March 2022	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive  Interim Director of Finance (S151)  Director of HR  Head of Democratic Services

**Recommendation 4**  
 The s151 officer should set out the strategy for applying capital receipts for transformation annually as part of the budget setting process.

**Cabinet Member Accountability:** Councillor King, Cabinet Member for Croydon Renewal

<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) A strategy for funding transformation to be incorporated into the budget setting process using the current Ministry of Housing, Communities and Local Government (MHCLG) Flexible Use of Capital Receipts Scheme.	Following extension of the Flexible Use of capital receipts scheme. Proposals for the use of up to £5 million of capital receipts, subject to availability of receipts will be drafted and agreed by ELT. This should be received in w/c 7 <sup>th</sup> June	COMPLETE - Embedded into BAU and incorporated into budget setting going forward	Interim Director of Finance (S151)
ii) In the absence of any national capital receipts for transformation scheme, the strategy for funding transformation will set out how future schemes will be funded using invest to save principles using rolling investment that is set aside and supported by business cases that demonstrate return. Any business case will have to demonstrate governance of the programme to assure the section 151 officer and Cabinet that the deliverables are being met.  All schemes approved for funding under this strategy will be assessed individually and against the overarching risk exposure and affordability for the Council.	See 4i above.	COMPLETE – Process Embedded into BAU with updates to Cabinet monthly	Interim Director of Finance (S151)

<p>iii) There will be an annual report to the Scrutiny &amp; Overview Committee and GPAC on the use of transformation funding and the delivery of schemes. A corporate strategy needs to be developed to assess future transformation projects prior to funding. This should include a requirement to identify the intended outcomes, risk exposure, ongoing affordability, how success will be measured, how progress will be tracked, and any interdependencies with other projects and any wider benefits.</p>	<p>Report to be prepared at the end of each financial year from 21/22 onwards</p>	<p>June 2022</p>	<p>Interim Director of Finance (S151)</p>
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**Recommendation 5**  
 The General Purposes and Audit Committee should receive reports on the actions being taken to address the Dedicated Schools Grant deficit and challenge whether sufficient progress is being made.

**Cabinet Member Accountability:** Councillor Flemming, Cabinet Member for Children, Young People and Learning

Action	Progress made to date	Status/Updated Deadline	Accountability
i) The Dedicated Schools Grant recovery plan should be presented to General Purposes and Audit Committee and Scrutiny and Overview Committee for review and agreement to ensure that it is adequate to meet objectives and timelines that have been set.	Reviewed at GPAC 4 March 2021	COMPLETE	Interim Director of Education
ii) Special Educational Needs Finance Board to be established and chaired by the interim Director of Education to oversee the delivery of the Dedicated Schools Grant recovery plan.	Initial meetings held with further meetings to be scheduled to update on the progress of the DSG recovery plan.	COMPLETE - Embedded into BAU	Interim Director of Education
iii) Training to be provided to members to ensure the committee possess a working understand of education funding and budgets	DSG training has been delivered to members of Scrutiny Committee, Labour Group and Conservative Group	COMPLETE	Interim Director of Education / Head of Learning &OD
iv) Implement the ‘New Approach to Special Educational Needs delivery’ strategy working with schools to ensure that more of our Special Educational Needs pupils are educated in mainstream provision to include: <ul style="list-style-type: none"> <li>• Developing more capacity within the post-16 provision</li> <li>• Opening of new Special Educational Needs free schools</li> </ul>	Report delivered to School’s Forum on Monday 26 <sup>th</sup> April and full approval given to widen the project to two further locality areas.  1% increase in CYP with an EHCP being educated in a Mainstream school.  Addington Valley Academy – the opening of new building on target to open in September 2021.  Provision for our Post-16 SEN learners at Coulsdon College has	Update provided- Further update to come to Q.3	Interim Director of Education

	been extremely successful. Discussions underway about making this pathway provision part of the main college site.		
v) Progress against the recovery plan to be included in the monthly budget monitoring report to Children’s, Families and Education Department Leadership Team, the Executive Leadership Team, the Children’s Improvement Board and the quarterly Cabinet, General Purposes and Audit Committee and Scrutiny & Overview Committee which will bring a greater level of control and transparency.	Progress update included in the monthly budget monitoring to Education SLT and CFE DLT.	COMPLETE Embedded into BAU with updates to Cabinet monthly	Interim Corporate Director, Children Families and Education / Interim Head of Finance - CFE
vi) Progress on Dedicated Schools Grant recovery plan to be reported to the Schools’ Forum on a termly basis	Included in the forward plan of agenda items for Schools’ Forum	COMPLETE Embedded into BAU	Interim Head of Finance, Children, Families and Education

<b>Recommendation 6</b>			
The Executive Director Children, Families and Education needs to review the services provided to UASC and to identify options to meet their needs within the grant funding provided by the Home Office.			
<b>Cabinet Member Accountability:</b> Councillor Flemming, Cabinet Member for Children, Young People and Learning			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) Complete a forensic review of grant income against the total expenditure for unaccompanied asylum seeking children and care leavers over the past 3 years, including the co-ordination of pan-London arrangements	Review completed and is informing Council’s approach to UASC support offer.	COMPLETE	Interim Head of Finance, Children, Families and Education
ii) Negotiate with the Home Office and Department for Education to secure the same financial support provided to other port of entry authorities such as Kent and Portsmouth to cover the exceptional overhead costs caused by the volume of unaccompanied asylum seeking children received in the Borough. <ul style="list-style-type: none"> <li>• Full cost recovery for exceptional overheads provided by Croydon such as age assessments, the social care duty service at Lunar House and legal fees. Due to volumes in the Borough from its port of entry position, these cannot be absorbed within normal overhead cost as per all other local authorities.</li> <li>• Increased funding for children cared for over and above the voluntary national rate to match the funding of Croydon’s children in care.</li> </ul>	<p>Meetings have been held with senior officials in the Home Office and Department for Education, underpinned by forensic review and modelling of additional costs.</p> <p>Agreement of full cost recovery for the age assessment team and the Duty Team at Lunar House for one year. This will cover costs of approximately £595k per annum agreed over 2021-22</p> <p>A report on the Council’s approach to UASC went to Cabinet in June and August 2021 Cabinet. These noted the risk involved in potential further savings in Children’s Services and recommended to allow Officers to look at all options possible going forward.</p>	<p>Ongoing – review for October 2021</p> <p>Next update to be provided in January 2022</p>	Interim Corporate Director, Children Families and Education
iii) Work with London local authorities to safely transfer responsibility for an agreed number of children in	Since the previous quarter update there have been no further	COMPLETE	Interim Corporate Director, Children Families and Education

<p>Croydon’s care to reduce disproportionate burden on Croydon.</p>	<p>transfers of children placed out of borough agreed.</p> <p>24 have been confirmed and work is underway between Croydon and the relevant boroughs to complete the transfers.</p>		
<p>iv) Introduce a needs based approach to withdrawing services to young people whose appeal rights are exhausted alongside earlier, robust triple planning as part of their pathway at 16 plus. This will assist and support a planned, safe voluntary return when all legal routes to remain have been exhausted and avoid a forced detention and removal when young people have no recourse to public funds, limited access to NHS and education and cannot work legally in UK.</p>	<p>A planned programme of Human Rights Assessments (HRAs) to inform the decision to safely withdraw services is underway. There are currently 15 young people whose appeal rights are exhausted. All will have an HRA by mid-August.</p>	<p>COMPLETE - Embedded into BAU</p>	<p>Director Early Help and Children’s Social Care</p>

<b>Recommendation 7</b>			
The Executive Director Children, Families and Education needs to identify the capacity threshold for the numbers of UASC that it has the capacity to deliver safe UASC services to.			
<b>Cabinet Member Accountability:</b> Councillor Flemming, Cabinet Member for Children, Young People and Learning			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) Draw on the analysis and review at 6 (i) to develop options to establish a capacity threshold for Croydon for unaccompanied asylum seeking children that is commensurate with other Local Authorities and in line with the nationally agreed standards and funding.	The voluntary national rate is the equivalent of 0.07% of the child population. In Croydon that equates to 66 children. This underpins the forensic review and modelling completed in 6i	COMPLETE - Embedded into BAU	Interim Corporate Director, Children Families and Education
ii) Present options for the Council to deliver safe services within the capacity threshold to the Children’s Improvement Board, Cabinet and General Purposes and Audit Committee and Scrutiny & Overview Committee to increase levels of control and improve transparency.	A Cabinet paper on the Council’s approach to caring for UASC will be presented on June 7 <sup>th</sup> 2021.	COMPLETE	Interim Corporate Director, Children Families and Education

<b>Recommendation 8</b>			
The Cabinet reports on the financial position need to improve the transparency of reporting of any remedial action taken to address in year overspends.			
<b>Cabinet Member Accountability:</b> Councillor Young, Cabinet Member for Resources and Financial Governance and Councillor King, Cabinet Member for Croydon Renewal			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
<p>i) A review of financial reporting best practice is to be undertaken and the results used to design reports and a system of reporting that will improve its approach to managing finance, performance and risk to introduce a greater level of transparency and better grip of expenditure. All departments will be required to report against their budgets to the Departmental and Executive Leadership Teams on a monthly basis.</p>	<p>A process for monthly reporting is being developed with the period 1 report to come to Cabinet June 7<sup>th</sup> 2021. These reports will develop iteratively over the coming months.</p> <p>See recommendation 8 – ii for further information on performance monitoring.</p>	<p>COMPLETE</p>	<p>Interim Director of Finance (S151)</p>
<p>ii) The Council will develop a new corporate framework for monthly reporting that includes finance, performance and risk. This will report to the Executive Leadership Team, Cabinet, General Purposes and Audit Committee and Scrutiny and Overview Committee as appropriate.</p> <p>The new framework will include progress against service delivery, departmental actions plans, savings opportunities and actions contained within the Croydon Renewal Plan. All actions will be assigned to accountable people (including relevant cabinet member) and will be tracked through a central reporting team to ensure that the process is joined up, consistent and timely. This will be a recognised Programme Management Office function using savings and actions trackers</p>	<p>The Council has developed a new Corporate framework to deliver monthly Corporate Finance, Performance and Risk update reports. These monitor implementation of improvement actions across the Council (including those contained in the RIPI and as part of the CRP) and set out KPIs and accountable officers.</p> <p>The PMO presented an approach to monthly Corporate, Finance,</p>	<p>COMPLETE</p> <p>Embedded into BAU with updates to Cabinet monthly</p>	<p>Chief Executive</p>

	<p>Performance Risk Reporting to Cabinet on April 12<sup>th</sup>.</p> <p>The June 7<sup>th</sup> Corporate Finance, performance &amp; Risk report iteration will provide a final set of CRP measures, and targets set to date, as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>		
<p>iii) A review of the capacity within the Finance Team to ensure there is adequate support for departmental cost centre managers to fulfil their responsibilities as budget holders.</p>	<p>A proposed structure for the finance team to ensure the service has the right support for departmental cost centre managers was developed in November 2020.</p> <p>This will be reviewed following the financial forensic audit which will inform the future size and shape of the Finance function.</p>	<p>Progressed – Further update to come for Quarter 3</p>	<p>Interim Director of Finance (S151)</p>

**Recommendation 9 – HIGH PRIORITY**  
 The Council (including Cabinet and Scrutiny and Overview Committee) need to show greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.

**Cabinet Member Accountability:** Councillor King, Cabinet Member for Croydon Renewal/ Callton Young, Cabinet Member for Resources and Financial Governance

Action	Progress made to date	Status/ Updated Deadline	Accountability
i) To support the Annual Budget setting process Budget Development Meetings will be held for each department and will be attended by Executive Directors, Corporate Leadership Team and Members with accountability for their service area and staff who are responsible for service delivery that understand what impact growth and savings plans will have on the services. To support this process Members will be provided with a clear set of proposals that demonstrate cost pressures (growth) and savings opportunities with narrative and comparators on budget and outcomes delivered to describe the impact of the decisions that are required to be taken.	Proposals were provided to members with a formal decision in November Cabinet. Saving opportunities for 21/22 were set out across all services and have been incorporated into delivery of Croydon Renewal Plan.  The Council recognises further savings will be necessary to achieve a sustainable budget in the long term. Discussions for further savings next year will be scheduled starting from April 2021.	COMPLETE Embedded into BAU	Interim Director of Finance (S151)
ii) To support the budget exercise the Council will seek external support to test the draft budget proposals, seek ideas and good practice and will take the same approach by seeking support for the scrutiny process.	Various support from external sources has been utilised to date to offer capacity and advice. This includes the LGA, Centre for Governance and Scrutiny, Council peers and CIPFA. The Council will continue to use such opportunities moving forward.	COMPLETE Embedded into BAU	Interim Director of Finance (S151)  Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive
iii) Develop a budget savings tracker that profiles savings by month to enable Members to track that savings are on target. This will need to correlate with the finance, performance and risk reporting that Council will introduce.	An in year savings tracker has been developed to monitor identified savings and escalate any delivery challenges. In year savings are rag rated based on confidence in delivery.	COMPLETE Embedded into BAU	Interim Director of Finance (S151)



<p>iv) To increase understanding of the choices Cabinet Members are making with regards to the emerging budget and to effectively challenge budget assumptions, Scrutiny and Overview Committee Members to receive regular briefings on the progress of budget setting.</p>	<p>Budget Discussions were conducted across January and February 2021. This included focused discussion on the 21/22 budget for specific directorates. Discussion took place at Children and Young People Sub-Committee, Health &amp; Social Care Sub-Committee, at Scrutiny, Streets, Environment &amp; Homes sub-committee and finally the Scrutiny &amp; Overview Committee.</p> <p>The Council will continue to brief Scrutiny committees on budget matters. Work is ongoing to further develop the process for budget scrutiny with conversations ongoing with Scrutiny Chairs. A date is held in the Forward Plan to ensure SOC has the chance to challenge the proposed budget for 2022/23.</p>	<p>COMPLETE Embedded into BAU</p>	<p>Interim Director of Finance (S151)</p>
<p>v) To review the budget setting-timetable to ensure that the Scrutiny &amp; Overview Committee has the time to digest and review the budget proposals and underlying assumptions and for Cabinet to respond fully to any challenge or comments and for Cabinet to be able to consider changing its proposals.</p>	<p>The Council is taking action to ensure budget discussions happen at an earlier date and more opportunities are offered to members to offer input into the budget and review its management. These actions include finalisation of Council meetings forward plan up until April 2022 with dates marked for policy discussions and monthly financial performance updates at Cabinet.</p>	<p>COMPLETE Embedded into BAU</p>	<p>Interim Director of Finance (S151)</p>

	<p>Additionally, budget developments meetings will begin in Spring 2021 as opposed to Autumn meaning savings will be identified and shared with members earlier in year. An MTFS update is scheduled for Cabinet in October.</p> <p>The Council will continue to brief Scrutiny committees on budget matters. Work is ongoing to further develop the process for budget scrutiny with conversations ongoing with Scrutiny Chairs. A date is held in the Forward Plan to ensure SOC has the chance to challenge the proposed budget for 2022/23.</p>		
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**Recommendation 10**  
 The General Purposes and Audit Committee must challenge officers on the progress in implementing the Financial Consultant’s recommendations to improve the budget setting, monitoring and reporting process and actions to address the Head of Internal Audit’s concerns on internal controls.

**Member Accountability:** Councillor Karen Jewitt, Chair of General Purposes and Audit Committee

Action	Progress made to date	Status/Updated Deadline	Accountability
i) Delivery of the Financial Consultant’s recommendations and the Head of Internal Audit’s concerns will be reported to the General Purposes and Audit Committee and to the Improvement Board as part of the Croydon Renewal Plan.	<p>Phase 1 of the review have been established and the work on the 75 recommendations in the initial review is ongoing. A progress update on the implementation of these recommendations went to GPAC in April. This included notice on completion of the Capital Programme review, Updated MTFS and new financial governance arrangements.</p> <p>Further updates on these will be presented to GPAC, with a date set for September.</p> <p>In March ELT agreed a renewed Internal Audit Governance Framework. The agreed framework states the Head of internal Audit is to regularly prepare reports for DLTs and ELT (4 times a year for each) to ensure visibility on existing concerns and mitigating actions in place,</p> <p>The Head of Internal Audit is regularly attending GPAC and can use the meeting as an opportunity</p>	<p>The next update on the Finance Review is scheduled for GPAC September 2021</p> <p>An update in this action plan will be shared in the Q.3 update</p>	Interim Director of Finance (S151)

	<p>to provide updates on concerns and the management actions being delivered to address the concerns.</p>		
<p>ii) That a piece of work be undertaken to clarify the roles of GPAC and Scrutiny to reduce duplication and ensure right things are being reviewed at the right time</p>	<p>Updates on phase 1 of the Finance Review are currently scheduled on the GPAC work plan up until September including updates on phase 1. It is suggested that it remain this way but Scrutiny call in as they feel appropriate to ensure correct level of challenge. The next update will be received at GPAC in September 2021 with a further update provisionally scheduled for February 2022.</p> <p>Phase 2 and 3 of the finance review have been paused to prioritise other pieces of work.</p> <p>The respective roles of GPAC and Scrutiny will be clarified as part of the wider review of the Constitution. (see LBC Recommendation 1)</p>	<p>COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Interim Director of Finance (S151)</p>

**Recommendation 11**

The s151 officer needs to revisit the Growth Zone assumptions following the pandemic and make recommendations to Cabinet and Council for the continued investment in the scheme.

**Cabinet Member Accountability:** Councillor King, Cabinet Member for Croydon Renewal

Action	Progress made to date	Status/Updated Deadline	Accountability
i) The Council have commissioned PwC to undertake a strategic review of the Growth Zone with completion expected November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	PwC report to cabinet made recommendations on future of Growth Zone. These are now being implemented	COMPLETE	Interim Director of Finance (S151)
ii) Revised financial model profile to be presented alongside budget review in February 2021 to Cabinet, General Purposes and Audit Committee and the Scrutiny and Overview Committee.	The March cabinet report sets out a direction of travel, with 1 year of capital expenditure. Considering the current macro-economic climate (i.e. impact of pandemic) and challenges facing Croydon and its economy, this means that the financial model will need updating throughout this calendar year. Dates for GPAC and Scrutiny & Overview Committee are being scheduled.  An update on the report will go to Cabinet in December 2021.	Further update to be provided in December 2021	Interim Director of Finance (S151)
iii) Cabinet paper with revised profile and recommendations to be issued March 2021.	See 11ii	COMPLETE	Interim Director of Finance (S151)
iv) The Council needs a mechanism in place to review projects to use the learning to inform any future work. This should be extended across all areas of the Council, with learning retained centrally as a corporate resources.	Project closure process in place as part of the governance of all projects.	COMPLETE – but needs further development to be embedded into BAU fully	Interim Director of Finance (S151)

<b>Recommendation 12 – HIGH PRIORITY</b>			
The s151 officer should review the financial rationale and associated risks and make recommendations to Cabinet and Council on whether the Revolving Investment Fund should continue.			
<b>Cabinet Member Accountability:</b> Councillor King, Cabinet Member for Croydon Renewal			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) The Council have commissioned PwC to undertake a strategic review of the Revolving Investment Fund with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	Report by PwC on governance & strategic review delivered in November 2020 to Cabinet.  Treasury Management strategy updated 1st March 2021 limits new lending under the RIF to BBB working capital loans only	COMPLETE	Interim Director of Finance (S151)
ii) Recommendations to be presented alongside budget review in Feb 2021 to Cabinet, General Purposes and Audit Committee and Scrutiny and Overview	See recommendation 12i	COMPLETE	Interim Director of Finance (S151)
iii) Cabinet paper with recommendations to be issued March 2021.	See recommendation 12i	COMPLETE	Interim Director of Finance (S151)

<b>Recommendation 13</b>			
The s151 officer should review the purchase of Croydon Park Hotel to identify lessons learned to strengthen future due diligence arrangements.			
<b>Cabinet Member Accountability:</b> Councillor King, Cabinet Member for Croydon Renewal			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) The Council have commissioned PWC to undertake a strategic review of assets that have been purchased with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	On February 18 <sup>th</sup> Cabinet agreed the approach set out in the Interim Assets Strategy. This included, in the appendices, options for an approach on the future of Croydon Park Hotel. An update with a decision on the future of Croydon Park Hotel is provisionally scheduled for September 2021.	COMPLETE	Interim Director of Finance (S151)
ii) Recommendations, including lessons learned, will inform changes required to governance arrangements and training/development that might be required. These recommendations to be presented alongside budget review in February 2021 to Cabinet, General Purposes and Audit Committee and Scrutiny and Overview.	Under Treasury management strategy changes no new investments will be made.  Lessons learned paper to be prepared.	September 2021	Interim Director of Finance (S151)
iii) Review and re-write the asset investment strategy that was approved by Cabinet in October 2018 incorporating advice from each of the Strategic Reviews. The review will explicitly consider best practice from the sector and lessons learned from other local authorities, the external auditor and the National Audit Office on effective investment practice.	Interim Asset Strategy has been approved at February 18 <sup>th</sup> Cabinet to fast track income generation and achieve “quick wins.”  A 3 year 21-24 Asset Strategy is being developed provisionally set for January 2022 Cabinet.	COMPLETE	Interim Director of Finance (S151) / Interim Corporate Director of Place
iv) Cabinet paper with recommendations to be issued March 2021. Update to be provided at Scrutiny on 9 <sup>th</sup> February	The Interim Assets Disposal Strategy, was discussed at both Cabinet and Scrutiny & Overview Committee in February.	COMPLETE	Interim Director of Finance (S151)

**Recommendation 14 – HIGH PRIORITY**

The Cabinet and Council needs to re-consider the Treasury Management Strategy for ongoing affordability of the borrowing strategy, the associated risks and identify whether alternative options can reduce the financial burden.

**Cabinet Member Accountability:** Councillor Young, Cabinet Member for Resources and Financial Governance and Councillor King, Cabinet Member for Croydon Renewal

Action	Progress made to date	Status/Updated Deadline	Accountability
i) The Treasury Management Strategy will be reviewed as part of the budget setting for 2021/22 and will take into consideration the outcome of the strategic reviews to factor in the overall financial position and best practice from other local authorities. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	Treasury Management strategy updated and agreed by Council on 8 <sup>th</sup> March 2021	COMPLETE	Interim Director of Finance (S151)
ii) The outcome of the strategic reviews that the Council have commissioned will inform the Treasury Management Strategy for 21/22 onwards and any changes in governance that may be required.	See recommendation 14i	COMPLETE Embedded into BAU	Interim Director of Finance (S151)



<b>Recommendation 15</b>			
The Chief Executive should arrange detailed Treasury Management training to assist Members to better understand and challenge the long-term financial implications of matters reported within the Treasury Management Strategy.			
<b>Cabinet Member Accountability:</b> Councillor Young Cabinet Member for Resources and Financial Governance			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) Members to attend training sessions facilitated by the Local Government Association to cover treasury management to enable better and effective financial leadership.	Treasury management training was offered to all members on the 3 <sup>rd</sup> March 2021.  Session was recorded and will be distributed to all Members and all budget managers.	COMPLETE	Chief Executive

**Recommendation 16**  
 The s151 officer should revisit the Minimum Revenue Provision policy to demonstrate that a prudent approach is being taken.

**Cabinet Member Accountability:** Councillor King Cabinet Member for Croydon Renewal

Action	Progress made to date	Status/Updated Deadline	Accountability
i) Link Asset Management has been commissioned to carry out a review of the Minimum Revenue Position policy. The report with recommendations will be discussed with General Purposes and Audit Committee and then on to Cabinet.	Minimum Revenue Provision Policy Statement 2020/21 went to Cabinet 1 <sup>st</sup> March as part of the Treasury Management Strategy.	COMPLETE	Interim Director of Finance (S151)

**Recommendation 17**  
 The Cabinet and Council should reconsider the financial business case for continuing to invest in Brick by Brick before agreeing any further borrowing.

**Cabinet Member Accountability:** Councillor Hamida Ali, Leader of the Council

<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) PwC has been commissioned to undertake a strategic review of Brick by Brick with completion expected in November 2020. The report with recommendations regarding the financial business case will be reviewed by the Scrutiny and Overview Committee prior to being presented to Cabinet.	<p>This specific action is complete however, ongoing activity with regard to BBB still needs to be taken hence further updates suggested.</p> <p>Phase 1 of the Strategic Review set out a number of options around BBB. This was received at Cabinet in November 2020 and it was agreed by members for further work to be carried out to advice on the best approach for BBB.</p> <p>The additional paper went to Cabinet in February 2021. It recommended an approach to build out of sites by Brick by Brick combined with a sale of sites under construction whilst still considering the option of a sale of the business, with a further report to come to Cabinet.</p> <p>On July 12<sup>th</sup> Cabinet approved recommendations to reject a purchase offer for BBB and agree a modified build out scenario of 23 sites be implemented. The Council</p>	Next update due in January 2022	Chief Executive

	<p>will receive reports on BBBs financial position, sales, contractual issues and other relevant matters on a monthly basis. Quarterly updates from these will also go to Cabinet.</p>		
<p>ii) Council to review the risks relating to Brick by Brick to ensure they are appropriately listed on the risk register</p>	<p>The Risks for Brick by Brick have been reviewed and are as follows per the Corporate Risk Register:</p> <ol style="list-style-type: none"> <li>1. Investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC).</li> <li>2. There is no effective challenge, review, investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC).</li> </ol> <p>**These risks specifically relate to financial strategy, treasury management strategy (including borrowing), capital investment strategies and appropriateness of continuing investment and association with BBB**</p>	<p>COMPLETE - Embedded into BAU</p>	<p>Interim Director of Finance (S151)</p>

	<p>The Corporate Red Risk Register is reviewed monthly at ELT to review and update risks where necessary.</p>		
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**Recommendation 18 – HIGH PRIORITY**  
 The Cabinet and Council should review and reconsider the ongoing financial rationale for the Council in the equity investment arrangement with Brick by Brick.

**Cabinet Member Accountability:** Councillor King Cabinet Member for Croydon Renewal

<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) PwC has been commissioned to undertake a strategic review of Brick by Brick. The report and recommendations will consider the ongoing financial rationale and equity invested and will detail options for the Council that will be considered by the Scrutiny & Overview Committee Cabinet prior to being presented to Cabinet.	<p>This paper went to Scrutiny &amp; Overview Committee and Cabinet in February 2021.</p> <p>The Cabinet paper noted that the Council has never made any equity payments, as planned, and is not in the financial position to do so. It was noted BBB sales proceeds were meant to be placed in an account for the Council to apply interest repayment and, if excess, to substantive loan repayment. Unfortunately, this process has not occurred and instead sale proceeds were retained by BBB effectively replacing the Council's equity share.</p> <p>The Council needs to review existing arrangement, change the current agreements or replace it with fresh loans.</p> <p>It is recommended that the current arrangements continue but in a modified way to give Brick by Brick capacity to have working capital to</p>	COMPLETE	Chief Executive

	ensure that funds are available to build out units on site		
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**Recommendation 19**  
 The s151 officer and monitoring officer should monitor compliance with loan covenants with Brick by Brick and report any breaches to Members.

**Cabinet Member Accountability:** Councillor King Cabinet Member for Croydon Renewal

Action	Progress made to date	Status/Updated Deadline	Accountability
<p>i) Loan covenants are within scope of the PwC strategic review and will be considered as part of the overall recommendations.</p> <p>A review of the existing loan covenants and their governance is to be undertaken. Learning from this review, a new system of control for all loan agreements entered into by the Council will be presented to Members and this will form part of the new Corporate Finance, Performance and Risk reporting system.</p> <p>The review and the proposed new system for loan covenants will be presented to GPAC &amp; Scrutiny and Overview Committee prior to being presented to Cabinet for approval.</p>	<p>Loan agreements to be redrafted to provide a comprehensive single agreement</p> <p>The February Cabinet report agreed that detail of the revised loan scheme be delegated to the Chief Executive after consultation with the leader and appropriate lead members.</p>	<p>COMPLETE                      Embedded into                      BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Interim Director of Finance (S151)</p>



**Recommendation 20 – HIGH PRIORITY**  
 The Cabinet and Council should review its arrangements to govern its interest in subsidiaries, how the subsidiaries are linked, and the long-term impact of the subsidiaries on the Council’s financial position and how the Council’s and taxpayers’ interest is safeguarded.

**Cabinet Member Accountability:** Councillor Young, Cabinet Member for Resources and Financial Governance

Action	Progress made to date	Updated Deadline/ Status/Updated Deadline	Accountability
i) An audit of the Council’s approach to membership of each subsidiary board will be undertaken. The audit will involve officers of the Council and any Chairs/Members of company boards.	<p>A working group was established to work through the existing list of companies that the Council has an interest in. Relevant officers and Directors of company boards were invited to present a paper at each of the working group meetings to discuss the company/companies they are involved with.</p> <p>These informed renewed governance arrangements which were approved by Cabinet on 26<sup>th</sup> July 2021, establishing the Croydon Companies’ Supervision and Monitoring Panel (CCSMP) and approving its terms of reference.</p> <p>As part of a refreshed approach to membership the S151 Officer in consultation with the Chief Executive, has delegated authority to appoint and remove nominated Directors from the board of Group entities.</p>	COMPLETE – governance arrangements embedded into BAU	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive  Interim Director of Finance (S151)

<p>ii) As part of this review the membership balance of the boards will be considered in aggregate in regard to best practice for achieving diversity, skill set, sectoral knowledge and Croydon Council representation.</p>	<p>The terms of reference for CCSMP includes the following:  <i>“In fulfilling its responsibilities the CCSMP will: Evaluate effectiveness of Group entity board governance structure and processes and recommend changes as required, including with a view to achieving diversity, skill set, sectoral knowledge and appropriate representation.”</i></p> <p>This measure will help ensure diversity, equality and inclusion aspects will be considered in all future decisions on membership.</p>	<p>COMPLETE – governance arrangements embedded into BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Interim Director of Finance (S151)</p>
<p>iii) External guidance on best practice will be sought. Roles, responsibilities and legal requirements for local authority company directors and guidance on skill set will be sought and this will include the best way to assess the competence of Members and Chief Officers for these roles.</p>	<p>Principles of Good Governance have been embedded within the terms of reference for CCSMP. These principles consider best practice at other local authorities including Nottingham City Council, Birmingham City Council, Ealing Council and Wirral Council.</p> <p>Furthermore, the terms of reference include the following:  <i>“In fulfilling its responsibilities the CCSMP will: Receive updates and training in respect of best practice for company governance and associated matters”</i></p>	<p>COMPLETE – External guidance will be continually sought as BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Interim Director of Finance (S151)</p>

<p>iv) Process for identifying gaps in knowledge and or experience will be brought forward to include training considerations. If necessary interim arrangements will be made to remove risks and ensure effective governance.</p>	<p>The Principles of Good Governance, which are embedded within the terms of reference for CCSMP, include the following:</p> <ul style="list-style-type: none"> <li>• <i>“Directors of the Group entity must act for the entity, declaring and avoiding any actual or apparent conflict of interest. The Group entity should have skills appropriate to the sector and roles. To ensure this is achieved the Board should have mandatory training including induction, an annual training programme and guidance notes. An annual skills audit and triennial independent review should be used to support the entity Board and identify appropriate external expertise</i></li> <li>• <i>Council nominated directors and member representatives to receive mandatory training on an annual basis and appropriate indemnity arrangements to be ensured”</i></li> </ul> <p>As explained above (20i), the ability to appoint and remove Directors has also been delegated.</p>	<p>COMPLETE – training referred to and governance arrangements to continue as BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Interim Director of Finance (S151)</p>
<p>v) Essential mandatory training will be undertaken on an annual basis and the retention of the director role for</p>		<p>Next update due in January 2022</p>	<p>Interim Corporate Director of Resources</p>

<p>each Councillor and Council official will rely on completion of the recommended training.</p>	<p>See above for (iv) – the date of the training will be determined in due course through the CCSMP.</p>	<p>Training referred to will continue as BAU</p>	<p>(Section 151) and Deputy Chief Executive  Interim Director of Finance (S151)</p>
<p>vi) The impact of these changes will need to be reflected in the Council's Constitution and relevant protocols.</p>	<p>CCSMP's responsibilities, as set out in the terms of reference, includes:</p> <p><i>“Embedding principles of good governance as referenced in Section B of these Terms of Reference, including by making recommendations via the Chair for the Council’s constitution to be amended to reflect the role of CCSMP and recommended corporate protocols, such item to be on the agenda for the first meeting of the CCSMP”</i></p> <p>Work to review the constitution will include ensuring that the Council’s constitution reflects best practice in relation to governance of subsidiaries.</p>	<p>Next update due in January 2022</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive  Interim Director of Finance (S151)</p>
<p>vii) Support for the effective governance of the Council’s subsidiaries and retaining a corporate overview of activity of individual companies and the whole group of companies is to be developed.</p>	<p>In addition to embedding the Principles of Good Governance section B of the terms of reference.</p> <p>CCSMP's responsibilities, as set out in the terms of reference, includes:</p>	<p>Responsibility referred to will continue as BAU.  Next update due in January 2022</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>

	<p>“Supporting the development of Group entities and the Group”. A full list of responsibilities can be seen <a href="#">here</a>.</p> <p>Further, although Brick By Brick will have separate reporting and governance arrangements, when CCSMP reports to Cabinet, Cabinet will also be asked to note the reports presented separately on Brick By Brick to ensure holistic consideration of the Council’s Group entities.</p>	<p>update on impact of CCSMP.</p>	<p>Interim Director of Finance (S151)</p>
<p>viii) Raise awareness of the timing of the Annual General Meetings of subsidiaries amongst Members.</p>	<p>CCSMP’s responsibilities, as set out in the terms of reference, includes:</p> <p><i>“The CCSMP will, via the Chair, report to Cabinet on a biannual basis at minimum and make recommendations as appropriate. The Chair shall frequently brief relevant Cabinet Members between formal reporting to Cabinet.”</i></p> <p>The Scheduling of this has is being actively discussed through the CCSMP.</p>	<p>Next update due in January 2022</p> <p>Updates from CCSMP chair will continue as BAU.</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Interim Director of Finance (S151)</p>
<p>IX) Cost effective mechanism to publish Board membership of Council subsidiaries to be investigated</p>	<p>Board membership of subsidiaries can be included within CCSMP’s</p>	<p>Updates from CCSMP chair will continue as BAU.</p>	<p>Interim Corporate Director of Resources (Section 151) and</p>

	<p>bi-annual reports to Cabinet (see Rec 20 – VIII).</p> <p>Other company and Directorship information already publicly available on company's house.</p>		<p>Deputy Chief Executive</p> <p>Interim Director of Finance (S151)</p>
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**LBC Recommendation 1**  
 Given the challenges ahead there will need to be improvement of the Council’s approach to risk management to enable a satisfactory turnaround of the financial position.

**Cabinet Member Accountability:** Councillor King Cabinet Member for Croydon Renewal

Action	Progress made to date	Status/Updated Deadline	Accountability
i) An externally led review of the Council’s appetite for risk needs to be undertaken with Members and Officers to ensure that the council’s financial capacity for managing risk is fully understood.	<p>Cabinet risk management session has been carried out which will need to have a follow up session during the 21/22 financial year.</p> <p>A selection of Officers across the Council have been given access to the Risk software to download and edit risk entries. This has included 1-1 training sessions on the creation of risks and the use of software.</p>	Training rollout has commenced and is scheduled to be completed by end March 2022.	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive  Director of HR  Head of Democratic Services
ii) Corporate Finance, Performance and Risk management to be combined into one reporting function to remove silo thinking and increase the rigour to enable delivery of services, savings plans and the overarching Improvement Plan. This will require one new unified system of corporate reporting.	<p>PMO developing initial Corporate Finance, Performance and Risk report.</p> <p>These reports will be developed monthly and will provide updates from across the Council on key KPIs. A Cabinet report on the process of reporting was provided on April 12<sup>th</sup> 2021.</p> <p>The June 7<sup>th</sup> Corporate Finance, performance &amp; Risk report iteration will provide a final set of CRP measures, and targets set to date,</p>	COMPLETE – Embedded into BAU with monthly reports to Cabinet	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive

	<p>as well as a further update on the work streams in place to produce a full set of corporate performance reports by September 2021 Cabinet.</p> <p>The monthly reports will develop over time as recommendations are progressed.</p>		
<p>iii) Risk considerations to be made at the outset of all new decisions will ensure the Council has capacity, capability and financial resources needed to deliver. The assessment of risk is on the individual decision and its impact on the whole of the Council.</p>	<p>All new programmes of work will be subject to sign off at the Programme Steering Group who will be able to provide a council wide view and ensure that risks have been considered. This process is in evolutionary phase so it is too soon to record this action as complete.</p> <p>Updates have been made to handling of Corporate Risk Register to improve presentation and to promote ownership across Directorates. Risks now presented to ELT on a monthly basis.</p>	<p>Next update due in January 2022</p> <p>To become BAU</p>	<p>All Corporate Directors</p>
<p>iv) Develop training for Members and Officers to understand effective risk management.</p>	<p>An initial workshop on risk took place in January 2021.</p> <p>In addition, per recommendation LBC 3 - i, this will form part of the wider Member Learning &amp; Development Programme as approved by Members Learning &amp;</p>	<p>Update provided – training to be delivered by March 2022.</p> <p>To be confirmed in Q.4 Update. To become BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Interim Director of Finance (S151)</p>



	<p>Development Committee on July 13<sup>th</sup> 2021.</p> <p>This training is aimed to be delivered by March 2022. Appropriate Training for Members will continue to be offered as BAU going forward.</p>		<p>Director of HR</p> <p>Head of Democratic Services</p>
<p>v) The Council to review the terms of reference in regards the General Purposes and Audit Committee and Scrutiny &amp; Overview Committee with regards to risk management to ensure there are no gaps in governance, to remove silo thinking and that both committees have a clear understanding of their responsibilities. This will include new guidance and joint training</p>	<p>Work to update the GPAC and Scrutiny TOR is being progressed as part of the review of the Constitution, aligned with the process of introducing an Independent Chair.</p> <p>Training for Scrutiny Members to understand their roles will accompany adoption of a new approach to scrutiny in response to the CfGS Scrutiny Improvement Review. Training for GPAC members will be implemented following the appointment of the Independent Chair.</p>	<p>Next update due in January 2022</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>
<p>vi) Councillors to be provided overview of Council risk function and how risks are constantly monitored and updated in the organisation</p>	<p>Cabinet training workshop took place in January 2021.</p> <p>Officers will look at opportunities to provide key learning to members through refreshed work programme for 2022. (see LBC 3- i)</p>	<p>COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>

<b>LBC Recommendation 2</b> Clarifying member and officer roles to support good governance arrangements			
<b>Cabinet Member Accountability:</b> Councillor Young Cabinet Member for Resources and Financial Governance			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
<p>i) The Council will need to undertake a review to consider its operating model to ensure it has capacity and specialist skills required to deliver the financial and operational improvements that are needed to deliver.</p>	<p>A restructure proposal has been approved by Full Council. This should be live Autumn 2021.</p> <p>A review of the Council's Internal Governance Meeting is in its final stages and its implementation should be aligned with the restructure going live.</p>	<p>Next update due in January 2022</p>	<p>Chief Executive</p>
<p>ii) The Member/Officer protocol is to be reviewed to ensure that it gives clarity on the respective roles and responsibilities for both Members and officers. The protocol should also explicitly place the seven principles of public life, known as the Nolan principles, at its heart.</p> <p><a href="https://www.gov.uk/government/publications/the-7-principles-of-public-life">https://www.gov.uk/government/publications/the-7-principles-of-public-life</a>.</p> <p>Training will be held for all Councillors and senior officers to develop good practice.</p>	<p>On May 26<sup>th</sup> a report reviewing the TOR of Ethics Committee went to the Committee and consequently a new work plan was adopted.</p> <p>An outline Training programme is being developed for all members including where appropriate, specific training for committee members (see LBC 3- i)</p> <p>The Member Code of Conduct is being reviewed, based on the new LGA Model Code of Conduct, with the Nolan principles at its heart: the revised Code will be presented to Council at its meeting on 11 October 2021 for adoption.</p>	<p>Training offer finalised.</p> <p>Training to be delivered with aim to fully deliver by March 2022.</p> <p>Capacity for Members and officers to undertake this review may be impacted by the need to focus attention on redrafting the constitution in preparedness for</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Head of Democratic Services</p>

	The Member/Officer Protocol will be reviewed as part of the wider review of the constitution, informed by the new Member and Staff Codes of Conduct.	a directly elected mayor in May 2022.	
iii) A review of the member and officer Codes of Conduct will be undertaken to incorporate any learning from recent events and to ensure that they explicitly include the seven principles of public life, known as the Nolan principles, as the basis of the ethical standards expected of elected and appointed public office holders.	The Member Code of Conduct is being reviewed, based on the new LGA Model Code of Conduct, with the Nolan principles at its heart: the revised Code will be presented to Council for approval on 11 October 2021.  This is linked to LBC2 - ii.	See LBC 2 ii above.	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive
iv) Development sessions for Members and officers to better understand each other's respective roles.	The review and revision of the Councillor/ Officer Protocol will include development sessions for members and officers to better understand each other's respective roles.  See LBC Recommendation 2 ii and iii and LBC Recommendation 3 i.	See LBC 2 ii above.  Next update due in January 2022  To become BAU	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive
v) Review the level of support and advice Scrutiny & Overview Committee and the General Purposes and Audit Committee receives from the Head of Paid Services, Section 151 Officer and Monitoring Officer to ensure that the advice is in line with their statutory responsibilities. With this include clarification on the ability and process for members to request information.	Meetings have been held between the Head of Paid Service, S151 officer, Monitoring Officer and Scrutiny Chairs to provide opportunity for regular discussion and planning.	Further update to be provided in January 2022	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive

	<p>The Scrutiny and GPAC Workplan is also being linked in to the Council’s forward plan.</p> <p>Adoption of a new approach to scrutiny in response to the CfGS Scrutiny Improvement Review will ensure that scrutiny’s work planning is supported by appropriate information and officer advice.</p> <p>An Access to Information Protocol, informed by the CfGS Scrutiny Improvement Review was presented to Ethics Committee in September 21 and further revisions will be presented to the November meeting for approval.</p>		
<p>vi) Review the capacity of the organisation to support the Scrutiny &amp; Overview Committee and the General Purposes and Audit Committee so that activity is prioritised within the financial resources for these functions.</p>	<p>This needs to be considered in conjunction with LBC Recommendation 2 v. See above therefore.</p> <p>At its meeting on 11 October Council will formally agree to appoint an independent chair to the General Purposes and Audit Committee.</p>	<p>Further update to be provided in January 2022</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>

<b>LBC Recommendation 3</b>			
Ensuring that Members are appropriately trained across all aspects of the Council’s financial duties and responsibilities			
<b>Cabinet Member Accountability:</b> Councillor Young, Cabinet Member for Resources and Financial Governance			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/Updated Deadline</b>	<b>Accountability</b>
i) A detailed training and development programme is being designed to enable all Members to fulfil their roles in regard to their role with sufficient rigour. The programme being developed will cover: <ul style="list-style-type: none"> <li>• Financial management to include the importance of effective budget setting, a robust Medium Term Financial Strategy and rigorous budget monitoring (Add reserves)</li> <li>• Understanding funding sources, eg general fund, housing revenue account and direct schools grant</li> <li>• The role of Audit and the external auditor</li> <li>• Treasury management and capital strategies and the Council’s approach to subsidiaries</li> <li>• Risk assessment</li> <li>• Commercial Investment</li> <li>• Mentoring</li> <li>• Commissioning and Procurement Process</li> <li>• ASC Budget</li> <li>• Transformation Funding</li> <li>• Statutory and non-statutory services</li> </ul>	<p>An outline training programme for all members, including where appropriate specific training for committee members, was approved by the Members Learning &amp; Development Panel on July 13<sup>th</sup> 2021. It has been aligned with the actions in the RIPI action plan to ensure all aspects covered. Detailed planning is now underway to ensure delivery by March 2022.</p> <p>Some training has already been carried out during the latter part of 2020/early 2021. This includes Finance, Treasury Management, Risk.</p> <p>The Council will ensure training attendance is recorded on Mod.gov.</p> <p>The training offer will be refreshed annually and continually offered to members as BAU going forward. A members induction programme for May 2022 will be informed by the RIPI recommendations.</p>	<p>Training offer finalised</p> <p>Training to be delivered with aim to fully deliver by March 2022.</p> <p>To become BAU</p>	<p>Chief Executive</p> <p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Director of HR</p> <p>Head of Democratic Services</p>

<p>ii) Further work on Cabinet development will be undertaken to support members to explore priorities for the new Cabinet, agree how the Members will work together to make the most of shared skills and consider individual and collective leadership styles and ways of working.</p>	<p>LGA have carried out a facilitated session for Cabinet members</p>	<p>COMPLETE</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>
<p>iii) Target support to be provided for Cabinet Members, Scrutiny &amp; Overview Committee Members and General Purposes and Audit Committee Members to strengthen the approach to reviewing the emerging plans, actions and risks that are being developed as part of the Croydon Renewal Plan, Financial recovery and progress against the Report in the Public Interest. In particular the training will include:</p> <ul style="list-style-type: none"> <li>• The role of Scrutiny and Overview in relation to finance and General Purposes and Audit Committee</li> <li>• Developing an effective culture of scrutiny and key questioning skills</li> <li>• Maintaining a ‘big picture’ view of the financial pressures affecting the council</li> <li>• Assessing effectively budget and financial plans, budget monitoring, reserves approach</li> <li>• Challenging how resources are allocated</li> <li>• Scrutinising partnership arrangements</li> <li>• Key finance issues for Scrutiny and Overview Committee to consider</li> </ul>	<p>An Access to Information Protocol, informed by the CfGS Scrutiny Improvement Review, was presented to Ethics Committee in September 21 and further revisions will be presented to the November meeting for approval.</p> <p>A Training offer is being developed for all members including where appropriate, specific training for committee members (See LBC3 – i).</p>	<p>Further update to be provided in January 2022</p> <p>To become BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>

<b>LBC Recommendation 4</b>			
The Council develops an improvement programme that has the necessary elements for it to function effectively and within its financial resource.			
Cabinet Member Accountability: Councillor Hamida Ali, Leader of the Council			
<b>Action</b>	<b>Progress made to date</b>	<b>Status/ Updated Deadline</b>	<b>Accountability</b>
i) Implement new Council management arrangements that ensure: <ul style="list-style-type: none"> <li>• the delivery of high quality statutory services</li> <li>• finances are appropriately managed and controlled</li> <li>• a sound understanding of risk management is at the heart of the organisation</li> </ul>	<ul style="list-style-type: none"> <li>• Corporate Restructure approved and senior recruitment campaign due to start in August</li> <li>• Risk Register format and style updated. Now regularly reviewed at ELT and DLTs.</li> <li>• Interim Assets Strategy in implementation stage with number of assets targeted to be disposed by end of financial year.</li> <li>• New process for monthly Corporate Finance, Performance and Risk reporting in place</li> </ul>	Update provided  Further update to be provided for Q.3  To become BAU	Chief Executive Officer
ii) Working with local residents, rebuild the trust with their local Council by focussing on effective delivery of core services, responding promptly and appropriately to queries and complaints and learning from good practice as well as failures and from each other.	A Cabinet paper on Croydon Renewal Community Engagement to establish a Community Panel went to May Cabinet with operating principles and outcomes defined. The Panel is seen as a key element on our journey to becoming more transparent, open and honest in our ways of working. The Panel will also represent a link between our communities and the delivery of the	Ongoing – To be updated every quarter  To become BAU	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive

	<p>wider Croydon Renewal Improvement Plan. The implementation of this is to be finalised.</p> <p>Sessions with residents have taken place in relation to Regina Road to open up direct communication links between officers and those affected.</p> <p>Rebuilding trust with residents will be an ongoing process with residents as we improve our cultures and systems to be the Council our resident’s needs. An update will continue to be provided against this action for the foreseeable future therefore.</p>		
<p>iii) Introduce a new system of internal control focussed on finance, performance and risk to manage financial expenditure, risk management, service performance and the delivery of Council priorities. This will follow a monthly cycle of Departmental Leadership Teams, Executive Leadership Team, Cabinet and Scrutiny &amp; Overview as appropriate.</p>	<p>New process for monthly Corporate Finance, Performance and Risk reporting in place.</p> <p>Work to align financial/HR data with the restructure is ongoing and is expected to be live in Autumn.</p>	<p>Update provided – next update for Q.3</p> <p>To become BAU</p>	<p>Chief Executive Officer</p>
<p>iv) Building on the work done to date and listening to staff concerns about equality and diversity in the workplace, co-create a working environment that respects and values all our staff and take positive action to ensure that this is the case.</p>	<p>Following the all-staff conference and the series of staff roadshows held Spring 2021. Further engagement with staff is planned for Autumn 2021 to provide an update to staff on the CRP and underline and continue to promote positive systemic and cultural changes.</p>	<p>Ongoing – To be updated every quarter</p> <p>To become BAU</p>	<p>Interim Assistant Chief Executive</p>



	<p>The Council is committed to creating a positive culture for all and continues to recognise it will take time to build staff trust and confidence.</p> <p>In addition, to the Guardians Programme detailed in the previous update the Council has implemented a series of monthly Tea Talks to provide staff a means to share experiences and discuss sensitive issues in a safe space.</p>		
v) Create a new system of staff performance appraisal, co-created with staff and agreed with the trade unions.	<p>The Council has implemented a light touch solution to appraisals for 2020/2021 to recognise the sheer level of work and commitment staff have shown in the last year.</p> <p>Further work on re-developing appraisals in the longer term is ongoing.</p>	<p>Next update January 2022</p> <p>To become BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Director of HR</p>
vi) By working with Council staff, co-create an environment that is open to listening, free from fear, built on trust and openness and reflects the diverse borough that we serve.	<p>See recommendation LBC 4 iv</p>	<p>Ongoing – To be updated every quarter</p> <p>To become BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p> <p>Director of HR</p>
vii) Agree a training programme for Council staff that includes finance for non-financial managers, Business Case Development, understanding risk,	<p>The Council training budget will be held centrally to assist with developing a corporate approach to staff training that creates</p>	<p>Update to be included in Quarter 3</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>

<p>project management and the Council’s own governance processes.</p>	<p>consistency and efficiency in the way this is managed and delivered. The more specific approach to these areas for training will be agreed once the forensic financial exercise is complete.</p> <p>The forensic audit includes recommendations for improved training of budget managers and finance staff that need to be worked up.</p>	<p>To become BAU</p>	
<p>viii) Ensure the actions contained in this plan are supported by a corporate programme office that can provide assurance to Members.</p>	<p>A PMO office has been established dedicated to coordinating and supporting the delivery of key improvement actions across the Council. This includes recommendations in the MHCLG Rapid Review, the RIPI and the Croydon Renewal Plan.</p>	<p>COMPLETE Embedded as BAU</p>	<p>Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive</p>
<p>ix) Corporate level sponsorship to be allocated to all projects to ensure clarity of responsibility for delivery.</p>	<p>ELT members already allocated across all actions. Further project managers to be identified to deliver the recommendations.</p>	<p>COMPLETE</p>	<p>Chief Executive</p>
<p>x) Work needs to be undertaken as a priority to understand the future model of the Council, which would inform the direction of travel in the improvement journey.</p>	<p>See recommendation LBC 2 - i</p>	<p>This is being progressed. Work to be complete and</p>	<p>Chief Executive</p>

		reported on for Q.3 update	
xi) Council is to provide appropriate officer support to Scrutiny in order that it can fulfil its role.	See recommendation LBC 2 - V	This is being progressed. Further update to be provided Q.3  To become BAU	Interim Corporate Director of Resources (Section 151) and Deputy Chief Executive

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Key:

	Action fully completed and, where appropriate, now part of Council's governance framework.		Action substantially completed.		Action still in progress		No action taken
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Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
Ref	Recommendation	Action	Progress made to date	Updated Deadline	
1a(iv)	The Executive Director Children Families and Education needs to address the underlying causes of social care overspends in children's social care and take effective action to manage both the demand and the resulting cost pressures.	iv) Secure independent external challenge through the Partners in Practice programme to enable valid judgements to be made about the correct level of funding to meet the needs of Croydon's children in care.	Report from LB Camden received under Partners in Practice Programme – December 2020  Independent Financial Adviser commissioned by the DfE to provide expert challenge and support commenced on 22/2/21 for a period of 9 months.	Complete  Ongoing support until November 2021	Copies of parts 1 and 2 of the 'Review of Croydon's Children Looked After Service' by the London Borough of Camden, dated 'October/November 2020' and 'December 2020' respectively were obtained. Part 1 looked at proposals for the redesign of the service, while Part 2 looked at (a) commissioning arrangements, (b) the changing needs/profile of children looked after and unaccompanied asylum seeking children, (c) the availability and resourcing of good quality services, (d) transitions issues and permanency planning.  Examination of the 'Croydon Financial Transformation Advisor Spec 221220' and the 'DfE Advisor Report May 2021' confirmed that a DfE advisor commenced their <i>role on 22 February 2021 on a 9 month contract to look at improvements and transformation within Croydon's Children's Services Finance</i> . The 'DfE Advisor Report May 2021' being an 'Initial Progress Report' detailing actions and recommendations to date, as well as future tasks.
1b(i)	The Executive Director Health, Wellbeing and Adults needs to address the underlying causes	i) Commission a diagnostic of spend and opportunities to be carried out by the	This was carried out and used during November 2020 to inform development of the	COMPLETE	It was confirmed that the 'Observations of Croydon Adult Social Care' by the Local Government Association (dated 5 November

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
Ref	Recommendation	Action	Progress made to date	Updated Deadline	
	of social care overspends in adults social care and take effective action to manage both the demand and the resulting cost pressures.	Local Government Association (LGA) National Care & Health Improvement Adviser Finance and Risks to inform future shape of transformation opportunities.	Adult Social Care Improvement Plan		2020) were presented as part of the 'ACS Budget Workshop' in November 2021.  The 'Adults Social Care Improvement Plan 2021 – 2024' confirms in paragraph 1.3 that, ' <i>Working closely with a Local Government Association (LGA) Adults and Finance expert, we have reviewed every aspect of our budget. We have modelled plans to deliver significant savings over three years, based on LGA recommendations.</i> '
1b(ii)	The Executive Director Health, Wellbeing and Adults needs to address the underlying causes of social care overspends in adults social care and take effective action to manage both the demand and the resulting cost pressures.	ii) Review the current service delivery models of adult social care and gateway services to right size the budget and delivery model to benchmark with comparator Councils in relation to population and service outcomes.	Data has been collected which provides benchmarking of Croydon ASC care spend vs other Councils, this was factored in to the Adult Social Care Improvement Plan.  Budget modelling has been agreed for ASC for 21/22 budget. Service modelling forms part of adult's improvement plan.	COMPLETE	The 'Adult Social Care Benchmarking 2019-20' report dated 31 December 2020 demonstrates that the Council had benchmarked against the 152 Councils with Adult Social Care Services Responsibilities in England for the period 1 April 2019 to 31 March 2020.  The 'Health, Wellbeing and Adults Budget Development Session' dated 1 October 2020, the 'ACS Budget Workshop' in November 2021 and the Adults Social Care Improvement Plan 2021 – 2024' and the presentation of the Executive Director of Health, Wellbeing and Adults to the Scrutiny Health & Social Care Sub-Committee on 26 January 2021 all included benchmarking data.  The Care Cubed tool (detailed in 1b(iii) below) is being trialled to provide the ability to benchmark placements costs with other councils.  As detailed in 1B(iv) below, examination of the Croydon Adults Improvement Plan and the Adult Social Care Budget presented to the Scrutiny Health & Social Care Sub-Committee on 26 January 2021 confirmed that budget modelling was agreed in the 2021/22 budget and that

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
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					service modelling forms part of the Adults Improvement Plan.
1b(iii)	The Executive Director Health, Wellbeing and Adults needs to address the underlying causes of social care overspends in adults social care and take effective action to manage both the demand and the resulting cost pressures.	iii) To create a placements board to challenge the Council on current cost of placements, managing demand for new placements and ensuring value for money in procurement of placements	<p>Placements boards have been implemented in the Council to challenge placements and reduce expenditure.</p> <p>Daily challenge panel has been in place since S114. All spend is then promoted to the Spend Control Panel, as agreed with then S151 Officer.</p> <p>Placements programme is in place with an agreed scope. Funding also agreed for Care Cubed placements tool agreed at ELT on 8 March 21.</p>	COMPLETE	<p>The 'Placements and packages of care across Children's and Adult's Social Care 2020/21' presentation dated 19 October 2020, as well as the subsequent 'Placements Programme Workstreams – Systems Processes and Payments' dated 26 November 2020 both detailed that:</p> <ul style="list-style-type: none"> <li>A 'Daily Panel – Director / Exec Director to sign off new placements (Res/Nursing)' was actioned and in place. Enquiry clarified that Adult Social Care has a challenge panel at 9am Monday to Friday where cases are presented for approval. The panel consists of the Interim Executive Director (usually) plus a selection of Adult Social Care Heads of Service and a Finance Manager. The case workers have to complete a template which is submitted prior to challenge panel. Each case is reviewed, challenged and a decision on the care is made, (sometimes this will be for a limited time with a requirement for the case worker to re-present, so it is not always a simple yes or no.) The decisions are recorded each day and a summary circulated at the end of each week.</li> <li>A 'placements programme' was in place. Review of the 'Placements and contracts Programme' task pages on Teams showing the progress of the various projects also confirmed the programme to be in place and actively being progressed.</li> </ul>

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
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					<p>The 'Overview Of The 2021-22 Adult Social Care Financial Performance' report provided to the Scrutiny Health &amp; Social Care Sub-Committee at the meeting held on 29 June 2021 confirms that, 'A further £0.026m transformation investment was agreed in Feb 21 for the purchase of a tool called Care Cubed. This allows the service to benchmark placements costs with other councils, enabling stronger provider negotiations.'</p> <p>The copy of the Care Cubed contract provided, confirms that, 'iESE will provide Licensee with access to CareCubed for one year from 1st April 2021 and ending on 31st March 2022' with the option to extend this.</p> <p>An update on Care Cubed by the Head Of Innovation And Change further confirmed that:</p> <ul style="list-style-type: none"> <li>• A series of training was scheduled and had been completed.</li> <li>• Progress was focussed on testing the tool within the Reviews Progression project team.</li> <li>• Analysis is due by end of September 2021 on the cases reviewed using Care Cubed.</li> </ul>
1b(iv)	The Executive Director Health, Wellbeing and Adults needs to address the underlying causes of social care overspends in adults social care and take effective action to manage both the demand and the resulting cost pressures.	iv) Use the output from the diagnostic review to remodel financial implications to help shape the Medium Term Financial Strategy (MTFS)	<p>Diagnostic review and benchmarking data has been used to shape the Adult Social Care Improvement plan.</p> <p>Croydon Adults Improvement plan has been fully developed and aligned to budget as signed off at March Cabinet. LBC delivery</p>	COMPLETE	<p>Documents seen for 1b(i), (ii), (iii) above confirm that diagnostic review and benchmarking data has been used to shape the Adult Social Care Improvement plan.</p> <p>Parts 6 and 7 of the Croydon Adults Improvement plan detail the 'Current budget development' and 'Year one and medium term financial strategy proposals' clearly aligning the Plan to the 2021/22 Budget. Likewise the Adult Social Care Budget presented to the Scrutiny Health &amp; Social Care Sub-Committee on 26 January 2021 summarised</p>



Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
Ref	Recommendation	Action	Progress made to date	Updated Deadline	
			tracker being updated fortnightly.		that, 'Adult social care continues to be under pressure nationally and locally. The outturn for 2016/17, 2017/18, 2018/19 and 2019/20 demonstrated both an increase in costs and increased use of transformation monies to meet current demand and increased complexities. Increasingly we are seeing residents who fund their own care running out of money, often referred to as 'wealth depleters'. A change in the way we deliver social care in order to reduce spend and live within our available resources is underway.'
2(i)	The Council (including Cabinet and Scrutiny and Overview Committee) should challenge the adequacy of the reserves assessment which should include a risk assessment before approving the budget.	i) Develop a reserves strategy as part of the Medium Term Financial Strategy (MTFS) and present it for approval with the Budget reports to Cabinet and Full Council. This needs to incorporate a clear assessment of risks and liabilities that demonstrate all current and future exposure has been thought through and factored into the recommendations. Strategy to map the financial governance process around agreeing additions to reserves to be included to reduce risk of duplication and that there were no gaps in approach.	The MTFS and 21/22 Budget agreed on 8th March contains a clear strategy for growing the reserves base up to a level which by 23/24 would give a general fund reserve in excess of £60 million.	COMPLETE	Examination of the 'Budget Report 2021/22' presented to Cabinet on 8 March 2021 confirmed plans that '£20m is being earmarked as part of the 20/21 planned capitalisation directive for contribution to the General Balance. With a further increase of £10m 21/22.' (i.e. to increase reserves by £50m).  The updated MTFS presented to Cabinet 12 July 2021 confirmed that, 'Part of the approved capitalisation direction request in 2020/21 contained provision to bolster general reserves by a further £15.0m in order to provide sufficient resilience to meet future risks and challenges. The 2021/22 base budget has £10m of contributions to reserves and the MTFS provides for a further £5m of reserves contribution in 2022/23 and a further £5m in 2023/24. This will result in a total of additional £45m in reserves by the end of 2023/24 which should leave a General Fund Reserve balance of £72.5m.'

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
Ref	Recommendation	Action	Progress made to date	Updated Deadline	
2(ii)	The Council (including Cabinet and Scrutiny and Overview Committee) should challenge the adequacy of the reserves assessment which should include a risk assessment before approving the budget.	ii) In considering future budget reports, Cabinet will assure itself that all risks and liabilities have been properly considered by requesting that the Scrutiny & Overview Committee and the General Purposes and Audit Committee review the adequacy of the strategy and its relationship to the MTFS prior to Cabinet taking a decision.	<p>From April 2021 Financial Monitoring reports will be provided to Cabinet on a monthly basis to ensure Members have increased oversight on any emerging pressures or movements.</p> <p>The 21/22 Budget was reported to Scrutiny on 16th February 2021 and comments were verbally reported to cabinet on 8th March 2021.</p> <p>Future year's timescales will need to include time for both this and reference to GPAC and Scrutiny Cross reference to LBC rec 3 as this will form part of the wider Member Development Programme to be developed and agreed</p>	COMPLETE	<p>It was confirmed that 'Financial Monitoring' reports were provided to Cabinet from April 2021, with the:</p> <ul style="list-style-type: none"> <li>• 'Financial Performance Report – Period 11' report provided on 4 May 2021,</li> <li>• 'Financial Performance Report – Month 1' on 7 June 2021,</li> <li>• 'Financial Performance Report – Outturn 2020/21' on 12 July 2021,</li> <li>• 'Financial Performance Report – Month 2' on 26 July, and the</li> <li>• 'Financial Performance Report – Month 3' scheduled for the meeting to be held on 13 September 2021.</li> </ul> <p>Examination of the Scrutiny Committee minutes of the meeting held on 16 February 2021 confirmed that the draft 2021/22 budget was reported to this meeting. Examination of the 'Budget Report 2021/22' presented to Cabinet on 8 March 2021 confirmed that item 21 reported that the 21/22 draft budget had been reported to the Scrutiny Committee.</p> <p>Dates for Scrutiny and GPAC are on the Corporate Forward Plan for the 2023/23 Draft Budget</p>
5(i)	The General Purposes and Audit Committee should receive reports on the actions being taken to address the Dedicated Schools Grant deficit and challenge whether	i) The Dedicated Schools Grant recovery plan should be presented to General Purposes and Audit Committee and Scrutiny and Overview Committee for review and agreement	Reviewed at GPAC 4 March 2021	COMPLETE	<p>The minutes of the General Purposes and Audit Committee meeting held on 4 March 2021 are not yet available. Examination of the agenda for the meeting confirms that item 6 was a paper on the 'Dedicated Schools Grant', but that this was an item for the Committee to 'Note' and not to agree or to challenge. However, the 'podcast' of the</p>

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
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	sufficient progress is being made.	to ensure that it is adequate to meet objectives and timelines that have been set.			meeting clearly evidences that members sought clarification and challenged this item.
5(ii)	The General Purposes and Audit Committee should receive reports on the actions being taken to address the Dedicated Schools Grant deficit and challenge whether sufficient progress is being made.	ii) Special Educational Needs Finance Board to be established and chaired by the interim Director of Education to oversee the delivery of the Dedicated Schools Grant recovery plan.	Initial meetings held with further meetings to be scheduled to update on the progress of the DSG recovery plan.	COMPLETE	Examination of the 'SEND Finance Board: Terms of Reference' confirms that the objectives of the Board includes to, ' <i>Ensure that milestones in relation to the SEND DfE recovery plan and management plan are being met through regular monitoring of this.</i> '  Examination of the Executive Director of Children, Families and Education's Outlook calendar confirmed that the SEND Finance Board met on 19 July 2021, with monthly meetings being diarised until the end of the calendar year.
5(iii)	The General Purposes and Audit Committee should receive reports on the actions being taken to address the Dedicated Schools Grant deficit and challenge whether sufficient progress is being made.	iii) Training to be provided to members to ensure the committee possess a working understand of education funding and budgets	DSG training has been delivered to members of Scrutiny Committee, Labour Group and Conservative Group	COMPLETE	A copy of the PowerPoint slides 'Dedicated Schools Grant (DSG) funding for Croydon' has been provided.  The Chair of the Children's & Young People Sub-Committee confirmed that they had a briefing at 2pm on 12 January 2021.  As noted in LBC Rec. 3 (ii) below, the 'Member Learning and Development Needs 2021-22' includes 'Education Funding and Budgets' which was 'Delivered to CYP Scrutiny and members of both Cons and Lab Groups' in January 2021.
6(i)	The Executive Director Children, Families and Education needs to review the services provided to UASC and to identify options to meet their needs within the grant	i) Complete a forensic review of grant income against the total expenditure for unaccompanied asylum seeking children and care leavers over the past 3	Review completed and is informing Council's approach to UASC support offer.	COMPLETE	The forensic review was undertaken by the Executive Director of Children, Families and Education, and the Interim Head of Quality Improvement for that department, with modelling by the Independent Financial Adviser commissioned by the DfE (refer to 1a(vi) above).

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
Ref	Recommendation	Action	Progress made to date	Updated Deadline	
	funding provided by the Home Office.	years, including the co-ordination of pan-London arrangements.			This included both unaccompanied asylum seeking children and care leavers. The subsequent report to Cabinet on 7 June 2021 also confirms that detailed modelling took place for unaccompanied asylum seeking children.
7(i)	The Executive Director Children, Families and Education needs to identify the capacity threshold for the numbers of UASC that it has the capacity to deliver safe UASC services to.	i) Draw on the analysis and review at 6 (i) to develop options to establish a capacity threshold for Croydon for unaccompanied asylum seeking children that is commensurate with other Local Authorities and in line with the nationally agreed standards and funding.	The voluntary national rate is the equivalent of 0.07% of the child population. In Croydon that equates to 66 children. This underpins the forensic review and modelling completed in 6i	COMPLETE	The report to Cabinet on 7 June 2021 explains that if the Borough no longer accepts new unaccompanied asylum-seeking children into care, then the number of such children under 18 in the Borough will fall to 66 by 2023/24. The report also acknowledges that this will not substantially reduce the number of asylum seeking care leavers in the Council's care over that same period.
9(i)	The Council (including Cabinet and Scrutiny and Overview Committee) need to show greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.	i) To support the Annual Budget setting process Budget Development Meetings will be held for each department and will be attended by Executive Directors, Corporate Leadership Team and Members with accountability for their service area and staff who are responsible for service delivery that understand what impact growth and savings plans will have on the services. To support this process Members will be provided with a clear set	Proposals were provided to members with a formal decision in November Cabinet. Saving opportunities for 21/22 were set out across all services and have been incorporated into delivery of Croydon Renewal Plan.  The Council recognises further savings will be necessary to achieve a sustainable budget in the long term. Discussions for further savings next year will be scheduled starting from April 2021.	COMPLETE	Item 87/20b to the Cabinet meeting held on 25 November 2021 was to: <ul style="list-style-type: none"> <li>• <i>'Consider the additional in-year savings for 2020/21 that will be presented to the extraordinary meeting of Full Council on 1 December 2020 to respond to the S.114 notice.'</i></li> <li>• <i>Consider and recommend to Full Council the savings proposals for consultation as set out in this report for the Medium Term Financial Strategy and 2021/24 and note that consultation will begin on 9 December 2020.'</i></li> </ul> Appendix B of the paper, the 'Schedule of Proposals for Savings & Investment in 2021/22' provided narrative explaining each savings proposal.

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
Ref	Recommendation	Action	Progress made to date	Updated Deadline	
		of proposals that demonstrate cost pressures (growth) and savings opportunities with narrative and comparators on budget and outcomes delivered to describe the impact of the decisions that are required to be taken			<p>The MTFS update report to the Cabinet meeting on 12 July 2021 detailed that, '<i>Further detailed work around Budget Development is ongoing within the Council and it is too early at this stage to reflect any specific details as such plans have not been fully validated.</i></p> <p>It was also confirmed that a 'Budget Development Group' had been set up, with updates on the work of the Group being provided to the ELT meetings held on 4 and 10 August 2021.</p>
9(ii)	The Council (including Cabinet and Scrutiny and Overview Committee) need to show greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.	ii) To support the budget exercise the Council will seek external support to test the draft budget proposals, seek ideas and good practice and will take the same approach by seeking support for the scrutiny process.	Various support from external sources has been utilised to date to offer capacity and advice. This includes the LGA, Council peers and CIPFA. The Council will continue to use such opportunities moving forward.	COMPLETE	<p>It is evident that the Council has received support and advice from a variety of external sources, including the LGA, the MCHLG and CIPFA, leading up to and subsequent to the S114 notice being issued in 2020. This has also included temporary appointment of experts, such as Financial Consultants, the Governance Improvement Adviser and the Improvement Plan Support Officer, each of whom also have networks to draw from.</p> <p>An example would be, as detailed in 1A(iv) above, the appointment of a DfE advisor, who commenced their 'role on 22 February 2021 on a 9 month contract month contract to look at improvements and transformation within Croydon's Children's Services Finance'.</p> <p>Another example would be that each of the ELT Away Day Cost Comparison exercises in January 2021 clearly drew on MCHLG data to help benchmark costs.</p>
9(iii)	The Council (including Cabinet and Scrutiny and Overview Committee) need to show	iii) Develop a budget savings tracker that profiles savings by month to enable	An in year savings tracker has been developed to monitor identified savings	COMPLETE	It was confirmed that a 'LBC Delivery Tracker' Power BI tool has been internally developed by the Council to monitor each of the agreed

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
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	greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.	Members to track that savings are on target. This will need to correlate with the finance, performance and risk reporting that Council will introduce.	and escalate any delivery challenges. In year savings are rag rated based on confidence in delivery.		savings. Screen prints from the tool demonstrate that monthly progress is detailed for each saving, along with a RAG rating on progress and likelihood of achievement.  It was also confirmed that 'Financial Monitoring' reports were provided to Cabinet for months 1 and 2 of 2021/22, which provided a summary of the 'MTFS Savings risk' (i.e. the savings at risk for each month).
9(iv)	The Council (including Cabinet and Scrutiny and Overview Committee) need to show greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.	iv) To increase understanding of the choices Cabinet Members are making with regards to the emerging budget and to effectively challenge budget assumptions, Scrutiny and Overview Committee Members to receive regular briefings on the progress of budget setting.	Budget Discussions were conducted across January and February 2021. This included focused discussion on the 21/22 budget for specific directorates. Discussion took place at Children and Young People Sub-Committee, Health & Social Care Sub-Committee, at Scrutiny, Streets, Environment & Homes sub-committee and finally the Scrutiny & Overview Committee.  The Council will continue to keep Scrutiny committees sighted on budget matters.	COMPLETE	Discussion confirmed that budget discussions were held. Information obtained in support of 1b(ii) above helped substantiate this, for example the 'Health, Wellbeing and Adults Budget Development Session' dated 1 October 2020 and the 'ACS Budget Workshop' in November 2021.  It was confirmed that budget reports were taken to the :  <ul style="list-style-type: none"> <li>• The Scrutiny Children &amp; Young People Sub-Committee meeting held on 19 January 2021</li> <li>• The Scrutiny Streets, Environment &amp; Homes Sub-Committee meeting held on 2 February 2021</li> <li>• The Scrutiny and Overview Committee meeting held on 16 February 2021</li> <li>• The Scrutiny Health &amp; Social Care Sub-Committee meeting held on 26 January 2021</li> </ul> The Council's Forward Plan includes an item for 'Budget Scrutiny, including questions to the Leader and Cabinet Members' for the Scrutiny and Overview Committee in February 2022.
9(v)	The Council (including Cabinet and Scrutiny and Overview	v) To review the budget setting-timetable to ensure	The Council is taking action to ensure budget discussions	COMPLETE	The copy of the forward plan provided is up to the 31 March 2022 and includes monthly financial

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	Committee) need to show greater rigor in challenging underlying assumptions before approving the budget including understanding the track record of savings delivery.	that the Scrutiny & Overview Committee has the time to digest and review the budget proposals and underlying assumptions and for Cabinet to respond fully to any challenge or comments and for Cabinet to be able to consider changing its proposals.	<p>happen at an earlier date and more opportunities are offered to members to offer input into the budget and review its management. These actions include finalisation of Council meetings forward plan up until April 2022 with dates marked for policy discussions and monthly financial performance updates at Cabinet.</p> <p>Additionally, budget developments meetings will begin in Spring 2021 as opposed to Autumn meaning savings will be identified and shared with members earlier in year.</p>		<p>performance updates at Cabinet as well as dates for budget review and approval in January and February 2022.</p> <p>As noted in LBC Rec. 3 (ii) below, the 'Member Learning and Development Needs 2021-22' includes:</p> <ol style="list-style-type: none"> <li>1) 'Series of Finance Training' of which Treasury Management was delivered in March 2021, with sessions on 'Financial management / Budget setting', 'Financial Strategy and Monitoring', 'Commercial Investment', 'Council's funding sources / reserves', 'Transformation funding' and 'Commissioning and Procurement being planned.</li> <li>2) 'Education Funding and Budgets' which was 'Delivered to CYP Scrutiny and members of both Cons and Lab Groups' in January 2021.</li> <li>3) 'Adult Social Care Budget' which was a 'Briefing held for members of the Health and Social Care Sub-Committee' in June 2021.</li> </ol> <p>The MTFS update report to the Cabinet meeting on 12 July 2021 detailed that, 'Further detailed work around Budget Development is ongoing within the Council and it is too early at this stage to reflect any specific details as such plans have not been fully validated.'</p> <p>It was also confirmed that a 'Budget Development Group' had been set up, with updates on the work of the Group being provided to the ELT meetings held on 4 and 10 August 2021.</p>
11(i)	The s151 officer needs to revisit the Growth Zone assumptions following the	i) The Council have commissioned PwC to undertake a strategic	PwC report to cabinet made recommendations on future	COMPLETE	It was confirmed that the PwC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a

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	pandemic and make recommendations to Cabinet and Council for the continued investment in the scheme.	review of the Growth Zone with completion expected November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	of GZ. These are now being implemented.		<p>review of the Growth Zone. This report detailed that, 'Given the current economic uncertainty, the steps the Council have taken to review and revise down the ambitious investment plan for Growth Zone are sensible' and that, 'Any subsequent increase in planned investment should be supported by a business case and taken through robust governance and sign off processes for full scrutiny.'</p> <p>A subsequent paper specifically on the Growth Zone was approved at the Cabinet meeting held on 22 March 2021. The paper sought approval to continue to fund key priority projects and activities in the short term, while a further report would be brought back to Cabinet later in the year setting out future years' capital expenditure requests for the Growth Zone programme.</p> <p>The Council's forward planner details that a 'Growth Zone Update' be presented to Cabinet in December 2021.</p>
11(iii)	The s151 officer needs to revisit the Growth Zone assumptions following the pandemic and make recommendations to Cabinet and Council for the continued investment in the scheme.	iii) Cabinet paper with revised profile and recommendations to be issued March 2021.	See 11ii	COMPLETE	As 11(ii) above
11(iv)	The s151 officer needs to revisit the Growth Zone assumptions following the pandemic and make recommendations to Cabinet	iv) The Council needs a mechanism in place to review projects to use the learning to inform any future work. This should be extended across all areas	Project closure process in place as part of the governance of all projects.	COMPLETE	A working group, including the members of the Council's Programme Management Office, is in place to review and revise the Council's 'Programme Management Framework' and meets every Tuesday.



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	and Council for the continued investment in the scheme.	of the Council, with learning retained centrally as a corporate resources.			The draft of the revised 'LBC Project and Programme management Framework' document produced by the working group, includes the requirement for a Project Closure document (including lessons learned) to be completed and approved for each project. <b>This is; however, not yet an embedded process.</b>
12(i)	The s151 officer should review the financial rationale and associated risks and make recommendations to Cabinet and Council on whether the Revolving Investment Fund should continue.	i) The Council have commissioned PwC to undertake a strategic review of the Revolving Investment Fund with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	Report by PwC on governance & strategic review delivered in November 2020 to Cabinet.  Treasury Management strategy updated 1st March 2021 limits new lending under the RIF to BBB working capital loans only	COMPLETE	It was confirmed that the PwC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a review of the Revolving Investment Fund. The paper detailed that, ' <i>The RIF has not been revolving, because very few of the loans have repaid with £208.8m* tied up in BBB loans with no interest received to date.</i> '  The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 approved by Cabinet at the meeting held on 1 March 2021 detailed that, ' <i>No new investments other than a loan for working capital to Brick by Brick will be made in 2021/22.</i> ' This was also presented to Council on 8 March 2021, but minutes of this meeting are not yet available.
12(ii)	The s151 officer should review the financial rationale and associated risks and make recommendations to Cabinet and Council on whether the Revolving Investment Fund should continue.	ii) Recommendations to be presented alongside budget review in Feb 2021 to Cabinet, General Purposes and Audit Committee and Scrutiny and Overview	See recommendation 12i	COMPLETE	As 12(i) above <b>Although no report/s were provided to the General Purposes and Audit Committee on this.</b>

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12(iii)	The s151 officer should review the financial rationale and associated risks and make recommendations to Cabinet and Council on whether the Revolving Investment Fund should continue.	iii) Cabinet paper with recommendations to be issued March 2021.	See recommendation 12i	COMPLETE	As 12(i) above
13(i)	The s151 officer should review the purchase of Croydon Park Hotel to identify lessons learned to strengthen future due diligence arrangements.	i) The Council have commissioned PWC to undertake a strategic review of assets that have been purchased with completion expected in November 2020. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	On February 18th Cabinet agreed the approach set out in the Interim Assets Strategy. This included, in the appendices, options for an approach on the future of Croydon Park Hotel. An update with a decision on the future of Croydon Park Hotel is provisionally scheduled for September 2021.	COMPLETE	It was confirmed that the PWC report was produced and was reported to the Cabinet meeting held on 25 November 2020, which included a review of the Asset Investment Fund, including the purchase of the Croydon Park Hotel. Appendix 2 and part 8 of the Interim Assets Disposal Strategy report approved by Cabinet at the meeting held on 18 February 2021 was a 'Summary of Options considered for Croydon Park Hotel.' The agreed action/s was to: 1) Appoint real estate advisors to prepare the marketing strategy for approval by the Council to be procured under the Council's Tender and Contract Regulations. 2) Subject to approval of the strategy, the Council will then seek to appoint the firm to manage the sales process and present bids/offers for the Council to approve also to be procured under the Council's Tender and Contract Regulations.
13(iii)	The s151 officer should review the purchase of Croydon Park Hotel to identify lessons learned to strengthen future due diligence arrangements.	iii) Review and re-write the asset investment strategy that was approved by Cabinet in October 2018 incorporating advice from each of the Strategic	Interim Asset Strategy has been approved at February 18th Cabinet to fast track income generation and achieve "quick wins."	COMPLETE	The Interim Assets Disposal Strategy report was approved by Cabinet at the meeting held on 18 February 2021. There was no evidence of the Asset Investment Strategy being reviewed.

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		Reviews. The review will explicitly consider best practice from the sector and lessons learned from other local authorities, the external auditor and the National Audit Office on effective investment practice.	A 3 year 21-24 Asset Strategy is being developed provisionally set for January 2022 Cabinet.		The Council's forward planner details that an 'Asset Management Plan 2022-24' will be presented to Cabinet in January 2022. The Interim Executive Director of Place has asserted that work in developing an investment strategy has progressed, but Internal Audit is yet to receive evidence of this.
13(iv)	The s151 officer should review the purchase of Croydon Park Hotel to identify lessons learned to strengthen future due diligence arrangements.	iv) Cabinet paper with recommendations to be issued March 2021. Update to be provided at Scrutiny on 9th February	The Interim Assets Disposal Strategy, was discussed at both Cabinet and Scrutiny & Overview Committee in February	COMPLETE	The Interim Assets Disposal Strategy report was approved by Cabinet at the meeting held on 18 February 2021.
14(i)	The Cabinet and Council needs to re-consider the Treasury Management Strategy for ongoing affordability of the borrowing strategy, the associated risks and identify whether alternative options can reduce the financial burden.	i) The Treasury Management Strategy will be reviewed as part of the budget setting for 2021/22 and will take into consideration the outcome of the strategic reviews to factor in the overall financial position and best practice from other local authorities. The report with recommendations on a way forward will be discussed with Cabinet and agreed by Members.	Treasury Management strategy updated and agreed by Council on 8th March 2021	COMPLETE	The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 was approved by Cabinet at the meeting held on 1 March 2021. The above document along with 'Council Tax and Budget' was also presented to Council at the meeting held on 8 March 2021. The minutes of this Council meeting are not yet available.
14(ii)	The Cabinet and Council needs to re-consider the Treasury Management Strategy for ongoing	ii) The outcome of the strategic reviews that the Council have commissioned will inform	See recommendation 14i	COMPLETE	As 14(i) above.

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	affordability of the borrowing strategy, the associated risks and identify whether alternative options can reduce the financial burden.	the Treasury Management Strategy for 21/22 onwards and any changes in governance that may be required.			
15(i)	The Chief Executive should arrange detailed Treasury Management training to assist Members to better understand and challenge the long-term financial implications of matters reported within the Treasury Management Strategy.	i) Members to attend training sessions facilitated by the Local Government Association to cover treasury management to enable better and effective financial leadership.	Treasury management training was offered to all members on the 3rd March 2021.  Session was recorded and will be distributed to all Members and all budget managers.	COMPLETE	The 'Member Learning and Development Needs 2021-22' includes a 'Series of Finance Training' of which Treasury Management was delivered on in March 2021. A copy of the diary entry of the training held on 3 March 2021 for 'Treasury Management Training' was obtained that confirmed that all members of the Council had been invited.  It was confirmed that a copy of the recorded training session – 'Treasury Management Training-20210303_170739-Meeting Recording.mp4' had been retained on SharePoint.
16(i)	The s151 officer should revisit the Minimum Revenue Provision policy to demonstrate that a prudent approach is being taken.	i) Link Asset Management has been commissioned to carry out a review of the Minimum Revenue Position policy. The report with recommendations will be discussed with General Purposes and Audit Committee and then on to Cabinet.	Minimum Revenue Provision Policy Statement 2020/21 went to Cabinet 1st March as part of the Treasury Management Strategy.	COMPLETE	The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 approved by Cabinet at the meeting held on 1 March 2021, as the title alludes, included a 'Minimum Revenue Provision Policy Statement.'  There is no evidence of the report being first discussed with the General Purposes and Audit Committee.
17(ii)	The Cabinet and Council should reconsider the financial business case for continuing to invest in Brick by Brick before	ii) Council to review the risks relating to Brick by Brick to ensure they are appropriately listed on the risk register	The Risks for Brick by Brick have been reviewed and are as follows per the Corporate Risk Register:	COMPLETE	It was confirmed that risk RCS0027 ' <i>There is no effective challenge, review, investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including</i>

Extract from April 2021 update report					Summary of Internal Audit work - Evidence obtained and seen
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	agreeing any further borrowing.		<p>1. Investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC).</p> <p>2. There is no effective challenge, review, investigation or ownership taken on all activities that the Council undertakes by the Executive Leadership Team, Cabinet and all Scrutiny Committees (including GPAC).</p> <p>**These risks specifically relate to financial strategy, treasury management strategy (including borrowing), capital investment strategies and appropriateness of continuing investment and association with BBB**</p> <p>The Corporate Red Risk Register is reviewed monthly at ELT to review and update risks where necessary.</p>		<p>GPAC)' was added to the was added to the Council's risk management system on 19 May 2021.</p> <p>The following risks, relating specifically to Bick by Brick and other subsidiaries were also noted, namely:</p> <ul style="list-style-type: none"> <li>• Risk FIR051 '<i>Risk of financial loss and reputational damage due to the poor performance of Brick By Brick including the Fairfield Halls refurbishment project.</i>'</li> <li>• Risk FIR036 '<i>Robust governance &amp; risk management procedures/frameworks are not activated to safeguard the interests (financial &amp; reputational) of the Council and it's taxpayers within all subsidiary organisations where the Council has an interest.</i>'</li> </ul>
18(i)	The Cabinet and Council should review and reconsider	i) PwC has been commissioned to undertake	This paper went to Scrutiny & Overview Committee and	COMPLETE	It was confirmed that the PWC report was produced and was reported to the Cabinet meeting

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	the ongoing financial rationale for the Council in the equity investment arrangement with Brick by Brick.	a strategic review of Brick by Brick. The report and recommendations will consider the ongoing financial rationale and equity invested and will detail options for the Council that will be considered by the Scrutiny & Overview Committee Cabinet prior to being presented to Cabinet.	<p>Cabinet in February 2021.</p> <p>The Cabinet paper noted that the Council has never made any equity payments, as planned, and is not in the financial position to do so. It was noted BBB sales proceeds were meant to be placed in an account for the Council to apply interest repayment and, if excess, to substantive loan repayment. Unfortunately, this process has not occurred and instead sale proceeds were retained by BBB effectively replacing the Council's equity share.</p> <p>The Council needs to review existing arrangement, change the current agreements or replace it with fresh loans.</p> <p>It is recommended that the current arrangements continue but in a modified way to give Brick by Brick capacity to have working capital to ensure that funds are available to build out units on site</p>		<p>held on 25 November 2020, which included a review of Brick by Brick and also the Revolving Investment Fund. The paper detailed that, <i>'The RIF has not been revolving, because very few of the loans have repaid with £208.8m* tied up in BBB loans with no interest received to date.'</i></p> <p>A report on the 'Review of Brick by Brick Croydon Ltd' was approved by Cabinet on 18 February 201 that <i>'revised funding arrangements be entered into with Brick by Brick to reflect the current loan positions and proposals for the future, including, where relevant, moving to a 100% debt funding position (as opposed to 25% equity and 75% debt); extending relevant loans and repayment periods; allowing delays with repayments of existing loans; agreeing to further funding of no more than £9.99 million in relation to sites proposed for Brick by Brick to continue developing ...'</i> This was also presented to Council on 29 March 2021, but the minutes of this meeting are not yet available.</p> <p>The Treasury Management Strategy Statement, Capital Strategy, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2021/2022 approved by Cabinet at the meeting held on 1 March 2021 detailed that, <i>'No new investments other than a loan for working capital to Brick by Brick will be made in 2021/22.'</i> This was also presented to Council on 8 March 2021, but minutes of this meeting are not yet available.</p>

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LBC Rec. 3 (ii)	Ensuring that Members are appropriately trained across all aspects of the Council's financial duties and responsibilities	ii) Further work on Cabinet development will be undertaken to support members to explore priorities for the new Cabinet, agree how the Members will work together to make the most of shared skills and consider individual and collective leadership styles and ways of working.	LGA have carried out a facilitated session for Cabinet members	COMPLETE	<p>The 'Member Learning and Development Needs 2021-22' includes as item 7 'LGA Training for Cabinet' which is ongoing. The notes for this course detail that 'LGA have carried out a facilitated session for Cabinet – in progress.'</p> <p>The 'Member Learning and Development Needs 2021-22' also included:</p> <ol style="list-style-type: none"> <li>1) A 'Series of Finance Training' of which Treasury Management was delivered in March 2021, with sessions on 'Financial management / Budget setting', 'Financial Strategy and Monitoring', 'Commercial Investment', Council's funding sources / reserves', 'Transformation funding' and 'Commissioning and Procurement being planned.</li> <li>2) 'Education Funding and Budgets' which was 'Delivered to CYP Scrutiny and members of both Cons and Lab Groups' in January 2021.</li> </ol>
LBC Rec. 4 (viii)	The Council develops an improvement programme that has the necessary elements for it to function effectively and within its financial resource.	viii) Ensure the actions contained in this plan are supported by a corporate programme office that can provide assurance to Members.	A PMO office has been established dedicated to coordinating and supporting the delivery of key improvement actions across the Council. This includes recommendations in the MHCLG Rapid Review, the RIPI and the Croydon Renewal Plan.	COMPLETE	<p>It was confirmed that a Project Management Office (PMO) has been established. The Council's intranet details that, '<i>The PMO was set up in April 2020 to ensure the Council approach to delivering programmes and projects is both consistent and thorough.</i>'</p> <p>It was also confirmed, (in completing this internal audit work to confirm the completed RIPI actions), that a Business Improvement Officer from the PMO had been specifically assigned to help co-ordinate and support the delivery of the RIPI actions.</p>

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LBC Rec. 4 (ix)	The Council develops an improvement programme that has the necessary elements for it to function effectively and within its financial resource.	ix) Corporate level sponsorship to be allocated to all projects to ensure clarity of responsibility for delivery	ELT members already allocated across all actions. Further project managers to be identified to deliver the recommendations	COMPLETE	Examination of the RIPI action plan confirms that each action has been assigned to an ELT member.



<b>REPORT TO:</b>	<b>Cabinet 15 November 2021</b>
<b>SUBJECT:</b>	<b>Community Safety Strategy</b>
<b>LEAD OFFICER:</b>	<b>Sarah Hayward - Interim Corporate Director Sustainable Communities, Regeneration &amp; Economic Recovery</b>
<b>CABINET MEMBER:</b>	<b>Councillor Manju Shahul-Hameed Cabinet Member for Communities, Safety and Business Recovery</b>
<b>WARDS:</b>	<b>All</b>
<p><b>COUNCIL PRIORITIES 2020-2024</b></p> <p>Delivering for Croydon, ensuring that safety and communities are at the heart of our delivery and map the progress made on the renewal of the Community Safety Strategy. <a href="#">Council's priorities</a></p>	
<p><b>FINANCIAL IMPACT</b></p> <p>There are no financial implications.</p>	
<p><b>FORWARD PLAN KEY DECISION REFERENCE NO.: This is not a Key Decision.</b></p>	

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. Recommend to Full Council the adoption of the Community Safety Strategy, Appendix 1 hereto.

**2. EXECUTIVE SUMMARY**

- 2.1 This report provides the recommendation of the Community Safety strategy to full Council.

**3. THE ROLE OF THE SAFER CROYDON PARTNERSHIP (“SCP”)**

- 3.1 The Safer Croydon partnership (“SCP”) covers community safety. It acts as the statutory Crime and Disorder Reduction Partnership (CDRP) for Croydon, as required by the Crime and Disorder Act 1998. The partnership includes the council, police, fire services, probation and health agencies, as well as businesses, community and voluntary sector organisations. The Safer Croydon Partnership works to cut crime, help neighbourhoods fight disorder and reduce reoffending.

- 3.2 This are a number of multi-agency programme boards that have delegated responsibility on behalf of the Safer Croydon Partnership, The purpose of the boards is to coordinate the delivery of actions that supported the strategic aim of the partnership in accordance with the 2017 – 2021 Safer Croydon Community Safety Strategy. The Boards will continue to play a role in co-ordinating the delivery of the proposed Community Safety Strategy 2022-2024

#### **4. SAFER CROYDON PARTNERSHIP: STRATEGIC ASSESSMENT**

- 4.1 On a yearly basis, the Violence Reduction Network lead on producing the evidence-based data product for the SCP – the Strategic Assessment- which gives an overview of the current and long-term issues affecting or likely to affect a specific area or borough.
- 4.2 The Strategic Assessment is used to make inferences and provide recommendations for prevention, intelligence, enforcement and reassurance priorities as well as to inform the future partnership strategy. This assessment must address specific elements in relation to crime and disorder (which encompasses anti-social behaviour) including the misuse of drugs, alcohol and other substances and reoffending so that the SCP can fulfil its statutory duty to produce a plan or strategy which deals with the reduction of the issues mentioned above. The Strategic Assessment is used to formulate the Community Safety Strategy which provides direction for the partnership in deploying resources efficiently to reduce crime and ASB in the borough and achieving other statutory objectives around reducing reoffending and reducing the misuse of substances such as drugs and alcohol.

#### **5. STRATEGY**

- 5.1 The current Community Safety Strategy runs from 2017 to 2020. The strategy was further extended in 2020 for an additional year and is due to expire on the 31<sup>st</sup> December 2021.
- 5.2 Croydon adopted a public health approach to reducing violence in June 2019 and has established a violence reduction network which has started to implement that approach. This new Community Safety Strategy 2022-2024 has focused on the Public Health approach to Violence Reduction by putting evidence at the heart of the strategy and actively involved a greater number of people and partners in the proposed solutions to reduce violence in the borough.

#### **6. KEY THEMES**

- 6.1 Taking the findings of the evidence-based data strategic assessment for 2020 and 2021 as well as other sources of evidence such as information from the Mayor's Office for Policing and Crime (MOPAC), feedback from partners at the Safer Croydon Partnership, information from the SCP Programme Boards as well as feedback the voluntary and community sector (VCS) have fed through a number of key themes were identified, these included:

- Domestic abuse  
Including how we can better support victims, challenge perpetrators and support them to change, and help people thrive once they've left violence.
- Protecting young people from violence and exploitation  
Including ensuring children's voices are heard and the partnership are protecting young people from violence and exploitation.
- Disproportionality in the criminal justice system  
Some people are treated differently by a range of public institutions, and this can have an impact on how they experience violence.
- Resilience, trauma and trust  
Different people have different protective factors, ranging from personal resilience to trust in other people and organisations. We need to understand how to foster the protective factors in individuals and communities.
- A focus on high priority neighbourhoods  
The strategic assessment identified nine priority areas in the borough which the Partnership should focus on because they are high in crime, Anti-Social Behaviour and the causes of crime.

6.2 The themes identified have been addressed in the draft Community Safety Strategy 2022-2024, Appendix 1, and will contribute to delivering against the following Council Corporate Plan themes and objectives;

- Everyone feels safer in their street, neighbourhood and home;
- People live long, healthy, happy and independent lives;
- Our children and young people thrive and reach their full potential

## **7. ENGAGEMENT**

7.1 The development of the new Community Safety Strategy was a genuinely collaborative approach with all parts of SCP having an input. In addition, and the development process included views and ideas from residents, communities and partners external to the SCP who were engaged with.

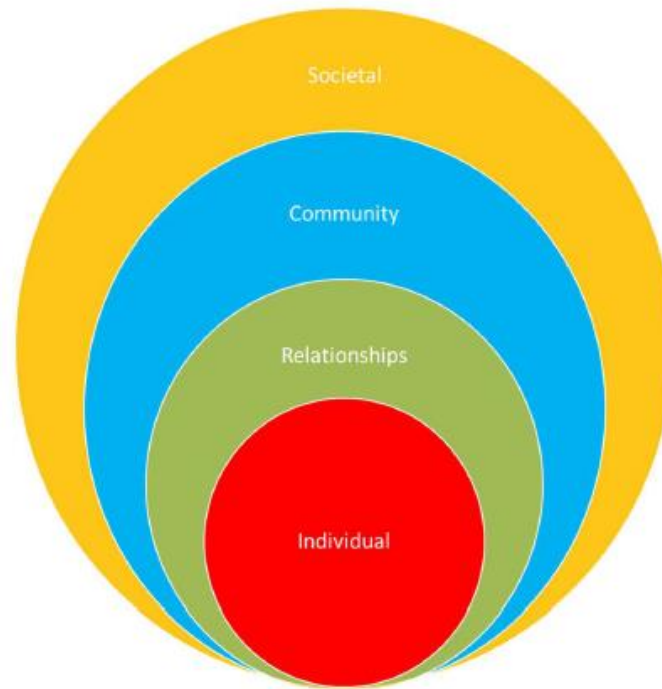
7.2 Voluntary sector partners that are either involved directly in violence and safety work, or those who help support people to divert people from crime and violence or support people and communities in its aftermath were also engaged with.

7.3 Representatives from all the programme boards which tackle specific themes (Youth Crime Board, Reduce Reoffending Board, Counter Extremism and Prevent Board, Domestic Violence and Sexual Violence) were also actively involved in the process. The engagement took place over a number of months and a variety of meetings where partners on the SCP discussed key themes, what the SCP and constituent partners are currently doing, what needs to be done and key actions for the new Community Safety Strategy. Partners were also asked to provide written feedback as part of the process.

- 7.4 The Health and Wellbeing Board also held a “Knife Crime Workshop” where discussions were held on what was working well and what areas needed improvement.
- 7.5 Two surveys were designed so that the views of local residents on key themes could be heard. Both surveys were circulated by the partnership and completed by a range of residents within Croydon. The purpose of the surveys was to hear resident’s views on where they felt safe geographically in the borough (wards), what settings they feel unsafe in (Public transport, public spaces), if they have experienced/ witnessed any violence, whether they would they report incidents to the partnership members and what could be done to improve their safety.
- 7.6 One survey centred on young People & Crime and was completed by young residents aged up to 25 years old. The purpose of the survey was to identify what areas people felt unsafe in and how we could improve safety in areas. In the last six months, 451 responses have been received. The survey was circulated by the Director of Education, Youth Offending Service (YOS) and the partnership. The Youth Engagement team also conducted surveys with young people when they carried out their outreach work.
- 7.7 The second survey focused on safety for women and girls which also identified areas where residents did not feel safe and what would need to take place in order to improve their safety. 1,245 responses have been received in the last six months. The survey was circulated by the Family Justice Centre (FJC), partners who work with the community to address Domestic Abuse and Sexual Violence as well as violence against women and girls. There was a degree of duplication with the surveys due to the age of respondents but responses were not double counted. There was a degree of overlap because both surveys covered girls which could have potentially fallen within the earlier survey but this did not entail us double counting responses.

## **8 PUBLIC HEALTH APPROACH**

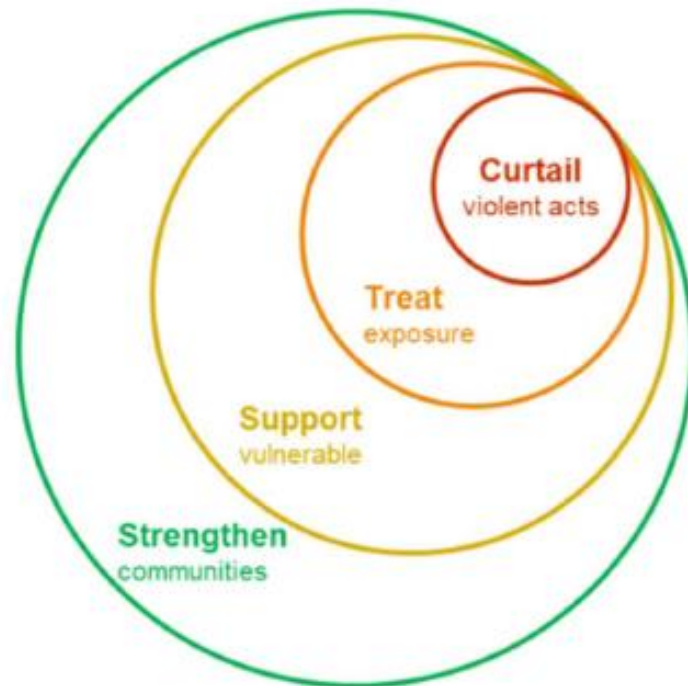
- 8.1 The borough’s Violence Reduction Network (VRN) has adopted the public health approach in reducing violence. This is also used by the London-wide Violence Reduction Unit which was set up by the Mayor of London in late 2018, who adopted it from Police Scotland where it was first used to reduce violence in 2005 and it was proven to be very effective. The public health approach involves a holistic view of both violence and coercion. It adopts an ecological framework based on evidence that no single factor can explain why some people or groups are at higher risk of interpersonal violence, while others are more protected from it. This framework views interpersonal violence as the outcome of interaction among many factors at four levels.



8.2 The ecological framework of the public health approach:

- These include economic and social policies that maintain socioeconomic inequalities between people, the availability of weapons, and social and cultural norms such as parental dominance over children and cultural norms that endorse violence as an acceptable method to resolve.
- The contexts in which social relationships occur, such as schools, neighbourhoods and workplaces, also influence violence. Risk factors here may include the level of unemployment, population density, mobility and the existence of a local drug or gun trade.
- Family, friends, intimate partners and peers may influence the risks of becoming a victim or perpetrator of violence. For example, having violent friends may influence whether a young person engages in or becomes a victim of violence.
- Personal history and biological factors influence how individuals behave and increase their likelihood of becoming a victim or a perpetrator of violence including being a victim of child maltreatment, psychological or personality disorders, alcohol and/or substance abuse.

8.3 A more practical way of showing how the VRN adopts this ecological framework in reducing violence is by embedding the following core actions in its approach shown in the figure below as used by Waltham Forest:



- Curtail violent acts at source, pursuing perpetrators and enforcing action.
- Treat those who have been exposed to violence to control the spread.
- Support those susceptible to violence due to their exposure to risk factors.
- Strengthen community resilience through a universal approach.

8.4 To achieve this there must be a holistic networked approach to tackling violence involving a wide range of relevant partners. It is also vital that data is at the heart of how the VRN and the partnership will operate. The proposed Community Safety Strategy which is attached continues to focus on our Public Health approach to Violence Reduction

## 9. PRE-DECISION SCRUTINY

9.1 On 7 September 2021, the Scrutiny & Overview Committee reached the following conclusions:-

- The Committee was strongly supportive of the broad themes identified for the new strategy, agreeing that these were the correct ones for Croydon.
- However, it was acknowledged that it would be a challenge to translate the strategy to an operational level that made a difference to the public in Croydon.
- The Committee was satisfied that there was evidence to indicate there was strong partnership working amongst the partners in the Community Safety Partnership.
- The Committee was encouraged that there was an acknowledgment of the importance to the delivery of the strategy of having both measurable and achievable targets.

- It was agreed that the Committee would look to review the Community Safety Strategy after twelve months to ensure that it was having the intended impact, that the targets were effective in managing delivery.

## **10 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS**

- 10.1 The Interim Director of Finance has confirmed that there are no financial aspects to this strategy.
- 10.2 Approved by: Matt Davis, Interim Director of Finance.

## **11. LEGAL CONSIDERATIONS**

- 11.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that Community Safety Partnerships, formerly known as Crime and Disorder Reduction Partnerships, were established under the Crime and Disorder Act 1998 to help tackle crime and reduce reoffending. Community Safety Partnerships are made up of representatives from 'responsible authorities' including: police, probation service, local authorities, health, fire and rescue authorities who are responsible for developing strategies for reducing crime and offending in their areas. There has also been a mutual duty on Police and Crime Commissioners and Community Safety Partnerships to cooperate on reducing crime and offending under provisions of the Police Reform and Social Responsibility Act 2011.
- 11.2 In summary, the responsible authorities have a statutory duty to work together to: reduce re-offending; tackle crime and disorder; tackle anti-social behaviour; tackle alcohol and substance misuse; and tackle any other behaviour which has a negative effect on the local environment. Community Safety Partnerships may also work with any other local partners they wish to, including business representatives and the voluntary and community sector. In carrying out their statutory duties, Community Safety Partnerships also have further obligations including: setting up a strategic group to direct the work of the partnership; to regularly engage and consult with the community about their priorities and progress achieving them; to set up protocols and systems for sharing information; analyse a wide range of data, including recorded crime levels and patterns, in order to identify priorities in an annual strategic assessment; set out a partnership plan and monitor progress; produce a strategy to reduce reoffending; and commission domestic violence homicide reviews (under the Domestic Violence, Crime and Victims Act 2004).
- 11.3 Section 6 of the Crime and Disorder Act 1998 as amended provides that the responsible authorities for a local government area shall, formulate and implement, in accordance with section 5 of that Act and regulations published thereunder—(a) a strategy for the reduction of crime and disorder in the area (including anti-social and other behaviour adversely affecting the local environment); and (b) a strategy for combatting the misuse of drugs, alcohol and other substances in the area; and (c) a strategy for the reduction of re-offending in the area. In this regard, the relevant regulations are The Crime and Disorder (Formulation and Implementation of Strategy) Regulations 2007, as amended. ("The Regulations").

- 11.4 The Regulations provide that for each area there shall be a strategy group whose functions shall be to— (a) prepare strategic assessments; and (b) prepare and implement a partnership plan, for that area on behalf of the responsible authorities. In this context, the Safer Croydon Partnership fulfils this role of strategy group and the partnership plan is referred to as the Community Safety Strategy.
- 11.5 The regulations provide that the partnership plan shall set out—
- (a) a strategy for the reduction of re-offending, crime and disorder and for combating substance misuse in the area ;
  - (b) the priorities identified in the strategic assessment prepared during the year prior;
  - (c) the steps the strategy group considers it necessary for the responsible authorities to take to implement that strategy and meet those priorities;
  - (d) how the strategy group considers the responsible authorities should allocate and deploy their resources to implement that strategy and meet those priorities; (e) the steps each responsible authority shall take to measure its success in implementing the strategy and meeting those priorities; and
  - (f) the steps the strategy group proposes to take during the year to comply with its obligations under regulations 12, 13 and 14 which pertain variously to community engagement and publication of a summary of the partnership plan.
- 11.6 The strategy group is required to publish in the area a summary of the partnership plan in such form as it considers appropriate, having regard to the need to bring it to the attention of as many different groups or persons within the area as is reasonable.
- 11.7 As various work streams which form part of the proposed strategy are brought forward, further legal consideration may be required on the implementation of the recommendations in the report.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

## **12. HUMAN RESOURCES IMPACT**

- 12.1 There is no human resources impact from this decision. If any should arise this will be managed under the Council policies and procedures.
- 12.2 Approved by: Jennifer Sankar, Head of HR Place & Housing on behalf of the Director of Human Resources.

## **13. EQUALITIES IMPACT**

- 13.1 An Equality Analysis Form has been completed and reviewed by the Council's Equalities Manager to ensure that strategy is in accordance with the Equalities



Act 2010. The Equality Analysis ensured that the appropriate steps have been considered to ensure the strategy would not have a negative impact on those who have protected characteristics. It predominantly highlighted that the strategy is informed by the data-led Strategic Assessment, the relevant partners under the SCP and community feedback through resident surveys. The strategy includes and supports the priorities of other local and pan-London strategies too which were listed in the analysis. Altogether, this provides a holistic approach in improving the safety of the community inclusive of protective characteristics, ensuring to eliminate potential negative impact.

13.2 Approved by: Denise McCausland, Equalities Manager.

## **14. ENVIRONMENT AND CLIMATE CHANGE IMPACT**

14.1 There is no climate change impact, there is no environmental impact because behaviour that adversely affects the local environment is also under the umbrella of crime and disorder functions detailed below.

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

15.1 Section 17 of the Crime and Disorder Act 1998 says that without prejudice to any other obligation imposed on it, it shall be the duty of the Council to exercise its various functions with due regard to the likely effect of the exercise of those functions, and the need to do all that it reasonably can to prevent crime and disorder in its area. This duty requires the Council to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); the misuse of drugs, alcohol and other substances in its area; and re-offending in its area.

15.2 By Section 6 of the same Act the Council and its partners are required to formulate and implement a strategy for the reduction of crime and disorder in the area.

15.3 Therefore there are two duties. The first is to formulate and implement a crime reduction strategy. This is about crime which already exists. The second is crime and disorder prevention.

15.4 Domestic Violence, Crime and Victims Act 2004 places a requirement on Community Safety Partnerships to conduct Domestic Homicide Reviews and this came into effect on 13th April 2011. Tackling domestic abuse remains a priority for the Partnership. The Partnership want to support victims better, challenge perpetrators and support them to change, and help people to thrive once they have left abusive relationships

15.5 An additional theme of the strategy is ensuring children's voices are heard and the partnership are protecting young people from violence and exploitation. Between 2014 and 2016 a number of pieces of legislation were introduced, including the Care Act 2014, Counter-Terrorism and Security Act 2015, Serious

Crime Act 2015, Modern Slavery Act 2015 and Psychoactive Substances Act 2016. Legislation introduced duties including new reporting, referral and decision-making mechanisms, staff awareness requirements and impacts on contract management in the work of relevant organisations.

- 15.6 Associated with the above mentioned theme, the Counter Terrorism and Security Act 2015 places a legal duty on local authorities “when exercising its functions, to have due regard to the need to prevent people from being drawn into terrorism”

## **18. DATA PROTECTION IMPLICATIONS**

### **18.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF ‘PERSONAL DATA’?**

**NO**

### **18.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**NO**

- 18.3 Approved by: Sarah Hayward, Interim Corporate Director of Sustainable Communities, Regeneration & Economic Recovery.

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### **CONTACT OFFICER:**

Christopher Rowney, Head of the Violence Reduction Network.

### **APPENDICES TO THIS REPORT**

Appendix 1 - Draft Community Safety Strategy 2022 - 2024

### **BACKGROUND PAPERS**

None.

# Community Safety Strategy

2022 to 2024

Delivering for Croydon

**CROYDON**  
[www.croydon.gov.uk](http://www.croydon.gov.uk)

## Foreword

### **The Safer Croydon Partnership (SCP) acts as the statutory Community Safety Partnership for Croydon, as stipulated by the Crime and Disorder Act 1998.**

The SCP is responsible for co-ordinating the development and implementation of Croydon's Community Safety Strategy. The partnership comprises the police, council, fire, probation and health agencies, as well as businesses, and community and voluntary sector organisations. It works with other boards on Croydon's Local Strategic Partnership on crime and safety matters, in particular the Safeguarding Children Partnership and the Adults Safeguarding Board.

Croydon is geographically the fifth largest borough in London covering 86 square kilometres. At 388,563 people, Croydon has the second largest population in London. Almost a fifth of the population is aged 60 or above. However, Croydon has the highest number of residents aged 0 to 19 years of age and the highest number of looked after children in the capital, which has implications for the types of services we need to provide for young people

Croydon ranks as the 17th least deprived out of the 33 London boroughs. However, this average hides the pockets of high deprivation within Croydon. One small area of Croydon is the third most deprived area in London (out of 4,642 small areas) and some 8,950 people live in areas that are amongst the 10% most deprived areas in the country.

In 2020, there was a 1.7% decrease in crime in Croydon compared to the year before. This may be compared with reductions of 14.2% in London and 8% nationally. These falls can be linked to the restrictions imposed on society during the Covid-19 pandemic. However, the lockdowns also brought about new challenges.

Violence represents around a third of all crime in the borough. In 2020, there was an 11% increase in the number of violent offences in Croydon, the highest total in the capital. London saw a 1% decrease in violence in the same period. This significant rise is largely attributable to an increase in domestic abuse, fuelled by lockdowns.

Croydon is a diverse, friendly and vibrant borough full of people living busy lives and helping to create supportive communities. However, we have seen violent incidents in our borough, across London as well as nationally, with the tragic loss of young people killed on our streets, women and young girls targeted in public places as well as experiencing violence at home, and public figures killed while carrying out their civic duties. We are working together as a partnership to ensure that people from all of our communities feel safe in their homes and neighbourhoods

We have sought to develop a collaborative strategy with all parts of Croydon's partnership and communities.

This strategy supports the priorities of the Mayor's Office for Policing and Crime (MOPAC) as set out in the [Police and Crime Plan for London 2017 to 2021](#): a better police service for London; a better criminal justice service for London; keeping children

and young people safe; tackling violence against women and girls; and standing together against hatred and violence.

Croydon adopted a public health approach to reducing violence in June 2019 and has since started work to create a violence reduction network in order to implement it. A number of themes and principles were developed:

**Theme One - Using Data to drive our approach-** Building a strong evidence base and a common screening tool that can be used across organisations to predict who, where and why individuals and families are more likely to be involved in violent or aggressive behaviours and identifying the interventions that will have the maximum impact.

**Theme Two - Preventing Violence before It Occurs** - Looks at the periods and key influences in a person's life journey, from pre-birth to adulthood which can increase the risks of becoming involved in violent behaviour and the opportunities when interventions can be most effective.

**Theme Three - Community Based Support** – Recognises the strength of the Community and Voluntary Sector in Croydon and places them at the heart of Croydon's public health approach to violence reduction. It promotes combining skills and enabling voluntary and community organisations to support people and families collaboratively.

**Theme Four - Targeted Interventions** - It uses the principles of a family centred approach aimed at addressing violence, by looking at the wider family and connected family dynamics, based on clear safeguarding, case management approaches.

**Theme Five – Intensive Interventions and Enforcement** – Sets out an intention to offer personalised support for those who are motivated to step away from a life of violence, whilst using the full range of enforcement across all agencies, against those whose behaviour places themselves, those around them, or the wider community at risk of harm.

The principles set out in the Framework for The Public Health Approach to Violence Reduction in Croydon are issues that have been consistently voiced at community meetings, with young people and by those directly affected by violence, offenders, victims and families.

- Every person understands the role they can play in reducing violence –Embedding trauma informed practice across local authority, health, schools, colleges, community and voluntary agencies, business sector and criminal justice agencies.
- Developing community-based networks to help those impacted by violence navigate the challenges they face – Identifying and training individuals who have influence in their local area to provide support for young people and families who are at risk of or affected by violence and guide them into support services.
- Focusing on the vocabulary of INCLUSION – Supported by the evidence from the Croydon Vulnerable Adolescent Review published by the Croydon Safeguarding Children Board in February 2019, to build a collaborative, partnership approach to

inclusion, including the development of an 'Inclusion Intervention Offer' in schools and colleges, or as part of a work readiness programme.

- Recognition of the importance of culture and identity for families and young people - The challenges of culture and identity within families are becoming increasingly relevant in terms of violence prevention. This priority proposes embedding an understanding of culture and identity within the family dynamics within contextual safeguarding and trauma awareness training for the Borough and as part of the screening and assessment process for families and vulnerable young people.
- Social media and violence – Sets out a series of Prevention and Intervention steps to improve the awareness of the impact of exposure to violent social media content for families, guardians and those working with young people

The above inform the four elements of this new Community Safety Strategy:

1. **Curtail** violent acts at source, pursuing perpetrators and enforcing action.
2. **Treat** those who have been exposed to violence to control the spread.
3. **Support** those susceptible to violence due to their exposure risk factors.
4. **Strengthen** community resilience through a universal approach.

This new Community Safety Strategy focuses on all of the above and seeks to strengthen it by actively involving a greater number of people and partners in our solutions to reduce violence in the borough. We have worked with a wide range of institutions represented on the Safer Croydon Partnership Board to develop the new strategy. We have involved our voluntary sector partners who participate directly in violence and safety work. Our strategy has also been informed by the views of residents and communities, particularly through surveys of young people and women and girls.

Engagement with the local communities is important both in order to contribute to our understanding of the causes and impact of crime, but also in order to work with them to tackle the underlying causes. We also need to provide reassurance of our determination to reduce crime and our progress in doing so. We will continue to learn from partners about the methods of communication and engagement that are working well for them.

Taking account of the evidence from the 2021 Strategic Crime Assessment, the views of stakeholders and findings from public engagement, our strategic priorities for the next three years will be:

1. **Tackle domestic abuse**
2. **Protect young people from violence and exploitation**
3. **Tackle disproportionality in the criminal justice system**
4. **Strengthen community resilience, offer trauma-informed services, focusing on Hate Crime, and build trust in the partnership**
5. **Focus on high priority neighbourhoods**

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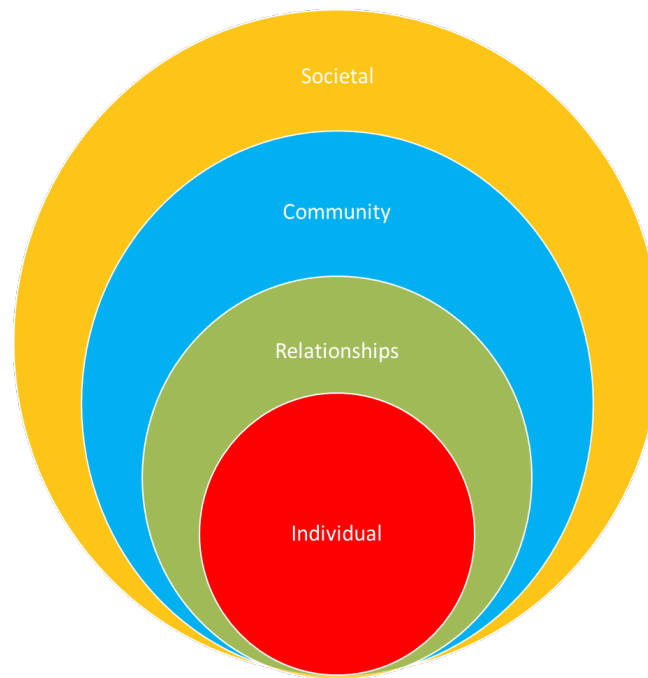
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## 1. Our Approach

### The public health model

Croydon's Violence Reduction Network (VRN) has adopted the public health approach in reducing violence. This strategy details how we will implement it.

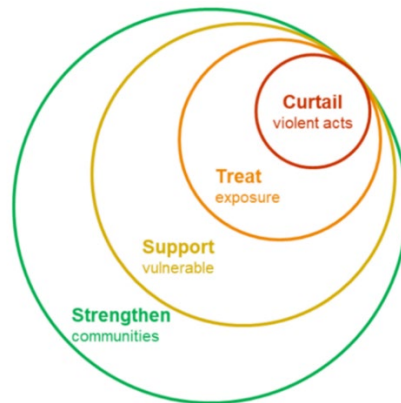
The approach takes a holistic view of both violence and coercion, based on evidence that no single factor can explain why some people or groups are at higher risk of interpersonal violence, while others are more protected from it. This framework views interpersonal violence as the outcome of interaction among many factors at four levels:



- **Community:** the contexts where social relationships occur (such as school, neighbourhoods and workplaces) also influence violence. Risk factors may include the level of unemployment, population density, mobility and existence of a local drug or gun trade
- **Relationships:** influence the likelihood of an individual becoming a victim or perpetrator of violence (family, friends, intimate partners and peers – e.g. violent friends)
- **Individual:** personal history and biological factors increase the likelihood of an individual becoming a victim or a perpetrator of violence (including being a victim of child maltreatment, psychological or personality disorders, alcohol or substance misuse)



The core actions of a public health approach to reduce violence are summarised in the figure below, as used by Waltham Forest's Violence Reduction Partnership:



- **Treat** those who have been exposed to violence to control the spread.
- **Support** those susceptible to violence due to their exposure to risk factors.
- **Strengthen** community resilience through a universal approach.

To achieve this there must be a holistic networked approach to tackling violence involving a wide range of relevant partners. It is also vital that data and lived experience are at the heart of how the VRN and the partnership operate.

#### Problem-oriented approach

We regard crime in an area as a problem, not an individual incident. For a crime to occur, three components are needed: a likely offender, a victim or target, and the absence of a guardian.

We focus on the underlying causes of those problems and how to tackle them. We assess places (where and when crime happens), victims and offenders and their respective potential controllers: the manager (e.g. a guard or security door), the guardian and the handler (e.g. parent, teacher or mentor) as shown below. Cross-cutting issues are identified, for addressing through a collaborative strategic plan.



## Crime harm, the 'Felonious Few', high priority victims and hotspots

We use the Cambridge Crime Harm Index to calculate how harmful a crime is relative to other crimes as a tool for focussing resources. The index multiplies each offence by the number of days in prison that crime would attract if an offender were to be convicted of committing it, based on no previous offending history.

Most crime, specifically crime harm, is committed by a small fraction of offenders against a small fraction of victims in a small fraction of locations. The Partnership will refocus its limited resources on, respectively, the 'Felonious Few', high priority victims and hotspots, to increase the chance of crime reduction, particularly concerning those targets which give rise to serious harm.

## Evidenced-based action

Any new method or approach we adopt to reduce crime must be based on evidence to avoid wasting time and resources on ineffective or less efficacious measures. The VRN ensures this through what is known as the "Triple-T Strategy" - targeting, testing and tracking:

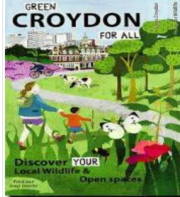



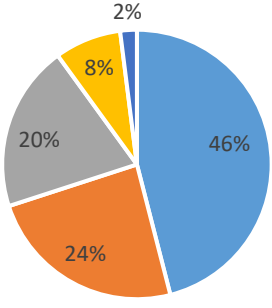
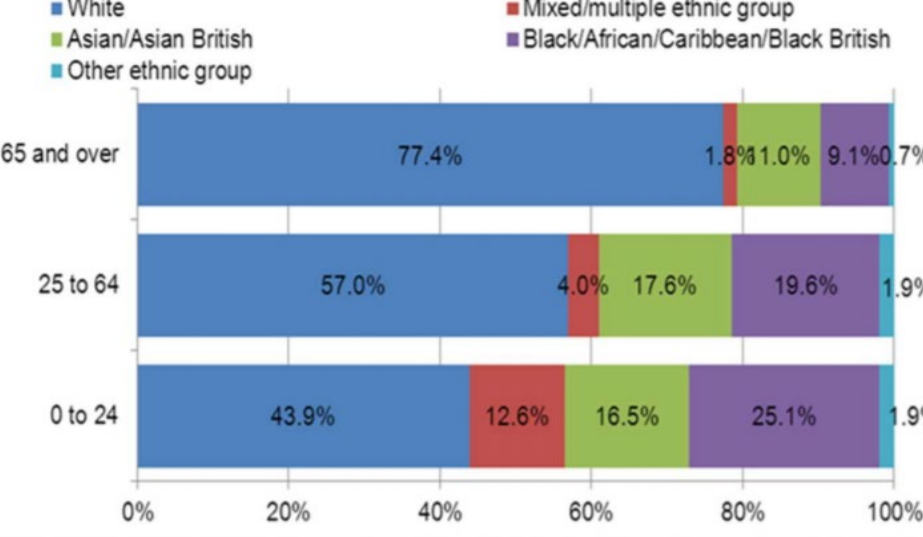
**Targeting:** It systematically identifies, ranks and compares the levels of harm linked to various crime "units", whether they be places, times or people.







**Testing:** Having identified the high harm target areas, the VRN reviews and tests methods to identify which is the most effective at reducing the harm.

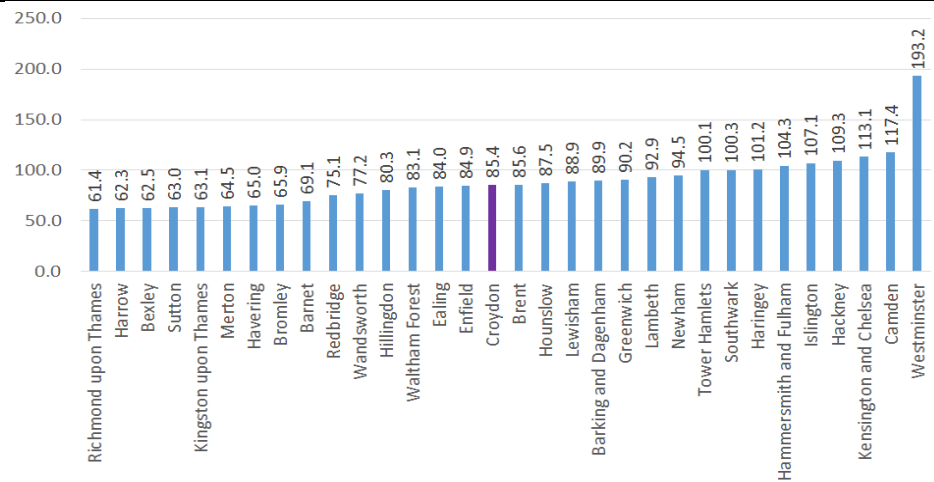
**Tracking:** It then generates and uses internal evidence to track the delivery and evaluate the effectiveness of the approach. The new tracking data forms the basis of new research and more reliable evidence of "what works".

For more information on the Partnership's approach, see the Strategic Assessment 2021 (pages 3-5).

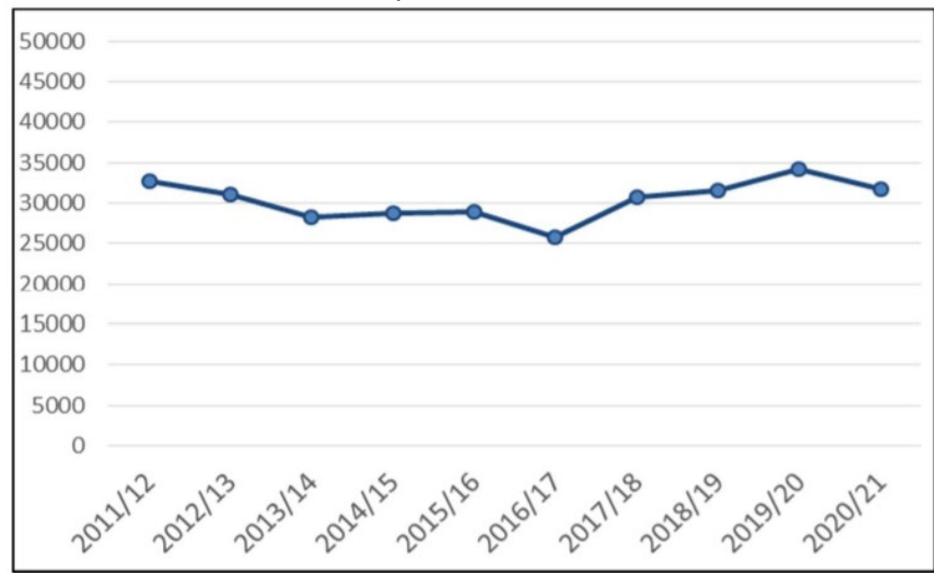
## 2. Croydon Facts

	<p>Croydon is London's southern-most borough and covers an area of 34 square miles (87km<sup>2</sup>). It is one of London's biggest local retail and commercial centres, with good rail, tram and road links, more than 120 parks and open spaces and some of London's most expensive housing.</p>																																				
	<p>Home to around 388,600 people, Croydon is the second largest London borough in terms of population and is continuing to grow. It is projected to grow by another 20,000 by 2043.</p>																																				
	<p>Croydon has the largest population of 0-19 year olds in London at 103,300 residents (Estimate ONS 2020), who make up 27% of the borough's total population.</p>																																				
	<p>Croydon Ethnic Group Profile in 2021 (GLA 2016 housing-led projections by ethnicity):</p> <div data-bbox="459 853 1401 1391" style="border: 1px solid #ccc; padding: 10px; margin: 10px 0;"> <p style="text-align: center;">Croydon Ethnic Group Profile 2021</p>  <table border="1" style="margin: 10px auto; border-collapse: collapse;"> <thead> <tr> <th>Ethnicity</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>White</td> <td>46%</td> </tr> <tr> <td>Black</td> <td>24%</td> </tr> <tr> <td>Asian</td> <td>20%</td> </tr> <tr> <td>Mixed</td> <td>8%</td> </tr> <tr> <td>Other</td> <td>2%</td> </tr> </tbody> </table> </div> <p>There was more diversity in the younger age group population in Croydon (Census 2011)</p> <div data-bbox="459 1480 1401 2031" style="border: 1px solid #ccc; padding: 10px; margin: 10px 0;">  <table border="1" style="margin: 10px auto; border-collapse: collapse;"> <thead> <tr> <th>Age Group</th> <th>White</th> <th>Black/African/Caribbean/Black British</th> <th>Asian/Asian British</th> <th>Mixed/multiple ethnic group</th> <th>Other ethnic group</th> </tr> </thead> <tbody> <tr> <td>65 and over</td> <td>77.4%</td> <td>9.1%</td> <td>1.0%</td> <td>1.8%</td> <td>0.7%</td> </tr> <tr> <td>25 to 64</td> <td>57.0%</td> <td>19.6%</td> <td>17.6%</td> <td>4.0%</td> <td>1.9%</td> </tr> <tr> <td>0 to 24</td> <td>43.9%</td> <td>25.1%</td> <td>16.5%</td> <td>12.6%</td> <td>1.9%</td> </tr> </tbody> </table> </div>	Ethnicity	Percentage	White	46%	Black	24%	Asian	20%	Mixed	8%	Other	2%	Age Group	White	Black/African/Caribbean/Black British	Asian/Asian British	Mixed/multiple ethnic group	Other ethnic group	65 and over	77.4%	9.1%	1.0%	1.8%	0.7%	25 to 64	57.0%	19.6%	17.6%	4.0%	1.9%	0 to 24	43.9%	25.1%	16.5%	12.6%	1.9%
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Other	2%																																				
Age Group	White	Black/African/Caribbean/Black British	Asian/Asian British	Mixed/multiple ethnic group	Other ethnic group																																
65 and over	77.4%	9.1%	1.0%	1.8%	0.7%																																
25 to 64	57.0%	19.6%	17.6%	4.0%	1.9%																																
0 to 24	43.9%	25.1%	16.5%	12.6%	1.9%																																

	<p>Croydon has become relatively less deprived compared to other local authorities in England between 2015 and 2019. There are pockets of deprivation and one small area of Croydon is the third most deprived area in London (out of 4,642 small areas) and some 8,950 people live in areas that are amongst the 10% most deprived areas in the country.</p>
	<p>Levels of permanent exclusions from primary and secondary schools in Croydon are lower than both the national and regional average rates (2019). Permanent exclusions were 0.06% in 2017/18, compared with 0.08% in London and 0.1% in England.</p> <p>The proportion of 16 and 17 year olds in education or training in Croydon (94.0% in 2019) has been in line with both regional and national averages for the past 3 years.</p>
	<p>The proportion of out of work claimants has risen by around 3% since March 2020 – directly as a result of the impact of the Covid-19 pandemic on the economy.</p> <p>The claimant count (not all unemployed) in July 2021 was 8.3% of the resident population of working age (up 3.9 percentage points from 4.4% in March 2020, but down 1.2 percentage points since the peak in March 2021). Croydon has a higher proportion of claimants compared to the region and national figure.</p>
	<p>The number of looked after children in Croydon is the highest in London (791 in March 2020)</p>
	<p>For 2020, the rates of children in need referrals and child protection referrals (563.0) per 10,000 children are much higher than the rates in London and England</p>
	<p>The number of homeless households in temporary accommodation on March 2021 was 2,029, of which 1,475 included children (Q4 2021 MHCLG)</p>
	<p>Rate of total notifiable offences per '000 resident population (year to 31 December 2020) was 85.4. Source MPS, Borough Volume and Trends dashboard</p>



After a downward trend, the number of offences increased from 2016/2017. However, the year since the start of the pandemic in March 2020 has seen a drop in numbers. Source: MPS



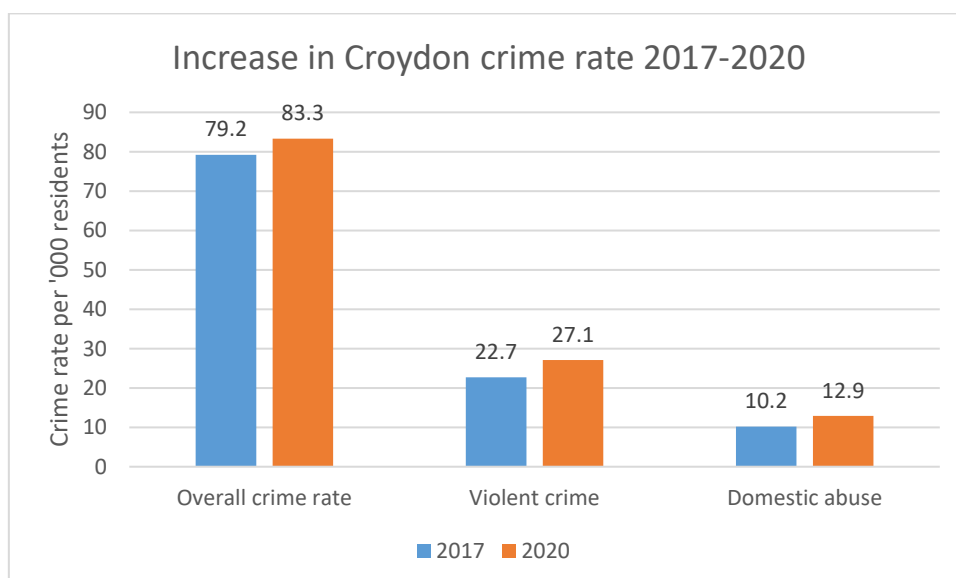
### 3. Key Outcomes 2017-21

The Covid-19 pandemic has caused fluctuations in crime and anti-social behaviour on a global, national and local scale. Government-imposed restrictions on society throughout 2020 had the effect of suppressing many types of crime. However, they were also a catalyst for other types of crime to increase. The overall effect is reflected in statistics that show a fall in crime in Croydon of only 2% in 2020, compared to the year before. Though some types of crime have been police driven – like drugs offences – it is violence that remains the main contributor to high crime in the borough.

Some of the outcomes achieved over the last four years are set out under each theme of the 2017-20 strategy:

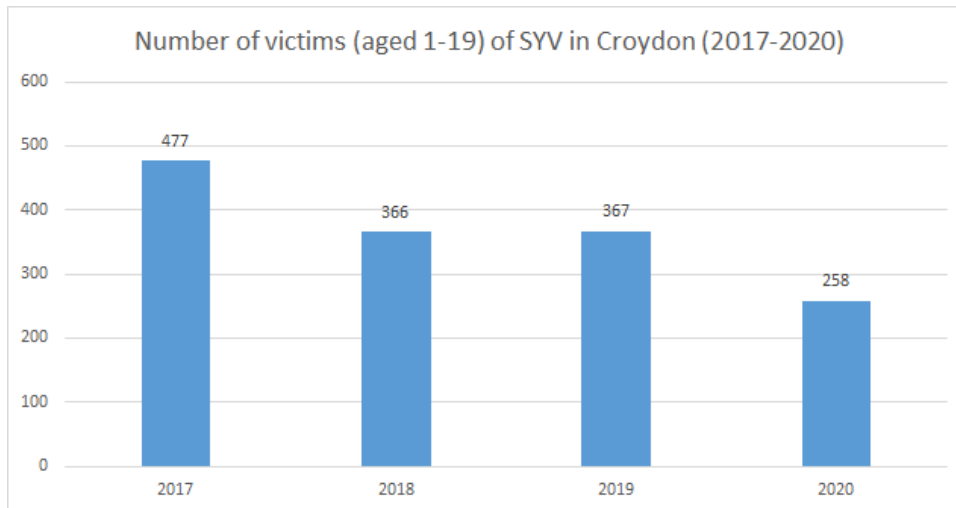
#### 1. **Reduce the overall crime rate in Croydon with a focus on violent crime, and domestic and sexual violence.**

- Croydon adopted a public health approach to violence reduction in 2019. The Council appointed the first director of the violence reduction network and restructured the community safety team to give a strategic and operational focus to violence reduction work. It secured significant external funding and committed council resources to implement the public health approach and reduce violence in Croydon.
- Even though there has been a decrease in *crime volume* in 2020 compared to 2019, by comparing 2020 to 2017 the overall *crime rate* in Croydon rose by 5%. Also during the same period the violent crime rate increased by 19% and the domestic abuse rate (DA) by 26%.
- Most DV and abuse is hidden, as in the rest of London. The Family Justice Centre (FJC) continues to perform at close to capacity with an average of 67 Multi Agency Risk Assessment Conference cases per month in the year to August 2021. This includes new victims and people who have been referred before.



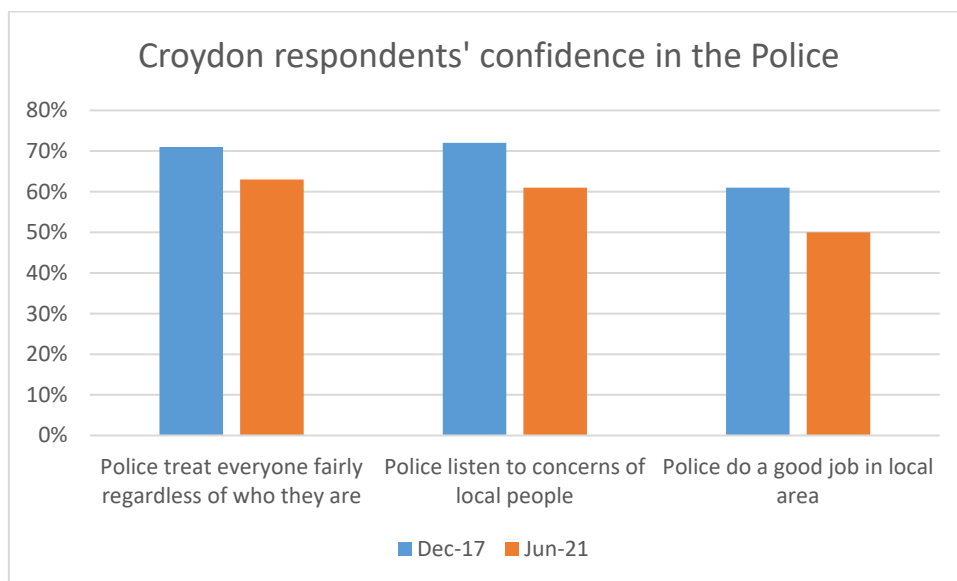
## 2. Safety of children and young people.

- The rate of serious youth violence has fallen since the 2016 peak (even before the Covid lockdown reduced the opportunities for such crimes), but it remained a serious issue for young people.
- Challenges relate both to safety of children and children's perceptions of their safety – many young people carry weapons because they feel threatened.
- The number of young people entering the criminal justice system for the first time has fallen for four consecutive years.



## 3. Improving public confidence and community engagement.

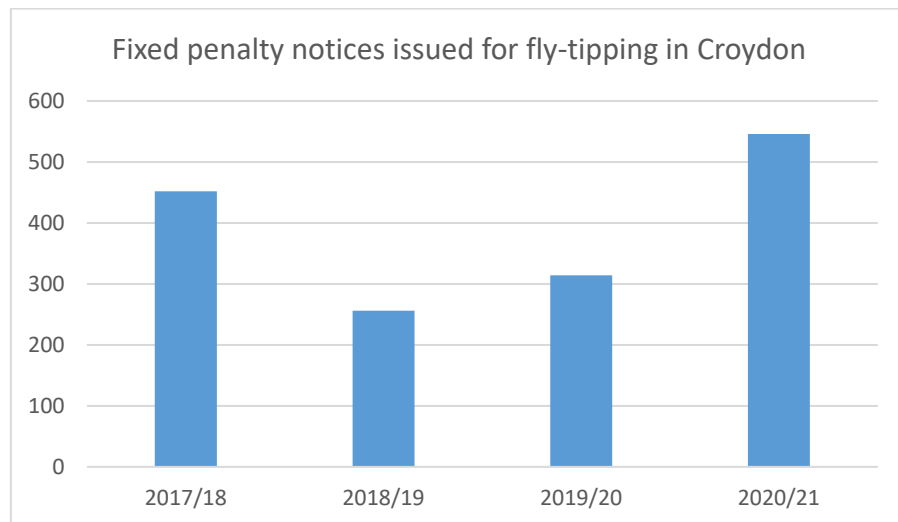
- Croydon residents' confidence in the police is higher than the London average, but has declined since 2017, according to MOPAC's Public Voice Dashboard. However, in the Violence Reduction Network's survey of safety of women and girls in the borough 79% of respondents stated that they would report a crime to the authorities.



- Other parts of regulatory services contributed to this work including Trading Standards who are doing nationally recognised work on illegal knife sales to children both on and off-line.

#### **4. Anti-social behaviour and environmental crime.**

- ASB-related calls to the Police in Croydon increased by 5% between 2017 and 2019. A further increase of 85% in 2020 is mostly attributed to Covid-19 where all related calls (e.g. social distancing and mask wearing) were recorded as anti-social behaviour.
- There were however a number of high profile successes, including business closures in Portland Road following a major undercover police operation.
- Fly-tipping incidents in Croydon increased by 3% to 25,532 between 2016/17 and 2019/20. In 2019/20 the number of fixed penalty notices (FPNs) issued by the council represented 1.2% of incidents, though some recipients may have been responsible for multiple incidents. The number of FPNs issued in 2020/21 increased by 74%.



#### **5. Improve support and reduce vulnerability for all victims of crime, focusing on hate crime.**

- Tackling hate crime has been a key area of success. Since it was launched in 2019, Croydon's hate crime pledge has been signed by 24,000 individuals and organisations.
- The Prevent and community outreach teams have worked with community organisations to equip them with the tools and knowledge to tackle hate crime and to support people to report it.
- The number of recorded hate crime offences increased by 35% from 698 in 2017 to 944 in 2020. However, the percentage of borough residents regarding hate crime as a problem in their area fell slightly from 14% in 2017/18 to 12% in 2019/20.



## 4 Strategic Assessment 2021

The Strategic Assessment provides the main evidence base for this strategy. It has highlighted the key issues for the Safer Croydon Partnership to address in order to reduce crime and anti-social behaviour (ASB) in the borough. Conducted annually, it will help to evidence the impact of the strategy on crime trends.

### Statistics

Although crime in Croydon fell slightly (by 1.7%) overall in 2020, there were large falls in crimes including burglary (-17%), robbery (-17%) and theft (-22%). This drop can be linked to societal restrictions implemented as a result of Covid-19. However, there were increases in other crimes, particularly drugs (+12%) and violence against the person (+11%). A rise in domestic abuse and hate crime contributed to this increase as well as a rise in harm in non-domestic violence with injury, specifically knife crime and, to a lesser extent, gun crime. The increase of arson offences, which show a link to domestic incidents, are also a cause for concern.

Both crime count and crime harm show a decrease in crimes involving young people. However, this is most likely linked to the Covid-19 restrictions and the VRN still recognises young people and their involvement in crime, particularly violence, to be a strategic priority.

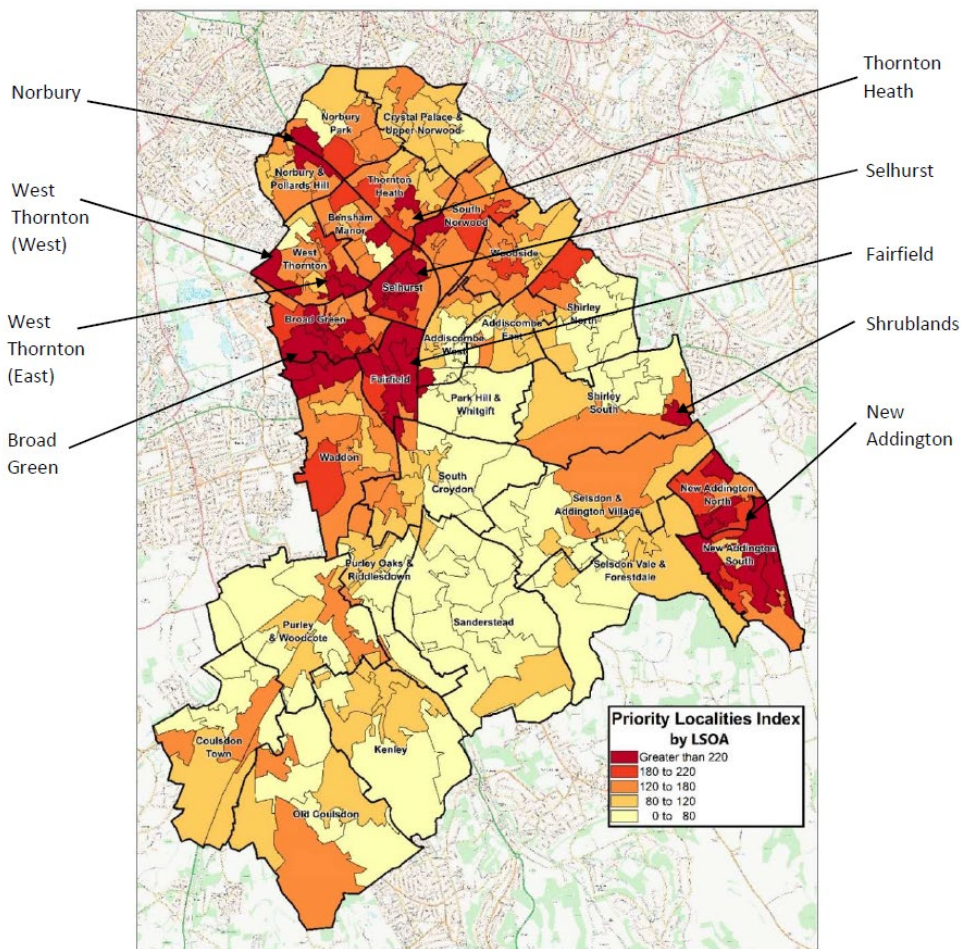
The table provides a breakdown of crime harm levels in Croydon by major crime type. It shows that where for some crime types there has been an increase in the count of offences, there has actually been a reduction in harm of this crime type.

Crime Harm				
Crime Type	2019	2020	+/-	% +/-
Arson and Criminal Damage	49,645.25	57,169.00	7,523.75	15.2%
Burglary	69,130.00	55,550.00	-13,580.00	-19.6%
Drug Offences	41,503.50	32,565.50	-8,938.00	-21.5%
Misc. Crimes Against Society	59,411.75	49,928.25	-9,483.50	-16.0%
Possession of Weapons	92,613.50	64,467.75	-28,145.75	-30.4%
Public Order Offences	24,781.25	25,658.00	876.75	3.5%
Robbery	397,850.00	330,325.00	-67,525.00	-17.0%
Sexual Offences	644,378.00	470,670.25	-173,707.75	-27.0%
Theft	43,104.00	36,366.00	-6,738.00	-15.6%
Vehicle Offences	19,899.00	18,611.50	-1,287.50	-6.5%
Violence Against the Person	528,368.50	578,093.00	49,724.50	9.4%
<b>Total Notifiable Offences</b>	<b>1,970,684.75</b>	<b>1,719,404.25</b>	<b>-251,280.50</b>	<b>-12.8%</b>

In line with our problem-oriented approach, we have focussed our assessment on Place, Offenders and Victims.

### Place

Given the shifts in crime owing to conditions under the pandemic, we have used data on crime, deprivation and demography to design a Priority Localities Index for the borough. This has helped us to identify neighbourhoods where cross-cutting issues causing crime and ASB need prioritised action by the partnership. The priority areas are highlighted on the next page.



## Offenders

Repeat offenders represent 20% of all suspects but commit more than 40% of crime in Croydon. For specific types of violence including domestic abuse, knife crime and serious youth violence, this rises to about half of all offences and harm committed. They also contribute significantly to hate crime offences. The homes of suspects and repeat suspects are highly concentrated in the Priority Localities Index areas.

A focus on high harm suspects will provide a more manageable, resource-focused and intensive approach to reducing serious crime in the borough. The number of individuals who commit 50% of harm in Croydon is less than 10% of the number of those who commit 50% of the volume of offences. They include the most high-risk individuals who have committed serious violence, sexual offences, robbery and arson, rather than more minor crimes of theft and criminal damage. They also commit a significant proportion of serious harm in the borough including domestic abuse, serious youth violence and non-domestic violence with injury.

Analysis of repeat offenders, high count and high harm offenders shows several cross-cutting issues which are likely to influence criminal behaviour, namely drugs, mental health and alcohol. In addition, most high count and high harm offenders are unemployed.

## Victims

Most adult victims of crime are aged between 18 and 45. Large percentages of victims of specific crimes, especially domestic violence (DV), are in this age-group. However, those aged 10 to 17 years old experience almost one fifth of all crime harm; this is closely associated with knife crime.

Repeat victims (9% of all victims) are victims of 20% of the crime count and 31% of crime harm where victims have been identified. They figure strongly in cases of:

- Domestic violence - more than a third of all DV offences and harm are committed on repeat victims
- Hate crime – 60% of repeat crimes are between neighbours (a consequence of increased interaction during lockdown)
- Alcohol related crime.

Identifying and supporting victims of 50% of crime harm, rather than of 50% of crime count in Croydon, would enable the partnership to maximise the use of its limited resources, as the cohort is 95% smaller.

High harm victims have experienced violence (including domestic abuse, non-domestic violence with injury and serious youth violence), sexual offences and arson, as well as alcohol-related crime. They are not, however, typically victims of hate crime.

[Strategic Assessment recommendations for the strategy](#) are:

1. Focus on the neighbourhoods identified from the Priority Localities Index to collaboratively address the underlying issues linked to crime and ASB.
2. Establish ways to improve neighbourhood cohesion in areas identified by the Priority Localities Index where this may have deteriorated.
3. Expand micro-patrols to the crime hotspot areas of the borough. This is to be done not just by the Metropolitan Police Service (MPS) but by other uniformed enforcement strands of the partnership too.
4. Invite and form a partnership with key agencies who can heavily contribute to addressing the underlying issues of crime in the borough and enforcement. One should be involved in providing opportunities to residents; the other should be the British Transport Police.
5. Use crime harm as a measure to identify suspects and victims of serious crimes in order to focus intensive resources to reduce further serious risk in the borough.
6. Increase information sharing by partners to reduce offending in the borough, specifically on mental health, employment, and alcohol and substance misuse.
7. Provide better guidance to 10 to 17 year olds on the risks and consequences of capturing and sharing explicit material online.

8. Write a problem profile on domestic abuse in the borough in order to provide a detailed strategic document to focus resources efficiently.
9. Build and implement a performance framework for the whole network so that the responses based on these recommendations are monitored and measured closely.

## 5. Public Engagement Summary

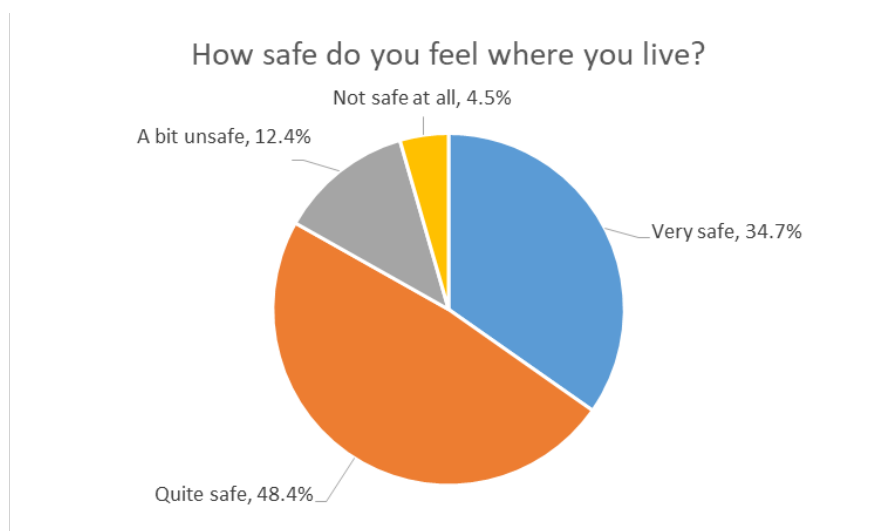
The Safer Croydon Partnership undertook two surveys in 2021 to improve our understanding of crime and safety from the point of view of young people and women and girls.

### Survey of young residents

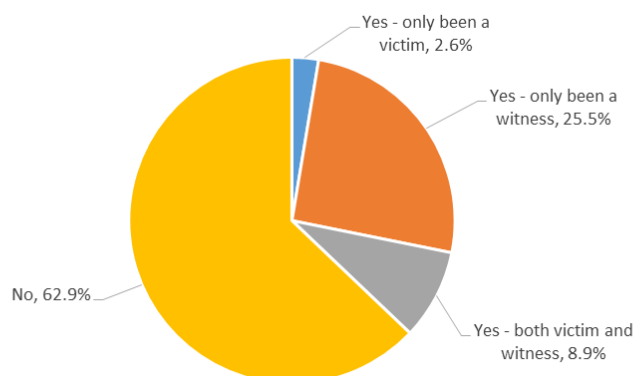
The survey was completed by young residents aged up to 25. Its purpose was to identify where people felt unsafe and how we could improve safety there. There were 451 respondents, of which 380 were used for the analysis after data cleansing.

While the vast majority of respondents felt safe, one sixth felt a bit unsafe or not at all safe where they lived, mainly because of knife crime, violence and gangs. However, one third had experienced or seen crime.

Larger district centres in the north and east, such as West Croydon and Thornton Heath, were most frequently mentioned as areas they would avoid.

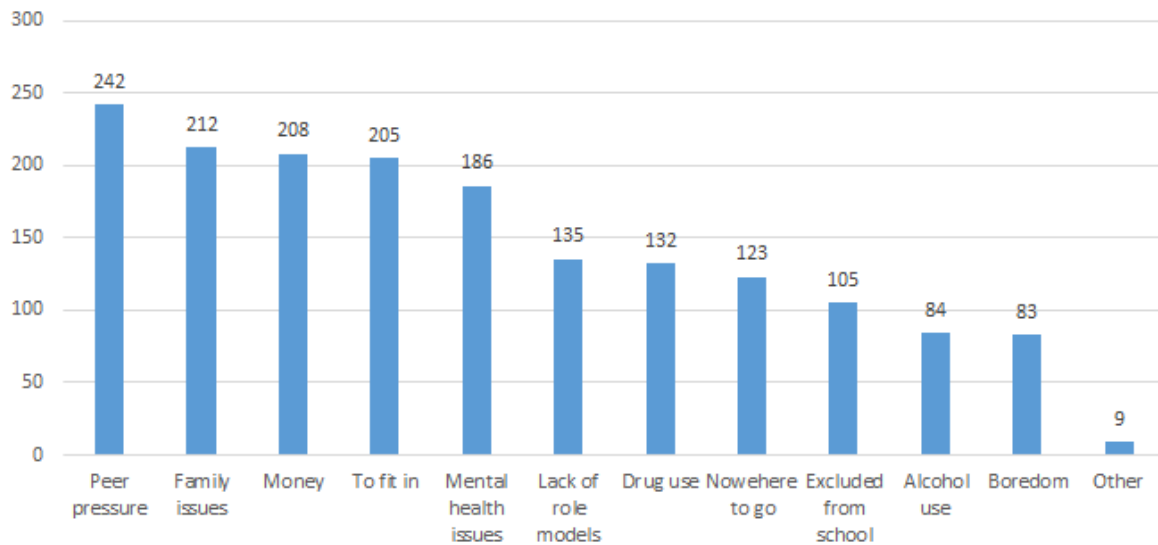


Have you ever been a victim and/or witnessed a violent crime?



The top five reasons why young people committed violent crime were given as peer pressure, to fit in, family issues, money and mental health issues.

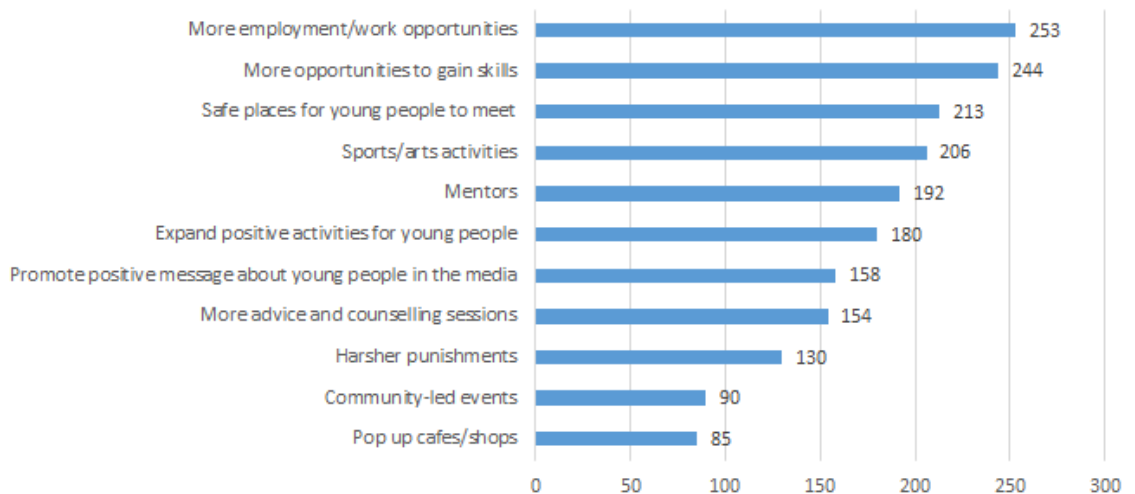
### Why do you think young people commit violence crime (multiple answers optional)?



Undetected crimes included knife carrying, drug dealing, child neglect, grooming and DV. However, a third of respondents would not report an incident, mainly for fear of being seen as a ‘snitch’ and because of a lack of trust in the authorities.

The most helpful ways to help young people at risk of violent crime included: more opportunities for gaining skills and jobs; safe places to meet, more sports, arts and other positive activities, and mentoring. Young people also believe that increasing CCTV, visible enforcement on patrol, family support, educational and community activities would also help reduce crime in their area.

### What do you think would be the most effective ways to help young people at risk of violent crime (multiple answers optional)?

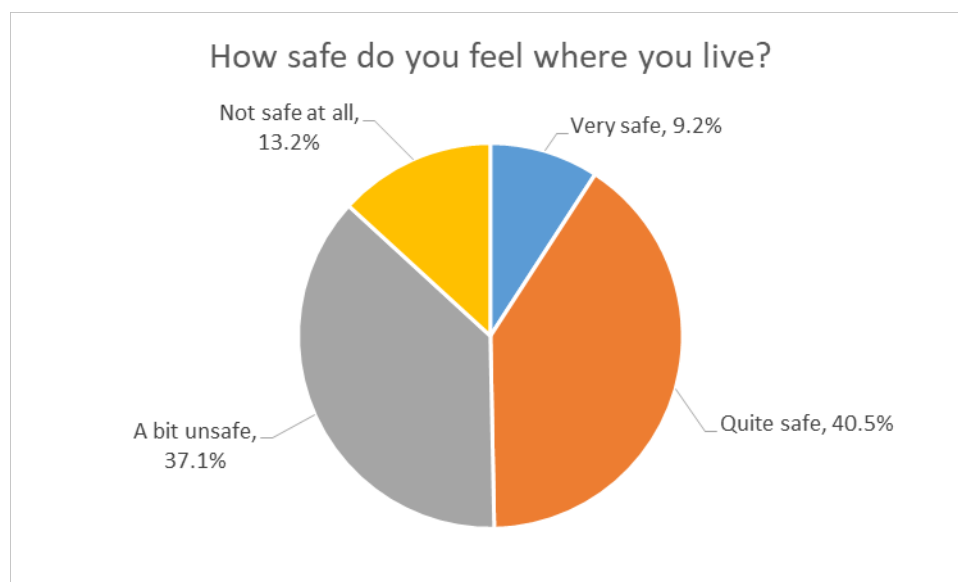


### Survey of women and girls

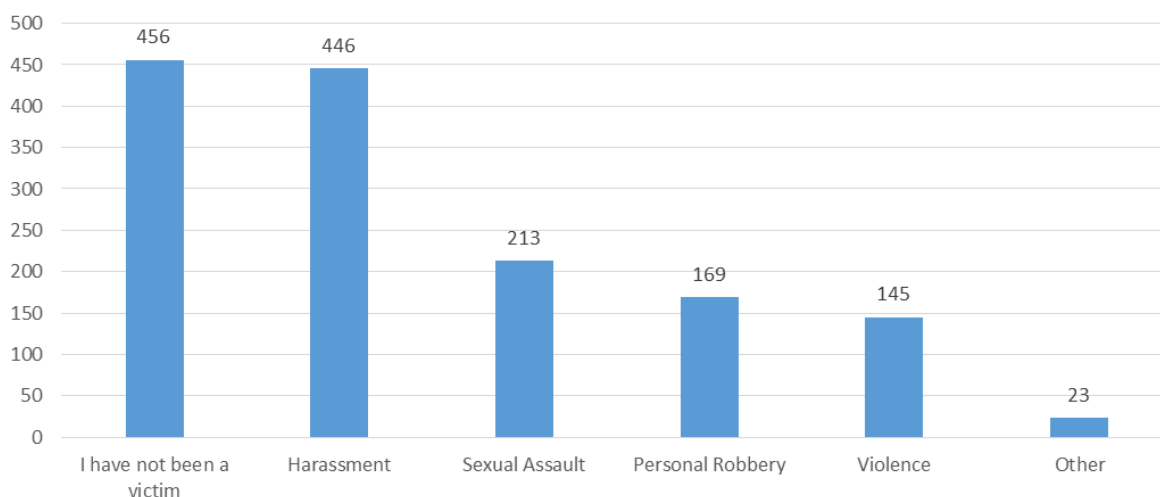
This survey focused on safety for women and girls, and identified areas where residents did not feel safe and what would need to take place in order to improve their safety. There were 1,245 responses, of which 1,113 were used for analysis after data cleansing.

Half of women and girls felt a bit unsafe or not at all safe where they lived (in contrast with one sixth of young residents); this was mainly because of harassment, sexual assault and personal robbery. 59% had experienced crime and three quarters had witnessed crime.

Larger district centres in the north and east, such as West Croydon, Thornton Heath, South Norwood and New Addington, as well as Croydon Town Centre, were most frequently mentioned as areas they would avoid.



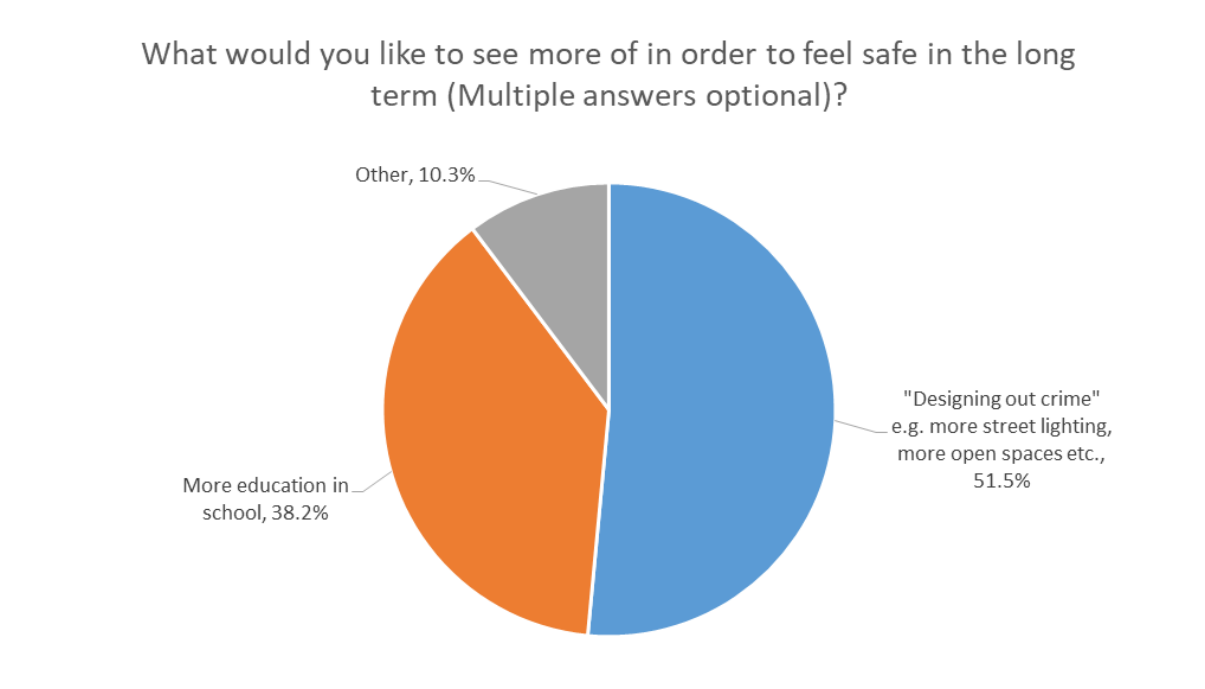
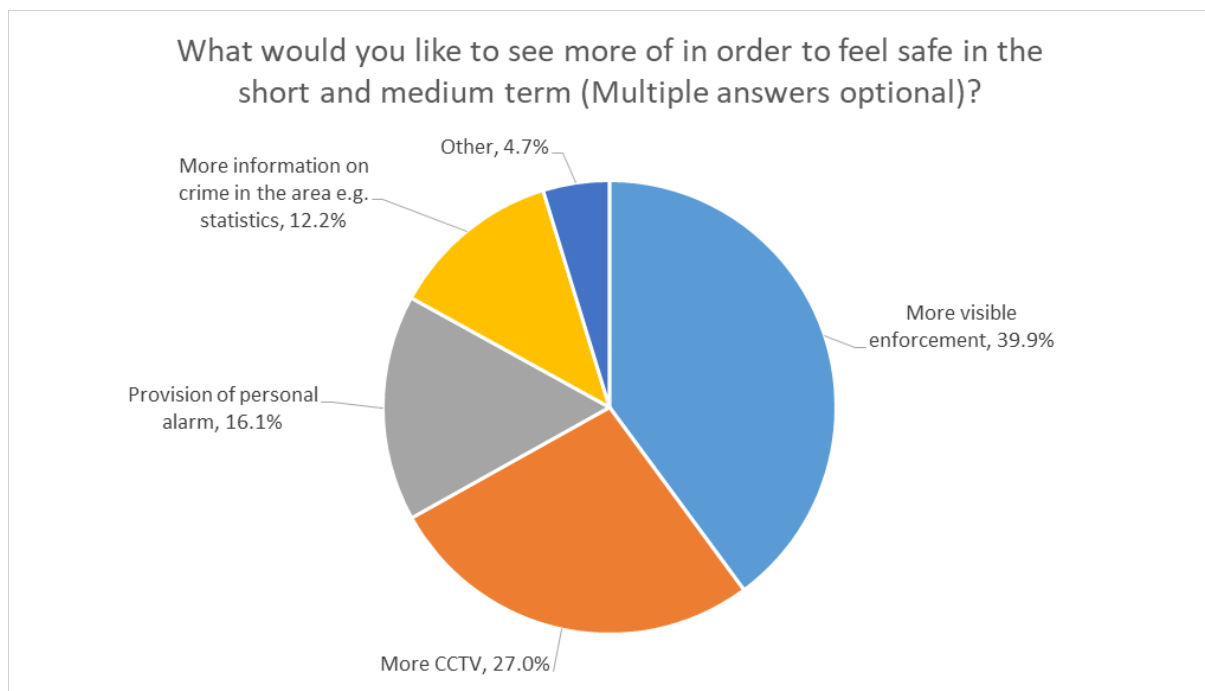
Excluding in your home, school and workplace, have you ever been a victim of the following:



Respondents did not feel safe while travelling or waiting for public transport, in parks, shopping centres and high streets, as well as in pubs, bars and clubs.

A fifth of respondents would not report an incident, mainly because it was a long process or for fear of reprisals, or of not being believed, and because of a lack of trust in the authorities.

In the short and medium term, more visible enforcement, more CCTV and personal alarms would make most people feel safe, as well as provision of personal alarms. In the long-term respondents wanted more education in schools and crime designed out of the public realm.





## 6. Conclusion

The Safer Croydon Partnership has considered the findings and recommendations in the Strategic Assessment. It has also taken account of feedback from engagement with young people and women and girls. It has decided on the following priorities for the Community Safety Strategy for 2022-2024:

1. **Tackle domestic abuse**
2. **Protect young people from violence and exploitation**
3. **Tackle disproportionality in the criminal justice system**
4. **Strengthen community resilience, offer trauma-informed services, focusing on Hate Crime, and build trust in the partnership**
5. **Focus on high priority neighbourhoods**

This strategy implements the Public Health approach to violence reduction. All actions within each priority are therefore designed to address the four elements of this model:

1. **Curtail** violent acts at source, pursuing perpetrators and enforcing action.
2. **Treat** those who have been exposed to violence to control the spread.
3. **Support** those susceptible to violence due to their exposure risk factors.
4. **Strengthen** community resilience through a universal approach.

Consistent with the problem-oriented approach, the partnership will focus on the underlying causes of those problems and how to tackle them. Mindful of the limited resources available, interventions will target the 'Felonious Few', high priority victims and hotspots to increase the chance reducing crime, particularly crime harm. The strategy's evidence-based approach will target, test and track its actions.

It is essential that the Safer Croydon Partnership has the confidence of people who live and work in the borough. The Partnership will build and implement a performance framework so that the responses to the recommendations in the strategic assessment are monitored and measured closely. The evaluation of the outcomes achieved by this strategy will include the views of residents, obtained through regular engagement during its three-year period.

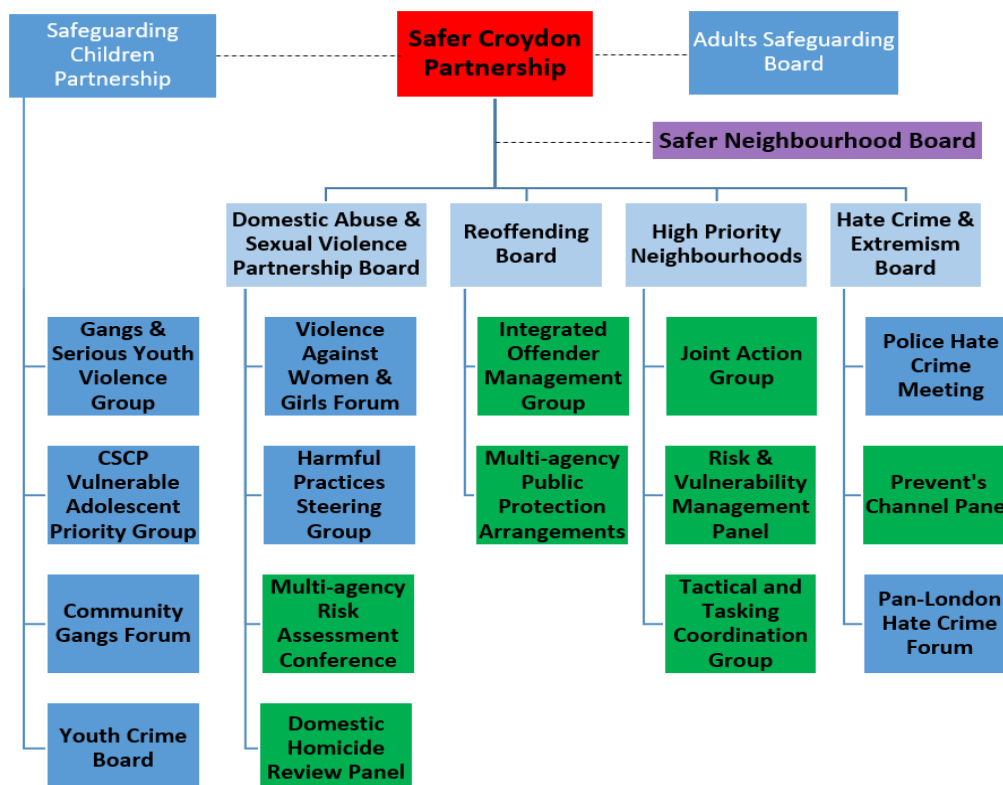
## 7. Delivery Framework

The Safer Croydon Partnership Board is responsible for all community safety matters across the borough. It provides strategic leadership and makes decisions regarding resources, performance management and future developments. It works with other boards on Croydon's Local Strategic Partnership on crime and safety matters, in particular the Safeguarding Children Partnership and the Adults Safeguarding Board.

Key responsible authorities on the Board include the council, police, and health, probation and fire services. The voluntary sector and residents are also represented. Organisations instrumental in delivering strategy priorities may also be invited to join.

The boards and meetings in the chart below are accountable to the Board (see Glossary for details). Those dealing with youth crime are directly accountable to the Safeguarding Children Partnership, which works closely with the Safer Croydon Partnership. Case management forums, in green, tailor plans for specific individuals to reduce offending or vulnerability. Where there is demand, specific working groups are also set up to tackle crime and ASB in a specific area, which last for a minimum of six months.

The SCP will continue to work closely with the Safeguarding Boards with the intention of building stronger partnerships. This will include the SCP providing them with information and updates on work programmes as well as action plans.



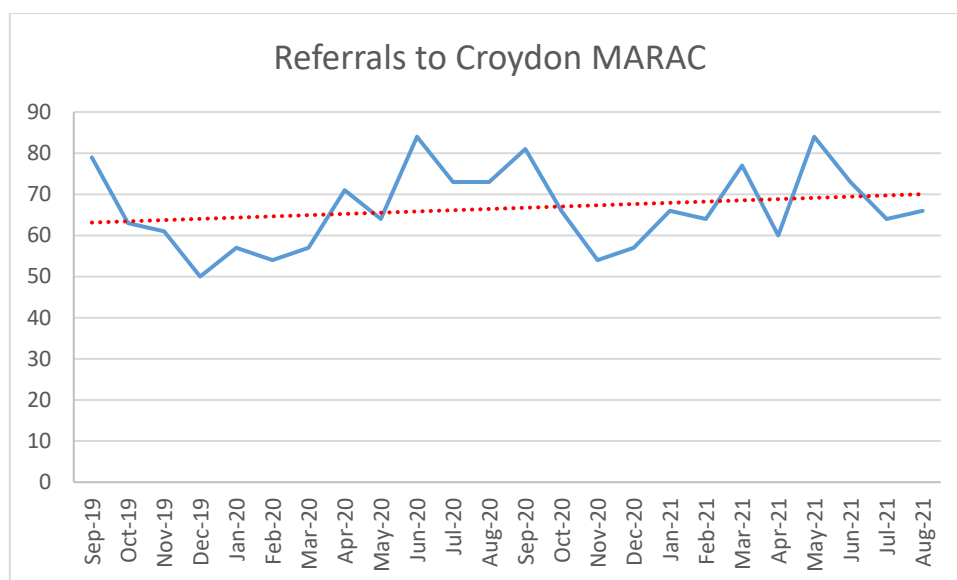
## 8.1 Priority 1 Tackle domestic abuse

### ***What we want to achieve***

Tackling domestic abuse remains a priority for the Partnership. We also want to support victims better, challenge perpetrators and support them to change, and help people to thrive once they have left abusive relationships.

### ***Level of need***

The rate of domestic abuse incidents and offences per 1,000 population has been increasing year on year in Croydon, which had the 3<sup>rd</sup> highest rate in London in 2020. There were 5,154 reported incidents of domestic abuse, an increase of 17.9%, compared to the previous year. In the year to August 2021 there was a 3.3% increase in the average level of cases with a high risk of severe harm referred to the Multi-Agency Risk Assessment Conference (MARAC).



Lockdown restrictions during the Covid pandemic forced intimate partners and family members of the same household to stay indoors together, putting themselves at greater risk of harm from an abusive partner or relative. In addition, better awareness of services for victims and of what constitutes domestic abuse increased the likelihood of people coming forward to report it.

### ***What we are doing***

#### ***Support victims***

The Partnership works through the police, council, including the Family Justice Centre (FJC), and voluntary and community organisations to mobilise the professional and community network through raising awareness and training frontline staff. It will use the measures introduced by the Domestic Abuse Act 2021 to protect and support victims.

FJC brings together several agencies to provide a single, multi-agency assessment of victims' risk and harm, obviating the need for victims to repeat their history, and refers victims for specialist support including accommodation and legal services. It

coordinates volunteers who provide emotional support and practical help. Its freedom programme supports survivors who have left abusive relationships.

Independent Domestic Violence Advisors at the FJC, police stations, and Croydon University Hospital provide specialist support, which extends to victims who are homeless, experiencing modern slavery or radicalisation, and those with no recourse to public funds. An independent sexual violence advisor is also available. Several local voluntary and community organisations support BAME women experiencing domestic abuse and sexual violence and work to improve their relations with the criminal justice system to encourage engagement and trust.

The Police use the Domestic Violence Disclosures Scheme (Claire's Law) to reduce serial perpetrators and give more control to women.

People with learning disabilities are at high risk of suffering domestic abuse due to factors including difficulties in recognising abuse, fear or lack of knowledge of how to report this, emotional vulnerability and communication difficulties. All staff working with people with learning disabilities need to be alert to the possibility of domestic abuse and know how to address this and where to make referrals for support.

### ***Challenge perpetrators and support them to change***

The police arrest perpetrators at the scene wherever possible, and otherwise within 24 hours. They will use and enforce bail conditions and compliance with Domestic Violence Protection Notices (DVPNs) to protect victims. After arresting perpetrators, the police will refer them to support groups, to the Domestic Abuse Perpetrator's Panel (DAPP) where appropriate, and to the rehabilitative DRIVE programme, which makes interventions to change the behaviour of perpetrators.

Several themed forums coordinate activity among practitioners in Croydon and exchange good practice, including the Violence Against Women and Girls (VAWG) coordinators meeting (Pan London), the VAWG Forum, Domestic Abuse and Sexual Violence Partnership Board, and Multi-Agency Safeguarding Hub (MASH) Operational Management Group.

Relevant case management meetings include the Adults Safeguarding Board Multi-Agency Risk Assessment Conference (MARAC), and Domestic Abuse Perpetrators Programme (DAPP) Meeting.

### ***What we will do***

We will continue to apply a multi-agency approach to tackle domestic abuse and sexual violence (DASV) within Croydon and provide multi-agency service provision for victims. DASV must be understood as part of the wider context of violence against women and girls (VAWG). This is the case, for example, with how young people experience domestic abuse. VAWG is dealt with under Priority 4. We will update Croydon's DASV Strategy and will:

### ***Curtail violent acts at source, pursuing perpetrators and enforcing action***

1. Use recommendations and learning from domestic homicide reviews to improve partnership practice and actions to tackle domestic abuse and sexual violence.

2. Produce an evidence-based profile of domestic abuse in Croydon and engage with service users and the VCS to develop actions to tackle this crime in hotspot areas.

**Treat those who have been exposed to violence to control the spread**

3. Continue to provide and arrange refuge and other safe accommodation to victims of domestic abuse and sexual violence.
4. Work with perpetrators through the rehabilitative [Croydon DRIVE Project](#) programme to end their abusive behaviour.
5. Train partners to develop appropriate trauma-informed responses to victims of domestic abuse and sexual violence.
6. Croydon Health Services NHS Trust to appoint a qualified member of staff to support the Independent Domestic Violence Advisor.
7. Develop a domestic abuse specialism in Croydon Health Services NHS Trust's safeguarding team to develop practitioners' knowledge and skills across the organisation

**Support those susceptible to violence due to their exposure to risk factors**

8. Raise awareness of domestic abuse and sexual violence and train Safer Neighbourhood Policing Teams to support victims and monitor and enforce perpetrators' compliance with bail conditions and Domestic Violence Protection Orders (DVPOs).
9. Strengthen partnership work and make services available to support parents involved in conflict and the children and young people exposed to it.
10. All staff in Croydon Health Services NHS Trust working with people with learning disabilities will be trained in understanding and responding to domestic abuse, complete training in safeguarding adults level 3, and develop links with the FJC.

**Strengthen community resilience through a universal approach**

11. Provide training for organisations working with victims of domestic abuse and sexual violence, and raise awareness to increase understanding of this crime and ensure that it remains everyone's business.
12. Ensure that all schools and GP practices in hotspot areas receive training to identify signs of violence against women and girls, including domestic abuse and sexual violence, and arrange appropriate responses.

**How we will we know our actions have been effective**

- Statistics on number of domestic abuse incidents, offences and sexual violence offences recorded by the Police. The volume of cases reported per '000 of women and girls resident in Croydon. This rate is likely to increase, as more victims come forward following implementation of the Domestic Abuse Act 2021.
- Number of cases at the Multi-Agency Risk Assessment Conference (MARAC)
- Number of cases recorded by the Family Justice Centre
- Level of engagement with and outcomes from [Croydon DRIVE Project](#)
- Feedback from voluntary and community sector partners
- Feedback from Family Justice Centre service users

- Sufficient independent domestic violence advisors are available to provide a safe level of support for victims of domestic abuse and sexual violence in Croydon.

## 8.2 Priority 2 Protect young people from violence and exploitation

### ***What we want to achieve***

We want to protect young people at risk of becoming victims of crime. We want to reduce serious youth violence in Croydon, including knife enabled violence and robbery, and involvement in gangs. We want to reduce the number of children and young people involved in exploitation, in particular county lines which involves using children and vulnerable people to traffic drugs from location to location.

This strategy takes a more holistic view, addressing both violence and the safety of young people. It has been informed by the views of young people in Croydon, their concerns and what they think would reduce youth violence.

Identifying adverse childhood experiences as early and quickly as possible is crucial for planning effective interventions to prevent violence. These include domestic abuse, child neglect, older siblings involved in crime and anti-social behaviour, school behaviour and exclusions, and cannabis use.

### ***What we are doing***

The Safer Croydon Partnership (SCP) covers the direct and indirect criminality and victimisation of children. This includes county lines, sexual and criminal exploitation and grooming. The SCP coordinates and leads on several meetings designed specifically in protecting young people from violence.

The Gangs and Serious Youth Violence (SYV) Board oversees the multi-agency approach to reducing SYV and gang activity in the borough at a strategic level. The Community Partnership ensures appropriate interventions are made for young people be they diversion, disruption or enforcement. The council runs workshops in schools on harm and safety, as well as events for staff on SYV and exploitation.

The Youth Crime Board is responsible for the work of the multi-agency Youth Offending Service to coordinate the delivery of actions to prevent and reduce re-offending and manage risk to safeguard children and young people within the borough in accordance with the Youth Justice Plan 2021/22.

Whereas the SCP is focussed on the risk of criminal exploitation of children, the [Croydon Safeguarding Children Partnership](#) (CSCP) focusses on raising awareness of safeguarding risk and supporting the wider partnership to recognise and respond appropriately to safeguarding concerns involving children up to 18 years of age. It supports the SCP by building awareness of child exploitation and providing training and quality assurance of safeguarding practice. Together, they provide a holistic approach to safeguarding children in the borough.

The CSCP provides for effective joint working with the SCP on matters of young people's safety through the Vulnerable Adolescents Priority Group, which uses a public health approach in reducing violence amongst young people.

The council leads working groups in areas where SYV is an issue. CVA and Croydon BME Forum deliver the 'My Ends' project to divert young people from crime through mentoring, support for parents, training youth work organisations on trauma and mental health, and establishing community partnerships. The Partnership also encourages young people to participate in decision-making on the issue of violence and exploitation through Croydon Youth Forum.

Other themed forums, including the Early Help Partnership Board, collaborate on funding bids, co-ordinate activity among practitioners and exchange good practice. Case management meetings include PREVENT's Channel Panel, Gangs Weekly Tasking Group, Risk Management and Vulnerability Panel and the Complex Adolescents Panel (CAP).

### ***What we will do***

#### ***Curtail violent acts at source, pursuing perpetrators and enforcing action***

1. Provide more visible enforcement on patrol where possible in areas of high harm towards young people.
2. Apply for Criminal Behaviour Orders (CBOs), Knife Crime Prevention Orders and Gangs Injunctions when disruption is appropriate.
3. Develop an agreed joint programme of actions to remove weapons and provide reassurance including Trading Standards initiatives (e.g. knife or corrosive substance test purchases)
4. Weapons sweeps by staff of partner agencies, e.g. London Fire Brigade, housing providers/estate managers and refuse collectors.
5. Sign up businesses to responsible retailer agreements and train them on knife sales issues and take appropriate enforcement action on the sale of knives to young people.
6. Use London Information Sharing to Tackle Violence programme and wider public health data, social media intelligence, local drugs markets and local rescue and response county lines analysis, and other relevant local authority data to inform the strategic assessment analysis.

#### ***Treat those who have been exposed to violence to control the spread***

7. Provide violent crime offenders with bespoke community service interventions before court and after conviction that protect the public.
8. Reduce harm to direct and indirect victims of offending
9. The Gangs Team to deliver on bespoke actions plans for gang members.
10. Refer offenders from police custody to providers of education, employment and training through the DIVERT programme.
11. YOS to ensure that Interventions take account of adverse childhood experiences and are trauma informed in recognition that those carrying out SYV have often been victims themselves
12. YOS to ensure victim(s) and potential victims are at the core of its work by offering restorative justice interventions by contacting identified victims of serious youth violence to offer the opportunity to engage in direct or indirect restorative interventions



13. Provide young victims of violence with a trauma informed needs assessment, with referral to the Emotional Health and Wellbeing service where appropriate and work effectively with partners for a fast track access to support for young people affected by serious youth violence.
14. Place a commissioned third sector organisation such as RedThread in Croydon University Hospital A&E to provide immediate support and space for young people injured through serious youth violence and ensuring information is shared with relevant agencies in a timely way.
15. To strengthen work on parents and families of those affected by knife crime.
16. Ensure that offenders (aged 18+) who meet the criteria for the MOPAC Knife crime GPS Pilot be considered and the relevant licence condition added. Consider also those already in the community who it is identified may pose a risk, as an alternative to recall or when re-released from recall.

***Support those susceptible to violence due to their exposure to risk factors***

17. Minimise school exclusions (and managed moves in place of exclusions), create inclusive settings and support young people back into education, employment and training.
18. Work with parents and carers, especially those who are vulnerable, to engage young people in diversionary activities and education and prevent harm.
19. Ensure services are deployed to known hotspots
20. The Youth Engagement Team to continue their delivery of the 'Safe and Well' programme in schools
21. YOS to offer bespoke services that support young people back into education and employment.
22. Ensure young victims of violence, are identified and given support to access diversionary services, including education, training and employment
23. Deliver universal and targeted programmes in schools (including as part of Sex and Relationships Education), based on Croydon safeguarding issues and trends, and support schools to assess quality and impact.
24. Safeguarding Children Partnership to ensure local Early Help processes and referral pathways, and everyone's role within them, are clear and easily accessible to parents, carers, schools, Pupil Referral Units and college staff.
25. Create more opportunities for gaining skills and jobs.
26. Develop more sports, arts and other positive activities, youth engagement, counselling and mentoring.
27. Develop resources for workshops in youth community settings and train partners to run them.
28. To develop communication methods to young people and families.
29. All staff in Croydon Health Services NHS Trust Learning Disability Team to complete PREVENT training

***Strengthen community resilience through a universal approach***

30. Where possible, to improve design of areas to remove opportunities for storing weapons.

31. Work to ensure places of education are safe and inclusive, build young people's resilience and have a trauma-informed approach.
32. To encourage schools to include knife crime and youth violence within their safeguarding plans.
33. Hold educational and community activities.
34. All partner agencies to adopt a trauma informed approach and commission training accordingly.
35. Co-design communication materials with YP in engagement stages to increase awareness of services by getting the language right and engage with families at a human level.
36. To explore the extension of the social workers in schools programme in partnership with education providers beyond March 2022

### ***How we will know our actions have been effective***

- Reduction in the number of young people who are victims of Youth Violence, Serious Youth Violence, CSE and Knife Crime with Injury where the victim is aged 1 to 24, recorded by the Police (MPS).
- Regular surveys of young residents find that a greater percentage of respondents report that they feel safe in Croydon.
- Reduction in the number of young people treated by London Ambulance Service for violent injuries inflicted in Croydon.
- Reduction in the number of people treated by Accident & Emergency at Croydon University Hospital for violent injuries received in Croydon.
- The number of young people being worked with by the Gangs Team.
- The number of PREVENT referrals of young people.
- A reduction in number of young people entering the criminal justice system for the first time.
- A reduction in re-offending.
- An increase in the number of young people in Education and Employment particularly for those 16+.
- Reduction in school exclusions.

### 8.3 Priority 3 Tackle disproportionality in the criminal justice system

#### ***What we want to achieve***

Some people are treated differently by a range of public institutions, and this can have an impact on how they experience violence. This chapter shapes a multi-agency response to reduce the disproportionality of outcomes people from Black, Asian and minority ethnic (BAME) backgrounds in the Criminal Justice System.

#### ***The problem***

People from a BAME background were over-represented as defendants in the criminal justice system in 2019, according to [Ministry of Justice \(MoJ\) data](#). This was largely because people from these ethnic groups made up a disproportionate share of people arrested, and this carried through to the prosecution, conviction, and imprisonment stages. Evidence also suggests that offenders from BAME backgrounds receive longer custodial sentences, which could be partly due to the higher rate of 'not guilty' pleading among defendants from these ethnic groups.

Discriminatory treatment of young people from BAME backgrounds can have significantly adverse impacts on young persons' views of themselves, their health and life chances. In Croydon young black males are significantly overrepresented in the youth justice system, more likely to enter it at a higher level, and more likely to receive stiffer sentences, including custodial sentences. This group are also more likely to be stopped and searched. Additionally, Black Caribbean pupils in Croydon, as in England as a whole, have the greatest level of disproportionately when it comes to exclusion from school.

When considering discrimination we must consider race, disability, gender, religion, sexuality and take into account the fact that discrimination can occur not just amongst individuals but also systemically.

#### ***What we are doing***

Croydon Youth Offending Service has developed a Disproportionality Action Plan for 2021/22 to monitor services with regard to diversity and address oppressive practice and inequality proactively, informing local practice and strategic planning, working collaboratively with Croydon BME Forum and strategic partners such as the police, courts and the NHS. Inspirational black male professionals and police are invited to speak to the young males group on the Criminal Justice System and aspirations. The service also closely monitors under-14 year olds entering the system and strives to divert them from re-offending.

Croydon BME Forum conducts training sessions for professionals on cultural sensitivity, addressing bias, prejudice, and discrimination and how to overcome this in practice. It advises the Partnership and the Gangs Matrix Board on local issues and partnership work to reduce disproportionality in the criminal justice system.

Police are conducting ongoing research in response to critical incidents, stop and search and criminal justice outcomes with a disproportionality focus and continue to

evolve their response to the systematic and institutional racism that influences the overrepresentation of young black males in the criminal justice system.

Although several agencies have made progress, currently the partnership lacks comprehensive and accurate equalities data of the cohorts of people affected in Croydon. This is needed to understand disproportionality fully and tackle it effectively. The CSCP has asked its member agencies to be more robust in their recording of ethnicity and disability of young people.

The Vulnerable Adolescent Priority Group (VAPG) reviews data on disproportionality and champions the need for accurate data recording. VAPG's Schools Curriculum and Change Group shares resources, strategies and information. It has begun a work programme that will examine racial harassment; teacher recruitment, retention and promotion; governor recruitment; exclusions; and pupil achievement.

The Probation Service inputs equalities data on their cases to inform the services they commission for particular groups. It has introduced the Effective Proposal Framework helping to reduce disproportionality by taking account of offending history and producing suitable proposals and disposals to use in court reports.

### ***What we will we do***

#### **Understanding the problem**

1. All agencies to record equality and inclusion information about their cases, including the Probation Service and Police research on critical incidents, stop and search and criminal justice outcomes with a disproportionality focus.
2. Produce data to understand the impact of disproportionality at every stage of the Criminal Justice System, from policing ('stop and search'), sentencing trends, custody rates and rates of reoffending, and numbers of young people entering the criminal justice system for the first time.
3. Once available, analyse data by ethnicity, gender, sexuality, disability, religion and geographic information to inform the planning of interventions and commissioning of services.
4. Analyse and review BAME groups at risk of gang affiliation and criminal exploitation through county lines in order to establish a baseline.
5. Share data, patterns, needs and learning across the partnership, including education (exclusions data), health and police, and hold discussions to better understand disproportionality across the criminal justice system and define actions required
6. Working and exchanging learning with other London Authorities
7. The Partnership will use relevant forums to formally raise the Partnership concerns and recommendations.

#### ***TREAT those who have been exposed to violence/crime to control the spread***

8. Youth Offending Service interventions are tailored to meet the individual needs of young people and address overrepresentation, paying particular attention to young people's self-assessments and learning styles

9. Youth Offending Service Officers to attend regular reflective practice to discuss needs of staff and offenders and plan actions to tackle overrepresentation, disproportionality and oppressive practice
10. Probation Service to use the equality and inclusion analysis of their caseload to ensure that services commissioned are tailored for certain groups.
11. Ensure the physical and mental health needs of individuals are quickly identified and actioned, promoting accessibility to health provision for disadvantaged groups
12. Ensure the Youth Offending Service and police identify young people suitable for diversion from the criminal justice system to achieve a fair application of alternatives to prosecution
13. Maintain dialogue with the judiciary and court users group on overrepresentation, involving young people, and compare similar offences and sentencing outcomes for young people by ethnic groups.
14. Probation will continue to use the Effective Proposal Framework Tool to produce a list of suitable proposals and disposals, before court reports are written, to ensure there are better sentencing outcomes for all groups, reducing disproportionality amongst those going through the criminal justice system and extend use of tool to those coming out of prison on licence.
15. Officers are being trained to ask safeguarding questions of all juveniles in custody and involve social services to help manage risk and offer diversions.

**SUPPORT** *those susceptible to violence due to their exposure risk factors.*

16. Identify individuals who are potentially experiencing systemic discrimination within the education system, and advocate accordingly.
17. Ensure that all young people, particularly those who are NEET, are offered opportunities for education, training and employment that are in line with their individuality and personal need.
18. Develop joint working between the Youth Offending Service and social care to develop a trauma-informed and culturally aware approach to meet the needs of unaccompanied minors.
19. Work with specialist voluntary organisations, and community and grass-roots projects that target the prevention and reduction of crime within overrepresented groups in the Criminal Justice System
20. Set up DIVERT programme to promote universal services with partners, including the community sector, for those arrested where no further action is taken.
21. Croydon Health Services NHS Trust Learning Disability Team will develop links with neighbourhood policing to ensure crisis plans are in place.
22. Police schools officers to offer early engagement to divert individuals from involvement in the Criminal Justice System.
23. Police Child Sexual Exploitation and Child Criminal Exploitation teams to divert those exploited who may also be involved in criminality themselves through the Complex Adolescents Panel.

**STRENGTHEN** *community resilience through a universal approach*

24. Arrange and encourage training in cultural competency, unconscious bias and disproportionality awareness for members of partnership organisations as well as programme boards
25. Strengthen and support schools to reduce fixed and permanent exclusions of BAME children. Continue monitoring exclusion rates and taking action to address over-representation, by working with schools, local health services, and the community to reduce the need to exclude pupils
26. Continue monitoring exclusion rates and taking action to address over-representation, by working with schools, local health services, and the community to reduce the need to exclude pupils

***How we will we know our actions have been effective***

- Reduction in the number of young people from BAME backgrounds who enter the criminal justice system for the first time
- Reduction in the number of young people from BAME backgrounds who reoffend
- Improved identification and support of people from BAME backgrounds involved in gang activity so they are provided opportunities and support to exit gangs
- Increase in the numbers of people from BAME backgrounds in the Criminal Justice System who gain access to education, employment and training
- Reduction in school exclusions and truancy
- Feedback from the Youth Offending Service, Police, and Courts
- Staff are fully trained in cultural competency and have full awareness of anti-discriminatory practice
- Services/interventions are culturally in tune with service users.

#### 8.4 Priority 4 Strengthen community resilience, offer trauma-informed services, focusing on Hate Crime, and build trust in the partnership

##### ***What we want to achieve***

Individuals benefit from different protective factors, ranging from personal resilience to trust in other people and organisations. We need to understand how to foster the protective factors in individuals and communities.

We will look at how the whole community safety system in Croydon and our services are organised and delivered and consider what steps we should take to help traumatised service users to heal and to avoid, or minimise, adding new stress or reminding them of their past traumas. 'Trauma-informed approaches' are ways of supporting people that recognise specific needs they may have as a result of past or ongoing trauma. A traumatic event is an event, a series of events or a set of circumstances that is experienced by an individual as physically or emotionally harmful or life threatening (Substance Abuse Mental Health Services Administration 2014).

Croydon residents' confidence in the police is higher than the London average, but has declined since 2017, according to MOPAC's Public Voice Dashboard. However, in the Violence Reduction Network's recent surveys in Croydon, 79% of women and girls responding, and 66% of young people, stated that they would report a crime to the authorities.

##### ***What we are doing***

The Council coordinates and takes part in a wide range of regular meetings of relevant partners to strengthen community resilience, offer trauma-informed services and build trust in the authorities. Multi Agency Public Protection Arrangements (MAPPA) meetings manage the most serious offenders and Integrated Offender Management (IOM) meetings manage prolific reoffenders. At the Risk and Vulnerability Management Panel, organisations jointly develop coordinated plans to protect vulnerable residents who are victims, witnesses or perpetrators of crime and ASB. Agencies at the Community Gangs Forum discuss individuals involved or at risk of being involved in gangs to plan a holistic approach to divert them away from gangs.

Through the Young Londoners Fund, the Council coordinates trauma-informed services for young people, including mental health professional and a range of diversionary activities.

Members of the community may use a community trigger to ask the Council, Police or a relevant housing association to review the work they are doing to tackle persistent anti-social behaviour (ASB) after reporting three separate incidents of ASB in the previous six months. When residents in a particular area report concerns about a rise in crime or ASB, the Council may set up a working group to plan a multi-agency response. Using data and community feedback, it tasks appropriate services and monitors progress, amending actions where necessary.

The Croydon Resilience Forum (CRF) ensures an integrated approach to emergency response and management for the borough. It involves emergency planning officers and representatives of sectors with a role in emergency preparedness and response, including local authority, health, police, fire, utility, environment, business, voluntary, community, faith and transport.

There is no place for hatred and intolerance in Croydon's communities: since 2019, 24,000 individuals and organisations have signed Croydon's hate crime pledge. It helps us to identify whether communities understand hate crime issues and the reporting mechanisms in place. We engage signatories about events and training by VCS partners on tackling hate crime. The partnership is committed to targeting offenders, monitoring community tensions, increasing awareness of action to combat hate crime, reducing tolerance of it and undermining any social acceptability of it.

We will develop the work of our partnership to provide an effective response across the borough to tackle violence against women and girls (VAWG). This will include developing a detailed three-year strategy for 2022-2024 to focus the partnership's resources effectively on ending violence against women and girls. It will involve partnership work across national, regional and local boundaries to help victims and provide an effective first response to violence and abuse. It will cover ensuring streets are safer for all women and girls, as well as sex work, trafficking, female genital mutilation and other harmful practices. We are also preparing a more detailed strategy on the Partnership's approach to tackling harmful practices. Croydon's strategy will be in conformity with the government's new VAWG strategy and the Mayor's forthcoming Pan-London VAWG Strategy. Further actions will be developed in Croydon's new VAWG strategy.

The Council's [statement](#) in May 2019 details its approach across all council activity to raise awareness of and identify modern day slavery and respond accordingly.

### **What we will do**

#### ***Curtailed violent acts at source, pursuing perpetrators and enforcing action.***

1. Develop a detailed three-year strategy to tackle violence against women and girls (VAWG), in conformity with the forthcoming Pan-London VAWG Strategy.
2. Increase the visibility of enforcement and support services, such as the Family Justice Centre, enforcement teams and police, on the street, in bars, and brothels (also supports Priority 5).
3. Develop Croydon's partnership response for addressing modern slavery through a multi-agency case conference to share intelligence, identify victims, offenders and hotspots and coordinate focussed action.
4. Expand partnership working groups across other areas of need in the borough and develop plans involving all agencies.



***Treat those who have been exposed to violence, and their trauma, to control the spread***

5. Provide frontline staff in partner organisations with trauma and attachment training, enabling them to adopt a trauma-informed approach
6. Increase information sharing by partners to reduce offending in the borough, specifically on mental health, employment, and alcohol and substance misuse.
7. Continue providing trauma-informed support and advocacy to women involved in the criminal justice system to aid their resettlement
8. Deliver training to partners on identifying and responding to modern slavery and supporting victims.
9. Croydon BME Forum's Health and Well-being Space will see a range of trauma-informed services support people with mental health issues and ensure they can access mental health support in their local communities.
10. Improve support and reduce vulnerability for victims of hate crime.

***Support those susceptible to violence due to their exposure to risk factors, taking account of their trauma***

11. Invite and form a partnership with key agencies who can contribute to addressing the underlying issues of crime in the borough and enforcement through providing opportunities to residents to contribute to addressing the underlying issues of crime and enforcement (Strategic Assessment Recommendation 4)
12. A qualified psychologist will be based in Croydon BME Forum's hub to provide free therapeutic support.
13. Hold a quarterly forum on violence against women and girls to exchange intelligence, share good practice and address challenges and barriers to help VCS partners in delivering support services within their communities.
14. Croydon Health Services NHS Trust Learning Disability Team to re-establish the 'Risk Assessment Forum' to identify and mitigate risks posed more robustly.

***Strengthen community resilience through a universal approach and build trust***

15. Challenge the deep-rooted social norms, attitudes and behaviours that discriminate against and limit women and girls across all communities by working directly with grassroots organisations in raising awareness
16. Build strong stakeholder relationships and reduce silo working across the Safer Croydon Partnership and Croydon Resilience Forum
17. Facilitate community involvement in Police monitoring of the impact of section 60 'no suspicion' stop and searches for offensive weapons

18. Launch police encounter panels as part of MOPAC promise to improve transparency and accountability of police tactics which are identified by the public as of particular concern (e.g. viral videos on social media)
19. Improve access to Police through ward panels, Safer Neighbourhood Boards and community meetings, focussing on areas of risk with a priority to improve community cooperation, involvement and legitimacy.
20. Develop a Safer Croydon communications plan to increase awareness of the work being done by the council, police and other partners to combat crime; specific communications for local communities to focus on what is being done in specific areas of crime such as:
  - Domestic abuse and sexual violence
  - Serious youth violence
  - local statistical information for community organisations on violence against women and girls
  - Hate Crime
  - PREVENT work
  - Other areas of concern highlighted by the community
21. Engage with the community through surveys on a more regular basis to gauge their concerns in their area.
22. Run programmes of community involvement, capacity building and regular engagement involving Croydon BME Forum and CVA
23. Partnership to support and inform the Police's assessment of community tensions monitoring
24. London Fire Brigade will provide easier community access to local fire stations and build trust and confidence with all stakeholder groups.
25. Develop a Modern-Day Slavery (MDS) action plan which will be implemented by the MDS Forum.

***How we will we know our actions have been effective***

- Feedback from the voluntary and community sector
- Public Dashboard of the Mayor's Office of Policing and Crime
- Regular surveys, including trust and confidence in services.
- The number of staff receiving trauma training
- We are developing our method for collecting and understanding community feedback. We wish to assess whether there is an increase in people responding to surveys (women, young people and BAME residents in particular) who say that they would report an incident or crime to the authorities.

## 8.5 Priority 5 Focus on high priority neighbourhoods

### ***What we want to achieve***

The strategic assessment identified nine priority areas in the borough which the Safer Croydon Partnership should focus on because they score highly in our 'Priority Localities Index' with regard to crime, anti-social behaviour and the causes of crime.

By focussing our resources on these areas, we will tackle the underlying causes of crime so that these persistent high harm targets no longer generate such serious crimes, reducing overall crime rates and costs in the medium to longer term.

### ***What we are doing***

The Council coordinates and participates in multi-agency meetings to reduce crime and ASB in specific areas. Several apply a problem-solving approach, analysing the issues, developing a tailored response, and finally assessing the outcomes. The monthly Joint Action Group (JAG) tackles any crime and ASB problems in the borough requiring a multi-agency approach. Lately, a specific multi-agency working group is set up when a neighbourhood of concern raised at the JAG requires a more intensive partnership approach in the medium-to-long term.

The Council contributes to the local Police Tactical and Tasking Coordination Group (TTCG), where crime and ASB in the previous month is analysed and actions are allocated to officers and partners based on the findings and recommendations. With Probation, it participates in the local Police's daily partnership violence meetings where seriously violent incidents in the previous 24 hours are discussed and appropriate partnership actions agreed in order to reduce harm, safeguard those involved, and reassure the community.

### ***What we will do***

#### ***Curtail violent acts at source, pursuing perpetrators and enforcing action***

1. Focus on the neighbourhoods identified from the Priority Localities Index to collaboratively address the underlying issues linked to crime and ASB
2. Expand the use of data from MPS, London Ambulance Service, London Fire Brigade and A&E and other relevant agencies to identify specific hotspots within those neighbourhoods.
3. Increase micro-patrols focussing on areas with concentrations of high harm crimes involving violence. Other uniformed enforcement strands of the partnership will support this action.
4. Use enforcement resources to target areas of high crime and ASB and offenders, including CCTV, Rapid Deployment Cameras and Enforcement Officers
5. Invite and form a partnership with the British Transport Police to address the underlying issues of crime and enforcement in relevant high priority neighbourhoods.
6. Where possible, conduct Randomised Controlled Trials (RCTs) to determine "what works" in regards to interventions.

***Treat those who have been exposed to violence to control the spread***

7. Use crime harm as a measure to identify suspects and victims of serious crimes in order to focus resources intensively to reduce further serious risk in the borough.
8. Develop and expand fortnightly working groups to organise a partnership approach in high priority neighbourhoods for tackling issues highlighted by partners' intelligence.

***Support those susceptible to violence due to their exposure to risk factors***

9. Develop and implement crime and safety prevention initiatives to minimise the frequency and impact of critical and major incidents that require a coordinated emergency response as required by the Civil Contingencies Act 2004 and London Emergency Services Liaison Panel Procedures
10. Focus and maintain the Change Grow Live service for those neighbourhoods that have high rates of alcohol and substance misuse

***Strengthen community resilience through a universal approach***

11. Engage communities in targeted neighbourhoods with messages that inform them of services that will protect them, help them feel safer, and promote civic pride.
12. Establish ways to improve neighbourhood cohesion in areas identified by the Priority Localities Index where this may have deteriorated.
13. Engage with VCS partners who are delivering programmes in the areas identified

***How we will we know our actions have been effective***

- Statistics on crime, ASB and other indicators.
- Where working groups have been active in a specific neighbourhood, a comprehensive assessment including a before/after comparison of the treatment area compared to a control area.
- An annual survey provided to the community on crime and ASB and other related issues.

## Glossary

### **Adults Safeguarding Board**

The Croydon Safeguarding Adults Board (CSAB) following the Care Act is now a statutory body with the following functions:

- Assure itself that local safeguarding arrangements are in place as defined by the Care Act
- Prevent abuse and neglect where possible
- Provide a timely and proportionate response when abuse or neglect has occurred.
- The SAB must take the lead for adult safeguarding across its locality and oversee and co-ordinate the effectiveness of the safeguarding work of its member and partner agencies. It must also concern itself with a range of matters which can contribute to the prevention of abuse and neglect such as the:
  - Safety of patients in local health services
  - Quality of local care and support services
  - Effectiveness of prisons in safeguarding offenders

The Board fully supports work on such priorities as hate crime and domestic abuse and is a part of the cross-cutting domestic abuse group. Other areas of importance to the Board include work on the Prevent programme, a national counter-radicalisation strategy.

### **Channel Panel**

Channel is an early intervention multi-agency panel designed to safeguard vulnerable individuals from being drawn into extremist or terrorist behaviour.

### **The Croydon Resilience Forum (CRF)**

The Council runs the CRF in order to have an integrated approach to emergency response and management for the borough. Membership includes emergency planning officers and representatives of sectors with a role in emergency preparedness and response, including local authority, health, police, fire, utility, environment, voluntary, community, faith, business, and transport.

### **Community Trigger**

This is a process used by members of the community to ask the Council, the Police or a relevant housing association to tackle persistent anti-social behaviour (ASB). They may do this after reporting three separate incidents of ASB to the Council, the Police or the housing association in the previous six months.

**Croydon Safeguarding Children Partnership (CSCP)**

The CSCP is responsible for scrutinising safeguarding arrangements across the borough. The CSCP is an independent body and challenges and holds to account the organisations working with children and young people in Croydon. The Children and Families Partnership and the CSCP work together to ensure that children and young people in Croydon are safe.

**Complex Adolescents Panel (CAP)**

The CAP is a multi-agency panel (incorporating MACE) which hears individual cases for children and young people who have been assessed as having a child exploitation episode to enable practitioners to share information, gather intelligence and help to determine the best way to manage the risk presented.

**Domestic Abuse and Sexual Violence Group (DASV)**

This group exists to have a strategic oversight of multi-agency responses to domestic abuse within Croydon, working in partnership to provide scrutiny to progress on the delivery of the DASV strategy and ensure the multi-agency management of domestic abuse is victim focused, efficient and effective.

The group brings together managers from key agencies and services whose remit has a direct impact on the domestic abuse and sexual violence strategy. Members are committed to effective partnership working based on trust and open communication and are aware of and understand the organisational frameworks within which colleagues in different agencies work.

**Gangs and Serious Youth Violence Group**

Oversees the strategic delivery of the multi-agency response to tackling Serious Youth Violence and Gangs. This group also led on the VRU's Local Violence and Vulnerability Action Plans.

**Integrated Offender Management Group**

A multi-agency response to reduce re-offending; by targeting the most problematic offenders in the borough. The IOM framework helps to address the problems behind an offender's behaviour by effective information sharing across a range of partner agencies and jointly providing the right intervention at the right time.

**Joint Action Group (JAG)**

The JAG is a multi-agency problem solving group tackling anti-social behaviour. Member agencies include, Police Neighbourhood Cluster Inspectors, Youth Offending Services, Youth Outreach, Substance Misuse Outreach Services (for individuals displaying anti-social behaviour linked to alcohol and/or substance misuse) Croydon Connected (multi-agency gang team) Environmental Health

Teams, Council and Police ASB Team, Safer Transport Teams, Fire Service, UK Border Agency and Neighbourhood Watch.

Each problem location identified is dealt with by a dedicated team responsible for pulling together short term action plans based on problem solving techniques. These are monitored by the JAG and the Police Borough Tasking Group. On-going hot spot areas, for example the Town Centre, remain as core agenda items.

**Multi Agency Public Protection Arrangements (MAPPA)**

A Multi-agency meeting to manage the most serious offenders

**PREVENT Strategy**

Prevent is one of the four elements of CONTEST, the government’s counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. The Home Office works with local authorities and a wide range of government departments, and community organisations to deliver the Prevent Strategy.

The Prevent Strategy:

- responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views
- provides practical help to prevent individuals from being drawn into terrorism and ensure they are given appropriate advice and support
- works with a wide range of institutions (including education, statutory services charities, online and health) where there are risks of radicalisation that we need to deal with.

You can [read the Prevent Duty Guidance for England and Wales on GOV.UK](#).

The Prevent team delivers work including:

- training for frontline staff in recognising, referring and responding to radicalisation
- projects to build capacity, increase resilience and improve understanding of extremism and radicalisation with partners such as schools, colleges, frontline staff, community groups, venues and parents
- Channel, a referral service for concerns, which acts as an early intervention service to safeguard vulnerable individuals from radicalisation.

**PREVENT Board**

To act as a strategic group in the identification of priorities which are in-line with the national priorities as outlined in the Prevent Strategy:

1. Working with vulnerable individuals,
2. Working with vulnerable institutions;
3. Challenging extremist ideology. This includes being responsible for the governance and scrutiny of Prevent’s Channel panel.

**Risk and Vulnerability Management Panel (RVMP)**

The RVMP is a meeting where information is shared on complex/high risk cases between various stakeholders. The purpose of the meeting is to work together to take appropriate action to prevent people with vulnerabilities being a victim and or perpetrator of crime and or ASB.

**Violence against Women and Girls Forum**

Quarterly forums to support VCS and grassroots organisations that provide support for victim/survivors of domestic abuse. Support with access to funding, share practice/trends. Organisations: Anos, BCWA, Lioness Circle, ARC, Hersana, Anima Youth, Cassandra Learning Centre, BME Forum, Encouraging Her, Walk With Me, Hestia

**Youth Crime Board**

The Youth Crime and Safety Board has a dual role in acting as the statutory governance board for the Youth Offending Service as well as the strategic board overseeing the delivery of the Youth Crime prevention Plan requires a partnership approach to ensure preventative measures are put into place across all partner agencies. It includes key statutory partners with a number of different council teams involved as well as representation from the voluntary and community sector.



<b>REPORT TO:</b>	<b>Cabinet 6<sup>th</sup> December 2021</b>
<b>SUBJECT:</b>	<b>2022/23 Budget and Three-Year Medium Term Financial Strategy</b>
<b>LEAD OFFICER:</b>	<b>Richard Ennis, Corporate Director of Resources (S151 Officer)</b>

**SUMMARY OF REPORT:**

This report sets out the Council's three year Medium Term Financial Strategy [MTFS] and is the first of a series of reports prior to the budget setting Council on 21st February. This report focusses on the General Fund on which there will be further reports at the January and February Cabinets. The Housing Revenue Account [HRA] will be reported to February Cabinet and the capital budgets will be reported in detail as part of the January and/or February Cabinet agendas as well.

The proposals set out in this report aim to support the Council's ambition for our borough and priorities as outlined below:

- We will live within our means, balance the books and provide value for money for our residents.
- We will focus on tackling ingrained inequality and poverty in the borough. We will follow the evidence to tackle the underlying causes of inequality and hardship, like structural racism, environmental injustice and economic injustice.
- We will focus on providing the best quality core service we can afford. First and foremost, providing social care services that keep our most vulnerable residents safe and healthy. And to keep our streets clean and safe. To ensure we get full benefit from every pound we spend, other services in these areas will only be provided where they can be shown to have a direct benefit in keeping people safe and reducing demand.

This report sets out the current MTFS gap for 2022/23 and 2023/24 as was approved by Full Council in March 2021 and the progress in identifying savings proposals to bridge that gap. From an original gap of £38m for 2022/23, savings proposals and growth requests (including a contingency for delivery risk) has so far identified options that would reduce that gap to £13m. This is net of the Council also dealing with further growth pressures but does include some areas that are still under negotiation that will be confirmed in the January and February reports. This further work is needed to provide greater delivery certainty against a number of identified savings options, and in particular the announcement of the Local Government Finance Settlement not being expected until late December.

With General Reserves being rebuilt earlier than originally envisaged the need to build adequate levels of earmarked reserves becomes a priority. In-year and future Base Budget contributions to General Reserves are instead more expected to be used to provide resilience through contributions to earmarked reserves. A risk assessment will be undertaken to assess and quantify the level of general un-earmarked and earmarked

reserves and the period over which the latter may need building as appropriate. A recommendation will be given in a future Cabinet report in this respect.

Any adverse change to the budget gap – either by new pressures emerging or savings proposals from this report or the previous March 2021 Council approved budget and MTFs not being continued with, would need to be offset by the identification of other compensating savings to ensure a robust sustainable budget for the coming and future years.

## **FINANCIAL IMPACT**

The setting of a budget and the Council Tax requirement is a legal obligation on the Council. This report sets out the progress made in addressing the £38m net budget gap as approved for 2022/23 in March 2021. This report identifies savings and growth pressures that to date reduce that gap to £13m. Savings that are ongoing help to reduce the budget savings target for future years. Officers continue to work on options to recommend to Cabinet and subsequently Council to close this gap.

The Council is currently undertaking a transformation process to re-base its budgets and service delivery model to one that allows itself to manage within its available income streams and relies on tapering capitalisation direction approvals over this and the future two years as it progresses toward that position. The setting of a robust and balanced budget as it works toward that target is essential to demonstrate progress is being made and enable future capitalisation directions to be approved.

## **1. RECOMMENDATIONS**

The Leader has delegated to authority to Cabinet to make the following decisions:

- 1.1 Note the significant progress towards delivering a balanced budget for 2022/23 and future years and the current budget gaps still to close;
- 1.2 Consider the contents of paragraph 3.24 in respect of the identified risks to the budget process and make any recommendations in respect of the risks to the budget process;
- 1.3 Request that Cabinet request the Corporate Director of Housing to bring a report to the February 7<sup>th</sup> Cabinet setting out how a reduction to the in-year and future year pressures against the existing Temporary Accommodation budget will be managed and achieved;
- 1.4 Request officers to continue to work on reducing growth pressures and report back any changes to the February 7<sup>th</sup> Cabinet;
- 1.5 Support the growth and savings schedules included at appendix 1, and
- 1.6 in principle, to recommend these to Full Council as part of the budget approval process. To note that officers will commence planning for the implementation from

April 2022 where appropriate where appropriate, but that any such proposals are subject to approval at February Council;

- 1.7 Ask the Corporate Management Team to continue work to identify further invest-to-save opportunities that improve the efficiency and effectiveness of the Authority, and minimise any service reductions;
- 1.8 Request the Corporate Management Team to ensure that there are sufficient resources to deliver the MTFS and report back in this respect in the January and February Cabinet reports;
- 1.9 Make any recommendations and comments that will further the ability for the Improvement Panel to make a positive recommendation to the Secretary of State for the Department of Levelling Up, Housing and Communities [DLUHC] in respect of the Council's progress and specifically confirming this year's £50m capitalisation direction and also next year's £25m (2022/23) capitalisation respectively in order to give financial certainty to the Council (a further £5m capitalisation is budgeted for in 2023/24);
- 1.10 Note the Council is undertaking further work in respect of the potential to maximise its capital receipts and the potential use of these to reduce its borrowing requirements subject to Cabinet and Council agreement;
- 1.11 Note that the scrutiny sub committees will have had initial discussions prior to this December Cabinet meeting and they and the Scrutiny and Overview Committee will undertake their scrutiny and overview work on the budget proposals and feed recommendations and comments for consideration into the January and February Cabinets;
- 1.12 Note the intention to take a report to the General Purposes and Audit Committee [GPAC] about the reserves strategy and its relationship to the MTFS prior to Cabinet taking a decision to recommend a budget to Full Council
- 1.13 Note the significant financial implications, approved in the March 2021 Budget at Full Council, from any policy changes and operational enforcement and income modelling changes, in respect of Healthy Neighbourhoods (formally referred to as Low Traffic Neighbourhoods), that will require the Council to find alternative savings in this respect;
- 1.14 Note that at this report's dispatch prior to the consideration of the Pensions Committee on 3<sup>rd</sup> December of a report recommending an actuary supported reduction in employer contributions that are part of the savings in 2022/23 preceding a further triennial pension review that will consider employer contributions for 2023/24 onwards. The savings in this respect are £3.400m in 2021/22 and £2.760m in 2022/23 (reducing as a part saving was already included in existing proposals for 2022/23) should the Pensions Committee scheduled on 3<sup>rd</sup> December agree to recommend these to Cabinet. An update will be provided at the actual Cabinet meeting;

- 1.15 Welcomes the additional 'one off' funding from the Home Office in 2021/22 and the temporary mandate of the national Transfer Scheme and request the Improvement Panel to support the cross party view of the Council in making further recommendations to the Secretary of State to fully fund the estimated circa. £4.5m of additional costs of Unaccompanied Asylum Seekers [UASC] that continue to fall disproportionately on the Croydon Council Tax payer; and
- 1.16 Note that officers continue to work on the closure of the draft accounts for 2019/20 and 2020/21 in response to dealing with the external auditors findings as reported to the General Purposes and Audit Committee [GPAC] and that this could have significant implications for the medium Term Financial Strategy and request officers to complete this work as soon as possible and at the latest ahead of the final February Cabinet.

## **2. EXECUTIVE SUMMARY**

- 2.1. This report is the first in a series of budget reports on route to producing a balanced budget for the Council for 2022/23 through to 2024/25.
- 2.2. This report focusses on the General Fund with further General Fund budget reports, the capital budget report and the Housing Revenue Account being brought to the January and February Cabinet meetings in the new-year.
- 2.3. The Council has made significant progress to deliver a balanced budget but there are still further significant savings to make of £13m; £16m; and £2m in the financial years 2022/23 to 2024/25 respectively.
- 2.4. In addition, the Council has built its general (un-earmarked) reserves to a more appropriate level and an assessment that takes account of the risks inherent in an organisation that is in recovery will be included in the February Cabinet report. Earmarked reserves need rebuilding having been drawn on as a result of the significant financial challenges the Council faced. A chart of reserves is shown against a number of other London boroughs in Table 8. As already mentioned further work in this respect is being undertaken and will form part of the Cabinet reports in the new-year.
- 2.5. The Council is making progress and needs to ensure that this is sustainable through continuing to ensure it has sufficient skills and capacity to deliver what will be a significant improvement and savings programme. Being able to both attract and retain existing and new excellent officers is of paramount importance as part of this recovery.
- 2.6. Discussions and negotiations continue with the NHS to ensure the Council receives increased allocation of resources supported by evidence from the Council on the substantial costs resulting from the increased needs of the population being met through the discharge to assess process and the need that is causing pressure through sustained high hospital occupancy. The total hospital occupancy remains at static high levels, however, due to increased acuity of people, the numbers requiring support with discharge, predominantly

through social care are substantially higher, as well as the size of packages people need.

- 2.7 The Social Care budget pressure for ongoing care package costs (post 6 weeks) is also arising from this increased activity. This is from during the pandemic and into winter, projected to continue due to the backlog in health care and increased frailty of people leaving hospital and higher need and sickness in the population. Funding is required to continue to both drive and support the NHS and our residents in delivering good flow through the system and quality services to those in need in a cost effective and outcomes driven way. System partner led programmes can be progressed to minimise ongoing costs to all parties and maintain quality.
- 2.8 The Council has identified significant contract and other spend-related savings of £5m (in addition to £14m of such savings already approved for 2022/23 in the March MTFS) through a member and officer group that continues to look for further savings in addition to delivering those identified already.
- 2.9 Work continues to identify ways to de-risk the Balance Sheet through, for example, taking a stronger approach to dealing with outstanding loans and debtors to the Council. This includes loans made to business that are now operating again post Covid.

### **3 GENERAL FUND REVENUE BUDGET**

- 3.1 The Approved 2021/22 Budget and Medium Term Financial Strategy
- 3.2 Cabinet and Full Council considered and approved the 2021/22 revenue and capital budgets for 2021/22 and a three-year Medium Term Financial Strategy [MTFS] on 8<sup>th</sup> March 2021 (*Agenda Item 18/21 of Full Council Meeting*). The General Fund revenue budget for 2021/22, being predicated on the final approval by the Department of Levelling Up, Communities and Housing [DLUCH - previously MHCLG] of a £50m capitalisation direction, was a balanced budget allowing for a further £10m contribution to General (*un-earmarked*) reserves to enable the Council to deal with the uncertainty of the current economy, the continuing challenges of the Covid pandemic, and to strengthen the Council's overall financial resilience. Whilst a number of budget change approvals for the years 2022/23 and 2023/24 were also approved at that meeting, a gap between revenue spend and income sources of £38m and a further £22m respectively identified in the latter two years (2022/23 and 2023/24) of the MTFS as the reliance on capitalisation direction requests reduced to £25m and £5m respectively.
- 3.3 If the Secretary of State decides to give a direction, he expected to confirm the final amount of capitalisation support and any conditions that would be applied in summer 2021. His consideration would include taking account of the following:
  - a) Evidence that the conditions set out in any capitalisation direction in respect of 2020/21 have been complied with;

- b) Evidence from the Improvement Panel of the Authority's progress against its Improvement Plan, as reflected in forthcoming progress reports from the Panel;
- c) Evidence from the Improvement Panel of the Authority's financial position and its ability to meet any or all of the identified budget gap without additional borrowing;
- d) Evidence from the Improvement Panel of the Authority's progress in developing and delivering against an asset disposal plan;
- e) Evidence of progress against the other areas of improvement that were identified in the Panel's February update to the Department: progress in resolving challenges in property ventures; a credible 2021/22 budget including a deliverable savings plan; progress in developing a plan to transform front line services; progress made to change the culture of the organisation;
- f) Evidence and recommendations from the Improvement Panel on the steps that the Authority may need to take to, for example, improve its governance arrangements, financial management, operational delivery and to reduce risk.

3.4 With this in mind, the Secretary of State also reserved the right to attach additional bespoke conditions to a direction in respect of 2021/22 depending on the Council's individual circumstances.

3.5 In the event of a failure by the Council to demonstrate progress in its recovery, the Secretary of State will consider whether it is appropriate to use the Best Value powers available, including the appointment of Commissioners.

3.6 At the time of writing this report the Secretary of State has not confirmed the 2021/22 capitalisation, having only referred to being "minded to approve" in their March 2021 letter to the Council, although discussions with officials at DLUHC have included statements that there is no indication of non-approval subject to the requirements above. The Improvement Panel have stated that their next letter to the Secretary of State will be after this 6<sup>th</sup> December Cabinet so the importance of this report is paramount.

3.7 A summary of the three-year growth and savings approved at the March 2021 Cabinet and Full Council meeting is set out in the table below:

Table 1 – Approved 2021/22 Budget and Medium Term Financial Strategy

	<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
	2021/22 (£,000's)	2022/23 (£,000's)	2023/24 (£,000's)	2024/25 (£,000's)	2021/22 (£,000's)	2022/23 (£,000's)	2023/24 (£,000's)	2024/25 (£,000's)
Children's, Families & Education	11,000	(4,609)	(2,219)	-	11,000	6,391	4,172	4,172
Health, Wellbeing & Adults	11,757	(3,825)	(2,625)	-	11,757	7,932	5,307	5,307
Place	(2,657)	(6,578)	(2,513)	-	(2,657)	(9,235)	(11,748)	(11,748)
Resources	8,603	(2,413)	(2,140)	-	8,603	6,190	4,050	4,050
Corporate & Cross-Cutting	21,297	30,803	11,630	-	21,297	52,100	63,730	63,730
<b>Net Changes (Excl Capitalisation)</b>	<b>50,000</b>	<b>13,378</b>	<b>2,133</b>	<b>-</b>	<b>50,000</b>	<b>63,378</b>	<b>65,511</b>	<b>65,511</b>
Less Capitalisation Direction	(50,000)	25,000	20,000	-	(50,000)	(25,000)	(5,000)	(5,000)
	-	<b>38,378</b>	<b>22,133</b>	-	-	<b>38,378</b>	<b>60,511</b>	<b>60,511</b>
Total Growth Changes	132,563	15,514	30,363	-	132,563	148,077	178,440	178,440
Total Savings Changes	(82,563)	(2,136)	(28,230)	-	(82,563)	(84,699)	(112,929)	(112,929)
Capitalisation Direction	(50,000)	25,000	20,000	-	(50,000)	(25,000)	(5,000)	(5,000)
<b>Net Changes (Excl Capitalisation)</b>	<b>-</b>	<b>38,378</b>	<b>22,133</b>	<b>-</b>	<b>-</b>	<b>38,378</b>	<b>60,511</b>	<b>60,511</b>

- 3.8 Applying the above approved budget changes for 2021/22 to the Base Budget brought forward from 2020/21, and reflecting approved budget virements (*transfers*) to reflect the change in departmental responsibilities following the corporate restructure, the approved 2021/22 departmental budgets are summarised in the table below:

Table 2 – 2021/22 General Fund Revenue Budget

	Income (£,000's)	Expenditure (£,000's)	Net Budget (£,000's)
Sustainable Communities, Regeneration & Economic Dvlpt	(74,033)	126,578	52,545
Children, Young People & Education	(224,967)	332,355	107,388
Housing	(40,634)	54,953	14,319
Adult Social Care & Health	(40,035)	167,218	127,183
Assistant Chief Executive	(57,129)	77,962	20,833
Resources	(225,458)	260,533	35,075
Corporate & Cross-Cutting	(90,659)	67,378	(23,281)
<b>Net Budget Requirement</b>	<b>(752,915)</b>	<b>1,086,978</b>	<b>334,063</b>
<b>Funded From:</b>			
Revenue Support Grant	(14,205)		(14,205)
Locally Retained Business Rates (Incl Top-Up Grant)	(71,764)		(71,764)
Council Tax	(198,094)		(198,094)
	<b>(1,036,978)</b>	<b>1,086,978</b>	<b>50,000</b>
Less Capitalisation Direction	-	(50,000)	(50,000)
<b>Total Budget</b>	<b>(1,036,978)</b>	<b>1,036,978</b>	<b>-</b>

### 3.9 Current Year Financial Performance Monitoring

- 3.10 Budget monitoring has been strengthened and is now reported to Corporate Management Team [CMT] and Cabinet on a monthly basis in line with the recommendations set out in the Finance Improvement Plan. The most recent report being to the end of October. As well as a forecast to year-end, identified further potential risks or opportunities which may impact on that forecast are also reported to provide an indication of how that forecast could change.

- 3.11 Departmental forecasts predict a net overspend across three portfolios (after mitigations enacted within those portfolios) as summarised below:
- a) The Sustainable Communities, Regeneration and Economic Recovery [SCRER] portfolio is reporting a £5.122m adverse variance relating principally to the Secretary of State not approving the requested Selective Licensing Scheme and secondly levels of parking income caused by continuing Covid-related downturn in traffic numbers and delays in member decisions to roll-out Healthy Neighbourhoods (formerly Local Traffic Neighbourhood [LTM]) schemes in respect of the policy which has significant financial implications for the budget that was approved in March 2021;
  - b) Healthy Neighbourhoods has an existing approved net income budget of £5.025m in 2021/22, £8.205m and £11.606m in 2022/23 and 2023/24. In total on a cumulative cash basis the Heathier Neighbourhoods budgets total nearly £25m of income over the three years of the MTFs as approved in the March 2021 budget. For 2021 there is already a £3m income shortfall forecast as a result of delays in decision making and ongoing impact of Covid;
  - c) The Housing service portfolio is forecasting a £1.881m overspend predominantly the result of increased pressures within the emergency and temporary accommodation services; and
  - d) Whilst having received additional exceptional and one-off funding from the Home Office to manage cost pressures in relation to Unaccompanied Asylum Seeker Children [UASC], this continues to be below the level to meet the particular numbers for which Croydon has become responsible, and net of the grant still represents a £1.615m adverse variance. This Government along with previous Governments have failed to deliver a fully funded UASC in particular to authorities such as Croydon, Hillingdon and Westminster where UASC cost impact is disproportionate.
- 3.12 Offsetting these projected portfolio overspends are other net underspends across other service areas that further mitigate the overall forecast to a net £3.030m adverse variance.
- 3.13 Some of the pressures contained in the current service forecast relate to expenditure or shortfalls in income resulting from the ongoing Covid pandemic. Accordingly from the start of the year, £3.451m of an overall £11.250m one-off DLUHC Covid pressures grant, held as a specific reserve, has been released to mitigate the overall net position. Taken collectively, the latest net General Fund revenue forecast predicts a £0.421m underspend position. The table below summarises the above:



**Table 3 – Latest General Fund Revenue Forecast**

	Period 6 Forecast (£,000's)	Period 7 Forecast (£,000's)	Change in Month (£,000's)
Children, Young People & Education	(3,148)	(3,742)	(594)
UASC Expenditure	1,615	1,615	-
Adult Social Care & Health	(869)	(1,088)	(219)
Housing	1,838	1,881	43
Sustainable Communities, Regen & Economic Recovery	5,672	5,122	(550)
Assistant Chief Executive Resources	(848) (210)	(636) (121)	212 89
<b>Service Forecasts</b>	<b>4,050</b>	<b>3,030</b>	<b>(1,020)</b>
Release of Covid Funding	(3,451)	(3,451)	-
<b>Net General Fund Forecast</b>	<b>599</b>	<b>(421)</b>	<b>(1,020)</b>

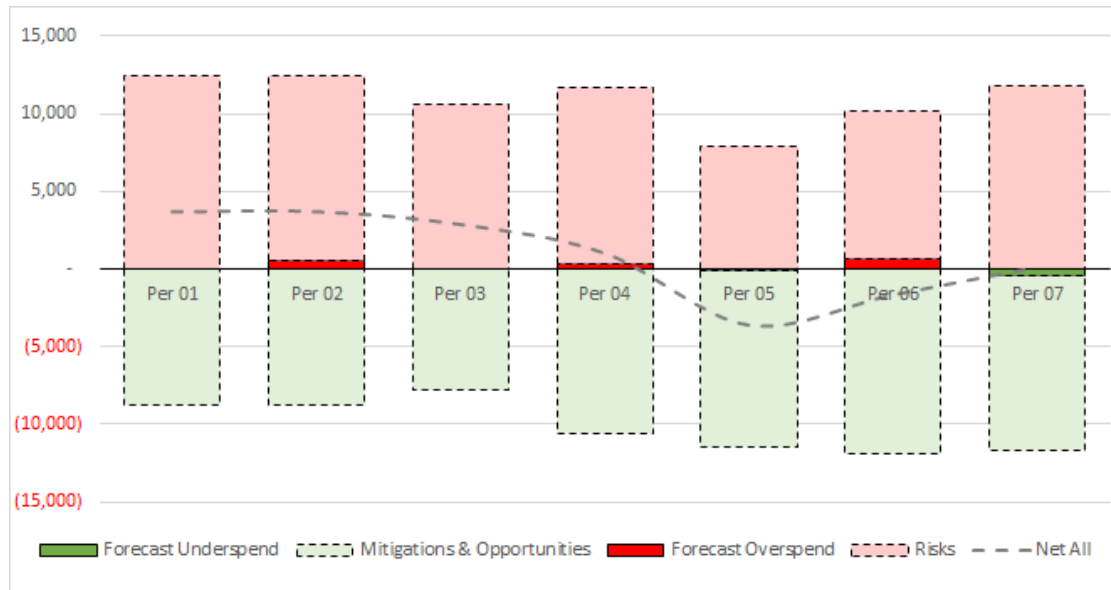
- 3.14 As referred to above, in addition to the forecast outturn previously set out, risks and opportunities that may materialise and impact on that forecast are also monitored and reported. Risks have been identified across service areas relating to both delivery of agreed savings proposals as well as other emerging pressures and in total represent £11.777m of risks and £11.259m of potential opportunities – net £0.518m risk. Whilst full details of these are set out in the Financial Performance Report separately reported to Cabinet, a summary of these risks and opportunities and their potential impact on the forecast outturn position is given in the table below:

**Table 4 – Risks and Opportunities – Potential Impact on Forecast**

	Savings Risks (£,000's)	Other Risks (£,000's)	Oppor- tunities (£,000's)	Net Risk Opps (£,000's)	Period 7 Forecast (£,000's)	Total (£,000's)
Children, Young People & Education	247	160	(1,307)	(900)	(3,742)	(4,642)
UASC Expenditure	-	-	-	-	1,615	1,615
Adult Social Care & Health	-	3,050	(1,307)	1,743	(1,088)	655
Housing	-	396	(396)	-	1,881	1,881
Sustainable Communities, Regen & Economic Recovery	4,025	2,899	-	6,924	5,122	12,046
Assistant Chief Executive Resources	- -	- -	(250) (200)	(250) (200)	(636) (121)	(886) (321)
<b>Service Forecasts</b>	<b>4,272</b>	<b>6,505</b>	<b>(3,460)</b>	<b>7,317</b>	<b>3,030</b>	<b>10,348</b>
Corporate & Cross-Cutting	1,000	-	(7,799)	(6,799)	(3,451)	(10,250)
<b>Net General Fund Forecast</b>	<b>5,272</b>	<b>6,505</b>	<b>(11,259)</b>	<b>518</b>	<b>(421)</b>	<b>98</b>

- 3.15 As for all councils, the forecast outturn position has the potential to move further in either direction as the year progresses, however activity continues to mitigate the impact of forecast overspends and potential pressures whilst delivering the benefit of potential opportunities to maintain the revenue position in line with approved budgets. Tracking of monthly reported forecasts has shown a relatively stable position during the course of the year to date

**Table 5 – Revenue Forecasting Trend**



**3.16 The 2022/23 Budget and Medium Term Financial Strategy**

3.17 Following the recommendation set out in the Finance Improvement Plan, the Council returned to setting out and approving a Medium Term Financial Strategy over a three-year planning horizon rather than just a one year budget and was approved by Full Council in March 2021. With an identified budgetary gap over the years 2022/23 and 2023/24 remaining at that time, work immediately began on a process to identify further options (or additionally arising pressures) that would be needed to set a balanced budget for 2022/23 and reduce any future year gap.

3.18 Development of the budget building process has been running throughout the late spring, summer and into the autumn to identify budget options to members that enable the Council to set a balanced budget for 2022/23 and extend the MTFS planning horizon over a further year.

3.19 The process has involved service departments reviewing their budgets and delivery models to identify potential savings opportunities for 2022/23 or beyond and reviewing their already agreed further savings and growth already approved in March 2021. All proposals have been reviewed through a series of Budget Development, Challenge and Star Chamber sessions involving departmental managers, Corporate Management Team and Cabinet portfolio holders, both individually and collectively. Delivery risk has been considered against individual proposals and has been used to inform the quantum potentially required for a necessary risk and contingency provision.

3.20 Based on those submissions, as modified through the Challenge and Star Chamber sessions, the current proposals (as set out in detail in Appendix 1) would see the original £38m gap for 2022/23 reduce to a net £13m.

- 3.21 In total, further savings opportunities of £58m are being put forward for consideration in this Cabinet report, but are offset by £10m being discounted in accordance with individual proposals assessed delivery risk weightings. Whilst this net position would notionally over-deliver against the original 2022/23 £38m gap by £10m, additional growth pressures have been identified amounting to £23m from that envisaged in setting the budget and MTFs in March 2021 which when taken into consideration leaves a remaining gap at this stage of £13m. The risk weightings continue to be reviewed.
- 3.22 The table below summarises this latest position (and which full detail is set out in Appendix 1):

**Table 6 – Latest MTFs Position**

	<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
	2021/22 (£,000's)	2022/23 (£,000's)	2023/24 (£,000's)	2024/25 (£,000's)	2021/22 (£,000's)	2022/23 (£,000's)	2023/24 (£,000's)	2024/25 (£,000's)
Original Gap (March 2021)	-	38,378	22,133	-	-	38,378	60,511	60,511
<b>Savings Proposals:</b>								
Children, Young People & Education	(2,000)	(2,611)	(1,479)	(330)	(2,000)	(4,611)	(6,090)	(6,420)
Adults Social Care & Health	-	(3,788)	-	740	-	(3,788)	(3,788)	(3,048)
Housing	-	(2,502)	(1,789)	-	-	(2,502)	(4,291)	(4,291)
Sustainable Communities, Regen & Econ Recovery	(175)	(3,918)	(1,005)	5	(175)	(4,093)	(5,098)	(5,093)
Assistant Chief Executive	(518)	(2,644)	(1,223)	(2,250)	(518)	(3,162)	(4,385)	(6,635)
Resources	(3,400)	(1,225)	(1,378)	(885)	(3,400)	(4,625)	(6,003)	(6,888)
Corporate & Cross-Cutting	-	(34,551)	(3,966)	(15,206)	-	(34,551)	(38,517)	(53,723)
	<b>(6,093)</b>	<b>(51,239)</b>	<b>(10,840)</b>	<b>(17,926)</b>	<b>(6,093)</b>	<b>(57,332)</b>	<b>(68,172)</b>	<b>(86,098)</b>
Less Delivery Risk Weighting	1,219	7,602	2,168	3,585	1,219	8,821	10,989	14,574
	<b>(4,874)</b>	<b>(43,637)</b>	<b>(8,672)</b>	<b>(14,341)</b>	<b>(4,874)</b>	<b>(48,511)</b>	<b>(57,183)</b>	<b>(71,524)</b>
<b>Growth Requests:</b>								
Children, Young People & Education	-	200	(100)	(100)	-	200	100	-
Adults Social Care & Health	-	500	-	-	-	500	500	500
Housing	-	2,000	-	-	-	2,000	2,000	2,000
Sustainable Communities, Regen & Econ Recovery	-	6,974	(119)	-	-	6,974	6,855	6,855
Assistant Chief Executive	51	1,513	175	-	51	1,564	1,739	1,739
Resources	-	325	-	400	-	325	325	725
Corporate & Cross-Cutting	-	11,721	2,239	11,487	-	11,721	13,960	25,447
	<b>51</b>	<b>23,233</b>	<b>2,195</b>	<b>11,787</b>	<b>51</b>	<b>23,284</b>	<b>25,479</b>	<b>37,266</b>
Changes to Use of Capitalisation Direction	-	-	-	5,000	-	-	-	5,000
<b>Overall Net Remaining Gap</b>	<b>(4,823)</b>	<b>17,974</b>	<b>15,656</b>	<b>2,446</b>	<b>(4,823)</b>	<b>13,151</b>	<b>28,807</b>	<b>31,253</b>

- 3.23 Included in the above summary of savings options and growth requests (full details of which can be referred to in Appendix 1) are the following worthy of particular note in this report:

- Children, Young People and Education savings proposals include a cumulative £3.000m saving for 2022/23 as a reduction to the £20.518 growth approved in March 2021;
- Adult Social Care and Health savings proposals include a cumulative £1.387m saving as a reduction to the previously approved growth of £35.859m;
- Housing proposals include £2.000m growth pressures for ongoing costs of emergency and temporary accommodation where work is ongoing to reduce this pressure;
- Sustainable Communities, Regeneration and Economic Recovery

[SCRER] proposals include £0.950m (rising to £1.100m in future years) for the Neighbourhood Operations (NSO) activity;

- e) Within the SCRER savings proposals agreed in March 2021, was included the roll-out of Healthy Neighbourhoods and Automatic Number Plate Recognition [ANPR] camera enforcement. Healthy Neighbourhood's has an existing approved income budget of £5.025m in 2021/22, and £8.205m, £11.606m in 2022/23 and 2023/24. In total on a cumulative cash basis the Heathier Neighbourhoods budgets total nearly £25m over the three years of the MTFs as approved in the March 2021 budget. The November Traffic Management Advisory Committee voted 3-2 in favour of continuing the roll out of the policy objectives. Whilst the Council must not have income as the objective it must be aware of the significant financial implications of a full or partial change to the policy and specifically as regards enforcement. This is particularly important in demonstrably showing the Council can deliver both the primary policy objective and secondary financial plan given it is only nine months since March 2021 when approval was given at full Council. For 2021/22 there is already a £3m shortfall forecast as a result of delays in decision making. This budget proposal remains in full in the MTFs and has not been reduced in subsequent proposals – any change in this assumption would further impact on the remaining gap and require significant alternative savings to be approved by full Council in order to maintain a direction of travel towards a robust budget;
- e) Growth requests within the SCRER portfolio include £1.313m to reflect Special Education Needs [SEM] transport cost pressures as well as £3.062m for the reduced income previously expected from the Selective Landlord Licencing Scheme which were refused by the Secretary of State. Both of these pressures form part of the current forecast variance in current year monitoring;
- f) Within the Assistant Chief Executive portfolio are two growth requests as a result of the referendum for a locally elected mayor - £0.330m for the costs of a mayor and support, plus an additional £0.240m cost in 2022/23 for the additional costs of holding the mayoral election alongside the borough-wide election;
- g) Corporate and Cross-Cutting savings proposals include an assumed increase in the average Band D Council Tax charge of 2.99% - being 1.99% general increase plus 1.00% Social Care Premium in line with indications set out in the Chancellor's Autumn Budget Statement and assumed to be taken in its assessment of Core Spending Power available to local authorities – this is currently below forecast inflation levels;
- h) Additionally, £5.700m additional income is assumed, pending the result of current consultation, with regard to proposed changes to the Local Council Tax Support Scheme (noting that a one off hardship fund of

£818k is in place to help claimants in particularly difficult circumstances and will be subject of a further report to Cabinet before a final decision on this proposal is made;

- i) Within the Corporate and Cross-Cutting savings proposals is £11.000m assumed to be delivered from negotiation with the NHS to reflect a contribution by them to support non-statutory activity or response timeframes in working with them to deliver better and speedier health outcomes; and
- j) Based on individual assessment of delivery risk on a line-by-line basis for each proposal, a net risk and contingency deflator is applied to the total quantum of proposed new savings amounting to £8.821m – representing an average 17% allowance for risk and optimum bias and potential non-delivery or delay in proposed savings being delivered.

3.24 A number of risks or uncertainties remain to be clarified which may further impact on the headline £13m gap, as set out above and summarised in Table 6. These include:

- i. The announcement of the Provisional Local Government Finance Settlement – whilst the Autumn Budget gave clarity over the allowable increase to Council Tax levels, it left much else to be announced at a local level, the distribution of which may not see an equal pro-rata benefit for Croydon itself. This includes remaining clarification over the future of the New Homes Bonus scheme;
- ii. Provision for inflation was included in the budget approved for March of 2% increases for both contract and employee costs for 2022/23. Whilst growth proposals have increased the provision for contract inflation to 3%, current forecasts suggest higher rates over the MTF5 period and further provision would need to be made if costs cannot be maintained within existing provision. The January and February Cabinet budget reports will include further work on inflationary pressures and additional budget is likely to be needed in this respect ;
- iii. The ongoing impact of the COVID pandemic has the potential to cause further impacts to the Council's budget position and may result in further unbudgeted costs or decline in income – both within service areas and impact on Council Tax / Business Rates taxbase and collection levels;
- iv. Negotiations with the NHS continue to agree a more realistic cost sharing for the costs of discharging people with higher needs from hospital as quickly and safely as possible. The Council will be unable to continue to provide the current discharge to assess services at the level it currently does in the absence of adults funding up to the £10.265m demonstrated cost of this on an ongoing basis from 2022/23. The breakdown of funding to be agreed to maintain over the statutory minimum and maintain the flow of the hospital is as follows:

<b>Council Costs arising from Discharge to Assess (D2A) / Home First</b>	<b>2022/23 Annual Cost Estimates</b>	<b>Council Costs Chargeable to NHS National Discharge Fund (per 21/22 Rules)</b>	<b>Council Costs to be sought from local NHS resource re-prioritisation</b>
Extended Discharge and Assessment Team	£0.5m - £1.0m	£0.5m - £1.0m	TBC
Care and Equipment costs during Discharge to Assess process for Adults in Croydon (up to 5 weeks fully funded D2A care for all discharges)	£5.0m - £6.2m	£1.9m - £3.1m	TBC
Ongoing Package Costs for previous D2A discharges from 20/21 & 21/22	£1.5m - £3.1m	Not Covered by the National Discharge Fund	TBC
Funding for Children's Education, Health and Care Plans and Continuing Care	£867k	Not Covered by the National Discharge Fund	TBC
Adult Continuing Healthcare	individual funding tbc	Not Covered by the National Discharge Fund	TBC
<b>TOTAL</b>	<b>£7.0m - £11.2m</b>	<b>£2.4m - £4.1m</b>	<b>TBC</b>

Continued joint advocating for National NHS Discharge Funding will be required. The levels that may flow through to Places is likely to be below the costs incurred by the Council/local system and requires ongoing work as partners to assess and re-prioritise local NHS funding allocations.

The impact of reduced service levels by social care due to lack of shared funding for Department of Health and Social Care legislated processes from 1/4/22 is assessed to be significant, including the potential for Croydon University Hospital to enter into code black within 2.5 days which means there the hospital is at full capacity. The cost to the NHS of opening additional hospital wards to meet need (escalation capacity) is projected to be £2m per year and there would be a significant increase in patient length of stay in the hospital without this escalation capacity and other high costs associated with length of stay and impact on elective surgery performance for example. Staffing this escalation capacity is also a significant challenge to the system. The NHS would be required to commission a much higher proportion of therapy services and intermediate care beds, for people to move to while they are rehabilitated to the appropriate level for statutory care packages.

The council would continue to meet its statutory duty and keep people safe through its social care duty, however, this would not optimise the flow of hospital as well as the formal discharge to assess process required by the new legislation, given the current sustained hospital occupancy.

There continues to be a need for the Council and the NHS to work together to ensure the correct funding and agree appropriate tripartite funding agreements for children's education health and care plans and continuing health needs expected to be in the region of £870k per annum. Appropriate continuing healthcare funding for adults with ongoing primary health needs is needed which has reduced significantly from the NHS to individual Croydon residents over the last three years.

The NHS are unlikely to be able to give certainty to the Council in this respect until February Cabinet and subsequently full Council in February. The NHS decision making process is required at national and integrated care system level. As stated, there will be a need for local re-prioritisation of NHS resources to ensure the timely discharge of Croydon residents to meet the high acuity levels currently, and there is commitment to continue to collaborate to secure plans to optimise the health of Croydon residents/patients in 2022/23. Should the NHS not be able to agree sufficient funding, the Council will meet its statutory duty but will not be able to deliver the higher cost discharge to assess process and the size and cost of packages generated by operating this model. The assumed additional contribution in NHS funding is currently being discussed with the NHS and cannot in full be relied upon, and is subject to uncertainty as to the outcome of those negotiations as well as funding available to the local NHS itself;

- v. Net capital financing costs are predicated on future interest rate movements and on assumed levels of capital receipts (both asset disposals and loan repayments from the Council's Brick by Brick property company – quantum or timing delays in these assumptions has the potential to impact on overall forecast borrowing costs);
- vi. The delivery of savings and growth proposals approved in March 2021 are assumed to be delivered in full, and in particular assume the roll-out of Local Traffic Neighbourhood / ANPR proposals continue as approved;
- vii. Ongoing work continues to address queries raised by the Council's external auditors with regard to the 2017/18 accounting treatment of capital receipts and assets transferred to the Croydon Affordable Homes charity. Whilst a worst case outcome has the potential to significantly impact on historic reserves levels and thus have an effect on reserves levels carried forward it is unlikely to have significant impact on the current in-year position;
- viii. The 2021/22 Budget assumes a Capitalisation Direction approval of £50m with £25m and £5m for the following two years as the Council implements changes to its operating model to spend within its funding resources. The 2021/22 Capitalisation Direction remains only "approved in principle" whilst those for future years remained

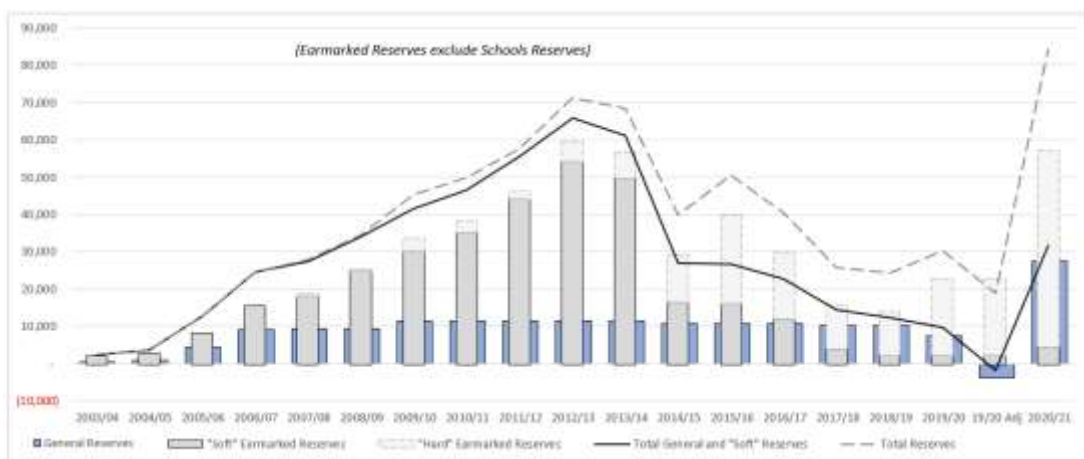
for DLUHC to consider after the Spending Review. Should these not be approved or approved at lower levels this would significantly impact on the remaining gap. They are needed to balance this budget.

- ix. The Governments levelling up agenda will inevitably mean the removal of resources away from London and put further pressure on London Local Authorities.
- x. The Greater London Authority are facing reductions in income from Transport for London and must look at ways to reduce costs and this could include reductions in support to London Boroughs.
- xi. The Council continues to want to deliver the Borough of Culture scheme and the costs associated with this. Currently the assumption in the budget is a net cost of nil after use of GLA grant funding and one-off repurposing of existing budgets, but which would not cover any overspend.

3.25 Subject to the above remaining uncertainties being appropriately dealt with , the current budget position taking into account all proposals so far identified, a gap of £13m remains for 2022/23 (with a further £16m in the following year).

3.26 The Council’s level of General Reserves had been below normative levels for a number of years and placed it at risk of having insufficient resilience. This culminated in changes made as part of the ongoing audit of 2019/20 accounts falling from £10.4m to a negative £3.9m. With the use of the 2020/21 Capitalisation Direction, balances have been restored to £27.5m in the draft 2020/21 accounts.

**Table 7 – Croydon’s Historic Reserves Levels**

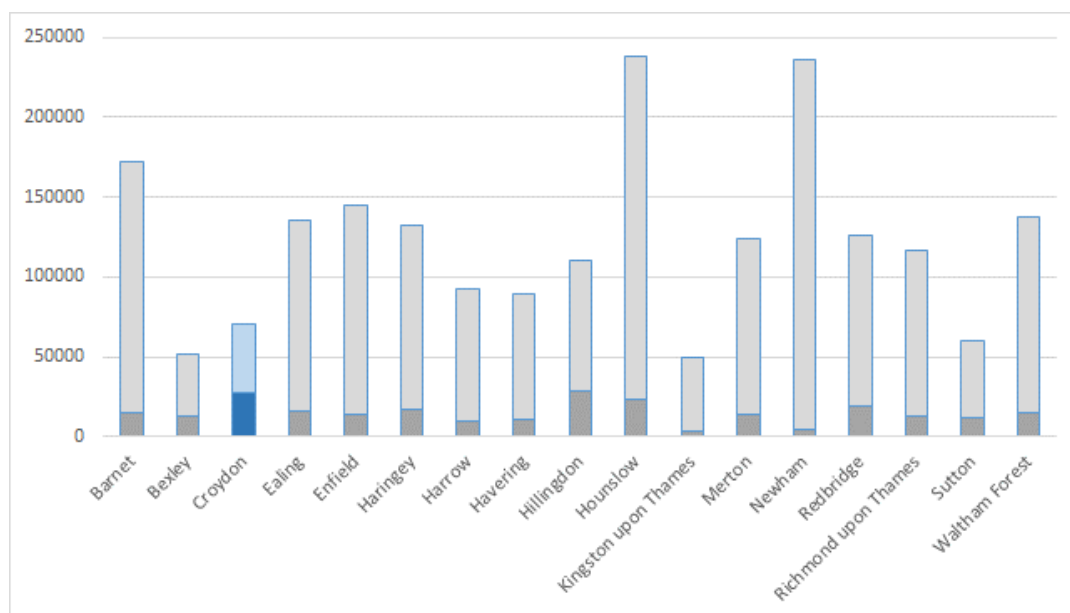


3.27 Whilst General Reserves are now at levels that are considered to be adequate, the levels of earmarked reserves remain low when those balances that have specifically set aside to fund planned transfers out of the Collection Fund Adjustment Account are taken into consideration. The table below



illustrates levels of reserves at the end of 2020/21 when compared to other Outer London Boroughs:

**Table 8 – Outer London Borough Reserves Levels**



3.28 The approved 2021/22 Base Budget and MTFs allowed for General Reserves to be further bolstered by £10m in 2021/22 and then rising to £15m and £20m in 2022/23 and 2023/24 respectively. With General Reserves already replenished as part of the 2020/21 outturn, it is proposed that instead this budget provision would be used to create sufficient levels of earmarked reserves to mitigate against specific future requirements – earmarked reserves to be created will be recommended to Cabinet as part of the February Budget Setting, MTFs and Council Tax report for their consideration and is likely to include, amongst others, some or all of the following to be built over this existing and potentially subsequent years:

- a) Insurance Reserve;
- b) Inflation and Pay Pressures Reserve;
- c) Council Tax / Business Rates Economic Downturn Reserve;
- d) Savings Delivery Reserve;
- e) MRP Smoothing & Capital Receipt Delay Reserve;
- f) Demographic Changes Reserve;
- g) Redundancy Reserve;
- h) UASC & Refugee Cost Pressures Reserve;
- i) Homelessness Pressures Reserve;
- j) Council Tax Hardship Fund Reserve;
- k) Further Pandemic Impacts Reserve;
- l) Litigation & Tax Liability Reserve;
- m) Interest Rate Impact Reserve; and
- n) Adult Social Care – Minimum Income Guarantee and Norfolk Judgement Reserve

- 3.29 Of the £42m of earmarked reserves brought forward into 2021/22, a significant proportion relate to timing differences in grants required to fund Covid-related business rate and council tax reliefs; ring-fenced public health funding; PFI smoothing reserves; and Growth Zone balances. Excluding these elements required to meet future costs, other earmarked reserves remain low at around £4m. The importance of delivering services within budget in 2021/22 will enable the Council to rebuild its earmarked reserves. A quantitative risk assessment will accompany a future budget report.
- 3.30 Whilst the £10m one-off creation of earmarked reserves as referred to above will help to redress the need to bolster such reserves, further resilience will be required and may be impacted by the certainty in delivering existing approved and new budget change proposals.
- 3.31 The thinking in respect of reserves needed has to be considered against a robustness of the budget, risks to the Council both from the market and specifically for Croydon, and evidence of demonstrable delivery of the existing 3 year budget approved in March 2021. Non –delivery will impact any possible recommendations and the ability to demonstrably show the Council can deliver a challenging budget.
- 3.32 This ability to deliver is particularly important given the scale of savings and improvements that need to be delivered in this and future years. With that in mind the new-year budget proposals will include thinking in respect of programme management and any strengthening needed in this respect.
- 3.33 It is particularly important that the Council shows it is able to both produce and deliver a robust sustainable budget where it is able to ‘stand on its own feet’ and be able to deal with the inevitable uncertainties of the existing economy, managing increasing demand and uncertainties of funding.
- 3.34 Inflation pressures are increasing and likely to increase further over the short to medium term. The current inflation assumptions are shown in the summary below over the next 3 years. This needs to be further reviewed in the new year budget reports (each 1% on pay and contracts is £2m and £3m respectively with a clear focus to maintain cost pressures to these limits:
- Pay Inflation – 2% per annum over next three years
  - Contract Inflation – 3% 2022/23; 2.5% 2023/24; 2.0% 2024/25

#### **4 HOUSING REVENUE ACCOUNT – REVENUE**

- 4.1 The Housing Revenue Account [*HRA*] is a ring-fenced element of the General Fund that under statute requires the income and expenditure relating to the Council acting as a social landlord to be separately accounted for and prevents the net cost of social housing provision to not be funded from the Council Tax payer.

- 4.2 As at Period 7, the HRA is forecasting a revenue overspend against approved 2021/22 budget of £0.786m – this forecast overspend would be met from HRA balances (£27.6m brought forward as per the draft 2020/21 accounts). A summary of the forecast variance for the HRA is set out in the table below:

Table 9 – Housing Revenue Account – Forecast Variance

	Forecast Variance (£,000's)
Responsive Repairs	492
Asset Management & Involvement	(697)
Allocations, Letting & Income Collection	289
Tenancy & Resident Engagement	124
Homelessness & Assessments	250
Directorate & Centralised Costs	327
	786

- 4.3 An exercise to update and develop a long-term business model for the HRA is currently being completed to assess the capital and revenue requirements to invest in the housing stock as well as the income to be expected to meet running expenses and fund capital investment costs. A report will be presented as part of the ongoing budget setting process that provides full details of this in the coming months to 7<sup>th</sup> February and also set out the Council's rent policy for the forthcoming year.

## **5 FINANCIAL CONSIDERATIONS**

- 5.1 As contained in this report.

## **6 LEGAL CONSIDERATIONS**

- 6.1 The Head of Litigation and Commercial Law comments on behalf of the Acting Director of Legal Services that, the provisions of the Local Government Finance Act 1992 sets out what the Council has to base its budget calculations upon, and require the Council to set a balanced budget with regard to the advice of the Council's section 151 officer. The setting of the budget is a function reserved to full Council, which needs to consider the draft budget which has been recommended for approval by Cabinet.
- 6.2 Section 25 of the Local Government Act 2003 requires the Chief Finance Officer to report on among other things the robustness of the estimates made for the purposes of calculating the Council Tax and the adequacy of reserves the latter of which are addressed within this report in preparation for the budget reports in February 2022.

- 6.3 Section 28 of the Local Government Act 2003 imposes a duty on the Council to monitor its budgets throughout the financial year, using the same figures for reserves as were used in the original budget calculations. The Council must take necessary appropriate action to deal with any deterioration in the financial position revealed by the review.
- 6.4 When considering the budget proposals the Cabinet and Council will be mindful of their fiduciary duty to ensure that the Council's resources are used in a prudent and proportionate manner. Members are required to have regard to their statutory duties whilst bearing in mind the requirement to act reasonably when taking in to account the interests of the Council Tax payers. As with other decisions taken by Members, the general principles of administrative law must be adhered to: Lawful discretions must not be abused or fettered, and all relevant considerations must be taken into account. No irrelevant considerations may be taken into account, and any decision made must not be such that no reasonable authority, properly directing itself, could have reached it.
- 6.5 In considering the advice of officers, and the weight to be attached to that advice, members should have regard to the personal duties placed upon the Director of Corporate Resources and Section 151 Officer as Chief Financial Officer of the Authority. The Chief Financial Officer is required by Section 151 of the Local Government Act 1972 and by the Accounts and Audit Regulations 2015 to ensure that the Council's budgeting, financial management, and accounting practices meet relevant statutory and professional requirements.
- 6.6 The procedure to be followed in developing the budget proposals are set out in the Budget and Policy Framework Procedure Rules provided in Part 4.C of the Council's Constitution.
- 6.7 No legal advice has been provided in relation to legal implications of the contents of the appendices to this report as part of the report approval process. Members need to be aware that in order to deliver some of the budget proposals, action may be required to comply with relevant statutory processes which apply to the area in question which may include compliance with legal pre-requisites and requirements for consultation, notification, publication, data protection impact assessments and assessment of equality impacts of proposals. In relation to the latter requirement, Members are directed to the Equalities Impact section of this report. In summary, those such as the Council are subject to the public sector equality duty and must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
  - Advance equality of opportunity between people who share a protected characteristic and those who do not.

- Foster good relations between people who share a protected characteristic and those who do not.

6.8 As various work streams which form part of the proposals are approved by Full Council as part of the Budget and brought forward, legal consideration may be required on the progression and implementation thereof.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Acting Director of Legal Services

## **7 HUMAN RESOURCES IMPACT**

7.1 The net total savings impact on staffing across the Council is 57.8 FTE posts to be deleted. The trade unions were informed on Friday 26 November 2021 of the savings proposals in accordance with the Council's restructuring and reorganisation procedure, and senior managers arranged local, in-person notification with affected staff groups, later the same day to ensure consistent and timely communications. In order to mitigate workforce impact, managers will delete vacant posts, where possible, and offer voluntary redundancy and/redeployment to affected staff supported by the HR team.

7.2 The change process will be delivered through separate, local restructures with lead managers, supported by HR, following the Council's restructuring and reorganisation procedure with meaningful consultation of staff and their trade union representatives, and following the statutory 30-day redundancy consultation required where between 20 and 99 staff are at risk of redundancy in a three-month period.

## **8 EQUALITIES IMPACT**

8.1 This report sets out a number of proposals that will change the services and provisions we provide for residents across Croydon. These proposals are subject to further work and the decisions in relation to the budget are reserved for Full Council – scheduled for 28 February 2022.

8.2 As a public body, the Council is required to comply with the Public Sector Equality Duty [*PSED*], as set out in the Equality Act 2010. The PSED requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Failure to meet these requirements may result in the Council being exposed to costly, time-consuming and reputation-damaging legal challenges.

8.3 The Council must, therefore, ensure that we have considered any equality implications for each of the budget proposals prior to the budget council meeting. The Council has an established Equality Impact Assessment [*EqIA*] process, with clear guidance and templates for managers to use whenever new policies or services changes are being considered. This approach

ensures that proposals are checked in relation to the impact on people with certain characteristics protected by the Equality Act.

- 8.4 Assessing the impact of proposed changes to policies, procedures, services and organisational change is not just something the law requires; it is a positive opportunity for the council to ensure it makes better decisions, based on robust evidence.
- 8.5 Our approach is to ensure the equality impact assessments are data led, using user information, demographic data and forecasts, as well as service specific data, to fully understand the impact of each savings proposal. This enables the Council to have proper regard to its statutory equality duties.
- 8.6 As an organisation we are committed to protecting the most vulnerable in our communities and to ensure that in making difficult decisions about funding we maintain an absolute commitment to tackling inequality and disadvantage and promoting equality for everyone who lives and works in the borough.
- 8.7 The initial stage of the EqIAs will screen for potential impacts on those with protected characteristics (race, sex, disability, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity, and age), as well as non-statutory equalities considerations: language, socioeconomic and health and social wellbeing. Where it is identified that the proposal are expected to have an equality impact, a more detailed assessment is undertaken. This will then require services to identify mitigating actions to reduce the negative impact for any protected characteristic groups.
- 8.8 The impact of the proposals on staffing is addressed through Equality Analysis undertaken as part of the HR process.

## **9 ENVIRONMENTAL IMPACT**

- 9.1 As contained in the body of the report

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

- 10.1 As contained in the body of the report

## **11 DATA PROTECTION IMPLICATIONS**

- 11.1 As contained in the body of the report

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**REPORT AUTHOR:** Matthew Davis, Interim Director of Finance

**APPENDICES:** Appendix 1 – Detailed Budget Change Proposals

**BACKGROUND DOCUMENTS:** Approved 2021/22 Budget and Three Year MTFS  
– Council 8<sup>th</sup> Mar 21 (Item 18/21)

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## PREVIOUSLY APPROVED BUDGET CHANGES

(Note these changes have been re-classified by new Corporate Management Structure)

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
<b>Children, Young People &amp; Education</b>									
CFE Sav 02	Reconfiguration Of Early Help Services	(424)	(185)	-	-	(424)	(609)	(609)	(609)
CFE Sav 03	Reconfiguration Of Adolescent Services	(1,608)	-	-	-	(1,608)	(1,608)	(1,608)	(1,608)
CFE Sav 04	Review Of Children With Disabilities Care Packages	(384)	(384)	(384)	-	(384)	(768)	(1,152)	(1,152)
	Transfer to HWA - Transitions	217	-	-	-	217	217	217	217
CFE Sav 05	Reduction In Spend on Children In Care	(794)	(1,654)	(1,385)	-	(794)	(2,448)	(3,833)	(3,833)
CFE Sav 06	Review Support For Young People Where Appeal Rights Exhausted	(295)	(560)	(142)	-	(295)	(855)	(997)	(997)
CFE Sav 07	Improve Practice System Efficiency	(1,065)	(1,450)	(385)	-	(1,065)	(2,515)	(2,900)	(2,900)
CFE Sav 08	Embed Systemic Practice Model	(272)	-	-	-	(272)	(272)	(272)	(272)
CFE Sav 17	Release Of One Off Investment / Full Year Effect Of Savings From 2020/21	(1,462)	-	-	-	(1,462)	(1,462)	(1,462)	(1,462)
CFE Sav 15/CFE 16	Staffing Review	(1,471)	-	-	-	(1,471)	(1,471)	(1,471)	(1,471)
CFE Sav 09	Review Children'S Centres Delivery Model	(660)	(240)	-	-	(660)	(900)	(900)	(900)
CFE Sav 10	Reduce Non-Statutory Education Functions	(587)	(221)	-	-	(587)	(808)	(808)	(808)
CFE Sav 12	Early Learning Collaboration Contract	(82)	-	-	-	(82)	(82)	(82)	(82)
CFE Sav 14	Reduce Family Group Conference Service	(203)	-	-	-	(203)	(203)	(203)	(203)
	<b>Children, Young People &amp; Education Savings</b>	<b>(9,090)</b>	<b>(4,694)</b>	<b>(2,296)</b>	<b>-</b>	<b>(9,090)</b>	<b>(13,784)</b>	<b>(16,080)</b>	<b>(16,080)</b>
CFE Gro 01	Children Looked After Placements - fund Demographic and Cost Pressures	8,431	85	77	-	8,431	8,516	8,593	8,593
CFE Gro 02	Leaving Care - fund Demographic and Cost Pressures	2,031	-	-	-	2,031	2,031	2,031	2,031
CFE Gro 03	Children with Disabilities - fund Demographic and Cost Pressures	6,477	-	-	-	6,477	6,477	6,477	6,477
CFE Gro 08	Realignment of Budgets where other funding sources have ceased	1,719	-	-	-	1,719	1,719	1,719	1,719
CFE Gro 07	Realignment of Budgets from 2020/21	909	-	-	-	909	909	909	909
CFE Gro 04	SEND Strategy - support inclusion and access to local provision	866	-	-	-	866	866	866	866
	<b>Children, Young People &amp; Education Growth</b>	<b>20,433</b>	<b>85</b>	<b>77</b>	<b>-</b>	<b>20,433</b>	<b>20,518</b>	<b>20,595</b>	<b>20,595</b>
	<b>Children, Young People &amp; Education Net Proposals</b>	<b>11,343</b>	<b>(4,609)</b>	<b>(2,219)</b>	<b>-</b>	<b>11,343</b>	<b>6,734</b>	<b>4,515</b>	<b>4,515</b>

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
<b>Adult Social Care &amp; Health</b>									
HWA Sav 06	Baseline Savings - Disabilities Operational Budget	(3,015)	(4,371)	(5,570)	-	(3,015)	(7,386)	(12,956)	(12,956)
HWA Sav 07	Stretch Savings - Disabilities Operational Budget	(1,367)	(1,213)	293	-	(1,367)	(2,580)	(2,287)	(2,287)
	Transfer from CFE - Transitions	(217)	-	-	-	(217)	(217)	(217)	(217)
HWA Sav 08	Review Of Contracts - Obc Commissioning, Working Age Adults	(600)	(586)	-	-	(600)	(1,186)	(1,186)	(1,186)
HWA Sav 09	Baseline Savings - Mental Health Operational Budget	(459)	(683)	(881)	-	(459)	(1,142)	(2,023)	(2,023)
HWA Sav 10	Stretch Savings - Mental Health Operational Budget	(225)	(201)	47	-	(225)	(426)	(379)	(379)
HWA Sav 19 & 20	Savings On Care Provision - Asc Older People	(2,599)	(3,195)	(3,019)	-	(2,599)	(5,794)	(8,813)	(8,813)
HWA Sav 22	Income From Care Uk Beds Released To Self- Funders	(254)	(264)	(275)	-	(254)	(518)	(793)	(793)
HWA Sav 23	Staffing Review	(2,199)	-	-	-	(2,199)	(2,199)	(2,199)	(2,199)
<b>Adult Social Care &amp; Health Savings</b>		<b>(10,935)</b>	<b>(10,513)</b>	<b>(9,405)</b>	<b>-</b>	<b>(10,935)</b>	<b>(21,448)</b>	<b>(30,853)</b>	<b>(30,853)</b>
HWA Gro 02	Growth To Fund Current Activity/Run Rate	19,048	-	-	-	19,048	19,048	19,048	19,048
HWA Gro 06	Growth To Fund Cost Inflation In Care Uk Contract	254	264	275	-	254	518	793	793
HWA Gro 07/08/09	Growth To Fund Care Packages/Placements Projected Demographic And Cost Pressures	5,221	5,209	5,065	-	5,221	10,430	15,495	15,495
HWA Gro 10	Care Package/Placements Inflation Above Corporate Allowance	-	1,387	1,479	-	-	1,387	2,866	2,866
HWA Gro 11	Progression Team	360	-	-	-	360	360	360	360
HWA Gro xx	Rebase Income From Health Budget	4,000	-	-	-	4,000	4,000	4,000	4,000
HWA Gro xxx	Growth To Fund Demographic And Inflation Pressures In Community Equipment Service	57	59	61	-	57	116	177	177
<b>Adult Social Care &amp; Health Growth</b>		<b>28,940</b>	<b>6,919</b>	<b>6,880</b>	<b>-</b>	<b>28,940</b>	<b>35,859</b>	<b>42,739</b>	<b>42,739</b>
<b>Adult Social Care &amp; Health Net Proposals</b>		<b>18,005</b>	<b>(3,594)</b>	<b>(2,525)</b>	<b>-</b>	<b>18,005</b>	<b>14,411</b>	<b>11,886</b>	<b>11,886</b>
<b>Housing</b>									
HWA Sav 23	Staffing Review	(1,239)	-	-	-	(1,239)	(1,239)	(1,239)	(1,239)
HWA Sav 01	Reduction Of Welfare Rights	(442)	(88)	-	-	(442)	(530)	(530)	(530)
HWA Sav 13	Reduction In Placements & Accommodation NRPB Budget	(200)	(100)	(100)	-	(200)	(300)	(400)	(400)
HWA Sav 15	Croydon Discretionary Support - Reduction In Service	(285)	(7)	-	-	(285)	(292)	(292)	(292)
HWA Sav 16	Croydon Discretionary Support - Deletion Of Service	(235)	(7)	-	-	(235)	(242)	(242)	(242)
HWA Sav 18	Restructure In Gateway Services	(114)	(21)	-	-	(114)	(135)	(135)	(135)

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
HWA Sav 25	Increase In Homelessness Prevention Grant	(1,679)	-	-	-	(1,679)	(1,679)	(1,679)	(1,679)
	<b>Housing Savings</b>	<b>(4,194)</b>	<b>(223)</b>	<b>(100)</b>	<b>-</b>	<b>(4,194)</b>	<b>(4,417)</b>	<b>(4,517)</b>	<b>(4,517)</b>
HWA Gro 05	Emergency/Temporary Accommodation Officers	311	-	-	-	311	311	311	311
	<b>Housing Growth</b>	<b>311</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>311</b>	<b>311</b>	<b>311</b>	<b>311</b>
	<b>Housing Net Proposals</b>	<b>(3,883)</b>	<b>(223)</b>	<b>(100)</b>	<b>-</b>	<b>(3,883)</b>	<b>(4,106)</b>	<b>(4,206)</b>	<b>(4,206)</b>
<b><u>Sustainable Communities, Regeneration &amp; Economic Recovery</u></b>									
CFE Sav 13	Croydon Music & Arts (Cma)	(126)	-	-	-	(126)	(126)	(126)	(126)
PLA Sav 03	Closure Of Libraries Buildings	9	(404)	-	-	9	(395)	(395)	(395)
PLA Sav 20	Closure Of South Norwood Library	-	(100)	-	-	-	(100)	(100)	(100)
PLA Sav 21	Combining Posts Across Museum And Libraries	(73)	-	-	-	(73)	(73)	(73)	(73)
PLA Sav 05	Economic Development Team Streamlined Service	(208)	(52)	-	-	(208)	(260)	(260)	(260)
PLA Sav 06	Move To Streamlined Regeneration Team	(153)	(51)	-	-	(153)	(204)	(204)	(204)
PLA Sav 18	Economy & Jobs - Remove Pressure From General Fund	(66)	-	-	-	(66)	(66)	(66)	(66)
PLA Sav 19	Merge Parks And Green Spaces	(369)	(80)	-	-	(369)	(449)	(449)	(449)
PLA Sav 07	Reduce Spatial Planning (Local Plan Team And Place Making Team)	-	(484)	-	-	-	(484)	(484)	(484)
PLA Sav 11	Cease Specialist Nursery Transport	(113)	(57)	-	-	(113)	(170)	(170)	(170)
PLA Sav 10	ANPR Camera Enforcement	(5,025)	(3,180)	(3,401)	-	(5,025)	(8,205)	(11,606)	(11,606)
PLA Sav 24	Parking Charges Increases	(3,014)	-	-	-	(3,014)	(3,014)	(3,014)	(3,014)
PLA Sav 08	Public Realm - Staffing Review	(270)	(90)	-	-	(270)	(360)	(360)	(360)
PLA Sav 23	Providers' Savings Proposals	(166)	-	-	-	(166)	(166)	(166)	(166)
PLA Sav 12	Revised Landlord Licensing Scheme	1,500	(2,300)	-	-	1,500	(800)	(800)	(800)
PLA Sav 13	Night Time Noise Reduction Service	(85)	(28)	-	-	(85)	(113)	(113)	(113)
PLA Sav 22	Re-Introduce Bulky Waste Charges	(307)	-	-	-	(307)	(307)	(307)	(307)
PLA Sav 09	Reviewing Provision Of Household Reuse And Recycling Centres (HRRCS)	(11)	(100)	-	-	(11)	(111)	(111)	(111)
PLA Sav 01	Reduce The Antisocial Behaviour Team	(80)	-	-	-	(80)	(80)	(80)	(80)
PLA Sav 04	Reduce Functions And Team In The Violence Reduction Unit	(204)	-	-	-	(204)	(204)	(204)	(204)
PLA Sav 27	15% Immediate Measures Staffing Savings	(3,418)	-	-	-	(3,418)	(3,418)	(3,418)	(3,418)
	<b>Sustainable Communities, Regeneration &amp; Economic Recovery Savings</b>	<b>(12,179)</b>	<b>(6,926)</b>	<b>(3,401)</b>	<b>-</b>	<b>(12,179)</b>	<b>(19,105)</b>	<b>(22,506)</b>	<b>(22,506)</b>
PLA Gro 05	Highways Maintenance Growth	400	1,000	1,000	-	400	1,400	2,400	2,400

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
PLA Gro 10	Active Lives Ph Funding	418	-	-	-	418	418	418	418
PLA Gro 01	Violence Reduction Management - Sufficient Revenue Costs	82	-	-	-	82	82	82	82
<b>Sustainable Communities, Regeneration &amp; Economic Recovery Growth</b>		<b>900</b>	<b>1,000</b>	<b>1,000</b>	<b>-</b>	<b>900</b>	<b>1,900</b>	<b>2,900</b>	<b>2,900</b>
<b>Sustainable Communities, Regen &amp; Economic Recovery Net Proposals</b>		<b>(11,279)</b>	<b>(5,926)</b>	<b>(2,401)</b>	<b>-</b>	<b>(11,279)</b>	<b>(17,205)</b>	<b>(19,606)</b>	<b>(19,606)</b>
<b><u>Assistant Chief Executive</u></b>									
HWA Sav 23	Staffing Review	(120)	-	-	-	(120)	(120)	(120)	(120)
HWA Sav 17	Contact Centre And Access Croydon - Reduction In Line Management	(87)	(8)	-	-	(87)	(95)	(95)	(95)
HWA Sav 24	Savings On TfL Freedom Pass Due To Reduction In Usage	(2,375)	-	-	-	(2,375)	(2,375)	(2,375)	(2,375)
RES Sav 11	Voluntary Community Services Small Grants	(100)	-	-	-	(100)	(100)	(100)	(100)
RES Sav 10	Rent Subsidy	(244)	-	-	-	(244)	(244)	(244)	(244)
RES Sav 31	Business Intelligence	(65)	-	-	-	(65)	(65)	(65)	(65)
RES Sav 09	Policy Team Reduction	(110)	-	-	-	(110)	(110)	(110)	(110)
RES Sav 07	Communities Team Reduction	(123)	-	-	-	(123)	(123)	(123)	(123)
RES Sav 20	Community Safety Fund Reduction	-	(400)	-	-	-	(400)	(400)	(400)
RES Sav 29	Stop Your Croydon Publication	(50)	-	-	-	(50)	(50)	(50)	(50)
RES Sav 13	Reduction To The Communications Team	(218)	-	-	-	(218)	(218)	(218)	(218)
RES Sav 27	Removal Of Campaigns And Stop Campaigns Budget	(50)	-	-	-	(50)	(50)	(50)	(50)
REV Sav 26	Restructure Of Croydon Digital Services To Provide A Reduced Service For Support And Maintenance Of Core Ict For Staff	(175)	(30)	-	-	(175)	(205)	(205)	(205)
RES Sav 24	Croydon Digital Services Reduction In It Contract Costs Due To Smaller Workforce	(50)	(100)	-	-	(50)	(150)	(150)	(150)
RES Sav 23	Extensions Or Procurements Of Core It Contracts	(340)	(150)	(250)	-	(340)	(490)	(740)	(740)
RES Sav 25	Rent Out Lbc Capacity To Brent	(72)	-	-	-	(72)	(72)	(72)	(72)
RES Sav 22	Croydon Digital Services Large Format Digital Advertising	-	(45)	(150)	-	-	(45)	(195)	(195)
RES Sav 16	Reduce Staffing In Mayor'S Office	(98)	-	-	-	(98)	(98)	(98)	(98)
RES Sav 15	Deliver Governance Review In Cost Neutral Way	(250)	-	-	-	(250)	(250)	(250)	(250)
RES Sav 18	Scale Back Members Special Responsibility Allowances	(303)	-	-	-	(303)	(303)	(303)	(303)
RES Sav 04	Deletion Of Legacy Oracle Financials	-	-	(60)	-	-	-	(60)	(60)
RES Sav 03	Reduce Learning And Organisational Development Service	-	-	(135)	-	-	-	(135)	(135)

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
RES Sav 05	Redesign Core Teams Within The Human Resources Service Based On Workflow Assessment	-	-	(200)	-	-	-	(200)	(200)
RES Sav 06	Hr Management Team Reorganisation	-	-	(210)	-	-	-	(210)	(210)
RES Sav 01	Deletion Of Learning And Development Manager Post	(80)	-	-	-	(80)	(80)	(80)	(80)
RES Sav 30	Consolidation Of Training Spend	(200)	-	-	-	(200)	(200)	(200)	(200)
RES Sav 41	15% Immediate Measures Staffing Savings	(563)	-	-	-	(563)	(563)	(563)	(563)
	<b>Assistant Chief Executive Savings</b>	<b>(5,673)</b>	<b>(733)</b>	<b>(1,005)</b>	<b>-</b>	<b>(5,673)</b>	<b>(6,406)</b>	<b>(7,411)</b>	<b>(7,411)</b>
COR Gro 27	Improvement Costs	1,000	-	-	-	1,000	1,000	1,000	1,000
RES Gro 11	Business Intelligence Team - Permanent Resource	212	-	-	-	212	212	212	212
RES Gro 04	Correction Of Reliance On Capital Funding For Business As Usual Works	4,054	(325)	(355)	-	4,054	3,729	3,374	3,374
Seth A	Cost Of May 2022 Election (Net Of Reserve)	-	250	(250)	-	-	250	-	-
Seth A	Cost Of Directly Elected Mayor Referendum	650	(650)	-	-	650	-	-	-
RES Gro 03	Corporate Programme Management Office	480	-	-	-	480	480	480	480
RES Gro x	Additional Hr Capacity To Support Organisational Change	253	5	(258)	-	253	258	-	-
	<b>Assistant Chief Executive Growth</b>	<b>6,649</b>	<b>(720)</b>	<b>(863)</b>	<b>-</b>	<b>6,649</b>	<b>5,929</b>	<b>5,066</b>	<b>5,066</b>
	<b>Assistant Chief Executive Net Proposals</b>	<b>976</b>	<b>(1,453)</b>	<b>(1,868)</b>	<b>-</b>	<b>976</b>	<b>(477)</b>	<b>(2,345)</b>	<b>(2,345)</b>
<b>Resources</b>									
PLA Sav 26	Savings On Building Closures / Disposals	(126)	(452)	(112)	-	(126)	(578)	(690)	(690)
PLA Sav 25	Savings On Facilities Management	(333)	-	-	-	(333)	(333)	(333)	(333)
PLA Sav 27	15% Immediate Measures Staffing Savings	(247)	-	-	-	(247)	(247)	(247)	(247)
RES Sav 12	Hwa Contract Reductions	(242)	(110)	(75)	-	(242)	(352)	(427)	(427)
RES Sav 32	Community Equipment Service Income Generation	(75)	-	(50)	-	(75)	(75)	(125)	(125)
RES Sav 33	Review Of Staffing Portfolio Across C&P Services (Procurement, Hwa, Place, Cfe And P&B)	(260)	(175)	(100)	-	(260)	(435)	(535)	(535)
RES Sav 36	Consolidate Debt Collection	-	(60)	-	-	-	(60)	(60)	(60)
RES Sav 37	Simpler Council Tax Support Scheme	-	(250)	-	-	-	(250)	(250)	(250)
RES Sav 38	Automation Of Revenue Processes	(50)	(100)	-	-	(50)	(150)	(150)	(150)
RES Sav 39	Digital By Default For Billing	-	(120)	-	-	-	(120)	(120)	(120)
RES Sav 40	ICT Savings	(10)	(153)	(47)	-	(10)	(163)	(210)	(210)
RES Sav 41	15% Immediate Measures Staffing Savings	(1,254)	-	-	-	(1,254)	(1,254)	(1,254)	(1,254)

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
<b>Resources Savings</b>		<b>(2,597)</b>	<b>(1,420)</b>	<b>(384)</b>	<b>-</b>	<b>(2,597)</b>	<b>(4,017)</b>	<b>(4,401)</b>	<b>(4,401)</b>
PLA Gro 06	Unachievable Fm Staff Savings	100	-	-	-	100	100	100	100
PLA Gro 09	Reduction Of Recharges Of Revenue Costs To Capital	1,360	-	-	-	1,360	1,360	1,360	1,360
PLA Gro 07	Investment Property Income Decline	6,445	(150)	-	-	6,445	6,295	6,295	6,295
PLA Gro 08	Landlords Rent Growth	1,297	(50)	-	-	1,297	1,247	1,247	1,247
RES Gro 13	Growth To Remove Unachievable Parking Permits Saving	300	-	-	-	300	300	300	300
RES Gro 07	Agency Rebate Internal Model	3,610	-	-	-	3,610	3,610	3,610	3,610
RES Gro 12	Croydon Equipment Service Pension Cost Shortfall	308	-	-	-	308	308	308	308
RES Gro 05	Build Resilience For The Finance Team	1,000	-	-	-	1,000	1,000	1,000	1,000
RES Gro 14	Removal Of Gateway Income Virement Pressure	218	-	-	-	218	218	218	218
<b>Resources - Growth</b>		<b>14,638</b>	<b>(200)</b>	<b>-</b>	<b>-</b>	<b>14,638</b>	<b>14,438</b>	<b>14,438</b>	<b>14,438</b>
<b>Resources Net Proposals</b>		<b>12,041</b>	<b>(1,620)</b>	<b>(384)</b>	<b>-</b>	<b>12,041</b>	<b>10,421</b>	<b>10,037</b>	<b>10,037</b>
<b>Corporate &amp; Cross-Cutting</b>									
RES Gro 09	Unachieved 20/21 Saving - Recharges To HRA	2,000	-	-	-	2,000	2,000	2,000	2,000
RES Gro 08	Unachieved 20/21 Saving - Recharges To Capital	500	-	-	-	500	500	500	500
COR Sav 05	Pension Contribution	(589)	(589)	-	-	(589)	(1,178)	(1,178)	(1,178)
COR Sav 06	Increased Social Care Grant	(405)	-	-	-	(405)	(405)	(405)	(405)
COR Sav 07	Lower Tier Services Grant	(634)	-	-	-	(634)	(634)	(634)	(634)
COR Sav 17	Fees And Charges	(1,000)	(200)	(200)	-	(1,000)	(1,200)	(1,400)	(1,400)
COR Sav 14	Use Of Nndr Smoothing Risk Reserve	(7,000)	7,000	-	-	(7,000)	-	-	-
COR Gro 22	Business Rates S31 Grant Funding	(18,072)	24,199	-	-	(18,072)	6,127	6,127	6,127
COR Gro 19	Interest Payable	(77)	(490)	(2,569)	-	(77)	(567)	(3,136)	(3,136)
COR Sav 15	Local Council Tax Income Guarantee 20/21 Grant	(4,536)	4,536	-	-	(4,536)	-	-	-
COR Sav 04	Revenue Support Grant	(78)	(284)	(290)	-	(78)	(362)	(652)	(652)
COR Sav 11	Business Rates Top-Up Grant	-	(2,883)	(733)	-	-	(2,883)	(3,616)	(3,616)
COR Sav 12	Locally Retained Business Rates	(134)	(526)	(751)	-	(134)	(660)	(1,411)	(1,411)
COR Sav 01	Council Tax - Tax Base Changes	4,045	(4,357)	(2,920)	-	4,045	(312)	(3,232)	(3,232)
COR Sav 02	Council Tax - Social Care Precept	(5,660)	-	-	-	(5,660)	(5,660)	(5,660)	(5,660)
COR Sav 03	Council Tax - Band D General Increase	(3,755)	(4,033)	(4,176)	-	(3,755)	(7,788)	(11,964)	(11,964)
<b>Corporate &amp; Cross-Cutting Savings</b>		<b>(35,395)</b>	<b>22,373</b>	<b>(11,639)</b>	<b>-</b>	<b>(35,395)</b>	<b>(13,022)</b>	<b>(24,661)</b>	<b>(24,661)</b>
COR Gro 01	Pay Inflation Provision	2,804	3,814	3,890	-	2,804	6,618	10,508	10,508

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
COR Gro 02	Contract Inflation Provision	5,142	6,859	6,996	-	5,142	12,001	18,997	18,997
COR Gro 03	New Homes Bonus	2,161	3,400	1,768	-	2,161	5,561	7,329	7,329
COR Gro 05	Bad Debt Provision	100	-	-	-	100	100	100	100
COR Gro 06	Contingency Provision	3,000	5,000	5,000	-	3,000	8,000	13,000	13,000
COR Gro 09	Precepts And Levies	30	31	31	-	30	61	92	92
COR Gro 24	Asylum Seekers Budget Correction	2,137	-	-	-	2,137	2,137	2,137	2,137
COR Gro 20	Cessation Of Flexible Homelessness Support Grant	1,100	-	-	-	1,100	1,100	1,100	1,100
COR Gro 17	Interest On Brick By Brick Loans	4,592	6,908	-	-	4,592	11,500	11,500	11,500
COR Gro 18	Dividend On Brick By Brick Investment	5,200	-	-	-	5,200	5,200	5,200	5,200
COR Gro 25	Other Interest Receivable	1,871	-	-	-	1,871	1,871	1,871	1,871
COR Gro 26	Minimum Revenue Provision Charges	949	1,461	584	-	949	2,410	2,994	2,994
COR Gro 11	Contribution To Gf Balances	5,000	5,000	5,000	-	5,000	10,000	15,000	15,000
COR Gro 04	Collection Fund (Surplus) / Deficit - Council Tax	2,451	52	-	-	2,451	2,503	2,503	2,503
COR Sav 16	Lcig 20/21 Grant Transfer To/(From) Earmarked Reserve	3,024	(4,536)	-	-	3,024	(1,512)	(1,512)	(1,512)
COR Gro 23	Business Rates S31 Grant Smoothing Reserve	17,649	(17,649)	-	-	17,649	-	-	-
COR Sav 13	Collection Fund (Surplus) / Deficit - Nndr	185	(1,910)	-	-	185	(1,725)	(1,725)	(1,725)
COR Gro 21	Nndr Collection Fund 20-21 Deficit - Spreading Cost	797	-	-	-	797	797	797	797
<b>Corporate &amp; Cross-Cutting Growth</b>		<b>58,192</b>	<b>8,430</b>	<b>23,269</b>	<b>-</b>	<b>58,192</b>	<b>66,622</b>	<b>89,891</b>	<b>89,891</b>
<b>Corporate &amp; Cross-Cutting Net Proposals</b>		<b>22,797</b>	<b>30,803</b>	<b>11,630</b>	<b>-</b>	<b>22,797</b>	<b>53,600</b>	<b>65,230</b>	<b>65,230</b>
Assumed Capitalisation Directions		(50,000)	25,000	20,000	-	(50,000)	(25,000)	(5,000)	(5,000)
Total - All Savings		(80,063)	(2,136)	(28,230)	-	(80,063)	(82,199)	(110,429)	(110,429)
Total - All Growth		130,063	15,514	30,363	-	130,063	145,577	175,940	175,940
Total Capitalisation Direction		(50,000)	25,000	20,000	-	(50,000)	(25,000)	(5,000)	(5,000)
<b>Summary of All Approved (March 2021) Budget Changes</b>		<b>-</b>	<b>38,378</b>	<b>22,133</b>	<b>-</b>	<b>-</b>	<b>38,378</b>	<b>60,511</b>	<b>60,511</b>

<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)

## APPENDIX 1 - NEW BUDGET CHANGE PROPOSALS

### Children, Young People & Education

22/23 CFE SAV 04	Increase the Education Traded Offer	-	(65)	(65)	-	(65)	(130)	(130)
22/23 CFE SAV 02	Youth Service review	-	(392)	-	-	(392)	(392)	(392)
	Contract Savings	-	(71)	-	-	(71)	(71)	(71)
22/23 CFE SAV 01	Growth reduction	(2,000)	(1,000)	(330)	(330)	(2,000)	(3,000)	(3,660)
	NHS Funding	-	(867)	-	-	(867)	(867)	(867)
22/23 CFE SAV 05	Capitalisation of System Team Staff Costs	-	(216)	216	-	(216)	-	-
22/23 CFE SAV 06	Develop Family Support Centres and introduce external funding	-	-	(1,300)	-	-	(1,300)	(1,300)
<b>Children, Young People &amp; Education Savings</b>		<b>(2,000)</b>	<b>(2,611)</b>	<b>(1,479)</b>	<b>(330)</b>	<b>(2,000)</b>	<b>(4,611)</b>	<b>(6,090)</b>
22/23 CFE GRO 02	New commissioning for targetted youth provision	-	200	(100)	(100)	-	200	100
<b>Children, Young People &amp; Education Growth</b>		<b>-</b>	<b>200</b>	<b>(100)</b>	<b>(100)</b>	<b>-</b>	<b>200</b>	<b>100</b>
<b>Children, Young People &amp; Education Net Proposals</b>		<b>(2,000)</b>	<b>(2,411)</b>	<b>(1,579)</b>	<b>(430)</b>	<b>(2,000)</b>	<b>(4,411)</b>	<b>(5,990)</b>

### Adult Social Care & Health

22/23 HWA SAV 20	Review of disability (Inc transitions) packages of care	-	(566)	-	-	(566)	(566)	(566)
22/23 HWA SAV 23	Review of Older Adults Packages of Care	-	(505)	-	-	(505)	(505)	(505)
22/23 HWA SAV 22	Review of Mental Health Packages of Care	-	(50)	-	-	(50)	(50)	(50)
22/23 HWA SAV 25	Innovation Budget Reduction	-	(180)	-	-	(180)	(180)	(180)
22/23 HWA SAV 24	Removal of previously agreed growth - HWA GRO10	-	(1,387)	-	-	(1,387)	(1,387)	(1,387)
22/23 HWA SAV 19	Capitalise Savings Project Mgmt Costs	-	(1,100)	-	740	(1,100)	(1,100)	(360)
<b>Adult Social Care &amp; Health Savings</b>		<b>-</b>	<b>(3,788)</b>	<b>-</b>	<b>740</b>	<b>(3,788)</b>	<b>(3,788)</b>	<b>(3,048)</b>
22/23 HWA GRO 02	Invest to Save in Carers Support	-	70	-	-	70	70	70
22/23 HWA GRO 03	Financial Assessments Improvements	-	50	-	-	50	50	50
22/23 HWA GRO 04	Replacement of Public Health Funding	-	380	-	-	380	380	380
<b>Adult Social Care &amp; Health Growth</b>		<b>-</b>	<b>500</b>	<b>-</b>	<b>-</b>	<b>500</b>	<b>500</b>	<b>500</b>
<b>Adult Social Care &amp; Health Net Proposals</b>		<b>-</b>	<b>(3,288)</b>	<b>-</b>	<b>740</b>	<b>(3,288)</b>	<b>(3,288)</b>	<b>(2,548)</b>

### Housing



		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
22/23 HSG SAV 01	Impact of maximising homelessness prevention	-	(578)	(683)	-	-	(578)	(1,261)	(1,261)
22/23 HSG SAV 02	Impact of increasing speed of homelessness decisions	-	(101)	(179)	-	-	(101)	(280)	(280)
22/23 HSG SAV 03	Increase use of LA Stock for EA/TA	-	(163)	(187)	-	-	(163)	(350)	(350)
22/23 HSG SAV 04	Repurpose under-utilised sheltered housing stock	-	(158)	(53)	-	-	(158)	(211)	(211)
22/23 HSG SAV 05	Reduction in housing stock supply under occupancy	-	(77)	(91)	-	-	(77)	(168)	(168)
22/23 HSG SAV 06	Incentivising empty private properties into use for EA/TA	-	(96)	(114)	-	-	(96)	(210)	(210)
22/23 HSG SAV 07	Ending EA/TA where the council has no duty	-	(193)	(35)	-	-	(193)	(228)	(228)
22/23 HSG SAV 08	Bringing long term voids back into use	-	(103)	(100)	-	-	(103)	(203)	(203)
22/23 HSG SAV 09	Incentivising temporary accomodation leasing schemes	-	(138)	(163)	-	-	(138)	(301)	(301)
22/23 HSG SAV 10	Housing supply pipeline maximisation	-	(80)	(109)	-	-	(80)	(189)	(189)
22/23 HSG SAV 11	Contract Reviews	-	(250)	-	-	-	(250)	(250)	(250)
22/23 HSG SAV 12	Staffing Review	-	(225)	(75)	-	-	(225)	(300)	(300)
22/23 HSG SAV 13	Income Maximisation - Rent Collection	-	(240)	-	-	-	(240)	(240)	(240)
22/23 HSG SAV 14	Housing Benefit Maximisation	-	(100)	-	-	-	(100)	(100)	(100)
	<b>Housing Savings</b>	-	<b>(2,502)</b>	<b>(1,789)</b>	-	-	<b>(2,502)</b>	<b>(4,291)</b>	<b>(4,291)</b>
22/23 HSG GRO 01	EA/TA Pressures	-	2,000	-	-	-	2,000	2,000	2,000
	<b>Housing Growth</b>	-	<b>2,000</b>	<b>-</b>	<b>-</b>	-	<b>2,000</b>	<b>2,000</b>	<b>2,000</b>
	<b>Housing Net Proposals</b>	-	<b>(502)</b>	<b>(1,789)</b>	-	-	<b>(502)</b>	<b>(2,291)</b>	<b>(2,291)</b>
<b><u>Sustainable Communities, Regeneration &amp; Economic Recovery</u></b>									
22/23 PLA SAV 26	CCTV merger	-	-	(4)	-	-	-	(4)	(4)
	CCTV footage charge for insurance claims	-	-	(2)	-	-	-	(2)	(2)
22/23 PLA SAV 14	Review CCTV Control Room and functions following council telephony upgrade	-	-	(152)	-	-	-	(152)	(152)
22/23 PLA SAV 11	Review of bin charging policy	-	(50)	-	-	-	(50)	(50)	(50)
22/23 PLA SAV 13	Charging managing agents for contaminated waste removal	-	(95)	5	5	-	(95)	(90)	(85)
22/23 PLA SAV 03	Review and reduction of the Neighbourhood Operations (NSO team)	-	(950)	(150)	-	-	(950)	(1,100)	(1,100)
22/23 PLA SAV 12	Review of clinical waste (clinical v offensive)	-	(30)	-	-	-	(30)	(30)	(30)
22/23 PLA SAV 06	Introduction of a variable lighting policy	(152)	(265)	-	-	(152)	(417)	(417)	(417)
	ASB Charging	-	-	(6)	-	-	-	(6)	(6)
22/23 PLA SAV 05	Withdraw council funding for school crossing patrols	-	(50)	-	-	-	(50)	(50)	(50)

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
22/23 PLA SAV 10	Adult Travel assistance review	-	(150)	(50)	-	-	(150)	(200)	(200)
22/23 PLA SAV 02	Bus Re-Tender Contract Savings	-	(120)	(80)	-	-	(120)	(200)	(200)
22/23 PLA SAV 04	Private Sector Environmental Enforcement	-	(250)		-	-	(250)	(250)	(250)
22/23 PLA SAV 08	Parking charges increase	-	(650)	(200)	-	-	(650)	(850)	(850)
22/23 PLA SAV 09	Independent travel optimisation	-	(20)	-	-	-	(20)	(20)	(20)
22/23 PLA SAV 28	New gym in Monks Hill Leisure Centre	-	(90)	(90)	-	-	(90)	(180)	(180)
22/23 PLA SAV 29	Non-capital and contract impact of Purley Leisure Centre closure	-	(50)	-	-	-	(50)	(50)	(50)
22/23 PLA Sav 20	Increase in Pre Planning Applications	-	(66)	-	-	-	(66)	(66)	(66)
22/23 PLA SAV 18	Reduce existing Leisure management fee	-	(510)	-	-	-	(510)	(510)	(510)
22/23 PLA SAV 19	Alternative funding for Libraries Books and Publications	-	(300)	-	-	-	(300)	(300)	(300)
22/23 PLA SAV 19	Reduction of Revenue Posts in Economy & Employment	-	(138)	(46)	-	-	(138)	(184)	(184)
	Amalgamation of spatial planning team and regeneration team	(23)	(34)	-	-	(23)	(57)	(57)	(57)
22/23 PLA SAV 31	Merger of Management Functions in Place	-	(100)	(230)	-	-	(100)	(330)	(330)
	<b>Sustainable Communities, Regeneration &amp; Economic Recovery Savings</b>	<b>(175)</b>	<b>(3,918)</b>	<b>(1,005)</b>	<b>5</b>	<b>(175)</b>	<b>(4,093)</b>	<b>(5,098)</b>	<b>(5,093)</b>
22/23 PLA GRO 02	Additional seasonal grounds maintenance workers	-	360	-	-	-	360	360	360
22/23 PLA GRO 03	Fairfield Halls Management Fee	-	193	(119)	-	-	193	74	74
22/23 PLA GRO 04	Special Educational Needs pupil transport (pupil number growth)	-	1,313	-	-	-	1,313	1,313	1,313
22/23 PLA GRO 05	Unavoidable contract inflation	-	610	-	-	-	610	610	610
22/23 PLA GRO 06	Unavoidable contract inflation not applied in 21/22	-	743	-	-	-	743	743	743
22/23 PLA GRO 01	Property growth / waste growth and new government charges	-	693	-	-	-	693	693	693
22/23 PLA GRO 10	Landlord licensing scheme - loss of income	-	3,062	-	-	-	3,062	3,062	3,062
	<b>Sustainable Communities, Regeneration &amp; Economic Recovery Growth</b>	<b>-</b>	<b>6,974</b>	<b>(119)</b>	<b>-</b>	<b>-</b>	<b>6,974</b>	<b>6,855</b>	<b>6,855</b>
	<b>Sustainable Communities, Regen &amp; Economic Recovery Net Proposals</b>	<b>(175)</b>	<b>3,056</b>	<b>(1,124)</b>	<b>5</b>	<b>(175)</b>	<b>2,881</b>	<b>1,757</b>	<b>1,762</b>
<b><u>Assistant Chief Executive</u></b>									
22/23 RES SAV 18	Reduction in previously agreed growth - RES GRO 10	-	(207)	207	-	-	(207)	-	-
22/23 RES SAV 17	HR Whole service redesign	-	(210)	200	-	-	(210)	(10)	(10)
22/23 RES SAV 16	Learning and Organisational Development redesign	-	(50)	85	-	-	(50)	35	35
22/23 RES SAV 15	Croydon Digital Service staffing reduction	-	(97)	-	-	-	(97)	(97)	(97)

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
22/23 RES SAV 13	Increase Croydon Digital Service capitalisation	(510)	-	-	-	(510)	(510)	(510)	(510)
22/23 RES SAV 14	Mobile phone reductions	(8)	(30)	-	-	(8)	(38)	(38)	(38)
	Refocusing Public Health funding	-	(780)	(465)	-	-	(780)	(1,245)	(1,245)
	Saving through online engagement and consultation	-	(20)	-	-	-	(20)	(20)	(20)
22/23 COR SAV 09	Rationalisation of software applications and contracts	-	(750)	-	-	-	(750)	(750)	(750)
22/23 COR SAV 08	Digital resident self service	-	-	(750)	(750)	-	-	(750)	(1,500)
22/23 COR SAV 07	Workforce digital capability	-	-	(500)	(1,000)	-	-	(500)	(1,500)
	Implementation of new senior structures	-	(500)	-	-	-	(500)	(500)	(500)
	Implementation of new structures through layers and spans review	-	-	-	(500)	-	-	-	(500)
	<b>Assistant Chief Executive Savings</b>	<b>(518)</b>	<b>(2,644)</b>	<b>(1,223)</b>	<b>(2,250)</b>	<b>(518)</b>	<b>(3,162)</b>	<b>(4,385)</b>	<b>(6,635)</b>
22/23 RES GRO 08	Establishing an Elected Mayor's Office	-	330	-	-	-	330	330	330
22/23 RES GRO 05	Registrars Growth	-	28	-	-	-	28	28	28
22/23 RES GRO 09	Registrars Income Shortfall	-	300	-	-	-	300	300	300
	Additional Mayoral Election Costs	-	240	(180)	-	-	240	60	60
22/23 RES GRO 02	Complaints Recharge Growth	-	290	-	-	-	290	290	290
22/23 RES GRO 06	Reversal of 21/22 Croydon Digital Service Saving	-	325	355	-	-	325	680	680
22/23 RES GRO 01	Staff Resourcing in Committee Services	51	-	-	-	51	51	51	51
	<b>Assistant Chief Executive Growth</b>	<b>51</b>	<b>1,513</b>	<b>175</b>	<b>-</b>	<b>51</b>	<b>1,564</b>	<b>1,739</b>	<b>1,739</b>
	<b>Assistant Chief Executive Net Proposals</b>	<b>(467)</b>	<b>(1,131)</b>	<b>(1,048)</b>	<b>(2,250)</b>	<b>(467)</b>	<b>(1,598)</b>	<b>(2,646)</b>	<b>(4,896)</b>
<b>Resources</b>									
22/23 PLA SAV 24	Reduction in postage costs	-	(25)	-	-	-	(25)	(25)	(25)
22/23 PLA SAV 25	Review and release of additional space in BWH	-	(388)	(1,039)	(650)	-	(388)	(1,427)	(2,077)
	Further asset disposals	-	(1,000)	-	-	-	(1,000)	(1,000)	(1,000)
22/23 RES SAV 01	Council wide legal services review	-	(130)	-	-	-	(130)	(130)	(130)
22/23 RES SAV 02	Legal business team review	-	(65)	-	-	-	(65)	(65)	(65)
22/23 RES SAV 12	Income from additional digital billboards	-	30	(70)	(80)	-	30	(40)	(120)
22/23 RES SAV 08	Contract Savings	-	(53)	-	-	-	(53)	(53)	(53)
22/23 RES SAV 10	Procurement team changes in Adults and Childrens	-	(61)	-	-	-	(61)	(61)	(61)
22/23 RES SAV 09	Procurement team changes in Sustainable Communities	-	(53)	-	-	-	(53)	(53)	(53)
Res Sav 40	Further ICT Savings (Change to Previous RES SAV 40)	-	(20)	-	-	-	(20)	(20)	(20)

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
22/23 RES SAV 05	Discretionary Charitable Business Rate Relief	-	-	(114)	-	-	-	(114)	(114)
22/23 RES SAV 19	Restructure technical support & development teams	-	-	(30)	(30)	-	-	(30)	(60)
22/23 RES SAV 07	Finance staffing review	-	-	(125)	(125)	-	-	(125)	(250)
22/23 RES SAV 04	Savings from Review and Re-Tendering the Insurance Contract	-	(100)	-	-	-	(100)	(100)	(100)
22/23 RES SAV 03	Mid-Triennial Review of Pension Contributions - subject to the outcome of consideration by Pensions Committee	(3,400)	640	-	-	(3,400)	(2,760)	(2,760)	(2,760)
	<b>Resources Savings</b>	<b>(3,400)</b>	<b>(1,225)</b>	<b>(1,378)</b>	<b>(885)</b>	<b>(3,400)</b>	<b>(4,625)</b>	<b>(6,003)</b>	<b>(6,888)</b>
22/23 RES GRO 10	Ongoing PPE Costs	-	325	-	-	-	325	325	325
22/23 RES GRO 03	Insurance Fund Growth	-	-	-	400	-	-	-	400
	<b>Resources Growth</b>	<b>-</b>	<b>325</b>	<b>-</b>	<b>400</b>	<b>-</b>	<b>325</b>	<b>325</b>	<b>725</b>
	<b>Resources Net Proposals</b>	<b>(3,400)</b>	<b>(900)</b>	<b>(1,378)</b>	<b>(485)</b>	<b>(3,400)</b>	<b>(4,300)</b>	<b>(5,678)</b>	<b>(6,163)</b>
<b>Corporate &amp; Cross-Cutting</b>									
22/23 COR SAV 01	Changes to Council Tax Base	-	(2,721)	(97)	(3,062)	-	(2,721)	(2,818)	(5,880)
22/23 COR SAV 02	Social Care Precept - 1% Council Tax increase	-	(1,981)	(2,040)	(2,102)	-	(1,981)	(4,021)	(6,123)
22/23 COR SAV 03	1.99% Council Tax increase	-	(141)	(2,348)	(6,910)	-	(141)	(2,489)	(9,399)
22/23 COR SAV 04	Collection Fund Surplus/Deficit - Council Tax	-	(2,940)	2,940	(2,504)	-	(2,940)	-	(2,504)
22/23 COR SAV 10	Change in Levies from Other Bodies	-	(155)	4	29	-	(155)	(151)	(122)
22/23 COR SAV 11	New Homes Bonus	-	(2,427)	(1,768)	-	-	(2,427)	(4,195)	(4,195)
22/23 COR SAV 12	Interest Receivable / Payable	-	(4,414)	593	593	-	(4,414)	(3,821)	(3,228)
22/23 COR SAV 13	Review of all contracts and commissioned services	-	(2,072)	-	-	-	(2,072)	(2,072)	(2,072)
22/23 COR SAV 06	Streamline corporate business processes	-	-	(250)	(250)	-	-	(250)	(500)
	Negotiate changes to the balance of funding between health and social care	-	(11,000)	-	-	-	(11,000)	(11,000)	(11,000)
	Increase in fees and charges	-	(1,000)	(1,000)	(1,000)	-	(1,000)	(2,000)	(3,000)
22/23 COR SAV 05	Local Council Tax Reduction Scheme Support review - subject to final decision making post-consultation	-	(5,700)	-	-	-	(5,700)	(5,700)	(5,700)
	<b>Total Corporate / Cross-Cutting Savings Proposals</b>	<b>-</b>	<b>(34,551)</b>	<b>(3,966)</b>	<b>(15,206)</b>	<b>-</b>	<b>(34,551)</b>	<b>(38,517)</b>	<b>(53,723)</b>
22/23 COR GRO 01	Minimum Revenue Provision reprofiling	-	2,543	(430)	468	-	2,543	2,113	2,581
22/23 COR GRO 02	Corporate Contract Inflation Provision	-	4,333	2,610	7,877	-	4,333	6,943	14,820
22/23 COR GRO 03	Corporate Pay Award Provision	-	(239)	(243)	3,720	-	(239)	(482)	3,238

		<----- Incremental Changes ----->				<----- Cumulative Changes ----->			
		2021/22	2022/23	2023/24	2024/25	2021/22	2022/23	2023/24	2024/25
		(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)	(£,000's)
22/23 CFE GRO 01	Increases in Unaccompanied Asylum Seeking Children leaving care	-	3,454	302	(578)	-	3,454	3,756	3,178
22/23 COR GRO 05	Increase in Employers National Insurance contributions	-	1,630	-	-	-	1,630	1,630	1,630
<b>Total Corporate / Cross-Cutting Growth Proposals</b>		-	11,721	2,239	11,487	-	11,721	13,960	25,447
<b>Total Corporate / Cross-Cutting Net Proposals</b>		-	(22,830)	(1,727)	(3,719)	-	(22,830)	(24,557)	(28,276)
22/23 COR GRO 04		-	-	-	5,000	-	-	-	5,000
<b>Assumed Capitalisation Directions</b>		-	-	-	5,000	-	-	-	5,000

**SUMMARY**

Total - All Savings	(6,093)	(51,239)	(10,840)	(17,926)	(6,093)	(57,332)	(68,172)	(86,098)
Total - All Growth	51	23,233	2,195	11,787	51	23,284	25,479	37,266
Total Capitalisation Direction	-	-	-	5,000	-	-	-	5,000
Total - All Net	(6,042)	(28,006)	(8,645)	(1,139)	(6,042)	(34,048)	(42,693)	(43,832)
Delivery Risk & Contingency	1,219	7,602	2,168	3,585	1,219	8,821	10,989	14,574
Net Proposals Incl Delivery Risk & Contingency	(4,823)	(20,404)	(6,477)	2,446	(4,823)	(25,227)	(31,704)	(29,258)
Original Approved Gap (March 2021)	-	38,378	22,133	-	-	38,378	60,511	60,511
<b>Total Remaining Gap</b>	(4,823)	17,974	15,656	2,446	(4,823)	13,151	28,807	31,253

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<b>REPORT TO:</b>	<b>CABINET 6 December 2021 COUNCIL 13 December 2021</b>
<b>SUBJECT:</b>	<b>Croydon Local Plan Review – publication of the Proposed Submission draft</b>
<b>LEAD OFFICER:</b>	<b>Sarah Hayward – Acting Corporate Director of Sustainable Communities, Regeneration &amp; Economic Recovery Heather Cheesbrough – Director of Planning and Sustainable Regeneration</b>
<b>CABINET MEMBER:</b>	<b>Councillor Lewis Cabinet Member for Culture and Regeneration</b>
<b>WARDS:</b>	<b>All</b>
<b>CORPORATE PRIORITY</b>	
<p>The vision set out in the introductory section of the document is provided from the Corporate Plan for Croydon 2018-2022. Relevant sections to planning of ‘what does success look like’ and ‘what will we do’ have been identified and also provided within this vision section. Going forward, this will allow future planning policies to align with the Corporate Plan vision and actions.</p> <p>Given the engagement the Directorate of Planning and Sustainable Regeneration and Spatial Planning has had with the Corporate Renewal Plan, it is considered objectives remain consistent and aligned.</p>	
<b>FINANCIAL IMPACT</b>	
<p>The Local Plan Review will be funded in full by the dedicated Local Plan reserve budget. The proposed submission stage costs fall within this overall reserve budget.</p>	
<b>FORWARD PLAN KEY DECISION REFERENCE NO: 4721CAB</b>	
<p>The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee</p>	

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 Council is recommended to

- 1.1 Approve the submission of the Proposed Submission draft of the Croydon Local Plan review (Appendix 1) to the Secretary of State following the conclusion of the statutory 6-week publication period in accordance with Section 20(1) of the Planning and Compulsory Purchase Act 2004;
- 1.2 Delegate the agreement of any Main Modifications required by the appointed Planning Inspector to make the Croydon Local Plan Review sound to the Cabinet Member for Culture and Regeneration, in consultation with the Director of Planning and Sustainable Regeneration;
- 1.3 Delegate the publication of any Main Modifications required by the appointed Planning Inspector for formal consultation to the Cabinet Member for Culture and Regeneration, in consultation with the Director of Planning and Sustainable Regeneration; and
- 1.4 Delegate minor modifications and factual corrections (that are not required to make the draft Croydon Local Plan Review sound) to the Director of Planning and Sustainable Regeneration in consultation with the Cabinet Member for Culture and Regeneration.

The Cabinet is recommended to

- 1.5 Approve the publication of the Proposed Submission draft of the Croydon Local Plan review (Appendix 1) its associated additional Sustainability Appraisals (Appendix 2) and updated additional supporting evidence for six weeks for representations to be made upon it, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012;
- 1.6 Approve that the Proposed Submission draft of the Croydon Local Plan be recommended to Full Council for submission to the Secretary of State upon conclusion of the statutory 6-week publication period; and
- 1.7 Delegate minor and/or factual changes to the Proposed Submission draft of the Croydon Local Plan including the Policies Map, prior to publication to the Director of the Director of Planning and Sustainable Regeneration in consultation with the Cabinet Member for Culture and Regeneration.

## **2 EXECUTIVE SUMMARY**

- 2.1 The purpose of this report is to seek Cabinet approval to publish the Proposed Submission draft of the Croydon Local Plan Review prior to submission to the Secretary of State. Preparation of the proposed content of the Local Plan



Review is required under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

- 2.2 A key aim of the Local Plan Review is to address the need for Croydon to help deliver more high quality housing and affordable housing whilst developing vibrant places to live, work, visit and socialise. Croydon has a housing target of approximately 42,000 new homes between 2019 and 2039. Three spatial strategies were set out in the Local Plan Review Issues and Options consultation which ran from the 1 November 2019 to 20 January 2020. Following this consultation, the Local Plan Review sets out the proposed strategy for addressing the causes of climate change associated with planning and directing growth across the borough, contributing to meeting housing need and supporting economic growth, especially taking account of the impact of the Covid 19 pandemic.
- 2.3 As this is a partial review of the Croydon Local Plan, this document is an edited version of the Croydon Local Plan 2018 rather than a rewritten new document and will be presented in both a clean and tracked change version (Appendix 1) for publication. It is important to have the tracked changed version so that it is clear that only those parts indicated as changed are subject to the review and subsequently able to be commented upon. This document also includes three additional strategic transformation areas for Purley Way, North End Quarter and Brighton Main Line and East Croydon Transformation Corridor. It also covers proposed policy updates, using existing and as appropriate updated evidence for each thematic policy area including housing, affordable housing, housing design, urban design, heritage and local character, employment, retail, community facilities – health and education, community facilities – social infrastructure, environment and climate change, green grid, transport and parking.
- 2.4 The 16 Places of Croydon will change depending on their local character, their accessibility to services and public transport, their heritage status and the ability to deliver growth with commensurate physical and social infrastructure to mitigate growth. The strategy set out in the proposed submission document details, the vision for these areas, as well as the proposed growth scenario.

### **3 DETAIL**

#### **3.1 Current position**

- 3.1.1 Croydon needs to review the existing Croydon Local Plan 2018 to rise to the challenges facing the borough and its communities over the next 20 years, and ensure general conformity with the London Plan (March 2021). Planning is critical to ensuring that Croydon meets the needs of all its residents, businesses and visitors in a sustainable manner. This Local Plan review sets out how Croydon might contribute to meeting its own housing needs, including the need for affordable homes; whilst tackling the causes of climate change in the borough, supporting economic growth and ensuring it is developing vibrant places for people to live, work and visit.

- 3.1.2 A The Council's Strategic Housing Market Assessment (SHMA) (updated November 2019) has calculated that there is a need for 46,040 new homes in the borough between 2019 and 2039. Since then the London Plan has been adopted (March 2021). Policy H1 of the London Plan has set a 10 year housing target of 20,790 dwellings between 2019-2029 i.e. over a 10 year period. This equates to a total of 41,580 dwellings during a 20 year time frame for the Local Plan Review (2019-2039). The Local Plan Review sets out a strategy to accommodate circa 42,000 homes 2019 – 2039, taking account of the capacity constraints in the borough. The SHMA and the Council's strategic approach to housing has been used to inform the amended policies to deliver the additional housing reflecting evidenced local needs.
- 3.1.3 The Croydon Local Plan Review – proposed submission draft document covers the following sections:
- Strategic Option
  - Three strategic transformation areas
  - Thematic Policy Areas (including strategic and development management policies)
  - Place Specific Policies

## **3.2 Strategic Option**

- 3.2.1 The Local Plan review sets out the proposed spatial strategy, sites and planning policies necessary to meet the needs of the borough, over the period from 2019 to 2039. During the Issues and Options consultation stage three strategic spatial options were set out. Each of the three options proposed a proportion of homes to be built in each of the boroughs 16 places based on differing criteria. Following the consultation, a strategy which closely resembles option 2, of the Issues and Options consultation is recommended to be taken forward. The delivery of this strategy is detailed in the Proposed Submission draft of the Croydon Local Plan and will be adopted following an examination of the plan by a Secretary of State appointed independent planning inspector.
- 3.2.2 The approach put forward is considered to be an environmentally and socially sustainable option as evidenced by the Local Plan Review's updated Sustainability Appraisal suite of documents. The strategy builds upon that in the adopted Local Plan 2018 where development is directed to three strategic areas or methods; in the Croydon Opportunity area, existing and additional site allocations / existing permissions across the Borough and windfall sites. To deliver additional growth as set out in the London Plan 2021 there is a strategic level of development focused on the Purley Way which is proposed to accommodate up to 7,515 homes over the plan period through a radical vision and plan led approach to the redevelopment of the area with high density mixed use, residential and commercial/retail developments; whilst respecting the borough's most valued and protected commercial locations. A draft Purley Way Masterplan Supplementary Planning Document has been prepared in tandem with the Local Plan review.
- 3.2.3 No Green Belt release is proposed to accommodate the London Plan housing target or infrastructure provision.

3.2.4 Under the proposed submission Local Plan the following homes by Place (2019-2039) are proposed through windfall sites and site allocations:

These figures will be updated at submission

<u>Place</u>	<u>Total</u>
Addington	568
Addiscombe	647
Broad Green & Selhurst	587
Coulsdon	2160
Croydon Opportunity Area	9753
Crystal Palace & Upper Norwood	382
Kenley and Old Coulsdon	725
Norbury	225
Purley	5735
Purley Way	7515
Sanderstead	885
Selsdon	633
Shirley	278
South Croydon	474
South Norwood & Woodside	331
Thornton Heath	1063
Waddon	413

### 3.3 Policy Areas

3.3.1 Following the feedback from the issues and options consultation each of the policy areas have been reviewed and amended. As this is a partial review Development Management policies have only been amended where necessary as a result of strategic policy change, the London Plan, the National Planning Policy Framework (NPPF) or monitoring of the 2018 Local Plan. The review uses existing and where appropriate new evidence as well as other documents for information such as the Infrastructure Delivery Plan, the latter is an example of documents that are ‘living’ technical documents and may evolve up to the submission of the Local Plan. The Evidence Base and the Sustainability Appraisals both old and new should be read as a whole as background documents to the review process. Where appropriate the following policy areas state and draw upon where new evidence has informed the review. Only the changes made to the Croydon Local Plan 2018 can be commented up and not the whole Local Plan. The following amendments support the delivery of the strategy, update the plan consistent with the NPPF and London Plan and address environmental and climate change issues.

#### Urban Design and Character

3.3.2 Places will change in the plan period depending on their local character, their accessibility to services and public transport, their ability to respect the significance of heritage assets and the ability to deliver commensurate physical and social infrastructure to mitigate growth. To respond to policy D3 and H2 of the London Plan on incremental densification, there are areas identified in the

borough that can support sustainable housing growth. These identified areas comprise Areas of Focussed Intensification (there are four of these in the Local Plan 2018) and Moderate Intensification Areas and will have a planned level of growth that will feed into the housing target for each particular Place. These areas are defined in the London Plan as follows:

- Areas of Focussed Intensification are within 800m of town centres, a train station or a tram stop or with a PTAL of 3 or above, where a step change of character to higher density forms of development will take place.
- Moderate Intensification area would apply to areas with inconsistent character where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good.

3.3.3 In terms of changes to the Local Plan, additional Areas of Focussed Intensification which accord with the criteria in the London Plan have been identified together with new areas identified for “moderate intensification”. These are all now included within the Proposed Submission Local Plan and are set out in the table below:

Moderate Intensification Areas	Areas of Focussed Intensification
Addiscombe	Environs of Brighton Road (Sanderstead Road) Town Centre
Waddon	Environs of Coulsdon Town Centre
Selsdon	Environs of Purley Town Centre/Reedham station
Purley North	Forestdale Centre
Purley East	London Road, Thornton Heath
Purley/Coulsdon	
Purley/Kenley	
Kenley Station	
South Croydon/Sanderstead	
Coulsdon Station South	

3.3.4 Shirley Local Centre currently identified as an Area for “Focussed Intensification” has been removed from the plan.

3.3.5 In addition to the above, the Local Plan has been amended to allow for evolution and gentle diversification that will be supported across all other residential areas, which are located further away from public transport and centres.

3.3.6 Conservation Areas and local heritage areas would remain conserved as they are excluded from the identified areas of growth. Also, three strategic transformation areas identified in the proposed plan for large scale redevelopment would not come under the intensification areas.

3.3.7 The tall buildings policy has been reviewed and minor amendments have been made to the wording to reflect London Plan Policy D9.

### Environment and Climate Change

3.3.8 Croydon Council declared a Climate Change Emergency in July 2019 and established a target for the Council to become carbon neutral by 2030. Climate change is a global issue with many local impacts, such as flooding events. Croydon is the 4<sup>th</sup> most susceptible town in the UK for surface water flooding.

3.3.9 Following the recommendations of the Council's Climate Change Commission and anticipated Climate Change Action Plan, the following changes have been made to the Environment and Climate chapter of the Local Plan in order to create positive change in support of the Climate Emergency:

- Policy has been updated to reflect the New London Plan, this includes new targets for carbon and construction, air quality neutral requirement, as well as 'Be Seen' as part of energy hierarchy;
- Policy has been updated to reflect changes to the NPPF, including, the change to paragraph 154 to reflect current government policy on national technical standards;
- Additional Policy has been provided to promote the Circular economy;
- Embed climate adaptation and carbon reduction actions.

### Green Grid:

3.3.10 One third of Croydon is green space, made up of a mixture of Green Belt, Metropolitan Open Land, recreation / sports grounds and other open spaces. There is an increasing pressure on these green spaces from population growth and the fragmentation of the green grid.

3.3.11 To support the borough's climate change objectives and deliver the proposed strategy the Green Grid changes cover the following:

- Delivering solutions to address the Climate change emergency through the Green Grid;
- Enhanced sustainability and green travel options;
- Integrating the Green and Blue grid, restoring the value and optimisation of the boroughs water bodies;
- Proving additional detail on expansion and delivery of the Green Grid network;
- Enabling additional tree planting, ecology and net increase in biodiversity;
- New policies on new publicly accessible open spaces and urban greening factor (UGF); and
- Identifying local green spaces (referred as Very important Community green spaces in the plan) based on the evidence received from the wider community.

### Housing (including affordable housing and housing design)

3.3.12 The Strategic Housing Market Assessment commissioned from GL Hearn to support the Local Plan Review identifies that Croydon's population is gradually getting older and household sizes are getting smaller. Furthermore, open market housing (both private rented and for sale) is getting less and less affordable for many households in the borough. The Strategic Housing Market Assessment has calculated that 2,254 affordable rented homes a year would be needed in Croydon to meet the need of lower income households for housing. There is also a need for 1,453 affordable home ownership homes in

the borough each year. The following policy amendments address these issues.

- Reflecting the new housing target in the London Plan – focussed to sustainable locations;
- Policy recognises the housing crisis and the need to encourage significant housing delivery, especially affordable homes and how we deliver;
- Affordable housing policy alignment with the London Plan;
- Additional housing design guidance.
- Updated policy to promote 3 bed home delivery.

#### Employment and Retail:

3.3.13 Croydon is the largest metropolitan centre in London and one of only two strategic office centres out of central London. There are also 9 District Centres, 9 Local Centres, 18 Neighbourhood Centres and 62 Shopping Parades in the borough. The following policy changes have been made to support the strategic option and align the Local Plan Review with the London Plan and NPPF, and respond to the changing function and use of all tiers of centres:

- Policy has been updated to reflect changes to the Use Classes Order;
- Additional clarity has been provided around the town centre hierarchy;
- Additional clarity has been provided for edge and out of centre developments taking into account changes to the use class order;
- Removing the distinction between primary and secondary retail frontages - which is a consequence of changes to the planning regulations;
- With the London Plan 'no net loss' provision for industrial and employment sites removed, policy has been amended to protect this land to support the borough's economy, supported by the Employment Land Review;
- Additional policies supporting the Creative economy, affordable workspaces and providing benefits to the local workforce; and,
- Policy changes are supported by the new evidence produced showing a need for employment land and protection of the warehousing sector.

#### Community facilities:

3.3.14 The key issue regarding community facilities is the access to appropriate community facilities for all ages, such as education, health, religious, sporting, cultural and creative spaces, for all residents and visitors of Croydon. The following amendments were made:

- Infrastructure Delivery Plan updated
- Housing crisis – need to match facilities with new development to mitigate impact
- Burial space provision

#### Transport:

3.3.15 As Croydon grows, we need to reduce the amount of private car use, traffic and congestion and resultant pollution in our streets in accordance with the Mayor's Transport Strategy. Changes to the transportation policies aim to address the Climate emergency, support the Mayor's Transport Strategy and enable growth in the borough. The following policy changes have been made:

- Addressing the London Plan parking standards;

- Promote changes to support reducing climate change impacts – promote development in sustainable locations (overall strategy);
- Encourage sustainable travel; and,
- Address development phasing and construction methods.

### Transformation Areas

#### The Purley Way:

3.3.16 The Purley Way is the borough's primary out of centre employment location, including two London Plan Strategic Industrial Locations. There is a need to facilitate considerable growth in residential, mixed use development along the Purley Way, outside the Strategic Employment Locations, and industrial intensification development within Strategic Employment Locations. To support the Purley Way as one of the borough's strategic transformation areas the new chapter addresses:

- Redevelopment of brownfield land;
- Ability to connect and complement Croydon Opportunity Area;
- Urban design opportunity to transform a hard traffic corridor into a green street that encourages sustainable transport options and serves four new local centres;
- Gateway to Croydon physically, economically and socially;
- Opportunity for a new communities supported by new local centres;
- Delivery of high quality mixed use development;
- Support the borough's economic growth by encouraging intensification of industrial land; and
- Embracing the latest technology and sustainability.

#### The Brighton Main Line and East Croydon Transformation Corridor:

3.3.17 Croydon Area Remodelling Scheme (CARS) is the largest and most complex part of Network Rail's longer-term Brighton Main Line upgrade project. CARS would remove one of the most operationally challenging bottleneck on Britain's railway network, located in the 'Selhurst triangle'. East Croydon station and East Croydon is a critical sustainable transport node, providing access to the train, tram, bus, walking and cycling networks. To support this area's transformation the East Croydon transformation area policies cover the following:

- Set the policy context to inform the Transport Works Act Order Inquiry (should the project get DfT funding to progress), especially support for the Brighton Main Line Upgrade and setting the placemaking and renewal context for the Station Square and Station Building.
- Outputs linked to achieving the Mayor's transport strategy.
- Allocations included to phase and guide development sites adjacent to the station post construction of the project.

#### The North End Quarter

3.3.18 A chapter updating the Croydon Opportunity Area Framework for the area is included to provide a vision and strategy for the transformation of this area as the role of town centres change and evolve. There are detailed policies covering specific requirements needed to deliver the development strategy for this area.

### The 16 Places

3.3.19 The longstanding 16 Places of Croydon will evolve and change based on their local character, their accessibility to services and public transport, their heritage status and the ability to deliver growth and commensurate physical and social infrastructure to mitigate growth. The structure of the places has been edited to emphasise placemaking around character, these updates have been done with reference to the character study. The places also reflect the additional allocations, intensification and the areas of focused intensification.

### Allocations

3.3.20 Site Allocations are also identified under each Place, including sites for future housing and other development such as schools, health facilities and community centres. The Local Plan Review lists all site allocations, sorted by Place.

### Very Special Community Green Spaces

3.3.21 National planning policy says that local communities should be able to identify for special protection green areas of particular importance to them by designating them as Local Green Spaces in Local Plans. NPPF paragraph-101 states that “Local Green Spaces can only be designated when a plan is prepared or updated, and be capable of enduring beyond the plan period.” The NPPF goes on to state in paragraph 102 that “Local Green Space designation should only be used where land is:

- in reasonably close proximity to the community it serves;
- demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
- local in character and is not an extensive tract of land.”

3.3.22 The NPPF (paragraph 103) also requires that policies for managing development within a Local Green Space should be consistent with those for Green Belts.

3.3.23 In 2016, as part of the preparation of the Croydon Local Plan 2018, the Council tried to gain this extra layer of protection for all of Croydon's parks and green spaces that met the above mentioned criteria. All identified sites were put forward to be designated, however, none of them were granted the Local Green Space designation as the Planning Inspector, appointed by the Secretary of State to review of Local Plan, felt there was not enough local evidence to prove how these spaces were special/important to local communities, or that they hold any particular local significance. In particular he said that *“many of [the characteristics identified by the Council], such as a community garden, children’s play area, natural open space, playing field or recreation ground seem rather commonplace with the consequence that, even where three of these co-exist, the criterion of “demonstrably special” or of “particular” significance within the terms of [national planning policy] is not met.”*

3.3.24 In preparation for the Local Plan Review, between 4<sup>th</sup> June 2019 to 22<sup>nd</sup> July 2019 the Council asked local residents to tell us which green spaces were special to them and why. The considerable responses received have been



reviewed by Officers. In reviewing the responses Officers have had in mind the following comments made by the Planning Inspector who examined the current Croydon Local Plan 2018 in which he said:

*“A large number of [representations made to the Council about designating particular spaces as Local Green Space] argue for the general benefits of open space to recreation and health. These are undisputed but, by definition, general benefits do not amount to the special justification needed to support Local Green Space designation on a specific site. Others argue for the historic interest of particular places or pointed to their ecological or nature conservation interest. These too cannot be disputed but... the [Croydon Local Plan 2018] already contains policies to protect land with these characteristics. Other [representations] provide pointers to the kind of criteria that the Council may wish to use in the [Local Plan] Review which I recommend... The concept of Local Green Space is not simply about maintaining a quantitative standard of open space or facilities, important though that is; it is concerned with boundaries which are capable of enduring beyond the end of the plan period, i.e., not just ensuring that a sufficient quantity of open space is provided or retained in an area but that it be provided or retained on the particular site in question because its location has particular importance to the local community, possibly as the result of an event on the site or as the result of a campaign of acquisition or gift in relation to the site.”*

3.3.25 Where responses have highlighted a feature or use of a green space that is beyond a general benefit; and it is not a feature protected by another Local Plan policy; then they are proposed in this Proposed Submission draft Local Plan. The proposed Local Green Spaces (referred as very special community green spaces) are set out under each Place, and include the reason why they are demonstrably special.

The table below identifies proposed Very Special Community Green Spaces that have met the demonstrably special criteria. The categories that have been used to identify sites as meeting the requirements of this designation include:

Name of the site	Place
Addiscombe Railway Park	Addiscombe
Biggin Wood	Norbury
Coulsdon Memorial Ground	Coulsdon
Foxley Wood and Sherwood Oaks	Kenley and Old Coulsdon/ Purley
Higher Drive Recreation Ground	Kenley and Old Coulsdon
Millers Pond	Shirley
Park Hill Recreation Ground	Central Croydon
Portland Road Community Garden	South Norwood and Woodside

Purley Beeches	Sanderstead
Rotary Field Recreation Ground	Purley
Sanderstead Pond (and Green)	Sanderstead
Sanderstead Recreation Ground	Sanderstead
Shirley Oaks Village Playing Field and Wood	Shirley
Shirley Recreation Ground	Shirley
Spring Park Wood	Shirley
Stambourne Woodland Walk	Crystal Palace and Upper Norwood
Temple Avenue Copse	Shirley
The Lawns	Crystal Palace and Upper Norwood
Wettern Tree Garden	Sanderstead
Woodcote Village Green	Purley

3.3.26 Just because a green space has not been put forward as a proposed Local Green Space, it does not mean that it is a development site. All green spaces are important; even more so in the context of for the target of circa 42,000 homes by 2039. These new homes will require access to green spaces. Therefore, other green spaces that do not lie within the Green Belt or Metropolitan Open Land and do not fulfill the criteria to be designated as “local green spaces” will be protected in the Local Plan review under an ‘other important green spaces’ policy. Many of them will also be part of the green grid network of open spaces proposed in the Green Grid section of this Proposed Submission Local Plan.

3.3.27 These spaces that are proposed to be protected through an “other green space” designation important include the following types of space:

- **Town (or Place) parks and natural open spaces** – These are large areas of open space that provide a landscape setting with a variety of natural features. They provide a wide range of activities, including outdoor sports facilities and playing fields, children’s play for different age groups and informal recreation pursuits. The category also includes larger areas of natural open space. They will usually provide recreation for an entire Place and can be up to 20ha in size.
- **Local parks and natural open spaces** – These provide for court games, children’s play, sitting out areas and nature conservation areas; or they are slightly larger areas of natural open space. They serve more

than the neighbourhood in which they are located, but won't serve an entire Place. Usually they will be under 2ha in size.

- **Neighbourhood parks and natural open spaces** – These also only serve the neighbourhood in which they are located but will be more formal green spaces. They include public gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas. Generally they are under 1ha in size.
- **Informal green spaces** – These are small areas of informal open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and small amounts of play equipment. Typically they will serve only the neighbourhood in which they are located, and are generally under 0.4ha in size.
- **Linear open spaces** – These are paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space.

3.3.28 To support the delivery of infrastructure set out in the Infrastructure Delivery Plan and mitigate the impact of development, the Council in early 2022/23 will explore the scope to review the Council's Community Infrastructure Levy (CIL) charging schedule adopted in 2013. This review will seek to strike an appropriate balance between additional investment through CIL to infrastructure to support development and the potential effect on the viability of developments.

## 4. CONSULTATION

4.1 The Issues and Options consultation for the Local Plan took place 1 November 2019 to 20 January 2020. The consultation was required under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation covered the three strategic options, the local plan topic area policies, two transformation areas and the Place of Croydon chapters. Issues and options related to these areas were identified and detailed in the issues and options document.

4.2 Through the consultation period responses were collected through the Bang The Table platform. Through this consultation 3252 total responses were received across the 19 topics consulted on. There was a strong response in respect of the three strategic options and generally people were not supportive of land being released from the Green Belt but the proposed transformation of the Purley Way attracted support. There was support for the Council's Climate Change emergency declaration and people considered that it was important to maintain and improve the quality of the Council's green spaces

4.3 If approved, publication of the Proposed Submission Local Plan Review and its Sustainability Appraisal, with the supporting evidence alongside will take place under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The representations received together with the documents will be sent to the Planning Inspectorate. A Planning Inspector will hold an Examination-in-Public on the draft Proposed Submission Local Plan Review, when he/she may invite some of those people who have made representations to give evidence in person.

## 5 PRE-DECISION SCRUTINY

5.1 This item went to Scrutiny on 29<sup>th</sup> September 2020 and 16 March 2021. The Local Plan was discussed alongside the proposed response to the Housing White Paper. The notes of the meetings are attached.

## 6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

### Revenue and Capital consequences of report recommendations

6.1.1 The Local Plan Review is funded in full by the dedicated Local Plan budget reserve. This stage of the Local Plan Review can be funded in full from the Local Plan budget reserve.

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2021/22 £'000	2022/23 £'000	2023/24 £'000	2024/25 £'000
<b>Revenue Budget available</b>	219	100		
Expenditure	119	100		
Income	0			
<b>Effect of decision from report</b>				
Expenditure				
Income				
<b>Remaining budget</b>				
<b>Capital Budget available</b>				
Expenditure				
<b>Effect of decision from report</b>				
Expenditure				
<b>Remaining budget</b>	100	0		

## **6.2 The effect of the decision**

- 6.2.1 The decision will commit Croydon to submit the Proposed Submission Draft of Croydon Local Plan document to the Secretary of State. The costs are estimated to be £219k and include all costs associated with the Local Plan Review, including evidence base assembly, consultation, document production, Local Plan Examination in Public and Adoption etc.

## **6.3 Risks**

- 6.3.1 There is a small risk that the Local Plan Budget Reserve which is £219k after this commitment will not be sufficient to conclude the Local Plan Review to adoption. This needs to be managed carefully to ensure costs are contained within the funding available as has been the case to date.

## **6.4 Options**

- 6.4.1 The alternative would be to delay the regulation 19 consultation stage. This would delay the review of the Local Plan and would mean having an out of date Local Plan in tension with statutory legislative requirements regarding plan making.

## **6.5 Future savings/efficiencies**

- 6.5.1 The project is being funded by the Local Plan Review Budget Reserve, which is carefully managed through the Local Development Framework Board and project managed to ensure the project scope aligns with the budget available.

Approved by Michael Jarrett Head of Finance for Place

## **7. LEGAL CONSIDERATIONS**

- 7.1 The Director of Law and Governance and Deputy Monitoring Officer acknowledges that this report seeks approval for the Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012 publication of the Local Plan Review and Submission of the Local Plan Review to the Secretary of State.

Approved by Nigel Channer, Interim Head of Commercial & Property Law on behalf of the Interim Director of Law and Governance & Deputy Monitoring Officer.

## **8. HUMAN RESOURCES IMPACT**

- 8.1 There are no Human Resource impacts as the production of the partial review of the Local Plan is set out in the Spatial Plan Service Plan and can be delivered with the current established staff levels. If any should arise these will be managed under the Council's policies and procedures.

Approved by Jennifer Sankar, Head of HR Housing and Sustainable Communities, for and on behalf of Dean Shoemith, Interim Chief People Officer

## **9. EQUALITIES IMPACT**

- 9.1 An Equalities Impact Assessment has been undertaken with the following chapters flagged for screening: Homes, Employment, Green Grid, Transportation and Communication, Urban Design and Local Character, Community Facilities, and Place Making.
- 9.2 An equality review has been undertaken in May 2021, to align the plan to current organisational priorities and to consider current data in respect of each characteristic.

Approved by: Denise McCausland – Equality Programme Manager

## **10. ENVIRONMENTAL IMPACT**

- 10.1 The Proposed Submission Local Plan provides an update on the Council's environmental, climate change and green grid policies as a way of addressing environmental impacts. Supports the work of the Council's climate change commission. The Proposed Submission draft of the Croydon Local Plan is also supported by the commissioned Sustainability Appraisal, which further assesses the environmental, social and economic implications of the Local Plan Review and how this will help to deliver sustainable development.

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

- 11.1 There are no known direct crime and disorder impacts.

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

- 12.1 Croydon needs to review its existing Local Plan to rise to the challenges facing the borough and its communities over the next 20 years and beyond. Planning is critical to ensuring that Croydon meets the needs of all its residents, businesses and visitors.
- 12.2 This Proposed Submission draft of the Croydon Local Plan sets out how Croydon might contribute to meeting its own housing needs, including the need for affordable homes; whilst tackling the causes of climate change in the borough, and ensuring it is developing vibrant places for people to live, work and visit.
- 12.3 It is a statutory requirement for the Council have an up to date Local Plan to ensure that the Council is able to determine planning applications in accordance with up to date Local Plan and resist inappropriate development and minimise the level of development occurring in the borough through the planning appeal process.
- 12.4 For this reason it is recommended to approve the Proposed Submission draft of the Croydon Local Plan for publication and for submission to the Secretary of State to enable the borough to meet the statutory duty to have an up to date

Development Plan that is in general conformity with the London Plan and consistent with national policy.

### **13. OPTIONS CONSIDERED AND REJECTED**

- 13.1 Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans, at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Therefore, it is not an option not to review the Local Plan.

### **14. DATA PROTECTION IMPLICATIONS**

#### **14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

**YES**

All consultation responses will be held in the Croydon Local Plan consultation database. This will include personal data. This data will need to be held until a date no earlier than 6 weeks after the date on which the Local Plan Review is formally adopted by the Council; or at the conclusion of any application by an aggrieved party to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004; whichever is the later date. This is so the Council can document that the Local Plan Review has been prepared in compliance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

#### **14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

**YES – reference number 521257**

The Corporate Director of Sustainable Communities, Regeneration and Economic Recovery confirms that a DPIA has been completed and is currently under review.

Approved by: Heather Cheesbrough, Director of Planning & Sustainable Regeneration

---

**CONTACT OFFICER:** Steve Dennington Head of Spatial Planning, extension 64973

#### **APPENDICES TO THIS REPORT**

Appendix 1 – Proposed Submission Draft of Croydon Local Plan

Appendix 2 – Sustainability Appraisal, Equalities Impact Assessment [Sustainability Appraisal and Equalities Impact Assessment | Croydon Council](#)

## BACKGROUND PAPERS

Proposed Submission Draft of Croydon Local Plan – Policies Maps [Croydon Local Plan review - Policies maps](#)

Additional Evidence Produced as a result of the review of the Local Plan

Strategic Housing Market Assessment

<https://www.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/local-plan-evidence-topic/homes>

Green Belt Review

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20Green%20Belt%20and%20Metropolitan%20Open%20Land%20Study.pdf?src=redirection-fix>

Employment Land Review [Economy and employment | Croydon Council](#)

<https://www.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/local-plan-evidence-topic/economy-and-employment>

Future of Destination Retail Study [Economy and employment | Croydon Council](#)

Strategic Flood Risk Assessment [Climate change | Croydon Council](#)

Purley Way Masterplan

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20Green%20Belt%20and%20Metropolitan%20Open%20Land%20Study.pdf?src=redirection-fix>

East Croydon Strategic Regeneration Framework

<https://www.croydon.gov.uk/planning-and-regeneration/planning/planning-policy/further-guidance/masterplans/east-croydon-masterplan>

Whole Plan Viability Assessment [Viability | Croydon Council](#)

Other Reports

Scrutiny Committee Report “Croydon Local Plan” 28 September 2020

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=2140&Ver=4>

Scrutiny Committee Report “Croydon Local Plan” 16 March 2021

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=2143&Ver=4>

The full suite of evidence documents is available on the Evidence Page for the Local Plan (see paragraph 3.31) of this report for how this relates to the review of the Local Plan – [Local Plan evidence by topic | Croydon Council](#)



**This document is a revision of the adopted Croydon Local Plan 2018.**

**The document contains deleted text shown as ~~struck through~~ with insertion indicated as **red text**.**

***Only these parts of the Local Plan that have been changed are subject to consultation.***

***To reduce the file size all revised figures and diagrams have been removed and are show in a separate comparative document***

~~February 2018~~ **December 2021**

# Croydon Local Plan 2018

A Development Plan Document forming part of the development plan for Croydon

27-February 2018

Published by  
Spatial Planning service  
London Borough of Croydon  
Bernard Weatherill House  
8 Mint Walk  
Croydon  
CR0 1EA

[www.croydon.gov.uk/localplan](http://www.croydon.gov.uk/localplan)

[ldf@croydon.gov.uk](mailto:ldf@croydon.gov.uk)

020 8407 1385

# Foreword

~~Councillor Alison Butler – Deputy Leader Statutory – Cabinet Member for Homes, Regeneration & Planning & Councillor Paul Scott – Chair of Planning Committee & Deputy Cabinet Member for Planning~~

~~The Croydon Local Plan 2018 is the most important planning policy document for the borough and provides an exciting and deliverable vision for Croydon up to 2036. It brings together the Strategic Policies with the Detailed Policies and Proposals. Our Local Plan has ‘Ambitious for Croydon’ enshrined in the overall vision, objectives and policies to ensure Croydon continues to be an attractive and thriving place for all who live, work and visit. Most importantly, the Local Plan will enable increasing the supply of homes through sustainable growth (together with affordable homes), and the renewal and regeneration of the borough’s District Centres and the Croydon Opportunity Area.~~

~~We are pleased that Croydon Local Plan 2018 has now been found sound by the Planning Inspectorate. The Local Plan demonstrates how sustainable growth of Croydon’s suburbs can increase the supply of new homes, including affordable housing whilst continuing to protect the borough’s important green spaces and heritage and cultural assets that make the 16 Places of Croydon and our neighbourhoods so special and the valued places that they are. It shows how Croydon will evolve sustainably from 2016 to 2036 setting out the policies that will guide development and the sites that we expect to be developed to help meet the need for new homes, jobs, schools, healthcare, leisure and other essential facilities and infrastructure we need across the borough.~~

~~The Croydon Local Plan 2018 also supports the Council’s Growth Zone, which is essential to the whole borough. Our Growth Zone will benefit from the Local Plan allowing for development that~~

~~underpins the Growth Zone and the plans for the infrastructure the Growth Zone will deliver with partners.~~

~~This Council believes in people focussed planning, making Croydon a better borough to live, work and visit from stepping out of your front door, going to the local shop, community hall or school or visiting your Neighbourhood Centre, District Centres or Croydon Opportunity Area for restaurants, shops, work and entertainment. As part of our commitment to people focussed planning the Croydon Local Plan 2018 has been developed in consultation with local communities and stakeholders across the borough and we thank everyone who has been involved in the making of the Croydon Local Plan 2018. We hope that you continue to be engaged in planning in Croydon.~~

**The Croydon Local Plan Review is an important planning policy document for the borough and provides an exciting and deliverable vision for Croydon up to 2039. The Local Plan Review details how the borough intend to deliver good growth while ensuring the unique character of the borough is protected and enhanced. Whilst the impact of Covid-19 has had a significant change to the way Croydonians choose to live and work, the Croydon Local Plan Review is reflective of this change and considers how our environments and economic growth will evolve to suit the growing needs of our communities. Our priority as a Council is to plan for future growth, so that development makes a lasting and positive impact on communities and opens up new opportunities for our people.**

**The Local Plan sets out a vision and policies about infrastructure provision, housing delivery, employment opportunities and**

protection of our environment. Our Local Plan has our corporate vision; 'Choose Your Future' encompassed in the overall vision, objectives and policies to ensure Croydon continues to be a place of prospect and a thriving place for all who live, work and visit. The policies will guide development and the sites that we expect to be developed to help meet the need for new homes, jobs, schools, healthcare, and leisure and other essential facilities and infrastructure we need across the borough.

The Croydon Local Plan Review supports the Council's Growth Zone and the renewal of the borough's District Centres and the Croydon Opportunity Area which are essential to the whole borough. The 16 places of Croydon provide the landscape for good growth that will establish the right development in the right places at the right scale, creating attractive sustainable neighbourhoods as well as new economic opportunities allowing Croydon to remain consistent with future demand and need. This approach is supplemented by three new transformation areas – The Purley Way, Brighton Main Line and East Croydon Transformation Corridor and the North End Quarter.

The Croydon Local Plan Review supports the development of a prosperous and innovative economy thriving communities and acts as an exemplar to sustaining a great quality of life. This is a plan for the kind of borough we want to enjoy in the future.

As part of our commitment to people focussed planning the Croydon Local Plan Review has been developed in consultation with local communities and stakeholders across the borough. We thank everyone who has been involved in the making of the Croydon Local Plan Review. We hope that you continue to be engaged in planning in Croydon and we can continue the conversation with you.

# How to use this Document

The Croydon Local Plan 2018 is broken down into 12 sections with a Glossary and other Appendices at the back. **Section 1**, the introduction, sets out the context and purpose of the Croydon Local Plan. **Section 2** sets the scene and looks at the borough's historical context, demographic factors, the regional context and drivers for change. **Section 3** lays out Croydon's overarching long term spatial vision, accompanying strategic objectives, the overarching Places of Croydon policy and the Key Diagram. **Sections 4 to 10** set out the thematic strategies that will ensure delivery of the strategic objectives and realisation of the spatial vision. These sections start with a Strategic Policy and are then followed by a set of more Detailed Policies that provide further details as to how the thematic strategies will be delivered. A guide to the Strategic Policies and the Detailed Policies and how to use and interpret them can be found below. See below for more information on how to use and interpret these sections. **Section**

## The Strategic Policies

Strategic Policies start with the prefix 'SP...' These policies are broken down by a series of headings phrased as statements: 'Where we want to be', 'How we are going to get there' (this is where the strategy and policies are set out), 'What it will look like', and 'Why we have taken this approach'.

### Where we want to be

This looks at the key issues and priorities; it articulates the issues and strategic objectives needed to contribute to the delivery of the overall spatial vision, Croydon's Sustainable Community Strategy priorities and the desired policy direction.

### How we are going to get there

**11** shows what Strategic Policies and Detailed Policies will mean for the 16 Places of Croydon, setting out the Places vision, summarising the opportunities and constraints and the changes that can be expected to take place up to 2036. This section also sets out Place Specific Policies and Detailed Proposals (sites that the Croydon Local Plan allocates for development) for each Place. A guide to the Place Specific Policies and the Detailed Proposals and how to use and interpret them can be found below. Finally **Section 12** explains how the policies proposed will be delivered. This is closely linked to the Infrastructure Delivery Plan, which in comprehensive detail outlines how infrastructure required to support the Strategic Policies will be delivered. This section also links to the Monitoring Framework for the Croydon Local Plan 2018 to measure the effectiveness of the policies.

## How to use this document diagram

This sets out the proposed strategic policy for achieving the strategic objectives. These provide the strategic planning policies that provide the opportunity for the production of Neighbourhood Plans. This will enable communities to influence the planning of their Place, in conformity with Strategic Policies.

### What it will look like

This shows the spatial elements of the strategic policy on a map.

### Why we have taken this approach

Here we set out our reasoned justification for the policy citing evidence and rationale.

## The Detailed Policies

Detailed Policies start with the prefix 'DM...' These policies are broken down by a series of headings that as follows:

- a) Strategic Objectives and related Croydon Local Plan strategic policies;
- b) Why we need this policy;
- c) The policy itself
- d) How the policy works; and
- e) Key supporting documents.

## The Place-specific policies (including the detailed proposals)

For each Place of Croydon there is a vision, summarising the opportunities and constraints and the changes that can be expected to take place up to 2036. This is followed by a Place-specific policy (prefixed with 'DM...' for which the following information is provided:

- a) A description of the general character of the Place;
- b) The policy wording;
- c) A full description of how the policy works; and
- d) A list of all the detailed proposal sites in each place including the proposed use on each site.

A guide to how the detailed proposals were identified can be found in Appendix 6 and a schedule containing further details of each site including indicative unit numbers and phasing can be found in Appendix 7.

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# Map of the 16 Places of Croydon



## A quick guide to which policies apply to which types of development – a new table will be produced on adoption

Use the guide below to find out which policies will probably apply to your proposed development. Note that it is not a definitive list and other policies of the Local Plan may also apply (for example if your proposed development lies within an area at risk of flooding).

Type of development	Applicable policies
Household extension	Policy DM10: Design and character
Small residential development (up to nine new homes)	<p>Policy SP6: Environment and Climate Change</p> <p>Policy DM10: Design and character</p> <p>Policy DM13: Refuse and recycling</p> <p>Policy DM16: Promoting healthy</p> <p>Policy DM23: Development and construction</p> <p>Policy DM24: Land contamination</p> <p>Policy DM25: Sustainable Drainage Systems and reducing flood</p> <p>Policy DM29: Promoting sustainable travel and reducing congestion</p> <p>Any applicable Place-Specific policy</p>

Type of development	Applicable policies
<p>Large residential development (ten or more new homes)</p>	<p>Policy SP2: Homes</p> <p>Policy SP6: Environment and Climate Change</p> <p>-Policy DM1: Housing choice for sustainable communities</p> <p>Policy DM3: Vacant building credit</p> <p>Policy DM10: Design and character</p> <p>Policy DM13: Refuse and recycling</p> <p>Policy DM14: Public art</p> <p>Policy DM15: Tall and large buildings</p> <p>Policy DM16: Promoting healthy</p> <p>Policy DM23: Development and construction</p> <p>Policy DM24: Land contamination</p> <p>Policy DM25: Sustainable Drainage Systems and reducing flood</p> <p>Policy DM29: Promoting sustainable travel and reducing congestion</p> <p>Any applicable Place-Specific policy</p>



Type of development	Applicable policies
<p>Change of use of a retail unit to a flat</p>	<p><del>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</del></p> <p><del>Policy DM6: Development in Shopping Parades</del></p> <p><del>Policy DM10: Design and character</del></p> <p><del>Policy DM11: Shop front design and security</del></p> <p><del>Policy DM13: Refuse and recycling</del></p> <p><del>Any applicable Place-Specific policy</del></p>
<p>A new retail unit (change of use)</p>	<p><del>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</del></p> <p><del>Policy DM5: Development in Neighbourhood Centres</del></p> <p><del>Policy DM6: Development in Shopping Parades</del></p> <p><del>Policy DM8: Development in edge of centre and out of centre locations</del></p> <p><del>Policy DM11: Shop front design and security</del></p> <p><del>Any applicable Place-Specific policy</del></p>

Type of development	Applicable policies
<p>A new build retail unit (any size)</p>	<p><del>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</del></p> <p><del>Policy DM5: Development in Neighbourhood Centres</del></p> <p><del>Policy DM6: Development in Shopping Parades</del></p> <p><del>Policy DM8: Development in edge of centre and out of centre locations</del></p> <p><del>Policy DM11: Shop front design and security</del></p> <p><del>Policy DM16: Promoting healthy</del></p> <p><del>Policy DM23: Development and construction</del></p> <p><del>Policy DM24: Land contamination</del></p> <p><del>Policy DM25: Sustainable Drainage Systems and reducing flood</del></p> <p><del>Policy DM29: Promoting sustainable travel and reducing congestion</del></p> <p><del>Any applicable Place-Specific policy</del></p>

Type of development	Applicable policies
New office or leisure use	<p><del>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</del></p> <p><del>Policy DM5: Development in Neighbourhood Centres</del></p> <p><del>Policy DM6: Development in Shopping Parades</del></p> <p><del>Policy DM8: Development in edge of centre and out of centre locations</del></p> <p><del>Policy DM23: Development and construction</del></p> <p><del>Policy DM24: Land contamination</del></p> <p><del>Policy DM25: Sustainable Drainage Systems and reducing flood</del></p> <p><del>Policy DM29: Promoting sustainable travel and reducing congestion</del></p> <p><del>Any applicable Place-Specific policy</del></p>
<del>Loss of an existing or former employment use (including offices and changes of use) to residential</del>	<p><del>Policy SP3: Employment</del></p>
<del>Loss of an existing or former community use to any other use</del>	<p><del>Policy SP5: Community Facilities and Education</del></p> <p><del>Policy DM19: Providing and protecting community facilities</del></p>
<del>Change of use of a public house</del>	<p><del>Policy SP5: Community Facilities and Education</del></p> <p><del>Policy DM21: Protecting public</del></p>

Type of development	Applicable policies
Proposed development in a garden	<p><del>Policy DM10: Design and character</del></p> <p><del>Policy DM13: Refuse and recycling</del></p> <p><del>Policy DM27: Protecting and enhancing our biodiversity</del></p> <p><del>Policy DM1: Trees</del></p> <p><del>Any applicable Place-Specific policy</del></p>
Proposed development in Green Belt or on Metropolitan Open Land	<p><del>Policy SP7: Green Grid</del></p> <p><del>Policy DM26: Metropolitan Green Belt and Metropolitan Open Land</del></p>
Proposed development affecting a heritage asset (such as Listed Building or Conservation Area)	<p><del>Policy SP4: Urban Design and Local Character</del></p> <p><del>Policy DM18: Heritage assets and conservation</del></p>

# 1. Introduction

**DM1.1** Croydon is a growing borough. It is already the most populous borough in London and aims to be London's most enterprising borough. Planning is critical to ensuring that Croydon meets the needs of its residents, business community and visitors. The Croydon Local Plan sets out the strategy, sites and planning policies necessary to meet these needs.

**DM1.2** The Croydon Local Plan 2018 is a key document in Croydon's Local Plan. It sets out the spatial vision and plan for the future of the borough and how it will be delivered.

**DM1.3** Croydon needs a spatial plan to rise to the challenges facing the borough and its communities over the next 20 years and beyond. The borough has a need for new homes, jobs and the infrastructure to support them, whilst respecting the context of the Places of Croydon. The Croydon Local Plan 2018 addresses each of these needs and sets out how Croydon will plan to meet them up to 2036. Increasing the supply of homes through sustainable growth, including affordable homes, is a key element of ~~Ambitious for Croydon~~, which is enshrined throughout the Croydon Local Plan. In part, the sustainable growth of the suburbs will deliver this growth as encouraged by this Plan. This will be achieved whilst protecting the borough's open space and the distinctive heritage and character, alongside the necessary infrastructure to mitigate the impact of growth. The Croydon Local Plan 2018 sets out the issues that the Plan as a whole is addressing and the strategic policy framework.

**DM1.4** In preparing the Croydon Local Plan 2018 and this review the Council has worked with partners and interested parties to devise policies and proposals that it thinks will best address the needs of the borough up to 2036. As part of this process the

Council has drawn upon an extensive evidence base referenced throughout this document and the comments made during consultation on drafts of the Plans. ~~The Strategic Policies have been subject to four periods of consultation. It started out with an Issues and Options consultation in July 2009 followed by two consultations on Preferred Option in February 2010 and September 2010, which led to their adoption in April 2013 after independent examination. A Partial Review of the Strategic Policies has been subject to further consultation on Preferred and Alternative Options in November 2015. The Detailed Policies were subject to two periods of consultation, both on Preferred and Alternative Options, one in October 2012 and the next in November 2015. The November 2015 consultation also included all of the Detailed Proposals.~~ **This review of the Croydon Local Plan 2018 has been undertaken since it was adopted in accordance with the Statement of Community Involvement and the Local Development Scheme**

~~**DM1.5** Between February and November 2017 an independent Planning Inspector examined the Strategic Policies and found them to be positively prepared, justified, effective and consistent with national policy as well as complying with the relevant legislation and regulations.~~

**DM1.6** The Croydon Local Plan 2018 is accompanied by a number of other documents which together form the development plan for Croydon and supporting documents. Table 1.1 shows the different scales of documents forming Croydon's planning policy framework. The Strategic Policies in the Croydon Local Plan 2018 set the framework that provides the opportunity for the production of Neighbourhood Plans. This will enable communities to influence

the planning of their Place, in conformity with Croydon's Strategic Policies.

**Table 1.1 Croydon's planning policy framework**

Scale	Document
Croydon – strategic policy	<p>The London Plan</p> <p>The strategic policies of the Croydon Local Plan 2018</p>
Croydon – place making	<p>The Detailed Policies and Proposals (including the Place Specific Policies) of the Croydon Local Plan 2018</p> <p>Policies Map</p> <p>South London Waste Plan</p> <p>Neighbourhood Plans</p>
Croydon – development management	<p>Supplementary Planning Documents (including the Croydon Opportunity Area Planning Framework)</p> <p>Neighbourhood Development Orders Interim Planning Guidance (including Masterplans)</p> <p>Interim Planning Guidance (including Masterplans)</p>

## 2. Setting the scene

### *'Setting the Scene' picture break*

2.1. The Croydon Local Plan addresses the needs of the borough for new homes and jobs plus the infrastructure needed to support growth ~~from 2011 up to 2036~~. Determining what these needs are begins with understanding how Croydon became the borough that it was in 2011 and by looking at the challenges it will face ~~from 2011 up to 2036~~.

## Historical context

**2.1** Croydon historically was a market town, which in the medieval period benefited from the presence of an Archbishop's residence and key trading links with the outlying villages of Addington, Sanderstead and Coulsdon to the south. A period of prosperity in the 18th century saw the development of settlements at Broad Green, Woodside and Thornton Heath. Construction of the pioneering Surrey Iron Railway in 1801-03, initially between Wandsworth and Croydon, created new links for the thriving manufacturing industries along the Wandle Valley. The borough's character was fundamentally changed by the arrival of railway connections to London in 1839 and then Brighton in 1841, with new stations appearing along the line later in the century promoting the rapid development of town centres at Thornton Heath, Norbury and South Norwood. Stations at Purley and Coulsdon likewise encouraged growth of both towns and suburbs. Croydon was incorporated as a borough in 1883 and with subsequent civic enthusiasm rebuilding took place across its towns through the proceeding decades with new buildings and parks. By 1914, the borough had become contiguous with central London.

**2.2** 1915 saw the arrival of the world's first international terminal building at Croydon Airport (the original London airport); resulting in the subsequent development of industry to the west of the town. A developing road and public transport system also paved the way for suburban expansion further to the south and south eastern edge of the borough, which was newly accessible by car. As a consequence, areas of the countryside were developed for house building, a trend that stopped with the introduction of the Green Belt. The town experienced its most dramatic transformation following the Croydon Corporation Act of 1957. Redevelopment led to an unparalleled office boom, with almost 500,000m<sup>2</sup> of office space built or given permission in the town

between 1957 and 1964. Private developers also took advantage of new commercial opportunities, with the Whitgift Foundation notably relocating the Trinity School out of the town to release its 11 acres of land for a large new shopping centre between North End and Wellesley Road, which itself was being transformed into an urban motorway.

~~**2.3** Increased emphasis from central government on allowing out of town shopping areas through the 1980's and 90's resulted in a new retail area growing along the A23 (Purley Way). A new station at East Croydon was built in 1992, and Tramlink, in 2000, providing much needed additional transport infrastructure across the borough from east to west.~~ **From the 1970s, however, Croydon Town Centre suffered a period of gradual decline as the Modernist vision fell out of favour and with the launch of a new office district at Canary Wharf. Central government's increased emphasis on out of town shopping areas through the 1980's and 90's resulted in a new retail area growing along the A23 (Purley Way). Croydon is changing the reputation it received as a result of its post-war development endeavours. As it became clear that the vehicular transport system previously central to the Modernist vision was unsustainable, new public transport infrastructure was developed as part of a new vision. The new East Croydon railway station was opened in 1992 and the Croydon Tramlink (introduced 2000) provided improved transport links. A series of detailed masterplans have already been drawn up for Croydon Town Centre and supported the Croydon Local Plan 2018 too. These lie at the heart of a new wave of transformation across the Town Centre**



## Croydon ~~Today~~ in 2011

~~2.4~~ By 2011 Croydon as a borough had many strengths and opportunities. It also faced some challenges too, which the Croydon Local Plan sets out to address.

~~2.5~~ By 2011 Croydon had become **is** a borough of contrasts. It was a borough with a series of distinct places from Victorian railway suburbs in the north and along the railway line in the valley, towards Purley and Coulsdon to 20<sup>th</sup> century suburbs on wooded hillsides in the south and away from the railway line in the east. The challenge for the Croydon Local Plan is to respect local character and distinctiveness whilst accommodating growth. **Croydon already has all the right ingredients. It is one of the top retail and commercial centres in London and enjoys some of the best transport connections in the UK, with London's only tram system; 15 minute rail connections from East Croydon Station to central London, only 20 minutes to Gatwick and connections to London Overground at West Croydon. The borough is renowned for its long and rich cultural history, including fostering the birth of Punk, Dubstep and Grime. Institutions such as The Fairfield Halls, Croydon Art College, and the Brits School have fostered and showcased world class creative talent. Croydon plays host to an increasing number of festivals and events, celebrating its diverse mix of cultures; in December 2018, Croydon was named as one of the Mayor of London's first Creative Enterprise Zones (CEZ) to further establish it as a place where creative industries flourish and grow. The newly refurbished Fairfield Halls lies at the centre of the emerging Cultural Quarter, acting as a further catalyst for culture within the borough. Croydon was named as the Mayor of London's Borough of Culture for the year 2023**

~~2.6~~ In Croydon Metropolitan Centre the borough has more shops in one location than anywhere else in London apart from the West End itself. However, in 2011 they faced stiff competition from other centres such as Bromley, Kingston and Bluewater. The Metropolitan Centre had more office floor space than anywhere else in South London and neighbouring districts in Surrey, but many of the offices in Croydon were seen as dated and vacancy had increased. ~~Croydon competes against more recent office developments in Docklands, Redhill and surrounding boroughs. The challenge for the Croydon Local Plan includes rejuvenating a dated Croydon Metropolitan Centre and growing a new residential community and jobs. Improvements to the public realm in the Metropolitan Centre to attract shoppers, employers, workers and new residents are vital to its regeneration and future vitality. Croydon Town centre is dated and unattractive to shoppers, employers, workers and new residents. In some areas progress has been made, for example the Ruskin Square development around East Croydon Station. This development is just under a quarter the size of Canary Wharf. Additionally, Croydon's Town Centre was designated only the second Growth Zone nationally. This released over £500M to finance and deliver a major regeneration programme to unlock further growth in the centre and beyond~~

~~2.7~~ The ~~growth~~ of retailing along the Purley Way leads to its own challenges of traffic congestion at peak times. The Purley Way employment areas are prime locations owing to their accessibility to the M25 and the rest of London and the Mayor of London's strategic employment protection recognises the demand for industrial premises in Croydon. The challenge for the Strategic Policies are to address ways of reducing traffic impact and making the shift from private transport to more sustainable modes of transport.

**Figure 2.1: Deprivation in Croydon relative to the rest of England – graphic updated**

~~2.8~~ In 2011 the borough ranked as the 14<sup>th</sup> least deprived borough in London (out of 33 authorities). Deprivation levels, however, differ greatly, with greater concentrations in the north of the borough and in the places of Addington and Shirley. The Victorian and Edwardian areas of the borough suffer from deprivation as do some of the inter and post-war local authority built housing estates. In general the south and east of the borough incorporate some of the least deprived areas of London. The challenge for the Strategic Policies is to reduce social, economic and environmental deprivation, look at measures to reduce unemployment, improve skills and education, community and environmental conditions and renew housing.

~~2.9~~ By 2011 Croydon was the largest borough in London in terms of population (with a population of 363,000 people) and was expected to grow by 30,000 people by 2031. They will need to have homes in which to live. **By 2019 Croydon was the second largest borough in London in terms of population<sup>1</sup>. Croydon is home to 396,837 people<sup>2</sup> and this is expected to increase to just under 500,000<sup>3</sup> by 2050. They will need to have homes in which to live.**

~~2.10~~ Demographically Croydon is a young borough and in 2011 a quarter of its residents were under the age of 20. **Demographically, Croydon is a young borough and in 2019 just**

**under a quarter of its residents were under the age of 17<sup>4</sup>.** However, the residents of the borough are getting older and by 2031 the number of people in Croydon over the age of 65 will have increased by 41% which will bring with it challenges in terms of the types of homes that are needed in the borough and the infrastructure needed to support an aging population. In contrast, the population aged between 20 and 64 will have increased by just 2.5%<sup>5</sup>. By 2031 Croydon will also be a more diverse borough with over half of the population being a member of a black and minority ethnic community<sup>6</sup>, compared to 36% in 2001<sup>7</sup>. The challenge for the Strategic Policies is to meet the needs of the population growth, the aging population and the cultural diversity.

**2.11** The Green Belt around Croydon together with the protection of open spaces elsewhere in the borough has ensured that over a third of the borough is open space. Whilst this is an asset, it is also a constraint for the borough as it limits the land available for new homes to house Croydon's growing population. The open space is unevenly distributed in the borough creating some areas, mainly to the north, with degrees of deficiency in access to nature and/or open space. The challenge for the Croydon Local Plan is to ensure access and quality of existing open space is improved whilst making the most of the natural resources and adapting to climate change.

<sup>5</sup> As above  
<sup>6</sup> GLA 2009 Round Ethnic Group Population Projections.  
<sup>7</sup> 2001 Census

## Croydon in the wider sub-region

**2.12** The future of Croydon needs to be viewed in the context of growth and development in London and the south east of England. At a London level, direction is provided by the Mayor of London through the London Plan.

**2.13** Croydon has responded to the Mayor's policy direction in the London Plan to work with neighbouring local authorities and cross borough issues have been considered by the Croydon Local Plan. Looking ahead it will be important for Croydon to build positive relationships with the Wandle Valley regional co-ordination corridor (through south London and outwards towards Gatwick Airport) and the Brighton to London corridor, which includes working closely with the Coast to Capital Local Enterprise Partnership of which Croydon is a member.

**2.14** A summary of how Croydon relates to the wider sub-region is shown in Figure 2.3 below.

**Figure 2.2 Croydon and its sub-regional context -2 graphics replaced this**

### 3. We are Croydon

#### *'Spatial Vision, Objectives' picture break*

**3.1** This section sets out how the **sustainable** priorities contained within the Sustainable Community Strategy together with the overarching 'We are Croydon' vision are embedded into the Croydon Local Plan. A complimentary Spatial Vision sets out how Croydon will develop over the next 20 years in response to the local challenges and opportunities. The Spatial Vision is translated into a set of Strategic Objectives which have informed a series of thematic policies, sub visions for the 16 Places of Croydon, the programmes of delivery (including a schedule of infrastructure projects) and the accompanying monitoring framework.

## Past Visions

**3.2** The Croydon Local Plan builds upon the historic visions of the past, some realised, such as the Croydon Board of Public Health in 1849 and the comprehensive developments of the 'sixties, and others, such as Vision 2020 and Alsop's 'Third City' vision. These historic visions reveal the tension between Croydon's large urban and suburban areas. *This paragraph is deleted.*

## Imagine Croydon

**3.3** The 'Imagine Croydon' project that ran from February to September 2009, sought local views on what the overarching, long term vision for Croydon should be up to the year 2040. Over 20,000 people were involved and the views received were distilled to articulate a new long term vision for the borough, entitled 'We are Croydon'. *This paragraph is deleted.*

## We are Croydon

**3.4** The 'We are Croydon' vision will be used by all partners as the touchstone for all future strategies and plans, including Croydon's Sustainable Community Strategy (SCS) prepared by Croydon's Congress (the Local Strategic Partnership). *This paragraph is deleted.*

**3.5** The government intends that the spatial vision and strategic objectives, as set out in the Croydon Local Plan, should foster growth, objectively establish and plan for development needs, whilst being informed by an analysis of the characteristics of the area, its constituent parts and the key issues and challenges facing them. It must be in general conformity with the London Plan and be consistent with national policy. It should also reflect the shared local priorities as set out in the SCS and 'We are Croydon' vision. The SCS identifies three overarching outcomes

which the Local Strategic Partnership will focus on delivering. These three outcomes are: to make Croydon a great place to learn, work and live, a place of opportunity for everyone and a place with a vibrant and connected community and voluntary sector. *This paragraph is deleted.*

**3.6** The overriding themes from the 'Imagine Croydon' consultation were that Croydon should be a place of opportunity, a place to belong and a place with a sustainable future. *This paragraph is deleted.*

The We are Croydon Vision
Croydon's vision is to be :
<b>Enterprising:</b> A place renowned for its enterprise and innovation with a highly adaptable and skilled workforce and diverse and thriving local economy
<b>Learning :</b> A place that unleashes and nurtures local talent, is recognised for its support and opportunity for lifelong learning and ambitions for children and young people
<b>Creative:</b> A place that draws people to its culture and creativity —an inspiration and enabler of new artistic and sporting talent in the country
<b>Connected:</b> 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
<b>Sustainable:</b> 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

### The We are Croydon Vision

**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

#Graphic removed

~~3.7 The 'We are Croydon' vision together with the SCS has informed the final spatial vision and strategic objectives (set out in 3.15). The spatial vision and strategic objectives are used to guide the overall strategy and spatial choices about where developments should go in broad terms and how development should take place. *This paragraph is deleted.*~~

### The Croydon Local Plan's Spatial Vision

~~3.8 In 2036, **By the end of the plan period**, we will be London's most enterprising borough - a city that fosters ideas, innovation and learning and provides skills, opportunity and a sense of belonging for all; an enterprising **borough** city, a Metropolitan Centre, a learning **borough** city, a creative **borough** city, a connected **borough** city, a sustainable **borough** city, and a caring **borough** city~~

**3.9** The historic legacy of Croydon as a major trading centre within the Wandle Valley and south of central London gives richness to its streets and public spaces. The 'sixties boom' added many buildings with a range of varied and interesting attributes. New development in our borough has been respectful of this historic legacy, including enhancement and intensification of Croydon's distinctive district centres and suburbs. Croydon's suburbs will have sustainably grown to accommodate homes, including affordable homes, to contribute to the borough's housing need.

**3.10** Croydon Metropolitan Centre has a friendly atmosphere with a retail and commercial centre unrivalled south of the Thames, serving the wider Gatwick Diamond economic area following the comprehensive redevelopment of the retail core. The scope for growth and new enterprises to locate is significant and the Council will be continuing to create an environment for inward investment. Large numbers of people use its shops, businesses, leisure and cultural facilities and enjoy returning to it with its compact and convenient arrangement of large stores, (including a choice of department stores), multiples and brand shops as an alternative to central London or out-of-town centres. Historic areas such as Surrey Street, Church Street and George Street, South End and the area around West Croydon station boast bijou, independent and culturally diverse shops, markets and restaurants, all within easy walking distance of North End and Wellesley Road. The cultural offer within Croydon Metropolitan Centre stems from the recently refurbished Fairfield Halls and links through to Exchange Square. The public realm is high quality and encourages outdoor life, vitality and cultural activity. Many existing office blocks have been refurbished, converted or redeveloped into homes and a new residential community now resides in the centre which boasts an environment that is family friendly. ~~The Council will continue to take a flexible approach to offices in the Croydon Metropolitan Centre becoming residential, whilst not undermining the opportunity for economic growth and office development around East Croydon Station and in New Town.~~

**3.11** Croydon's connectivity has continued as its main strength, being outer London's largest regional public transport interchange. Access to people, markets and goods, puts Croydon Metropolitan Centre at the top of the list of successful business centres. The upgrades to Brighton Mainline, rebuild of East Croydon station, the metroisation of the suburban services and continued investment into the Tram network have all

assisted in retaining this status. The Square Mile and West End can be reached more quickly on public transport from Croydon than from most parts of east and west London. Croydon has the largest economy in the Wandle Valley and is the main business centre serving Gatwick Airport, supplying it with many of the people, skills and facilities it needs. Croydon's relations with both Central London and the South Coast are stronger, providing an alternative, exciting place to do business, live and visit.

**3.12** ~~In 2036,~~ **By the end of the plan period** the borough's District, Local, Neighbourhood Centres and local parades **will** still possess their unique characteristics and support the growing communities they serve. The Council's regeneration, capital and public realm programmes will have enhanced the centres vitality and viability. Enterprise and leisure facilities in these areas contribute to diverse local economies. The economic growth of the borough has benefitted all sections of Croydon's community and access to work has been increased. The richness of character of Croydon's suburbs has been respectfully enhanced and intensified through demanding the best design from new development and having a deep understanding of the qualities places have for homes, open spaces, diversity, facilities and natural resources. Their easy access to the beautiful countryside of the North Downs is an important asset and a substantial factor in people's decision to live in the borough.

**3.13** The borough has experienced an uplift in housing delivery to aid with alleviating borough's pressing housing need. This has led to the increased opportunity for affordable housing throughout the borough. This housing delivery has occurred in sustainable locations, is supported by the necessary infrastructure and the growth has supported the vitality and viability of the borough's centres.

**3.14** The delivery of critical infrastructure, particularly in Croydon Opportunity Area, has been enabled by Croydon's Growth Zone status and the Council's willingness to embrace the opportunities presented by devolution to ensure delivery.

## Strategic Objectives

**3.15** The strategic objectives form the link between the high level spatial vision and the detailed strategy (made up from the thematic policies and the Places of Croydon section). They are the objectives needed to fulfil the spatial vision. The policies and delivery programme within the Croydon Local Plan show how this can be achieved within the plan period.

### A Place of Opportunity

**Strategic Objective 1:** Establish Croydon as the premier business location in South London and the Gatwick Diamond.

**Strategic Objective 2:** Foster an environment where both existing, and new, innovative, cultural and creative enterprises can prosper.

**Strategic Objective 3:** Provide a choice of housing for people at all stages of life.

**Strategic Objective 4:** Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

### A Place to Belong

**Strategic Objective 5:** Ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.

**Strategic Objective 6:** Provide and promote well designed emergency services, community, education, health and leisure facilities to meet the aspirations and needs of a diverse community.

**Strategic Objective 7:** Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.

### A Place with a Sustainable Future

**Strategic Objective 8:** Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

**Strategic Objective 9:** Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.

**Strategic Objective 10:** Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.

**Strategic Objective 11:** Tackle flood risk by making space for water and utilising sustainable urban drainage systems.



## The Places of Growth in Croydon – strategic policy

### How we are going to get there

#### The Places of Croydon Growth in Croydon 2019-2039

SP1.0A Growth in homes, jobs and services that constitutes sustainable development following a brownfield land first approach, will be welcomed, provided growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further infrastructure and following the good growth principles. Across the borough growth will be accommodated as follows:

#### Targets for growth up to 2039

- a. A minimum of 41,639 homes will be delivered (2019-2039) to address future demographic and economic needs. Of these, 6410 homes (641 dpa) will be delivered on small sites (below 0.25ha) and at least 20,790 homes by March 2029.
- b. The Croydon Opportunity Area will accommodate at least 9,753 new homes and 10,500 jobs up to 2039, supported by upgrades to the Brighton mainline and provision new/enhanced supporting infrastructure.
- c. Ensure 40% (or 831 dpa ) of all additional housing delivered is affordable to low income groups during the life of the Plan
- d. The local economy will be supported by retaining and intensification of employment land, primarily in the Croydon Opportunity Area and District Centres for all

sectors that support sustainable economic growth and job creation.

- e. To support the overall growth, sufficient new and enhanced infrastructure will be provided in sustainable locations.

#### Development Hierarchy

These locations according to the hierarchy provide for a level of services and facilities to serve their appropriate catchment. Growth and facilities should be provided in line with the hierarchy.

d. The Croydon Opportunity Area- This is the main focus of significant growth of housing, employment, town centre uses and infrastructure as it provides excellent access to jobs, retail, services and visitor facilities with well-established transport links with other places within and outside the borough.

e. Main District Centres of Purley and Thornton Heath-. These locations have a sufficient provision of retail, local services, community facilities and good public transport provision including main line stations that are able to be accessed from more than one of the Places of Croydon, enabling them to be the secondary focus of development and other supporting facilities.

f. District Centres –Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, South Norwood and Selsdon. These locations provide good access to local services and facilities such as retail, community uses and public transport

and can accommodate growth and additional facilities, for the wider local area.

e. Local and Neighbourhood Centres –These locations provide small scale facilities and community uses for day to day needs for the immediate local area, with some access to public transport.

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c District Centres –Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, South Norwood and Selsdon. These locations provide good access to local services and facilities such as retail, community uses and public transport

and can accommodate growth and additional facilities, for the wider local area.

g. Local and Neighbourhood Centres –These locations provide small scale facilities and community uses for day to day needs for the immediate local area, with some access to public transport.

#### Transformation areas

SP 1.0B Transformation areas are identified locations for large scale redevelopment, change and renewal alongside the required infrastructure.

a. The Purley Way transformation area is an opportunity for mixed use redevelopment using large areas of brownfield land. It will include three new local centres, a neighbourhood centre, renewed and intensified light industry and warehousing providing jobs to support residential growth alongside much improved public realm that reduces the dominance of the road infrastructure and creates a safe and welcoming environment for pedestrians and cyclists;

b. The North End Quarter transformation area will be renewed with integrated retail and leisure alongside green and blue infrastructure and public life at its core. It will have a more balanced and resilient mix of uses including new homes, public realm, education and other knowledge economies, creative and cultural uses, and supporting services.

c. The Brighton Main Line and East Croydon Transformation Corridor will accommodate major new transport infrastructure to address the ‘Croydon Bottleneck’ and enable growth

(development and inward investment) across the borough and elsewhere in the Croydon-Gatwick-Brighton corridor.

### Delivering Homes

SP1.0C There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.

- a. Areas of Focused Intensification are areas where a step change of character to higher density forms of development around transport nodes and existing services will take place; in locations where access to local transport and services is good.
- b. Moderate Intensification – are areas where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good.
- c. Evolution and gentle densification will be supported across all other residential areas.

### Place to Belong

SP1.0D Developments will be supported that can achieve the following.

- a. Protect and enhance what is distinctive about Croydon and its Places collectively by securing a sense of belonging and high quality design that sits well with its surroundings.
- b. Sustainable growth while protecting and enhancing the borough's natural environment and built heritage.

d. An enhanced Green Grid with creating a biodiversity network contributing towards better health and well-being of the residents and help address climate change.

e. A welcoming place that is designed inclusively to meet the needs of the residents and visitors.

### Sustainable development

a) When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- b) Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- c) Specific policies in that Framework indicate that development should be restricted.

### Place making

The Council will require all new development in the borough to contribute to enhancing a sense of place and improving the character of the area, whilst acknowledging the need for growth:

Development proposals should respond to and enhance local character, the heritage assets and identity of the Places of Croydon; and

Development proposals should be informed by the 16 Places of Croydon (refer to Section 11 – The Places of Croydon), the Borough Character Appraisal and other place-based evidence.

#### Growth

Growth in homes, jobs and services that constitutes sustainable development will be welcomed; provided growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further sustainable infrastructure investment within the plan period to 2036.

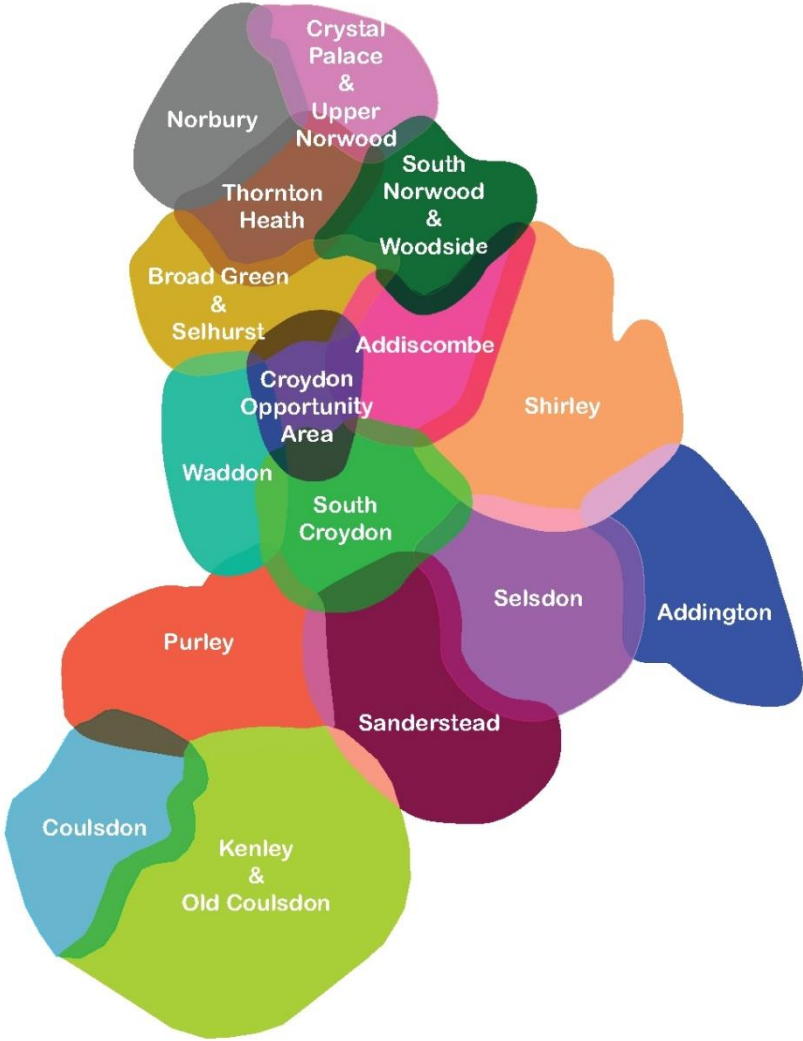
Croydon Opportunity Area will be the primary location for growth, including approximately a third of the borough's residential growth, with the Places of Waddon, Purley, Broad Green & Selhurst, Thornton Heath and Coulsdon accommodating medium and moderate residential growth (see the Key Diagram).

The Council will seek to encourage growth and sustainable development and to manage change, so as to create a network of connected, sustainable, high quality, locally distinctive, healthy places.

**Table 3.1 Housing targets for the 16 Places of Croydon**

Place/Transformation area	Homes to be delivered 2019-2039
Addington	568
Addiscombe	647
Broad Green & Selhurst	587
Coulsdon	2160
Croydon Opportunity Area*	9753
Crystal Palace & Upper Norwood	382
Kenley and Old Coulsdon	725
Norbury	225
Purley	5735
Purley Way Transformation Area	7515
Sanderstead	885
Selsdon	633
Shirley	278
South Croydon	474
South Norwood & Woodside	331
Thornton Heath	1063
Waddon	413

Figure 3.1 The Places of Croydon



## Why we have taken this approach

**3.16** Croydon is a borough made up of a series of varied and distinctive neighbourhoods and areas, which are referred to here as 'Places'. Understanding and expressing the character and what makes each place special and different enables sensitive planning.

**3.17** The overarching strategy must make sense for the borough as a whole, and celebrate and respect the characters of different parts of the borough whilst delivering the spatial vision. All Places will grow and change, to varying degrees, as a consequence of the strategy of welcoming sustainable development and growth of the suburbs, with renewal and regeneration.

**3.18** The overarching thematic policies put forward in the Croydon Local Plan's Strategic Policies have developed and are based on the distinctive character and unique places of Croydon; whilst also encouraging and creating a collective policy environment for the borough's development needs to be delivered. The appropriate approach for the 16 Places over the plan period will be determined largely by the opportunities and constraints that exist. Opportunities for development should always consider brownfield sites in the first instance.

**3.19** The Borough Character Appraisal 2016, identified and analysed the characteristics of the 16 Places of Croydon, considered a number of key aspects that add to the way these Places are today and what contributes to their local distinctiveness. This Appraisal has helped to inform the production of more detailed policies contained within the Croydon Local Plan.

**3.20** National guidance clearly sets out the need for planning to be "spatial" - dealing with the unique needs and characteristics of places. Place making helps to deliver sustainable communities.

**3.21** The 16 Places are frameworks that help to steer those involved in shaping the built environment, in order to assist in creating sustainable neighbourhoods. Each Place includes a vision, map and summary of how the borough-wide thematic policies will shape the places over the plan period up to 2036. Forthcoming planning documents, including Development Plan Documents, Supplementary Planning Documents and masterplans, as well as planning applications will be used to help implement each of the Place's visions. Furthermore, it is considered the Places provide some context to the possible formulation of Neighbourhood Plans.

Key Diagram - **graphic updated**

# A Place of Opportunity

## *A Place of Opportunity picture break*

The content of this section is related to the theme of Croydon as 'A Place of Opportunity'. It looks at planning for homes and employment, and the need for new homes and new jobs resulting from future population growth.



## 4. Homes

### Strategic policy

#### Where we are now

**4.1** The key issues that the borough faces in terms of planning for new homes up to 2036 are as follows:

- Population growth means that an additional 44,149<sup>8</sup> new homes would be needed in Croydon by 2036 to meet the need for new homes. Population growth in the first decade of the plan period is expected to be higher than in its second decade.
- There is limited developable land available for residential development within the built up area meaning that it is only possible to plan for 32,890 new homes in the plan period.
- Croydon is home has the second largest population in London and an attractive employment location, which has increased demand for housing and created an imbalance in the housing market
- A quarter of the population comprises of the under 17 youth growth, but this group is expected to experience a lower growth than the older population growth. This will impact the type, size and tenure of housing that will be needed to address local needs.
- There is a need to increase the delivery of three bed (+) homes to cater for families, as well as a range of different sized housing.
- New homes need to be well designed to address the needs of residents with disabilities and age related illnesses, as well as specialised housing for an ageing population.

- The need to achieve a level of affordable housing that addresses the level of need, whilst still ensuring that developments are viable and much needed market homes continue to be built in Croydon.
- Managing Croydon's sustainable growth that accommodates homes across the borough which contributes to the borough's housing need and vitality and viability of centres, whilst not undermining the borough's valued character and heritage.
- The need to meet housing targets at the same time should allow for land to be provided for employment, education, health, retail and other community facilities to ensure a good quality of life for the residents of new housing in the long term.

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<sup>8</sup> Croydon's Strategic Housing Market Assessment - 2015 and Addendum Report 2015

## Where we want to be

**Strategic Objective 3:** Provide a choice of housing for people at all stages of life.

**Strategic Objective 4:** Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

**Strategic Objective 5:** Ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.

**Strategic Objective 6:** Provide and promote well designed emergency services, community, education, health, and leisure facilities to meet the aspirations and needs of a diverse community.

**Strategic Objective 7** Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.

**Strategic Objective 9:** Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.

## How we are going to get there

### Policy SP2:Homes

**SP2.1** In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of **sustainable** development of new homes ~~provided applications for residential development to meet the~~ **future needs of the area** requirements of Policy SP2, SP3.14 and other applicable policies of the development plan.

#### Quantities and Locations

**SP2.2** In order to provide a choice of housing for people in Croydon the Council will seek to deliver a minimum of ~~32,890<sup>9</sup>~~ **37,795 (or 2,100 over 18 years)** homes between ~~2016 and 2036~~ **2019-2039**. This will be achieved by:

- a) Concentrating development in the places with the most capacity to accommodate new homes whilst respecting the local distinctiveness of the Places and protecting the borough's physical, natural and historic environment, whilst recognising that Places change and in particular suburbs will sustainably grow; and
- b) The allocation of ~~6,970~~ **11,724** homes in the Croydon Local Plan's ~~Detailed Policies and Proposals~~ beyond the Croydon Opportunity Area;
- c) Within the Croydon Opportunity Area, ~~the Croydon Local Plan's Detailed Policies and Proposals has been informed by the Croydon Opportunity Area Planning Framework and allocates~~ **allocate** sites for at least ~~10,760~~ **7,9753** net additional homes;- and
- d) ~~10,060~~ **10,897 (.i.e. 641\*17, assuming adoption in 2023)** homes being delivered across the borough on windfall sites; and
- e) ~~Seeking to return at least 190 vacant homes back into use by 2026;~~ and
- f) Ensuring land is used efficiently, and that development addresses the need for different types of homes in the borough and contributes to the creation or maintenance of sustainable communities; and
- g) Not permitting developments which would result in a net loss of homes or residential land; **and**
- h) **Supporting a range of housing delivery methods, including self-build, custom-build and community-led housing.**

<sup>9</sup> Of which ~~4,890~~ **3,844** are either completed or under construction

### Affordable Homes

**SP2.3** ~~The Council will seek to~~ To ensure that a choice of homes is available in the borough that will contribute to addressing the borough's need for affordable homes. ~~This will be achieved by~~ a strategic policy target of **as follows**:

- a) 25% of all new homes developed in the borough over the plan period to be ~~either affordable~~ **low cost** rented homes ~~(homes which are up to 80% market rent)~~ **comprising of social and affordable rented homes** or homes for social rent to meet the borough's need; and
- b) 15% of all new homes in the borough developed over the plan period to be intermediate affordable housing for ~~starter homes, low cost shared or~~ **intermediate rent** home ownership managed by a Registered Social Landlord or ~~intermediate rent~~.

**SP2.4** ~~To deliver affordable housing in the borough, on sites of ten or more dwellings the Council will:~~

- a) ~~Negotiate to achieve up to 50% affordable housing, subject to viability providing that;~~
- b) ~~Seek a 60:40 ratio between affordable rented homes and intermediate (including starter) homes unless there is agreement between Croydon Council and a Registered Provider that a different tenure split is justified and subject to national regulations on provision of starter homes or, on schemes which are covenanted Private Rental Schemes where the 60:40 ratio is not viable<sup>10</sup>;~~
- c) ~~Require a minimum provision of affordable housing as set out in SP2.5.~~

**Residential development should respond positively to the need for affordable homes that are genuinely affordable for local residents by.**

- a) **Providing at least (i) 35% of new housing as affordable on residential developments of 10 or more dwellings, exploring all possible options to achieve 50% affordable housing and (ii) 50% onsite affordable housing if publically owned land or land protected by Policy SP3.2**
- b) **Providing affordable housing in a ratio of: (i) 70% low cost rented homes, comprising of social rented or affordable rented housing, prioritising increasing the delivery of social rented housing (ii) 30% intermediate housing to meet a range of needs. To depart from this,**

<sup>10</sup> In such instances, the Council will expect the covenant to require the scheme to be solely for private rented accommodation owned by one institution or company for a minimum of seven years post completion of the development.

an agreement with a Registered Provider will be required to demonstrate that a different tenure split is justified and it will address local housing needs; and

- c) Ensure that low cost rented homes are genuinely affordable to lower income households; Ensuring that the provision of intermediate homes responds to local needs by providing rented or low cost home ownership products that are in reach of local household incomes;
- d) Making the most efficient use of land in order to facilitate and maximise the delivery of affordable housing and where a development site is sub-divided so as to create two or more separate development schemes one or more of which falls below the relevant threshold, the appropriate level of affordable housing to reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme for the site, will be sought.
- e) Where development seeks to add additional dwellings on a site with an existing consent or under construction the affordable housing will be calculated on the gross number of dwellings;
- f) Building out the development and achieving an agreed level of progress on implementing the scheme within 2 years of grant of planning consent, otherwise an early stage review will be triggered to assess whether additional affordable housing is viable.

**SP2.5** ~~The Council will require a minimum provision of affordable housing to be provided either:~~

- a) ~~Preferably as a minimum level of 30% affordable housing on the same site as the proposed development or, if 30% on site provision is not viable;~~
- b) ~~If the site is in the Croydon Opportunity Area or a District Centre, as a minimum level of 15% affordable housing on the same site as the proposed development plus the simultaneous delivery of the equivalent of 15% affordable housing on a donor site with a prior planning permission in addition to that site's own requirement. If the site is in the Croydon Opportunity Area, the donor site must be located within either the Croydon Opportunity Area or one of the neighbouring Places of Addiscombe, Broad Green & Selhurst, South Croydon or Waddon. If the site is in a District Centre, the donor site must be located within the same Place as the District Centre; or~~
- c) ~~As a minimum level of 15% affordable housing on the same site as the proposed development, plus a Review Mechanism entered into for the remaining affordable housing (up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units) provided 30% on-site provision is not viable, construction costs are not in the upper quartile and, in the case of developments in the Croydon Opportunity Area or District Centres, there is no suitable donor site.~~

In the following specific instances where affordable housing is not provided in full the following may apply:

- a) In exceptional circumstances, affordable housing is not provided in accordance with policy, applications must be supported by a viability assessment which will be independently tested, demonstrably designed to maximise affordable housing delivery, be able to demonstrate a planning benefit which outweighs the provision of affordable housing and will be subject to a late stage review (i.e. at the point of 75% of sales/tenancies). Developments proposing below a minimum of 20% affordable housing will not be supported;
- b) Where development proposes a higher level of affordable housing than 35%, a different tenure mix may be supported without the need for a viability assessment, where this is agreed with a Registered Provider;
- c) Where development is for build to rent<sup>38</sup>, co-living or community-led housing scheme, the affordable housing may be provided in a different form such as discounted market rent, providing it is genuinely affordable and meets identified housing needs in the borough.
- d) Making the most efficient use of land in order to facilitate and maximise the delivery of affordable housing,
- e) Ensuring that the provision of intermediate homes responds to local needs by providing rented or low cost home ownership products that are in reach of local household incomes; and
- f) Building out the development and achieving an agreed level of progress on implementing the scheme within 2 years of grant of planning consent, otherwise an early stage review will be triggered to assess whether additional affordable housing is viable.

In assessing viability, the Council will compare Residual Land Value with Existing Use Value **Benchmark Land Value (competitive)** ~~(plus an incentive to provide a competitive return to a willing landowner)~~ or Alternative Use value if there is an alternative use for the site which would comply with the policies of the development plan and could be implemented<sup>11</sup>; will take account of features which appear to seek to exclude affordable housing by design or by incurring upper quartile construction costs<sup>12</sup>; and will take account of abnormal costs incurred.

<sup>11</sup> To be implementable an alternative use will generally need to have an existing implementable planning permission unless other evidence on how it will be implemented can be provided.

<sup>12</sup> By reference to Building Cost Information Service (BCIS) or similar indices for similar development types in London.

**SP2.6** ~~The Council will only accept in exceptional circumstances commuted sums on sites with ten or more units in lieu of on-site provision of affordable housing (or provision on a donor site) if it is not possible to find a Registered Provider to manage the on-site affordable homes.~~

~~Policy deleted~~

#### Mix of Homes by Size

**SP2.7** The Council will seek to ensure that a choice of homes is available in the borough that will address the borough's need for homes of different sizes. For both market and affordable housing, this will be achieved by:

- a) Setting a strategic target for 30% of all new homes up to 2036 to have three or more bedrooms; and
- b) Setting a preferred unit mix on individual sites in the Croydon Local Plan's Detailed Policies and Proposals, applicable to sites of ten or more homes across the borough including sites within Croydon Opportunity Area; and
- c) Working with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people.

#### Quality and Standards

**SP2.8** The Council will seek to ensure that new homes in Croydon meet the needs of residents over a lifetime and contribute to sustainable communities with the borough. This will be achieved by:

- a) Requiring that all new homes achieve the minimum standards set out in the ~~London Plan Mayor of London's Housing Supplementary Planning Guidance~~ and National Technical Standards (2015) or equivalent; and
- b) Ensuring that all new homes designed for families meet minimum design and amenity standards set out in the Croydon Local Plan's Detailed Policies and Proposals and other relevant London Plan and National Technical Standards (2015) or equivalent. **Development will need to demonstrate the design of both private and communally shared spaces, and supporting management strategies successfully meet the needs of all residents, including families.**
- c) **Provide internal and external spaces which contribute positively to resident's health and wellbeing, whilst offering places for activity, shared experiences and retreat. And**
- d) **Ensure the design and layout will support independent living.**

#### Gypsies and Travellers

**SP2.9** The Council will deliver a minimum of 36 additional Gypsy and Travellers pitches in the borough by 2036 to meet the need of Croydon's Gypsy and Traveller community. Land is allocated for Gypsy and Traveller pitches in the Croydon Local Plan's Detailed Policies and Proposals. Any proposals for additional sites that are not allocated should meet the following criteria:

- a) Should be available and deliverable; and
- b) Should have good access to essential services including health and education facilities and access to local shops; and
- c) Have good means of access from roads; and
- d) Not be located in areas of high flood risk (Flood Risk Zone 3); and
- e) Should not have unacceptable adverse impact on the biodiversity of the borough.

### What it will look like

Figure 4.1 Growth in homes in Croydon 2016-2036 – **graphic removed**



Figure 4.2 Housing trajectory of new homes in Croydon 2016-2036 – **graphic removed**  
Figure 4.3 Total number of new homes in Croydon 2016-2036 – **graphic removed**

## Why we have taken this approach

### Quantities and Locations

**4.2** There is a need for over ~~46,040~~ **42,930** new homes in Croydon by ~~2039~~ **2036** and evidence indicates that ~~approximately 40% half~~ of these need to be larger homes<sup>13</sup>. ~~However there is only a limited supply of land in Croydon for new homes without eroding the Metropolitan Green Belt, Metropolitan Open Land (MOL) and Local Green Spaces which are all protected by national policy and the London Plan.~~ The target of ~~36,030~~ **31,850** homes reflects the availability of land for development in Croydon, facilitating the sustainable growth of the suburbs, the need to provide a mix of homes to support sustainable communities and the objective to provide a choice of homes for people at all stages of life. It also reflects the need to provide land for other uses such as employment, education, health and other infrastructure to support growth in Croydon<sup>14</sup>. ~~In particular, in Croydon Opportunity Area allowance has been made for office and retail development in line with Policy SP3 (Employment).~~

**4.3** The provision of new homes is phased in accordance with the supply of land for new homes. ~~Sites identified by the Strategic Housing Land Availability Assessment (SHLAA) as being deliverable have been included in the first five years of the plan. Those sites which could be developed but are not available now have been phased after 2026.~~ **Sites with planning permission have been included in the first five years of the Plan, those sites with developer interest the second five years of the Plan, and**

~~those which could be developed but are not available now have been phased after 2034 (.i.e. 15yrs+). Other factors have been considered when determining site delivery on a case-by-case basis. identified by the Strategic Housing Land Availability Assessment (SHLAA) as being deliverable have been included in the first five years of the plan. Those sites which could be developed but are not available now have been phased after 2026.~~ The nature of the borough being primarily built-up means that a number of the available sites for delivery growth are small. These small sites are allocated for development in the Plan and have been identified in Appendix 7. It is recognised that there are many types of housing that can help diversify the market and speed up delivery, as well as providing more specific products to cater for the needs of different communities. Community-led housing schemes should be genuinely community-led and provide benefits to the locality, in line with the Mayor of London's definition<sup>15</sup>. Proposals for custom-build or self-build homes should demonstrate that the initial owner(s) of the dwelling(s) has played a meaningful role in the ultimate design as outlined in the Self-build and Custom Housebuilding Act 2015 (and any further revisions) and conform with the requirements of applicable design policies in this Plan.

### Affordable Homes

~~**4.4** Of the overall number of homes needed in Croydon, about 91% need to be affordable homes for residents on lower incomes. It is not realistic to expect that this proportion of new homes in the borough will be affordable, both in terms of deliverability and because the private rental sector also meets~~

<sup>14</sup> The infrastructure needs of the proposed new homes are considered by the Infrastructure Delivery Plan which sets out in its Infrastructure Delivery Schedule how the required infrastructure will be provided.

and will continue to meet a significant proportion of the need for affordable housing. For this reason the strategic target is 40% of overall supply, which reflects the findings of the Strategic Housing Market Assessment, has regard development viability and the need to deliver balanced communities with a mixture of tenures and dwelling types. The Strategic Housing Market Assessment undertaken in 2019 identifies a considerable need for new affordable housing in the borough (2,254 dwellings per annum) compared to the overall housing need (2,302 dwellings per annum) and concludes that the Council should continue to seek as much affordable housing as is viably possible when setting affordable housing policies. A strategic policy target for affordable homes based on this level of annual need would be unrealistic and undeliverable. For this reason the strategic target is 40% (minimum) of overall supply, which reflects the findings of the Strategic Housing Market Assessment, has regard to development viability and the need to deliver balanced communities with a mixture of tenures and dwelling types. But the Council will seek to increase the provision of affordable housing, above this (where viable) to meet the London Plan Strategic target of ensuring 50 per cent of all new homes delivered across London to be genuinely affordable.

**4.5** An appraisal of development sites in the borough has found that a requirement for 30% on site affordable homes will be viable for the majority of sites in the borough. House prices have risen much faster against the original Dynamic Viability Model compared to construction costs such that, unless there is a severe economic downturn resulting in house prices falling by 25% (as happened in 2008) then either a minimum requirement of 30% on-site provision or an alternative of 15% on-site provision and a review mechanism is always likely to be viable. The Council will calculate the proportion of affordable housing based on habitable rooms so long as the resultant mix of units on the site meets the need for affordable housing in the borough

identified by the most up to date Strategic Housing Market Assessment (or equivalent). First Homes is the Government's initiative to increase home ownership amongst individuals and households, who are first time buyers and were priced out of the housing market, either due to their low income, lack of supply of supply of affordable homes or shortage in suitable accommodation that adequately addresses their needs. The key national criteria's new housing must meet the definition of First Homes are; a minimum discount of 30% must be applied against the market value that must be protected in perpetuity to ensure the housing remains affordable for future buyers. The price of first homes must be no higher than £420,000 in London, after the discount has been applied. Thirdly to be eligible for a First Homes, the purchaser(s) must be an individual, couple or groups who are first time buyers whose annual income does not exceed £90,000. Government indicates 25%

**4.6** For schemes where it is not viable to provide 30% affordable housing on site, and, if applicable, there is no suitable donor site then a reduced provision of 15% affordable housing on-site combined with a review mechanism will ensure that, if the viability of the development improves such that by the time the homes are sold more affordable housing would have been viable than at the time of granting permission, a commuted sum will be payable to cover the cost of providing affordable housing on another site in the borough. The review mechanism will be linked to the gross development value difference between affordable and market units provided through a review mechanism at agreed stages of the development. Viability evidence suggests that schemes that are not viable with 15% on-site provision of affordable housing would not be viable with any affordable housing, and are therefore unlikely to be built.

**4.7** Features which have been found to exclude affordable housing by design include an insufficiency of circulation cores

(lifts and stairwells) to allow both affordable rented and private market homes to be managed in coexistence, or unnecessary basement car parks which inflate service costs.

**4.8** Where the number of on-site affordable homes is low, the Council may accept a commuted sum in lieu of on-site provision of affordable homes if it is not possible to find a Registered Provider to manage the on-site affordable homes. The Council may also consider a different tenure split during negotiations, for example if the number of affordable units on-site is low and there is agreement between a Registered Provider and the Council that a different tenure split is justified. A minimum of three Registered Providers should be approached before the Council will consider applying this policy

**4.9** Croydon Council considers that affordable rent homes (homes available at 80% of market rent levels) meet a range of housing needs within the affordable sector (including the need for social rented affordable homes due to the availability of Universal Credit/Housing Benefit to tenants unable to afford the full rent for an affordable rent property). Development proposals should be accompanied by a sustainable letting scheme to support the use of affordable rent homes in meeting the need for social rented housing and also develop and maintain balanced communities.

#### Mix of Homes by Size

**4.10** Analysis of the Strategic Housing Market Assessment suggests that approximately 50% of homes should have three or more bedrooms. Unfortunately, analysis suggests that to meet this demand on the sites likely to come forward for development

is impractical. Nevertheless a doubling of the outturn for family houses achieved since 2011 is a realistic target.

**4.11** Between 2011 and 2031 the number of people in Croydon over the age of 55 is projected to increase by 63%, from a 2013 base. Therefore the Council will need to work with partners to facilitate the provision of specialist and supported housing for the elderly and vulnerable.

#### Quality and Standards

**4.12** New homes in Croydon need to provide a choice of housing for people at all stages of life. In order to do so they will need to meet minimum standards of design. The National Technical Standards (2015), Mayor of London's Housing Supplementary Planning Guidance (2016) will be applied in conjunction with Croydon's Borough Character Appraisal.

**4.13** A good quality design can mean that a smaller two bedroom property is suitable for smaller families. In order to establish what a home suitable for a family is, the Croydon Local Plan's Detailed Policies and Proposals will set out the design and amenity standards that are expected of family homes.

**4.14** Policy SP6 (Environment and Climate Change) of the Croydon Local Plan requires all new homes to achieve the National Technical Standards (2015), Mayor of London's Housing Supplementary Planning Guidance (2015) or equivalent. The London Plan also sets requirements for 10% of homes to be designed to be wheelchair accessible (units that are designed for wheelchair users to live in) or easily adaptable for residents who are wheelchair users<sup>16</sup>. The London Plan also requires all new housing to make provision for play and informal recreation based on the expected child population generated by the

<sup>16</sup> London Plan Policy 3.8

development<sup>17</sup>. The Mayor's Supplementary Planning Guidance 'Shaping Neighbourhoods: Play and Informal Recreation' provides further guidance on the requirements. As the London Plan forms part of the statutory development plan for Croydon, these requirements are not duplicated in the Croydon Local Plan but will be applied to all residential developments.

**4.15** Together these requirements contribute to ensuring that developments incorporating new homes will contribute to promoting sustainable use of resources and the principles of good design. They will also help to address the health and wellbeing impacts of poor quality housing.

#### Gypsies and Travellers

**4.16** Both English Gypsies and Irish Travellers are recognised as ethnic groups and, like other members of Croydon's Black and Minority Ethnic communities, are protected from discrimination by the Equalities Act 2010. Local authorities are required to assess their need for housing in the same way that they are required to assess the needs for new homes for people who live in "bricks and mortar" homes.

**4.17** There is a need for 49 new Gypsy and Traveller pitches (a pitch being space for one mobile home) and one emergency stopping place in Croydon up to 2036 providing for the English Gypsy and Irish Traveller communities<sup>18</sup>. However, that need was identified by a method which is reported to result in an overestimate of need. Subsequent to the study, government has amended the definition of gypsy and traveller for planning purposes so the figure for identified need is further reduced. Three spaces have been found at the existing Latham's Way

site. In consequence, the residual requirement is estimated to be 36 pitches. The location of new pitches (including the emergency stopping place) must enable the residents to access services including schools and health facilities in the same way that residents of new houses need to be able to access community facilities. In addition, Gypsy and Traveller sites need good access to the road network as they often need to move larger vehicles as part of their livelihood and way of life<sup>19</sup>. The Croydon Local Plan's Detailed Policies and Proposals allocates land to help meet this need for additional pitches.

<sup>17</sup> London Plan Policy 3.6

<sup>18</sup> London Borough's Gypsy and Traveller Accommodation Needs Assessment (2014)

<sup>19</sup> ODPM Circular 01/06 (paragraphs 64-66)

## Housing choice for sustainable communities

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 3
- Strategic Objective 7
- Policy SP2.1

- Policy SP2.7
- Policy SP2.8
- Policy SP4.1

### Why we need this policy

~~4.18 The Council seeks the provision of a mix and range of housing as set out in Strategic Policy SP2.7 of the Croydon Local Plan and it is also the aim of Strategic Objective 3. This will assist in building sustainable communities, in line with paragraph 50 of the National Planning Policy Framework.~~

4.19 In line with Strategic Objective 7, residential development should set out to achieve healthy and liveable communities to support the health and wellbeing of residents.

4.20 The need for larger homes in Croydon was identified in the Croydon Strategic Housing Market Assessment 2015. Croydon has large numbers of households that are overcrowded. Meanwhile there is also a growth in single person households which is driving the requirement for smaller homes.

4.21 Three bedroom residential units are needed to house families and the existing stock retained to assist provision. The London Plan defines family housing as 'generally having three or more bedrooms'. In line with London Plan Policy 3.14, the retention of residential units originally designed with three or more bedrooms is supported by the Council.

4.22 Croydon's Strategic Housing Market Assessment identified the need for 44,149 new homes to be built between 2016 and 2036. The strategic policy requirement is for 32,890 new homes to be built in the same period, making more efficient use of housing stock a necessity including sub-divisions, conversions and change of use to residential.

~~4.23 The Strategic Housing Market Assessment 2015 identifies that 50% of the future requirement for market housing is for larger homes. The Strategic Housing Land Availability Assessment has identified that whilst projections of future housing requirements are rising, levels of building have fallen. Existing three bed residential units should therefore be retained and any conversions should ensure that there is no loss of three bed homes. Paragraph deleted~~

**4.24** Within the Croydon Opportunity Area, the Croydon Housing Typologies Study has found that the strongest opportunities for homes suitable for families will be associated with the lower and moderate density sites in the Croydon Metropolitan Centre

(including the inner residential area in the Croydon Opportunity Area<sup>20</sup>). It indicates that there will be more opportunities for studio, one and two bedroom units on the higher density sites in the Croydon Metropolitan Centre.

Policy DM1: Housing choice for sustainable communities

~~The Council will seek to enable housing choice for sustainable communities by requiring the minimum provision of homes designed with~~  
**Development must not result in the net loss of a 3 or more bedrooms or larger home (in its current form) on sites of 10 or more dwellings as shown in Table 4.1, except: and smaller homes below 130m<sup>2</sup> (as originally built).**

~~Where there is agreement with the associated affordable housing provider that three or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal, or;~~

~~Within three years of the adoption of this plan, where a viability assessment demonstrates that larger homes would not be viable, an element may be substituted by two bedroom, four person homes complying with the floor space specification of national Technical Standards or the London Mayor's Housing Supplementary Planning Guidance or equivalent.~~

~~The Council will permit the redevelopment of the residential units where it does not result in the net loss of 3 bedroom homes (as originally built) or the loss of homes smaller than 130m<sup>2</sup>.~~  
**To enable housing choice for sustainable communities, the minimum provision of homes designed with 3 or more bedrooms, must comply with Table 4.1 except where there is evidence from an associated affordable housing provider that 3 or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal.**

<sup>20</sup> Paragraph 9.12 of the Croydon Opportunity Area Planning Framework Jan 2013

Table 4.1 Minimum percentage of three bedroom or larger units on sites with ten or more dwellings

Setting <sup>21</sup>	PTAL <sup>22</sup> of 0, 1a, 1b, 2 or 3	PTAL of 4, 5, 6a or 6b
Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically 2 to 3 storeys	70%	60%
Urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of 2 to 4 storeys, located within 800 metres walking distance of a District Centre or along main arterial routes	60%	40%
Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of 4 to 6 storeys, located within 800 metres walking distance of Croydon Metropolitan Centre	This location does not exist in Croydon	20% (minimum of 5% in Retail Core area of Croydon Opportunity Area and 10% in 'New Town' and East Croydon as defined by the Croydon Opportunity Area Planning Framework)

<sup>21</sup> The definition of each setting is the same as that in the London Plan, Table 3.2.

<sup>22</sup> Public Transport Accessibility Level – a rating of accessibility provided by Transport for London. A site with a lower PTAL than the surrounding sites and adjoining streets shall be considered at the higher PTAL.



## How the policy works

**4.25** This policy applies to both market and affordable housing, whether the homes are new build or conversions. **Family housing is a dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms. To manage the current shortage of family homes, proposals must not result in the net loss of three bed or larger homes or the loss of smaller homes below 130m<sup>2</sup> (as originally built) that can address the needs of young and low income households. This policy is intended to ensure that the redevelopment of larger homes, including 4 or 5 bedroom homes, incorporates a replacement unit of that size to retain existing stock. This policy is intended to ensure that any loss of three bed (or more) homes should as a minimum be replaced by an equivalent quantity of three bed homes within schemes.**

**4.26** To meet the need for three bedroom homes the Council will require a minimum proportion of homes to have three bedrooms or more. ~~London Plan Policy 3.4 Optimising Housing Potential provides the basis of Table 4.1 and the definitions of Suburban, Urban and Central, and relating new development to access to the public transport network.~~ **The approach recognises that more central locations with higher density development will not be so compatible for accommodating larger units. For small schemes where it is not possible to adhere exactly the percentage requirements of Table 4.1, the percentage provision of 3 or more bedroom homes achieved should be the closest percentage figure to that required.**

**4.27** ~~The proportion of homes to have three bedrooms will vary across the borough based on existing character and public~~

~~transport accessibility and is based upon the London Plan's density matrix<sup>23</sup>. The approach recognises that more central locations with higher density development will not be so compatible for accommodating larger units. The Council's housing allocations scheme gives more priority to households that are working and the use of local letting schemes and the level of housing need will help to balance any issues arising regarding the viability of providing family homes.~~ **Paragraph deleted**

**4.28** The Strategic Housing Market Assessment 2015 **2019** identifies a difference in the size of housing required between tenures with affordable housing requirement for a greater proportion of smaller homes (particularly ~~one~~ **two** bedroom homes) than market homes.<sup>24</sup>

**4.29** The Croydon Opportunity Area Planning Framework identifies percentages for levels of three bed housing in six 'character areas' in the Croydon Opportunity Area which are reflected in this policy.

**4.30** ~~It is recognised that the development market will need time to adjust to providing the quantum of larger family homes of three bedrooms or more in line with this policy to meet the identified need in the borough.~~ **Paragraph deleted**

**4.31** ~~This policy is also intended to ensure that the conversion of single family houses into flats does not further reduce provision of three bedroom homes. Any dwelling house with a gross internal floor area of less than 130m<sup>2</sup> cannot be redeveloped,~~

<sup>23</sup> London Plan Policy 3.4

<sup>24</sup> Table 34, para 9.22, Fig.68 Strategic Housing Market Assessment, June 2015

~~demolished or subdivided, that would result in the loss of this type of property.~~ Paragraph deleted

~~**4.32** The gross original internal floor area does not include general storage areas such as lofts, cellars, fuel stores, garages or conservatory type structures. Parts of rooms with ceilings less than 1.5 metres are excluded unless used solely for storage. The calculation of the Gross Internal Area must comply with the National Technical Housing Standards or equivalent 2015.~~

Paragraph deleted

### Key supporting documents

- Croydon's Strategic Housing Market Assessment (2015)
- Borough Character Appraisal (2015)
- Character Typology (2015)
- Croydon Housing Typologies Study (2010)
- Croydon Opportunity Area Planning Framework (2013)
- Mayor of London's Housing Supplementary Planning Document (2016)

## Amenity standards for residential developments

### Why we need this policy

**4.32A** The need to ensure that alongside meeting housing need and addressing the housing crisis there is still a need for site layout and design to consider the provision of useable amenity space alongside the siting of the building. This policy sets the local amenity standard for residential dwellings alongside the policies and guidance in the London Plan.

**4.32B** It is important that Private outdoor spaces should be useable for not only residents but their visitors so have level access with the minimum depth and widths are required. Other

design requirements such as designing communal open space to ensure that it is overlooked by surrounding development, is accessible to wheelchair users and other disabled people, is designed to take advantage of direct sunlight, and has suitable management arrangements in place is necessary to provide suitable amenity for residents. This will ensure the outdoor space remains useful and welcoming to all its intended users. With the exception of management arrangements which are a matter for residents and the body managing the building, is delivered through the policy..

## Policy DM 1A Amenity standards for residential developments

**DM1A.1** Residential development will need to provide private amenity space that:

Is of high quality design, and enhances and respects the local character

Provides a minimum amount of outdoor space of 5m<sup>2</sup> per 1-2 person unit and an extra 1m<sup>2</sup> per extra occupant thereafter; and it must achieve a minimum depth and width of 1.5m

Provides functional with a minimum width and depth of balconies should be 1.5m

All flatted developments and major developments need to provide a minimum of 10m<sup>2</sup> per child of new play space, calculated using GLA's the Mayor of London's population yield calculator

All flatted developments of 10 units should provide a minimum of 50 square metres of communal amenity space with a further 1 square metres per additional unit thereafter

**DM1A.2** Large scale purpose built shared living schemes and non-self-contained student housing must also provide communal amenity space. When calculating the communal amenity space requirements each bedroom will be treated as a 1b1p flat and the resultant private outdoor space requirement will be combined to form the total need for communal amenity space. In Large scale purpose built shared living scheme and non-self-contained student housing communal areas (including kitchens) may be considered as communal amenity space.

### How the policy works

**4.32C** Amenity space is an important and essential element of a residential development, providing an outdoor space that is practical and can be used as a utility, social and recreation area. The health and well-being of local residents is a key consideration

on the quantum of outdoor space, child's play space and communal open space to be provided for developments.

**4.32D** Private outside space is defined as an area which is accessible only to, useable for and screened for the purposes of

individual dwellings at the rear or in the case of flatted schemes within the grounds. Private outside spaces can take form of a garden, terrace, roof garden, courtyard garden or balcony. The use of roof areas, including podiums, and courtyards for additional private or shared outside space is encouraged.

**4.32E** Communal amenity space is defined as amenity space that is shared, accessible to all within the development and is be for their exclusive use.

**7.32J** Balconies, winter gardens or roof terraces may help to meet a development's private outside space requirement and will be supported providing they are designed to minimise any overlooking and privacy issues. Enclosures may need to be opaque to achieve this. They may be an innovative way of providing private or communal amenity space in areas of high density.

**7.32K** The amenity space provided for play space can be part of the shared amenity area; it may be a void deck within a tall flatted development, possibly on the ground floor and in small developments of less than ten dwellings it could be part of the shared or private garden.

**7.32L** The GLA Population Yield Calculator should be used to calculate the expected number of children and young people likely to live in the development. The London Plan Housing Supplementary Planning should be referred to for the allocation and design guidance for play space.

**7.32M** All new housing developments should enhance the quality of local places, taking into account physical context, local character, density; tenure and land use mix; and relationships with, and provision of public, communal and open spaces that takes into account the needs of children and old people. The need

to provide communal amenity space should reflect the local character. It is important that the site layout, ensures the provision of useable amenity space, alongside the siting of the building. Private outdoor spaces should have level access.

### Key supporting documents

The Mayor of London's Housing Supplementary Planning Guidance: The London Plan Implementation Framework (March 2016)

## Residential care and nursing homes

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 3
- Strategic Objective 5
- Strategic Objective 7

- Policy SP2
- Policy SP5

### Why we need this policy

**4.33** The Council seeks the provision of a mix and range of housing as set out in Strategic Policy SP2.7 of the Croydon Local Plan and it is also the aim of Strategic Objective 3. This will assist in building sustainable communities, in line with paragraph 50 of the National Planning Policy Framework.

**4.34** In line with Strategic Objective 7, residential development should set out to achieve healthy and liveable communities to support the health and wellbeing of residents.

**4.35** Croydon has a very high number of nursing and residential care homes compared to other London boroughs. Analysis of changing needs for services supplied by the nursing and residential care home market evidences a 'saturation point' has been reached for some customer groups or categories of people in need. At the same time there is a greater public policy focus on supporting people to remain living at home safely whenever possible. It is therefore necessary that Croydon plans to enable it to supply care provision to meet current and future needs of Croydon residents. A change in policy ensures:

- a) Croydon's planning policy supports its commissioning intentions;
- b) The Council has first-hand knowledge of the services operating in the borough as required by the Care Act 2014; and
- c) The provision is in alignment with emerging care needs.

**4.36** Croydon experiences a range of challenges arising from the significant number of nursing and residential care homes that continue to be sited in the borough. These challenges include excess demand on a range of local health and social care services which is not reflected in national funding formulae for central Government funding towards local services.

**4.37** As of September 2015 the 142 care homes in Croydon have a total capacity of 2,796 bed spaces. Between April 2014 and November 2014, 761 of those bed spaces were occupied by people placed by Croydon Council and Croydon Care Commissioning Group (the grouping of GPs in Croydon that provides primary health care services in the borough). It was estimated that between 1,000 and 1,150 bed spaces were occupied by self-funders. The remainder of the bed spaces were

either vacant or occupied by people placed from outside of Croydon. This has an adverse impact on the provision of health services in Croydon.

**4.38** Services provided by care homes within the borough do not fully meet the needs of Croydon residents with more specialised or urgent needs. As a consequence between April and November 2014, 382 people were placed in nursing and residential care homes outside the borough. This is an undesirable outcome because vulnerable people risk losing their natural family and community support networks when placed at distance from Croydon.

**4.39** Croydon has produced a Market Position Statement (2015) to ascertain the level of future need. As need changes, it is

projected that 1,118 beds spaces will be needed by 2020 and 1,450 by 2030 across learning disability, mental health, older people and physical disability services, to meet the increased complex and dual care needs of people placed by the Council or the Croydon Care Commissioning Group.

**4.40** The National Planning Policy Framework (paragraph 50) states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.

**4.41** In accordance with the London Plan, the need for this type of accommodation has been identified taking into account the indicative requirement benchmarks set out in Annex A5: Specialist Housing for Older People.

**Policy DM2: Residential care and nursing homes**

Planning permission for new residential care or nursing homes will only be granted if there is a need for the particular services provided by the home in supporting with the care of residents of Croydon.

Proposals for supported living and sheltered accommodation will generally be supported in the borough in accordance with the London Plan, Annex A5, Specialist Housing for Older People.

This policy does not apply to accommodation for children (under the age of eighteen).

**How the policy works**

**4.42** Where there is an identified demand for residential care and nursing home bed spaces, the Council will support provision of this type of housing. This policy seeks to meet this need, however does not support an over-provision of care and nursing home bed spaces. This is the preferred approach as set out in the care home forecast.

**4.43** The Care Act 2014 places a duty on all local authorities to meet the need for residential care and nursing home bed spaces within their own area. The policy accords with Annex A5: Specialist Housing for Older People of the London Plan.

**4.44** According to Croydon’s Market Position Statement there are ample care and nursing home bed spaces within the borough to satisfy demand up to 2031. The policy therefore seeks to

address the current over-provision and supply this type of accommodation only where there is an identified need.

**4.45** Croydon's Market Position Statement will be used to assess applications for new residential care and nursing homes to determine whether there is a need.

**4.46** It is considered preferable that people within the borough that require care are cared for within their community, close to their networks of friends and family.

#### **Key supporting documents**

- Croydon's Market Position Statement (2015)
- Care Home Forecast (2015)



## Large scale purpose built shared living

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 3
- Strategic Objective 4
- Strategic Objective 7

- Policy SP1

### Why we need this policy

**4.46A** Large-scale purpose-built shared living housing is generally understood to be a large scale purpose built managed rental block, comprising of functional private living units with extensive communal facilities, under single professional management. These schemes include a wide range of amenities to support a diverse community of residents and their needs. These may be able to help meet housing need among single-person households in Croydon by adding to the stock of rooms available for rent in the borough; as well as helping free up larger dwellings and flats to address the shortfall in family homes,

**4.46B** Large scale purpose built shared housing is a unique new form of development that seeks to address the demands of a niche subset of the housing market, so policies are required to shape the delivery of these. This will ensure the development of well designed, adequately sized rooms with a sufficient quantity of quality communal areas and facilities in order to enable future

residents to fulfil their daily needs, interact with one another; and develop sustainable and cohesive communities, as well as promote their health and well-being. It will provide residents with increased security via a medium – long term tenancy agreement, to enable them to establish themselves, feel more connected to a locality, and be part of a community. This will also help avoid generic issues related to HMO properties such as a lack of/poor quality shared communal facilities and amenity facilities, insufficient parking spaces, lack of long term tenancy security and transitory living as well as poor management/maintenance of properties. Finally, it will seek to ensure future schemes are located within the most accessible locations to local facilities, services and avoid the potential loss of residential uses/permissions via speculative applications and an over concentration of large scale purpose built shared living and student accommodation.

## DM2A Large scale purpose built shared living

**DM2A.1** Development proposals for large-scale purpose-built shared living will be supported where they meet both the requirements of London Plan policy H16 and the following additional Croydon -specific requirements:

- a) Proposal should not compromise delivery of self-contained housing to meet housing needs of the Borough during the life of the Plan
- b) Shall be located in locations with good or excellent public transport accessibility;
- c) There should not be more than two large scale purpose built shared living schemes and purpose built student housing within a 250m distance of each other and total capacity of schemes (using a ratio of 1.8 beds/per C3 unit) should not exceed 5% of total place based housing growth. This will ensure development would not result in an over-concentration of similar uses, which may be detrimental to residential amenity or the balance and mix of uses in the area or place undue pressure on local infrastructure Including Green and social Infrastructure).

**DM2A.2** Affordable housing contributions should be made in accordance with London Plan policy H16 in the form of a single upfront payment to Croydon based on 50 per cent discount to market value of 35 per cent of the units (or 50 per cent of the units where the London Plan threshold applies).

**DM2A.3** Each private unit shall include or have exclusive access to the following;

- a) at least 30sqm range of functional living space separate from the communal facilities;
- b) A minimum of 5m2 of communal amenity space shall be provided per bed space/person incorporating a wide range of amenities to support a diverse and inclusive community of residents and to address their needs
- c) Include at least one set of cooking facilities for every 2-5 persons and two sets for every 6-10 persons
- d) Provided storage space in both private and communal areas.
- e) includes a management plan that, to the satisfaction of the Council, will appropriately mitigate potential harm to the amenities of future resident and neighbouring properties

## How the policy works

**4.46C** In Croydon, large-scale purpose-built Shared living developments are generally considered to consist of at least 50 non-self-contained units.

**4.46D** Proposals for large-scale purpose-built shared living should not compromise delivery of self-contained housing to meet Croydon's housing need.

**4.46E** A minimum range of circa 20-30 SQM of personal functional living space per bed/person is considered acceptable in a large scale purpose-built shared living development. A smaller area per person would not provide an adequate living environment for the health and well-being of people in the borough. Each personal room should include a window. In addition, proposals will need to be; well-designed that will include an adequate level of natural sunlight and ventilation,

**4.46E** In contrast, a minimum communal space of 5SQM per bed/person is considered reasonable, given the relatively small size of private space and potentially a high number of residents residing and using these. An adequate quantity of kitchen facilities are an important component of shared living and these should be well designed and highly accessible, to meet needs of all users. This will enable residents to fulfil their day to day needs, interact, socialise with their neighbours, develop healthy relationships and build a diverse inclusive, cohesive community. Communal spaces should provide a, a range of c amenities, that facilitate health and well-being that support a diverse community and address their daily needs.

Given the very high density nature of this type of accommodation, proposals should be located the in parts of the borough with good or excellent public transport accessibility levels and well-served by local services. To avoid an over concentration of Purpose Built large scale Purpose Built shared living and purpose built student living schemes, no more than two of these similar uses should be located within 250m distance of each other and the total quantity of the former should not exceed 5% of the total housing growth proposed for a place within the Plan. This will ensure that shared living schemes are located throughout the area and within the most sustainable locations of the Borough in line with the settlement hierarchy. Further, it will help ensure that schemes do not compromise the delivery of conventional housing, particularly in places where lower levels of housing growth is proposed by the Plan, where the delivery of 50 bed unit schemes (assuming London Plan ratio of 1.8bed: 1 C3) may not be possible or in delivered lower quantities, vice versa. This approach will prioritise the delivery of conventional housing to address the needs of families, avoid any potential adverse effects of over concentration on residential amenity or the mix of uses and balance of population in a neighbourhood and local pressures on services, infrastructure given the very high-density characteristics.

## Vacant building credit

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 3
- Policy SP2

### Why we need this policy

**4.47** A Ministerial Statement on 28<sup>th</sup> November 2014 introduced a vacant building credit for developers of vacant buildings such that a reduced provision of affordable housing should be required. This vacant building credit only applies to buildings which have not been made intentionally vacant in order to redevelop them and to sites which do not have an extant or recently expired permission for the same or similar development. A policy is required to set out how it will be determined that a

building has not been made intentionally vacant, to define a same or similar development and a recently expired permission.

**4.48** The Mayor of London's Draft Interim Housing SPG encouraged boroughs to have policies in their local plans that set out the criteria for how the vacant building credit will be applied. In particular it suggested minimum vacancy periods and marketing requirements should be set.

### Policy DM3: Vacant building credit

The Council will promote the re-use or redevelopment of existing buildings by applying a vacant building credit such that affordable housing requirements will only apply to the net increase in floor space resultant from development of buildings which have been:

Vacant for a period of at least eighteen months prior to the granting of planning permission; and

Marketed for their lawful use (or uses which could be lawful under the General Permitted Development Order) throughout the period they have been vacant.

Vacant building credit will not be applied to development proposals or to proposals to modify S106 agreements for schemes which are the same as or similar to an extant or recently expired planning permission where:

A similar planning permission is one where there is less than a 25% increase in the proposed residential and non-residential floor space and where the overall residential floor space is more than half that of the existing or recently expired permission; and

A recently expired permission is one that lapsed within the previous two years prior to the granting of consent of the new planning permission.

### How the policy works

**4.49** The policy should ensure that only genuinely vacant buildings benefit from the vacant building credit and thus encourage their return to use.

**4.50** Buildings that have been made intentionally vacant, including those made redundant through estate rationalisation will not benefit from the vacant building credit.

**4.51** Vacant building credit does not apply to abandoned buildings. There is no planning definition of abandoned buildings; however an abandoned building cannot be marketed.

**4.52** The threshold for a similar proposal is set to prevent applications for developments with marginal increases or decreases in floor space, or changes of use or reduction in size of non-residential floor space avoiding providing needed affordable housing.

**4.53** Likewise, a two year period as the definition of a recently expired permission is set to provide a disincentive to simply let existing permission expire so that vacant building credit can be applied for thus reducing the amount of affordable housing provided.

**4.54** Where vacant building credit is applicable to a development proposal, the full affordable housing requirements set by Policy

SP2.4 of the Croydon Local Plan will apply to the net increase in floor space. This means that the Council will negotiate for 50% of the net increase in floor space to be for affordable housing and the current minimum requirements will apply in full. The Council will expect overall scheme viability to improve with the application of vacant building credit and this will be reflected in negotiations around any planning obligations including affordable housing.

### Key supporting documents

- National Planning Policy Guidance

# 5. Employment

## Strategic policy

### Where we are now

5.1 The key issues that the borough faces in terms of planning for employment up to 2036 are:

- Land for industry and warehousing will need to have continued protection to support these sectors in the future.
- ~~There is approximately 30% vacant office floor space in Croydon Metropolitan Centre and current low rents do not support the development of new office floor space, although some speculative office is being built out.~~
- **While there is approximately 30% vacant office floor space in Croydon Metropolitan Centre, this is predominantly B grade office space with the area is experiencing an undersupply of Grade A floor space, which is exacerbated by low rents which do not support the development of new office floor space**
- Supporting the area around East Croydon Station and New Town as Croydon Metropolitan Centre’s office centre.
- The public realm of Croydon Metropolitan Centre has seen considerable investment and improvement, but renewal remains necessary as poor public realm discourages businesses from locating in Croydon and people shopping in the town.
- Encouraging development in Croydon Metropolitan Centre through flexible and pragmatic planning, that contributes to the centre's economic prosperity and vitality.
- Croydon faces competition from other areas of London and the South East for inward investment both in office and retail markets.

- The increase in the population of Croydon and planned house building will result in an increase in the need for jobs.
- ~~Establishing a policy response to the contracting of retail uses within-District, and Local Centres, increased vacant premises, with poorly designed conversions uses, has impacted on the public realm and the ability of the Centres to attract new business and create attractive residential areas.~~
- **Retail Uses are declining with Croydon’s Town Centres which include Croydon Metropolitan Centre and the District and Local centres. This has led to an increase in vacant premises, this in combination with poorly designed conversions to other uses has had a negative impact on the public realm and consequently the ability of centres to attract new businesses to create attractive focal points for the community.**

### Where we want to be

<b>Strategic Objective 1:</b> Establish Croydon as the premier business location in South London and the Gatwick Diamond.
<b>Strategic Objective 2:</b> Foster an environment where existing, new, innovative, cultural and creative enterprises can prosper.
<b>Strategic Objective 4:</b> Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.
<b>Strategic Objective 8:</b> Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
<b>Strategic Objective 9:</b> Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.

## How we are going to get there

### Policy SP3:Employment

**SP3.1** The Council will encourage innovation and investment into the borough to support enterprise and increased employment for the benefit of all Croydon residents. The Council will apply a presumption in favour of employment-related development, provided it meets the standards of Policy SP3 and other applicable policies of the development plan.

#### Innovation, Investment & Enterprise

**SP3.2** ~~The Council will adopt a~~ Innovative approaches that reflect technology changes in delivery and servicing to future proof the borough's industrial and employment land will be supported in accordance with '4-Tier' approach provides the hierarchy for the retention and redevelopment of land and premises relating to industrial/employment activity as ~~set out in Table 5.1 follows~~.

- a) Strategic and Separated Industrial Locations (Tier 1) – significant sized self-contained industrial locations that have separation from nearby residential properties, with strong protection for existing, and support for new industrial and warehousing activity, employment generating Sui-Generis uses and ancillary uses that complement and support the area's industrial function will be permitted
- b) Integrated Industrial Locations (Tier 2) – smaller scale industrial estates, where residential development has grown up alongside the commercial buildings, with strong protection for existing, and support for new industrial and warehousing activity, employment generating Sui-Generis Uses and support for non-Town Centre community uses to support growth in the borough;
- c) Town Centre Employment Sites (Tier 3) – Industry, warehousing and employment generating Sui-Generis Uses<sup>25</sup> in Town Centre locations, with protection for existing, and support for new industrial and warehousing activity, with other uses permitted as set out in Policy DM22.2;
- d) Scattered Employment Sites (Tier 4) – Isolated industry, warehousing and employment generating Sui-Generis Uses<sup>26</sup> not in Tier 1, Tier 2 or Town Centre locations, with protection for existing industrial and warehousing activity, support for new Research and Development, Light Industrial or Warehousing uses, with other uses permitted as set out in Policy DM22.2.

**SP3.3** ~~The Council will promote.~~ To support the Borough's function as a hub of culture and creativity, development supporting the growth and expansion of Cultural and Creative Industries ~~to make Croydon a better place to live as a driver of growth and enterprise in the local economy~~ will be supported. The focus for accommodating Cultural and Creative Industries will be the network of Enterprise Centres set out below:

- a) Croydon Metropolitan Centre;
- b) Purley District Centre;
- c) Crystal Palace District Centre; and
- d) South Norwood District Centre/Portland Road.

**SP3.4** The Council will support ~~promote the remodelling of the Fairfield Halls as a performance facility.~~

**SP3.5** ~~The Council will support~~ Croydon is home to a diverse population known for its creative industries and unique culture, development for these uses that support culture and diversity will be supported as well as the temporary occupation of empty buildings and cleared sites by creative industries, ~~and~~ cultural organisations and other meanwhile uses where they contribute to regeneration and enhance the character and vitality of the area.

#### Town and Neighbourhood Centres

**SP3.6** The Council will apply the London Plan Town Centre hierarchy:

- a) Croydon Metropolitan Centre
- b) District Centres: Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, Purley, Selsdon, South Norwood and Thornton Heath
- c) Local Centres: Beulah Road, Brighton Rd (Sanderstead Road), Brighton Road (Selsdon Road), Broad Green, Hamsey Green, Pollards Hill, Sanderstead, Shirley and Thornton Heath Pond.
- d) Future new Local Centres: Fiveways, Waddon Marsh, Valley Park



## Neighbourhood Centres

e) ~~In addition The Council has identified~~ a number of Neighbourhood Centres **have been identified** as follows:

Ashburton Park, Bridgstock Rd., Brighton Rd./Downlands Rd, Coulsdon Rd./Court Road, Green Lane/Northwood Rd., Godstone Rd., Fieldway, London Rd./Kidderminster Rd, Lower Addiscombe Rd./Cherry Orchard Rd.,Portland Rd./Watcombe Rd./Woodside Ave., Shirley Rd., Selsdon Park Rd./Featherbed Lane, Selhurst Rd, South End/Parker Rd./St. Peter's Church, Spring Park/Bridle Rd., South Norwood Hill, Waddon Rd./Abbey Rd., Woodside Green,

f) **A new Neighbourhood centre is proposed at Waddon Way.**

**SP3.7** The Council will work with the GLA and neighbouring boroughs to ensure Croydon's network of town centres is sufficiently flexible to accommodate change up to 2031 by:

- a) Working with its partners through the process of regular town centre 'health checks' to highlight reclassifications of the borough's existing Local and District Centres; **and**
- b) Designating the boundaries of the network of town centres and their Primary Shopping Areas in the Croydon Local Plan's Detailed Policies and Proposals and undertaking regular review to ensure the vitality of the centres is maintained; ~~and~~
- c) ~~Considering the designation of new Local Centres at Fiveways and Valley Park when they can be supported by population growth in these areas.~~

**SP3.8** ~~The Council will promote and support the development of all B1 uses (including office, light industry and research & development) retail, leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre, District Centres and Local Centres.~~ **As a borough with a focus on innovation and enterprise development that encourages opportunities for local business to start, grow and remain in Croydon are supported. Local business and enterprise should be encouraged through a healthy mix of uses at a variety of scales with the provision and retention of affordable units and opportunities such as provision of studios or managed workspace.**

**SP3.9** ~~Croydon's location lends it a number of strategic benefits, positioned centrally in the London – Gatwick diamond Croydon is well positioned to support innovation and enterprise uses. As the borough's metropolitan centre the~~ **Croydon Metropolitan Centre will remain the principal location in the borough for office, retail, cultural business uses (including office, light industry and research & development), retail,**

leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities ~~and hotel activity, and also be the largest retail and commercial centre in South London~~. A flexible approach will be applied to these uses, the mix and scale of these uses must be appropriate to support the Croydon Metropolitan Centre's higher order destination function.

**SP3.10** The Council will adopt a flexible approach to B1 uses (office, light industry and research & development), retail, leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre. This flexible approach will be supplemented by the Croydon Opportunity Area Planning Framework and the Council's masterplans that apply to the Croydon Metropolitan Centre. **Neighbourhood centres are key to sustainable neighbourhoods. Intended to be located within walking or cycling distance from neighbourhoods, these centres provide multimodal access to a communities day-to-day service needs. A wide variety of smaller scale development proposals which will enhance the vitality and viability of a neighbourhood centre and meet community needs will be supported.**

**SP3.11** The Council will promote and support measures to improve the quality of the borough's stock of retail<sup>27</sup> and office<sup>28</sup> premises, particularly in the Croydon Metropolitan Centre. **Much of Croydon's office stock is characterised by older B grade offices. Development that supports the creation and refurbishment of the borough's office stock, provision of affordable workspace and retail premises in the Croydon Metropolitan Centre will be encouraged.**

**SP3.12** The Council will favourably consider net increases to the stock of retail premises commensurate with Croydon's retail function as a Metropolitan Centre and ensuring the viability and vitality of Croydon Metropolitan Centre, District Centre and Local Centres. The Council will seek to maintain as a minimum, the current amount of retail floor space in Croydon, enhance the quality of retail floor space in Croydon and seek to reduce A Use Class vacancy. **Development should reflect the implications of a shifting work environment supporting flexible use of office space to reinforce the areas employment function. At the street level development should encourage walkability and the pedestrian experience creating pedestrian friendly frontages along key pedestrian routes leading to the town centres.**

**SP3.13** The Council will promote and support the development of new and refurbished office floor space in Croydon Metropolitan Centre, particularly around East Croydon Station and within New Town, and the District Centres as follows<sup>29</sup>: **East Croydon Station is the borough's key transportation hub, development and refurbishment of office floor space that encourages sustainable travel and provision of new local working and employment opportunities including affordable workspace around the station and within the Croydon Metropolitan Centre is supported as follows**

<sup>27</sup> Para 10.3, Croydon Metropolitan Centre Retail Strategy, Dec 2009 (Drivers Jonas)

<sup>28</sup> Para 7.7, L.B. Croydon Office, Industrial, Warehousing Land/Premises Market Assessment, August 2010 (URS & Stiles Harold Williams)

<sup>29</sup> Employment Land Review 2014

- a) Up to ~~92,000~~30,500m<sup>2</sup> by ~~2034~~ 2039 to be located in Croydon Metropolitan Centre; and
- b) Retaining, or through refurbishment providing, higher quality office floor space (Grade A), or lower quality floor space for which there remains a demand, within the Office Retention Area of the Croydon Metropolitan Centre. Mixed use developments must include a level of office floor space proportionate to Croydon's role as an **Edge of London** ~~Outer London~~ Office Centre; and
- c) ~~Up to 7,000m<sup>2</sup> to be spread across the borough's District Centres.~~

**SP3.14** Opportunities for employment and skills training will be considered by means of section 106 agreements for major developments (residential developments of 10 units or more or non-residential developments exceeding 1,000m<sup>2</sup>). The Council will seek to secure a minimum of 20% of the total jobs created by the construction of new development above the set threshold to be advertised exclusively to local residents through the Council's Job Brokerage Service for a specified minimum period. It is expected that best endeavours be used and that the developer will work with the Council to ensure that the target of 20% employment of local residents is achieved in both construction and end user phase of new qualifying development.

**SP3.15** Each of Croydon's District and Local Centres collectively form the Borough's town centres as defined in Annex 2 of the NPPF. Each has a diverse community and unique culture. To encourage local opportunities to live, work and play development in these centres should support the consolidation of uses to target toward the local community. Business and Town Centre Uses coming forward should provide affordable workspace for small and medium size businesses that reflect the scale and nature of the centre.

Table 5.1 Four-tier approach to land and premises in industrial locations – *table moved to DM policy*

Tier	Designation	Locations	Approach	Permitted Uses	Other Uses
4	Strategic and Separated Industrial Locations	Marlpit Lane Purley Way <sup>30</sup> Selsdon Road Gloucester Road (East) Vulcan Way	Strong protection for industrial and warehousing activities with no loss of Class B floor space <sup>31</sup> permitted	Class B1b, B1c, B2 and B8 uses  Employment generating sui-generis uses <sup>32</sup>  Gypsy and Traveller pitches (for Gypsies and Travellers with a qualified connection to Croydon)	Not permitted

<sup>30</sup> Including both Purley Way North and Purley Way South

<sup>31</sup> Excluding Class B1a (Offices)

<sup>32</sup> To be acceptable in these locations, employment generating sui-generis uses must provide employment which is comparable in terms of activities and job numbers to industrial/warehousing uses.

Tier	Designation	Locations	Approach	Permitted Uses	Other Uses
2	Integrated Industrial Locations	Gloucester Road (West) Thornton Road Union Road	Strong protection for industrial and warehousing activities	Class B1b, B1c, B2 and B8 uses  Employment generating sui-generis uses <sup>33</sup>	<ul style="list-style-type: none"> <li>• <del>Planning permission for limited residential (Class C3) office (Class B1a) or Education and Community Facilities (Class D1) will be granted if it can be demonstrated that:</del></li> <li>• <del>There is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and new Class B1b, B1c, B2 and B8 floor space is designed to meet the needs of future occupiers; and</del></li> <li>• <del>Residential and Office use does not harm the site and wider location's industrial function.</del></li> <li>• <del>Opportunities for employment and skills training will be considered via Section 106 where possible.</del></li> </ul>

<sup>33</sup> To be acceptable in these locations, employment generating sui-generis uses must provide employment which is comparable in terms of activities and job numbers to industrial/warehousing uses.

Tier	Designation	Locations	Approach	Permitted Uses	Other Uses
3	Town Centre Industrial Locations	Industrial sites in Croydon Metropolitan Centre, a District Centre or a Local Centre	Protection for industrial and warehousing activities encouraging opportunities to provide additional workshop/studios on town centre sites	Class B1b, B1c, B2 and B8 uses  Employment generating sui-generis uses <sup>34</sup>	<p>Planning permission for offices (Class B1a), residential (Class C3), leisure (Class D2), visitor accommodation (Class C1) and community facilities (Class D1) development will be granted if it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>• there is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and there is no net loss of Class B1b, B1c, B2, B8 floor space unless the other uses are required to enable development of the site to be viable; and</li> <li>• residential use does not harm the wider location's business function; and</li> <li>• the development will increase the vitality viability and diversity of employment uses of the town centre.</li> <li>• Opportunities for employment and skills training will be considered via Section 106 where possible.</li> </ul>

<sup>34</sup> To be acceptable in these locations, employment generating sui-generis uses must provide employment which is comparable in terms of activities and job numbers to industrial/warehousing uses.

Tier	Designation	Locations	Approach	Permitted Uses	Other Uses
4	Scattered Employment Sites	Other employment locations/sites falling outside of Tier 1, Tier 2 and Tier 3	Protection for industrial and warehousing activities. Allowance for community uses to locate in the (Higher PTAL) more accessible locations	<p>Class B1 (excluding B1a office), B2 and B8 uses</p> <p>Employment generating sui-generis uses<sup>35</sup></p> <p>Class D1 (Education and Community Facilities) in industrial locations in PTALs 3 or above</p>	<p>Planning permission for limited residential development will be granted if it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>• there is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and</li> <li>• residential use does not harm the wider location's business function.</li> <li>• Opportunities for employment and skills training will be considered via Section 106 where possible.</li> </ul>

<sup>35</sup> To be acceptable in these locations, employment generating sui-generis uses must provide employment which is comparable in terms of activities and job numbers to industrial/warehousing uses.

## Designations shown on the Policies Map

Each of the designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 5.2 below:

**Table 5.2 Designations set by Policy SP3 shown on the Policies Map**

Designation	Locations
Strategic Industrial Location	Marlpit Lane
	Purley Way North
	Purley Way South
Separated Industrial Location	Gloucester Road (East)
	Selsdon Road
	Vulcan Way

Designation	Locations
Integrated Industrial Location	Approach Road, Purley
	Bensham Grove
	Bushey Close
	Gloucester Road (West)
	Hampton Road
	Hastings Road
	Land between railway tracks (Norwood Junction/Penge Road)
	Land between railway tracks (Purley/Fairbairn Close)
	Norbury Trading Estate
	Pitlake
	Thornton Road
Union Road	
Croydon Metropolitan Centre	Croydon Metropolitan Centre



Designation	Locations
District Centre	Addiscombe
	Coulsdon
	Crystal Palace
	New Addington
	Norbury
	Purley
	Selsdon
	South Norwood
Thornton Heath	

Designation	Locations
Local Centre	Beulah Road
	Brighton Road (Sanderstead Road)
	Brighton Road (Selsdon Road)
	Broad Green
	Hamsey Green
	Pollards Hill
	Sanderstead
	Shirley
	Thornton Heath Pond
	<b>New Local Centres</b>
	<b>Waddon Marsh</b>
	<b>Valley Park</b>
Office Retention Area	New Town and East Croydon areas of the Croydon Opportunity Area

**What will it look like**

Figure 5.1 Employment in Croydon (2011-2036) –**graphic updated**

Figure 5.2 Employment in Croydon (2011-2036) **graphic updated**

**Why we have taken this approach**

Innovation, Investment & Enterprise

**5.2**The vision from Croydon’s Sustainable Community Strategy states ‘We will be London’s most enterprising borough – a city that fosters ideas, innovation and learning and provides skills, opportunity and a sense of belonging for all’. A network of Enterprise Centres focusing on cultural and creative industries and innovation will be pursued across the borough as part of realising this vision.

**5.3**The Council is committed to training, work placements and apprenticeships and views them as being a sustainable way to improve employment prospects for local people. The Council is determined to ensure that S106 obligations secure placements for local people during the construction phase of building projects and the provision of skills training.

**5.4**In the face of strong competition from other uses, planning policies giving strong protection for industrial sites have served the borough well in terms of retaining the stock of industrial and warehousing premises and land.<sup>36</sup>

**5.5**~~To achieve our vision to ‘...be London’s most enterprising borough...~~**\_create a fairer, more inclusive Croydon with a vibrant, resilient and sustainable local economy’** it is essential that Croydon has the capacity to meet expected demand for **small and medium enterprise employment**, industrial and warehousing activities. The evidence base indicates that the current supply is tight and predicted to become more so. The Croydon Monitoring Report (April,2015~~8~~) found that overall there was a net loss of almost ~~42,000m<sup>2</sup>~~ **34,811m<sup>2</sup>** of Class B floor space in Croydon between 2011 and 201~~5~~**8**.

**5.6**The ‘4-tier’ approach is a strong approach to the protection of industrial capacity (in line with Croydon’s ‘restrictive transfer’ status<sup>37</sup>) which supports the South London Waste Plan DPD, yet also offers greater prospects of bringing about investment and renewal of industrial/employment locations, bringing forward new workshops/studios in town centre locations and meeting other policy objectives.

**5.7**~~“Tier 1’ locations are significant sized industrial locations that have historically been established and are self-contained so that they benefit from better separation from nearby residential properties and therefore lend themselves to the highest level of protection for industrial and warehousing activity. Two of these areas Purley Way (comprising Purley Way North and South) and Marlpit Lane are also identified as Preferred Industrial Locations in the London Plan – see Fig 5.1). “Tier 1” locations due to their strategic function and economic importance will be subject to the highest policy protection to ensure their economic importance is assured.~~**in the London Plan as Strategic industrial Locations and**

<sup>36</sup> Table 7.3, p.107 – LB Croydon Office, Industrial, Warehousing Land/Premises Market Assessment (August 2010)  
<sup>37</sup> The London Plan sets out the approach each borough should take in relation to industrial land. For some boroughs, this means releasing an identified over

supply for alternative uses. For Croydon, it means continuing with a more restrictive approach to the transfer of industrial sites to other uses.

should therefore have the highest policy protection to ensure their economic importance which have local as well as regional economic significance is assured.

**5.8** 'Tier 2' Locations perform an important economic function but are smaller scale industrial estates where residential development grew up alongside the commercial buildings. This proximity between uses has not resulted in undue harm to residential amenity and therefore, new mixed-use schemes, that are well designed and give priority to the area's commercial functionality, are acceptable. New Class B1b, B1c, B2 and B8 premises in mixed-use developments should be designed to meet the needs of future occupiers and to preclude future conversion to residential use. Mixed-use developments in these locations must not result in an increase in operational difficulties for businesses. 'Tier 2' locations also perform an important economic function so will be subject to strong policy protection to ensure their role is assured. They perform a valuable economic function as they generally employ a local workforce. This function of Tier 2 locations has a social benefit as well as being sustainable as the workforce does not travel so far encouraging sustainability of the location

**5.9** The fringes of some Tier 1 and Tier 2 locations within the context of Policy SP3.2 have the potential for transition through development that enables the locations to relate better to their surrounding uses and character. This transition could come in the form of intensification of development, high-density development and the introduction of new land uses or mix of land uses. Paragraph deleted

**5.10** Extending protection of industrial/warehousing activities to sites falling W within town centres ('Tier 3') (industrial/warehousing uses will be protected to help the Council limit the losses in the borough wide stock of such premises. The

promotion of new workshops in these locations will also add a greater degree of diversity (and theoretically a greater resilience), to the employment offer of the borough's town centres. However the Council will adopt a flexible approach to B1 uses (excluding B1a office), leisure, visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre.

**5.11** The Council is aware that D1 uses can struggle to find suitable premises. This has led, in the past, to situations where 'Tier 1' type premises have been lost to community uses to the detriment of the area's business function. Allowing the change of use or redevelopment of 'Tier 2 and 4' premises in the more accessible locations, to D1 use class activities (non-residential institutions), not only helps safeguard 'Tier 1' for continued industrial uses, it also opens up a significant supply of premises for community uses/groups to consider. Restricting this flexibility to higher PTAL locations means that uses which attract large numbers of visitors will be able to make more use of public transport. Paragraph deleted

**5.12** Likewise Gypsies and Travellers also struggle to find suitable sites for new pitches. To enable provision of sites throughout the Plan period, particularly the last ten years of the Plan period, the development of 'Tier 1' sites to use as Gypsy and Traveller pitches (for those families with a qualified connection to Croydon) will be permitted. In the case of Gypsies and Travellers, a qualified connection is defined as being resident on an existing authorised site in Croydon (but with no space to expand), being the parent, grandparent, child, grandchild, brother or sister of a Gypsy or Traveller currently resident in Croydon on an authorised site; or having resided in Croydon on unauthorised sites for a period of not less than five years ending on the date of adoption of the Local Plan. If there is

no qualified connection then the use of Tier 1 sites would not be permitted.

**5.13** In order to demonstrate that there is no demand for a scheme comprised solely of Class B1b and B1c, B2 and B8 uses in 'Tiers 2, 3 and 4' locations, evidence will need to be submitted that a marketing exercise has been undertaken for a minimum of 18 months. The Council will need to be satisfied that the site has been offered at a price commensurate with the value of the site for the permitted uses and that active promotion has been undertaken by agents marketing the site.

**5.14** ~~Croydon is good at producing creative talent (BRIT School, College of Art, Dance, Dubstep etc.), but less successful at providing them with a base in the borough<sup>38</sup>. Other London boroughs have been able to address this — e.g. the 'Chocolate Factory' in Hackney and Westbourne Studios in Kensington and Chelsea. Evidence supports promotion and supporting cultural and creative industries to assist in changing Croydon's image<sup>39</sup>.~~

**5.15** ~~The study, 'Understanding and Shaping the Cultural Sector in the London Borough of Croydon, Sept 2010', highlights clusters of creative industries talent in four locations with a recommendation that the~~ **The creative and cultural sectors are a key industry in Croydon, the Enterprise Centre in Croydon Metropolitan Centre act as a flagship for the sector. Developing a central location as a 'hub' will provide a clear signal that Croydon is 'open for creative businesses'.**

**5.16** **Croydon is well known for the success rising from its creative economy.** The Fairfield Halls is a cultural asset **and creative space** synonymous with Croydon and is also of regional

~~importance. therefore its retention and remodelling merits inclusion within the Strategic Policies of the Croydon Local Plan.~~ **As a creative space synonymous with Croydon, its retention has a prominent role in supporting the development of spaces for the creative economy and** merits inclusion within the Strategic Policies of the Croydon Local Plan.

**5.17** **The creative economy has previously been associated with those of with low social mobility which has constraining the sectors ability to thrive.** Across Croydon, but particularly within Croydon Metropolitan Centre, there are substantial amounts of underused sites/buildings. This usually corresponds with sites that are pending development. The Council considers such sites lying dormant a potential opportunity. Organisations within this sector such as ACAVA (Association for Cultural Advancement through Visual Art) and ACME (providing artists with affordable studio and living space) are experts at making temporary use of such space. **Opportunities to support Croydon's Cultural and Creative industries through temporary occupation should be taken allowing the industry to grow and support chances for increased social mobility.** Elsewhere in the Strategic Policies other temporary uses are promoted such as urban greening, urban agriculture and providing space for community groups. **Providing a variety of different sized employment and workspaces aims to encourage and maintain local business in Croydon. Ensuring small and medium units are available following redevelopment provides affordable options for businesses starting out as well as making sure there is space in the borough for businesses to grow into remaining in the borough as they expand**

<sup>38</sup> 'Understanding and Shaping the Cultural Sector in L.B. Croydon (Draft Final Report)' (Sept 2010)

<sup>39</sup> 'Understanding and Shaping the Cultural Sector in L.B. Croydon (Draft Final Report)' (Sept 2010)

**5.18** As well as encouraging new activity in this sector, it is essential that the Council continues to protect existing capacity for activities such as theatres, cinemas, art galleries etc. This is supported by **the Culture for all Londoner's – Mayor of London's Cultural Strategy**. ~~Policy Action 2.1 of the London Mayor's Cultural Metropolis Strategy.~~

**5.19 Encouraging design that is sensitive to the character of the area is an important way to improve the quality of the built environment in the borough. Development should consider its orientation on site with respect to main roadways, providing clear signage and landscaping where appropriate. Addressing the interface between industrial and non-industrial sites as well as the streetscape should be used to improve the quality of the environment. Design considerations that address placemaking should be integrated into industrial sites to improve conditions for employment and worker amenity.** Derelict sites and buildings can impact on the perception of the borough and the visual quality of the public realm. They can have an adverse impact on community safety owing to lack of active frontages. A policy to encourage creative and cultural uses can enhance the public realm to help build social cohesion, support cultural diversity and engender a sense of safety and belonging as well as helping this sector to grow in the borough.

#### Town Centres

**5.20** The process of conducting town centre health checks should ensure that the role of the borough's town centres and their relationships to one another is fit for purpose and adequately supports the London network of town centres and the borough's convenience and comparison retail needs. Centres can be reclassified in the light of subsequent reviews or alterations to future LDF DPDs. ~~Changes to the upper tiers in the network (Major and above) should be coordinated first through the London Plan-~~ **the Local Plan or the London Plan.**

**5.21** The objective to direct town centre uses to existing centres (because of their higher levels of accessibility and ability to support multiple purpose trips) remains central to government policy in the National Planning Policy Framework and provides justification for this policy. The mix of uses in each centre will be determined by factors such as existing clusters of activity (e.g. vibrant evening economy, grouping of large offices, presence of higher education providers, etc.) as well as other designations. ~~For example, both Crystal Palace and Croydon Metropolitan Centre are identified in the Sub-Regional Development Framework, South London, 2006 (Table 1D.3), as Primary Locations for future visitor accommodation.~~

**5.22** Croydon Metropolitan Centre has the highest level of regional and sub-regional accessibility in the borough. The case for it to be the principal location for the town centre uses is supported by the importance attached to Croydon Metropolitan Centre in the London Plan. The Council is committed to facilitating development within Croydon Metropolitan Centre. Therefore, the Council will seek to strengthen Croydon's role as a Metropolitan Centre **as covered in detail in the North End Quarter policies of this Plan, the supplementary Croydon Opportunity Area Framework and the Council's Masterplans that apply to the Croydon Metropolitan Centre.** ~~Therefore, the Council will seek to strengthen Croydon's role as a Metropolitan Centre and adopt a flexible approach to B1 uses (office, light industry and research & development) retail, leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre. This flexible approach will be supplemented by the Croydon Opportunity Area Framework and the Council's masterplans that apply to the Croydon Metropolitan Centre.~~ Policies in the Transport and **Tele**communications section to improve Wi-Fi connectivity and mobile phone bandwidth will support this policy.

**5.23** ~~Furthermore, changing the town centre hierarchy as set out in Croydon's Unitary Development Plan to the hierarchy set out in the London Plan brings the Strategic Policies into general conformity with the regional plan. Development in Croydon Metropolitan Centre will be promoted in accordance with the London Plan designation as an 'Opportunity Area, a 'Metropolitan Centre', a 'Potential Outer London Development Centre' for 'Strategic Office' and 'Higher Education' uses and in accordance with its status as a 'Strategic Cluster of Night-Time Activity with Regional/Sub-Regional Importance'.~~

**5.24** Regular town centre 'health checks' form part of the Council's promotional role and help to ensure boundaries, policies and classifications remain relevant. The nature of planned growth in the borough over the plan period could necessitate the need to provide additional town centres. Conversely, other centres which face challenges resulting from changes in retailing (growth in online shopping, competition from out-of-town retail, etc.) may require consolidation.

**5.25** In addition to the London Plan town centre hierarchy, Neighbourhood Centres have been identified. These offer the opportunity for clusters of uses, in particular community uses, to emerge or be supported by planning policy. **Accessible to residents by active transport these well connected areas are key to encouraging population health by increasing activity and improving air quality through reduced dependence on the private vehicle.** The identification of Neighbourhood Centres goes beyond recognising centres solely for their retail function, but for the wider role they play in supporting the local community.

**5.26** Croydon is in competition for inward investment with other parts of London, notably the Thames Gateway and the M4 corridor (the Western Wedge). It also competes with centres in Surrey and West Sussex and to do so successfully, the stock of

commercial premises needs to be improved. Policy SP4 (Urban Design & Local Character) will also help Croydon to retain/attract new job opportunities.

**5.27** It is anticipated that the level of reduction in retail vacancies will be achieved through the regeneration of Croydon as a Metropolitan Centre and through a mixture of new lettings and redevelopments of town centre sites. ~~Within Croydon Metropolitan Centre, the Opportunity Area Planning Framework will address this point and the uptake of approximately 15,500m<sup>2</sup> floor space alone could equate to the provision of approximately 800 additional jobs. For the District and Local Centres the proposed reduction in vacancy would equate to an uptake of approximately 16,000m<sup>2</sup> floor space and provision of approximately 850 additional jobs.~~

**5.28** **Based on labour growth forecasts** the demand for office space in the borough over the **plan period 2013 to 2031** is for between **29,440-33,000** m<sup>2</sup> and **91,840-44,000** m<sup>2</sup>. It is estimated that there is potential for 60,010m<sup>2</sup> of space. This space requirement is of a similar scale to that estimated for the 2010 Employment Land Review. **The lower end of the range reflects a change to more home working as a result of the COVID-19 pandemic, and it is this figure that is taken forward as the floor space target in the Local Plan. This takes into account the uncertainty in the office market at the time of preparing the Local Plan as a result of the COVID-19 pandemic.** The majority of this office space demand, (90%), is projected to be for Grade An accommodation in prime locations within the Croydon Metropolitan Centre in the vicinity of East Croydon station, within the New Town area (as defined in the Opportunity Area Planning Framework). Croydon being identified as a strategic outer London office location in the London Plan means this area is the borough's most attractive to commercial developers. Therefore, development in this area is encouraged to be office based (in full

or part) and it is required that office development is explored fully as part of any development proposal. Demand is highest in this area for Grade A Office floor space (as defined in the Glossary in Appendix 1). There remains demand for cheaper, lower quality accommodation for new businesses so, within the Office Retention Area loss of office floor space needs to be justified by the submission of a viability appraisal to show that there is no demand for office floor space, proportionate office floor space or refurbished offices. Office floor space provision within a scheme will also be considered against the complexion and merits of the other uses proposed. This growth and protection will increase the opportunities for employment in Croydon Metropolitan Centre, support its urban renewal and contribute to the Croydon Local Plan's spatial vision of being London's most enterprising borough. Higher education attainment has been shown to correspond to lower rates of unemployment and poverty. Positive outcomes in these areas are associated with increased resilience within the community through reduced societal deprivation. Opportunities to provide higher education uses such as universities and associated facilities to the borough are supported. Provision of higher education uses should encourage the full eco system of associated activities to the town centre.

## Development in Croydon Metropolitan Centre, District and Local Centres

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP3.6
- Policy SP3.7
- Policy SP3.8
- Policy SP3.9
- Policy SP3.10
- Policy SP3.11
- Policy SP3.12
- Policy SP3.13

#### Why we need this policy

**5.29** ~~Retailing~~ **Community** is at the heart of the borough's town centres. ~~These spaces serve as the primary location for retail, meeting the day-to-day needs of the community and can often be accessed through active travel.~~ However, they are also places where a wide range of other uses help to ensure vitality and viability is maintained. This policy sets out the approach to uses by location within a centre. For this purpose it sets the following designations:

- a) Boundaries of the Croydon Metropolitan Centre, District and Local Centres (the borough's town centres);
- b) Primary Shopping Areas; ~~and~~

- c) ~~Main Retail Frontages;~~ ~~and~~
- d) ~~Secondary Retail Frontages.~~

**5.30** These boundaries ~~were have been~~ reviewed during the preparation of ~~this the~~ 2018 Local Plan to ensure they ~~met meet~~ the needs of the borough. The review ~~was has been~~ supported by an Assessment of Boundaries and Designations for Croydon Metropolitan Centre, District and Local Centres including analysis of mixed use developments (2012 and 2015) and a Review of Town Centre Designations (2013).



**5.31** London Plan policy 2.15 SD6 identifies a range of measures boroughs should undertake in relation to town centres, including setting out policies for each type of area within centres.

~~competitive town centre environments and set out policies for the management and growth of centres over the plan period~~ support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaption.

**5.32** Paragraph 23-85 of the National Planning Policy Framework states 'Planning policies should be positive, promote

**Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres**

**DM4.1** ~~The Council will ensure that the~~ vitality and viability of Croydon Metropolitan Centre and the borough's District and Local Centres ~~is~~ will be maintained and increased by ~~not~~ permitting new developments or changes of use **at ground floor<sup>40</sup> in accordance with Table 5.3** ~~which would result in a net loss of ground floor<sup>41</sup>. Class A uses within Main Retail frontages (unless it relates to the expansion of an existing community use).~~

**DM4.2** ~~Within Croydon Metropolitan Centre and the borough's District and Local Centres development proposals and changes of use on the ground floor must accord with Table 5.3. Policy deleted~~

**DM4.3** ~~Outside of Main and Secondary Retail Frontages, but within centres, proposals for mixed use developments will be required to either:~~

- a) Demonstrate that a specific end user will be occupying the ground floor unit upon completion; or
- b) Provide a free fitting out of all ground floor units for the eventual end occupier to ensure that the unit is capable of occupation and operation by the end user and ensure that the ground floor units are capable of conversion to the same use as the remainder of the building if after two years, subsequent to completion, no end user has been found for the ground floor unit.

**Table 5.3 New development proposals and changes of use in Croydon Metropolitan Centre and District and Local Centres**

Part of the town centre	Use	Expansion of existing uses or newly proposed uses
Main Retail Frontage	A1	Acceptable in principle
	A2—A4	Acceptable in principle as long as it does not result in more than 60% of the ground floor of units falling outside the A1 Use Class <sup>42</sup>

<sup>42</sup> For the purposes of calculating the percentage of units within a given frontage, the Council will apply a rule of seven units either side of the subject property and an equal number of units on the opposite side of the road (if the frontage designation extends there also). Guidance is given in Appendix 2.

Part of the town centre	Use	Expansion of existing uses or newly proposed uses
	A5	Acceptable in principle as long as it does not result in more than 60% of the ground floor of units falling outside the A1 Use Class and does not result in two or more adjoining A5 units <sup>42</sup>
	All Other Uses	All changes of use to a non Class A ground floor space within Main Retail Frontages will be refused. Expansions of existing non Class A uses will be refused unless it relates to a Community Use
Main Secondary Retail Frontage	<del>A1—A4 Business, Commercial, business and service (Class E) and Community Uses</del>	Acceptable in principle <del>with a ground floor limit on Community Uses in these locations of 250m<sup>2</sup> (gross)</del>
	<del>Pubs and drinking establishments (sui generis)</del>	Acceptable in principle
	<del>A5 Hot Food Takeaways ( sui generis)</del>	Acceptable in principle as long as it does not result in two or more adjoining <del>A5 Hot Food Takeaway</del> units at ground floor
	<del>B4 Class C1 Hotels, boarding and guest houses</del>	Acceptable in principle as long as it results in an active frontage and does not undermine the retail function of the frontage
	All Other Uses	<del>Not acceptable. Unless it relates to a Community Use proposals involving an increase of existing non A Class ground floor space within Secondary Retail Frontage will be refused</del>
Outside a Frontage but within Primary Shopping Area	All Uses	Acceptable in principle subject to the requirements of Policy DM4.3
Rest of Centre	A1 <del>Class E</del>	See Policy DM8: Development in edge of centre and out of centre locations
	All Other Uses	Acceptable in principle subject to the requirements of Policies DM4.3 and SP3.2

**Designations shown on the Policies Map**

Each of the designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 5.4 below:

**Table 5.4 Designations set by Policy DM4 shown on the Policies Map**

Designation	Locations
Primary Shopping Area	Croydon Metropolitan Centre
	Addiscombe District Centre
	Coulsdon District Centre
	Crystal Palace District Centre
	New Addington District Centre
	Norbury District Centre
	Purley District Centre
	Selsdon District Centre
	South Norwood District Centre
	Thornton Heath District Centre
	Beulah Road Local Centre
	Brighton Road (Sanderstead Road) Local Centre
Brighton Road (Selsdon Road) Local Centre	
Broad Green Local Centre	

Designation	Locations
	Hamsey Green Local Centre  Pollards Hill Local Centre  Sanderstead Local Centre  Shirley Local Centre  Thornton Heath Pond Local Centre
Main Retail Frontage	See Appendix 3 for locations
Secondary Retail Frontage	See Appendix 3 for locations

**How the policy works**

**5.33** ~~In part, this policy sets thresholds for uses within the Main and Secondary Retail Frontages.~~ **To allow for flexibility in uses this policy allows for Class E uses in town centre frontages.** This policy limits the saturation of ~~A5 uses~~ **Hot Food Takeaways** as the associated waste and delivery issues can cause harm to residential amenity. The clustering of hot-food takeaways can have an adverse impact on the vitality and viability of town centres, therefore limiting hot-food takeaways will help to ensure residents have a greater choice of retail services.

**5.34** Studies have identified that one in three children is overweight or obese by the time they leave primary school and in 2014, an estimated 62% of the adult population were overweight

or obese<sup>43</sup>. Croydon was selected as a pilot for the Mayor of London's Food Flagship program and one of the aims of the program is to improve the quality of food available to schools and communities. Limiting the number of hot food takeaways in the borough's town centres will support the public health agenda of tackling obesity and associated health problems and will promote access to healthier food options.

**5.35** Proposals for ~~B1~~ **business uses and affordable workspaces** will be supported in ~~Secondary Retail~~ **Main** Frontages to create opportunities for office, research & redevelopment and light industrial workshops within town centres. However, these uses should not undermine the retail function of the frontages and ~~will be only permitted if they~~ **should** provide an active frontage **to enhance the vitality of the area.**

**5.36** ~~The reason why 250m<sup>2</sup> is the threshold for community uses within Secondary Retail Frontages in Croydon Metropolitan Centre and District and Local Centres, is that it would allow uses such as dentist surgeries and a High Street police office to operate but would deter larger scale activities from potentially undermining the A Use Class focus of these locations.~~  
Paragraph deleted

**5.37** Across the borough there are many examples of mixed use developments in town centres, but outside of Main and Secondary Retail Frontages, where the ground floor units have been left as an empty shell. The costs of fitting out these units to a standard that allows them to be used for their intended purpose can be prohibitive and the resultant boarded up units harm the vitality of the centre. To avoid this all mixed use developments within a town centre but outside of a designated frontage will be

required to have either an end user for the unit (evidenced by a pre-let agreement or by the applicant being the end user) at the time of granting permission or to provide a free fitting out of the unit for the first occupier.

**5.38** All speculative schemes in town centres but outside of Main ~~and Secondary~~ Retail Frontages will also be required to be designed in a way that would allow conversion of the ground floor unit to residential or the same use as the remainder of the building if not residential. In some cases, the Council may enter a legal agreement with the applicant to ensure that the ground floor unit is let and if not then converted to the same use as the remainder of the building.

**5.39** For the purposes of Part 3 Class M of the General Permitted Development Order (2015), which sets out the circumstances where planning permission is not required for changes of use from retail to residential use, Main Retail Frontages and Secondary Retail Frontages are considered to be key shopping areas. In these locations any change of use from a retail use to residential will require an application to be made for planning permission which will be considered against the requirements of this policy.

### Key supporting documents

- Croydon's Monitoring Report (annual)
- Borough Wide Retail Needs Study Update (2008)
- Croydon Metropolitan Centre Retail Strategy (2009)
- Office, Industrial & Warehousing Land/Premises Market Assessment (2010)
- Employment Land Review Update (**2020** ~~2013~~)

<sup>43</sup> Building the foundations: Tackling obesity through planning and development (Town and Country Planning Association, March 2016)

- Review of Town Centre Designations (2013)
- Assessment of boundaries and designations for Croydon Metropolitan Centre, District and Local Centres including analysis of mixed use developments (2012 and 2015)
- Appendix 3 – Designated shopping frontages

## Development in Neighbourhood Centres

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 6
- Strategic Objective 7
- Policy SP4.9
- Policy SP5.3
- Policy SP5.4
- Policy SP5.5
- Policy SP5.6
- Policy SP5.7

### Why we need this policy

**5.40** The Council seeks to provide a range of services and community facilities to contribute to its aim of creating healthy and liveable neighbourhoods ~~as set out in the Croydon Local Plan Strategic Policy SP5.3 and Strategic Objectives 5, 6 and 7.~~ This will help in promoting healthy communities in line with paragraphs 69 and 70 of the National Planning Policy Framework.

**5.41** In appropriate areas, the Council will seek to promote development of community facilities that will serve a neighbourhood demand for these uses.

**5.42** Community facilities are defined in the Croydon Local Plan as facilities providing for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

**5.43** Neighbourhood Centres are not intended to compete with designated District or Local Centres, and should serve a local need smaller in scale to that of a Local Centre. They should be able to meet the day-to-day needs of the local community and allow for modest growth in order to accommodate local needs.

**5.44** Typically more limited in retail offer to Local or District Centres, Neighbourhood Centres may contain a place of worship, playground, school, public house, GP and pharmacy.

**5.45** Neighbourhood Centres serve the whole community, but are particularly important to those who do not have access to a car, are unable to travel far or those with a disability.

**5.46** The London Plan states that boroughs should identify and promote the complementary offers of the other smaller centres in the network including neighbourhood centres and local shopping parades. These play a key role in meeting 'walk to', everyday needs and are often the core of local 'Lifetime' neighbourhoods.

**5.47** Neighbourhood Centres typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket, sub-post office, pharmacy, launderette and other useful local services. They can play a key role in addressing areas deficient in local retail and other services.

**5.48** The London Plan sets out its ambitions to plan for a range of social infrastructure required for London's communities and neighbourhoods to support a high and improving quality of life. It supports a city of diverse, strong, secure and accessible neighbourhoods and seeks to ensure that neighbourhoods provide convenient access, especially by foot, to local goods and services needed on a day to day basis. . Local neighbourhoods

should act as a focal point for local communities and enhance their overall attractiveness.

**5.49** Surplus commercial capacity should be identified and brought forward to meet housing and local community needs, recognising that this process should contribute to strengthening the 'offer' of the Centre as a whole.

~~**5.50** The London Plan advocates a light touch approach regarding neighbourhood centres in order to sustain and improve their convenience offer while supporting redevelopment of surplus units for housing.~~ Paragraph deleted

**5.51** The Urban Design Compendium notes that 'local facilities bring residents together, reinforce community and discourage car use'. Furthermore, it states that newsagents should be within a five minute walk, and local shops, health centres and other services which serve a local need, should be a ten minute walk. This approach is also considered appropriate in Shaping Neighbourhoods: A Guide for Health, Sustainability and Vitality.

Policy DM5: Development in Neighbourhood Centres

**DM5.1** The Council will ensure that the vitality and viability of Neighbourhood Centres are maintained and enhanced and that they continue to provide a level of service of neighbourhood significance.

**DM5.2** In the vicinity of Neighbourhood Centres, development proposals:

- a) For ~~A1–A5 uses, B1 uses~~ **Town centre Class E (Commercial, business and service) uses, Pubs and drinking establishments** and community facilities should be of a reasonable scale, proportionate to serve a neighbourhood need and have a clear relationship to other facilities within the centre. Guidance is given in Appendix 4;
- b) Must accord with Table 5.5; and
- c) Demonstrably relate to the Neighbourhood Centre, be in scale and be within reasonable walking distance to other retail and community uses within the centre.

Table 5.5 New development proposals and changes of use in the vicinity of Neighbourhood Centres

Part of Neighbourhood Centre	Use	Expansion of existing units or newly proposed units
Within a Shopping Parade	All	See Policy DM6: Development in Shopping Parades
Outside of a Shopping Parade	<del>A1–A5, B1</del> <b>Main Town centre Class E (Commercial, business and service) uses; Pubs and drinking establishments, Hot food takeaways</b> and town centre community uses	Acceptable in principle with a limit of floor space of 280m <sup>2</sup> (net), located within a five or ten minute walk from the centre, having a clear visual relationship to the centre and not disconnected from the centre by physical barriers. Guidance is given in Appendix 4.
	<b>Non-main town centre Class E uses (Commercial, business and service)</b>	<b>Acceptable in principle</b>
	All other community uses	Acceptable in principle
	C3	Acceptable in principle



Part of Neighbourhood Centre	Use	Expansion of existing units or newly proposed units
	All other uses (including A1 – A5, B1 and town centre uses with more than 280m <sup>2</sup> (net) floor space)	Not acceptable

### Designations shown on the Policies Map

Each of the designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 5.6 below:

**Table 5.6 Designations set by Policy DM5 shown on the Policies Map**

Designation	Location
Neighbourhood Centre	Ashburton Park
	Brighton Road/Downlands Road
	Brigstock Road
	Coulsdon Road/Court Avenue
	Fieldway
	Green Lane/Northwood Road
	Kenley (Godstone Road)
	London Road/Kidderminster Road
	Lower Addiscombe Road/Cherry Orchard Road

Designation	Location
	Portland Road/Watcombe Road/Woodside Avenue
	Selhurst Road
	Selsdon Park Road/Featherbed Lane
	Shirley Road
	South End/Parker Road/St Peter's Church
	South Norwood Hill
	Spring Park/Bridle Road
	Waddon Road/Abbey Road
	Waddon Way
	Woodside Green

### How the policy works

**5.52** This approach is the preferred approach as it assists in promoting the development of community facilities to serve

neighbourhood areas and complies with the National Planning Policy Framework and the London Plan.

**5.53** Neighbourhood Centres are not town centres (unlike District and Local Centres). Thresholds are applied to specific uses within Neighbourhood Centres to ensure that proposed developments only serve a neighbourhood need and should not be to the detriment of designated Local or District Centres whilst enabling development of town centre uses that serve the local community.† enabling development of town centre uses that serve the local community.

**5.54** This policy seeks to ensure that flexibility is granted to community facilities that wish to locate in Neighbourhood Centres in order to serve a local identified need.

**5.55** Where indicated as acceptable in principle, proposals will also have to comply with other policies in the plan such as those on neighbouring amenity or traffic safety.

**5.56** Neighbourhood Centres typically serve their immediate residential properties, and as such a five to ten minute walk is considered an appropriate distance.

**5.57** The Council will not permit the development or expansion of retail or commercial premises that would significantly increase the ‘offer’ of the Neighbourhood Centre to the detriment of a Local or District Centre. For this reason, development of retail and town centre community uses with a floor space above 280m<sup>2</sup> will still be subject to a sequential test in accordance with Policy DM8: Development in edge of centre and out of centre locations. **Town centre uses considered are as defined in the glossary of the National Planning Policy Framework (under Main town centre uses) and in Appendix 1 of this Plan**

**5.58** For the purposes of Part 3 Class M of the General Permitted Development Order (2015), which sets out the circumstances where planning permission is not required for changes of use from retail to residential use, designated Shopping Parades within Neighbourhood Centres are considered to be key shopping areas. In these locations any change of use from a retail use to residential will require an application to be made for planning permission which will be considered against the requirements of this policy which would not allow for the conversion.

**Key supporting documents**

- Croydon’s Monitoring Report (annual)
- Assessments of boundaries and designations for Croydon Metropolitan Centre, District and Local Centres (2012 and 2015)
- Borough Wide Retail Needs Study Update (2008)
- The Urban Design Compendium (2000)
- Barton, H., et al. (2003) Shaping Neighbourhoods: A Guide for Health, Sustainability and Vitality

## Development in Shopping Parades

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP3.6
- Policy SP3.7
- Policy SP3.8
- Policy SP3.9

- Policy SP3.10
- Policy SP3.11
- Policy SP3.12
- Policy SP3.13

### Why we need this policy

**5.59** The primary function of Shopping Parades is to provide local convenience shopping facilities. This policy sets out the policy approach to different uses within Shopping Parades and also designates each Shopping Parade in the borough.

**5.60** In relation to drawing up Local Plans, paragraph ~~23~~ 60 of the National Planning Policy Framework states that local planning authorities should 'set policies for the consideration of

proposals for main town centre uses which cannot be accommodated in or adjacent to town centres'.

**5.61** A review of all retail units outside any town centre or Shopping Parade based on the Croydon Monitoring Report 2014/15 has identified that there are a number of locations in the borough that could benefit from designation as a Shopping Parade.

Policy DM6: Development in Shopping Parades

The Council will ensure that the vitality and viability of the borough’s Shopping Parades is maintained and increased and that they continue to serve local communities by ensuring new development proposals and changes of use on the ground floor are in accordance with Table 5.7.

Table 5.7 New development proposals and changes of use in Shopping Parades

Use	Expansion of existing uses or newly proposed uses
A1-Town centre Class E (Commercial, business and service) uses and Pubs and drinking establishments	Changes of use or proposals which do not result in an increase in floor space of the overall Parade are acceptable in principle. Other development will be subject to the provisions of Policy DM8: Development in edge of centre and out of centre locations.
Non-town centre Class E (Commercial, business and service) uses A2—A4 and Community Uses	Acceptable in principle <del>as long as it does not result in more than 50% of the ground floor of units (within the entirety of the Parade) falling outside the A1 Use Class</del>
A5-Hot Food Takeaways	Acceptable in principle as long as it does not result in more than 50% of the ground floor of such units (within the entirety of the Parade) <del>falling outside the A1 Use Class</del> , and allows for a range of <b>Class E and F2 uses</b> <del>A2-A4 uses</del> as well as <b>A5-Hot Food Takeaways</b> , provides an active frontage, provides adequate arrangements for dealing with waste (including customers' waste) and for any delivery service intended and is accredited in accordance with the Council's Eat Well Croydon scheme
B1 (Change of use only)	<del>Changes of use to office, research &amp; development and light industrial workshops are acceptable in principle as long as it does not result in more than 50% of the ground floor of units (within the entirety of the Parade) falling outside the A1 Use Class, allows for a range of A2-A4 uses as well as B1 and provides an active frontage</del>
All Other Uses (including new development of B1)	Unless it relates to a Class F2 Community Use <del>or change of use to B1 a use</del> , proposals involving an increase of non-Class A <b>E</b> ground floor space within parades will be refused

Designations shown on the Policies Map

Each of the designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 5.8 below:

Table 5.8 Designations set by Policy DM6 shown on the Policies Map

Designation	Location
Shopping Parade	Bensham Lane
	Brighton Road/Biddulph Road
	Brighton Road/Kingsdown Avenue
	Brighton Road/Newark Road
	Brigstock Road
	Bywood Avenue
	Calley Down Crescent
	Chapel View
	Cherry Orchard Road
	Chipstead Valley Road
	Crossways Parade
	Crown Parade
	Elmfield Way
	Fiveways Corner
	Forestdale Centre
Godstone Road, Kenley	
Green Lane	

Designation	Location
	Grovelands
	Headley Drive
	Kenley Station
	Lacey Green
	London Road/Fairholme Road
	London Road/Mead Place
	London Road/Nova Road
	Lower Addiscombe Road
	Lower Addiscombe Road/Davidson Road
	Lower Addiscombe Road/Warren Road
	Lower Barn Road
	Mayday
	Milne Park East
	Mitcham Road/Aurelia Road
	Mitcham Road/Wentworth Road
	Monks Orchard
	Norbury Road
Portland Road	

Designation	Location
	Portland Road/Sandown Road
	Purley Oaks
	Purley Way
	St James's Road
	Sanderstead Station
	Selhurst Road
	Selsdon Road
	Shirley Poppy
	Shirley Road
	Shirley Road/Bingham Road
	Shrublands
	Southbridge Road
	South Norwood Hill
	Stoats Nest Road
	Taunton Lane
	The Parade, Coulsdon Road
	Thornton Road
	Waddon Road

Designation	Location
	Wayside, Fieldway
	West Croydon
	Whitehorse Lane
	Whitehorse Road
	Whitehorse Road/Pawsons Road
	Wickham Road
	Windmill Road/St Saviour's Road
	Windmill Road/Union Road
	Woodside Green

### How the policy works

**5.62** This policy seeks to ensure that at least 50% of the units within the Shopping Parade are within Class E (Commercial, business and service) A1-use (or a pub or drinking establishment). Under certain circumstances when one or more units within a Parade are much larger than the other units (for example, when there is an 'anchor' store) the 50% threshold may be applied to the gross floor space within the Parade rather than the number of units. Unless it relates to a Class F2 community use, proposals involving the net loss of ground floor A-Class E floor space within Shopping Parades will be refused. The Council's annual land use surveys suggest this threshold is generally effective in securing a predominance of A1 Class activity in Shopping Parades but does not render them prone to issues of long-term vacancy.

**5.63** The policy limits the opening of new ~~A5-Hot Food Takeaways~~ units or changes of use to ~~A5-Hot Food Takeaways~~ in shopping parades. This will help to ensure residents have a greater choice of local retail services and will limit associated waste and delivery issues that can cause harm to residential amenity. Controls on the opening of new hot food takeaways support access to healthier food options outside town centres as shopping parades are often located in residential areas in close proximity to open spaces and schools.

**5.64** Sui generis activities which serve the local area (such as a launderette) and community facilities are also acceptable uses within Shopping Parades. Shopping Parades can also provide space for small start-up companies who need office or workshop space so changes of use to ~~Class B1-Business~~ uses are also acceptable to facilitate this. However all other uses (including sui generis which serve a wider catchment) are not acceptable uses. ~~New development of Class B1 uses are also unacceptable as new development of this type could threaten the retail character of a Shopping Parade in a way that change of use would not.~~

**5.65** For the purposes of Part 3 Class M of the General Permitted Development Order (2015), which sets out the circumstances where planning permission is not required for changes of use from retail to residential use, Shopping Parades are considered to be key shopping areas. In these locations any change of use from a retail use to residential will require an application to be made for planning permission which will be considered against the requirements of this policy.

### Key supporting documents

- Croydon's Monitoring Report (annual)
- Assessments of boundaries and designations for Shopping Parades (2012 and 2015)

- Appendix 3 – Designated shopping frontages

## Development in Restaurant Quarter Parades

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP3.6
- Policy SP3.7
- Policy SP3.8
- Policy SP3.9
- Policy SP3.10
- Policy SP3.11
- Policy SP3.12
- Policy SP3.13

#### Why we need this policy

**5.66** The Restaurant Quarter in South End has grown over many years into a popular collection of largely independent bars and restaurants. The area is also home to Scream Studios, a recording studio and live music venue, which, along with other complementary activities, helps to diversify the cultural/leisure offer.

**5.67** This policy applies to the ground floor only and seeks to encourage more bar and restaurant activity. The policy differs from that which relates to Shopping Parades by not placing a limit on the number of A3 and A4 uses **Restaurants, Cafes and, Drinking Establishments** within the frontage. ~~It creates a new~~

~~designation, a~~ **The Restaurant Quarter Parade, to be is** shown on the Policies Map.

**5.68** ~~In relation to drawing up Local Plans, paragraph 23 of the National Planning Policy Framework states that local planning authorities should 'set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres'. **Paragraph deleted**~~

**5.69** A survey of South End indicated that the cluster of bars and restaurants is significant not only in terms of the cultural and



leisure offer, but also as a generator of direct and indirect employment.

**5.70** Policy 4.6e **HC5** of the London Plan encourages the designation and development of cultural quarters.

**Policy DM7: Development in Restaurant Quarter Parades**

The designated Restaurant Quarter Parades will ensure the vitality and viability is maintained and increased and that it continues to serve local communities by ensuring new development proposals and changes of use are in accordance with Table 5.9.

**Table 5.9 New development proposals and changes of use in Restaurant Quarter Parades**

Use	Expansion of existing uses or newly proposed uses
A3–A4-Restaurants & Cafes; and Pubs and drinking establishments	Acceptable in principle
Hot food takeaway-A5	Proposals for new <b>hot food takeaways A5</b> -uses or extensions to existing <b>hot food takeaways A5</b> -uses will be refused
All Other Uses	Unless it relates to a Community Use (up to 250m <sup>2</sup> gross), proposals involving an increase of <del>non-A3–A4 Glass-uses other than Restaurants, cafes, Pubs and drinking establishments on ground floors</del> <del>space</del> within Restaurant Quarter Parades will be refused

**Designations shown on the Policies Map**

Each of the designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 5.10 below:

**Table 5.10 Designations set by Policy DM7 shown on the Policies Map**

Designation	Location
Restaurant Quarter Parade	South End

**How the policy works**

**5.71** This policy seeks to promote bar and restaurant activity by limiting the amount of other uses that can occupy (or extend) the

ground floor of premises. A new Restaurant Quarter Parade has, therefore, been designated at 6 - 78 (even) and 1 - 77 (odd).

**5.72** The policy limits Class A5 activity (which could undermine the area’s function if restaurants and bars are replaced with hot-food takeaways). This will help to safeguard and promote the Restaurant Quarter.

**5.73** Allowing community uses to locate here but limiting their size will enable complementary activities to move into the area but not dominate it.

**Key supporting documents**

- Appendix 3 – Designated shopping frontages

## Development in edge of centre and out of centre locations

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP3.6
- Policy SP3.7
- Policy SP3.8
- Policy SP3.9
- Policy SP3.10
- Policy SP3.11
- Policy SP3.12
- Policy SP3.13

#### Why we need this policy

**5.74** In line with the 'Town Centres First' principle, commercial activity should be directed to town centres to take advantage of their better transport functions and so as not to undermine the established centres. However, there are circumstances when proposals for town centre uses in edge of centre and out of centre locations may be acceptable.

**5.75** In relation to drawing up Local Plans, paragraph 23 of the National Planning Policy Framework states that local planning authorities should 'set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres'.

**Policy DM8: Development in edge of centre and out of centre locations**

The Council will ensure the vitality and viability of the borough's town centres is maintained and increased by:

- a) Ensuring new development proposals for main town centre uses in edge of centre and out of centre locations are in accordance with Table 5.11 and Table 5.12; and
- b) Applying planning conditions to control the subdivision of units, extensions (including mezzanines), and the range and mix of convenience and comparison goods sold.

**Table 5.11 Development of main town centre uses in edge of centre and out of centre locations**

Use	Development in edge of centre locations	Development in out of centre locations
<p>A1—A4 Town centre Class E (Commercial, business, service) and Leisure</p>	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre.</p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m<sup>2</sup>.</p> <p>Drive through restaurants must make adequate arrangements for dealing with waste (including customer's waste) and for any delivery service intended.</p>	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or edge of centre location or existing vacant units in any location, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre.</p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m<sup>2</sup>.</p> <p>Drive through restaurants must make adequate arrangements for dealing with waste (including customer's waste) and for any delivery service intended.</p>

Use	Development in edge of centre locations	Development in out of centre locations
<p><b>A5-Hot Food Takeaways</b></p>	<p>Not acceptable in wards where the existing provision of hot food takeaways exceeds the national average. In other wards, where a sequential test satisfactorily demonstrates such uses cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre<sup>44</sup> and the use is accredited in accordance with the Council's Eat Well Croydon scheme. Hot food takeaways must make adequate arrangements for dealing with waste (including customers' waste) and for any delivery service intended.</p>	<p>Not acceptable in wards where the existing provision of hot food takeaways exceeds the national average. In other wards, where a sequential test satisfactorily demonstrates such uses cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre<sup>45</sup> and the use is accredited in accordance with the Council's Eat Well Croydon scheme. Hot food takeaways must make adequate arrangements for dealing with waste (including customers' waste) and for any delivery service intended.</p>
<p>Offices and Leisure</p>	<p><del>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre.</del></p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m<sup>2</sup>.</p>	<p><del>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or edge of centre location or existing vacant units in any location, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre.</del></p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m<sup>2</sup>.</p>
<p>Arts, culture and tourism</p>	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre.</p>	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated, on sites or in units that are both suitable and available, within a town centre or edge of centre location or existing vacant units in any location, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre.</p>

<sup>44</sup> Well connected" is defined as a location benefitting from a Public Transport Accessibility Level of 4 and above.

<sup>45</sup> Well connected" is defined as a location benefitting from a Public Transport Accessibility Level of 4 and above.

Use	Development in edge of centre locations	Development in out of centre locations
Non town centre community uses	Acceptable in principle	Acceptable in principle

## How the policy works

**5.76** This policy applies to all commercial uses equating to the National Planning Policy Framework's main town centre uses.

Together these are defined as the following:

- a) Retail development (including warehouse clubs and factory outlet centres);
- b) Leisure, entertainment facilities and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls);
- c) Offices; and
- d) Arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**Table 5.12 Definition of edge of centre and out of centre location (informed by Annex 2 of the National Planning Policy Framework)**

Use	Edge of centre when...	Out of centre when...
Retail development	Within 300m of the boundary of the centre's Primary Shopping Area and well connected	More than 300m from the boundary of the centre's Primary Shopping Area
Offices	Within 300m of the boundary of the centre or within 500m of East Croydon, West Croydon, Norbury, Thornton Heath, Norwood Junction, Purley or Coulsdon Town stations	More than 300m from the boundary of the centre and more than 500m from East Croydon, West Croydon, Norbury, Thornton Heath, Norwood Junction, Purley or Coulsdon Town stations
Other commercial use	Within 300m of the boundary of the centre	More than 300m from the boundary of the centre

**5.77** When undertaking a sequential test, applicants will be required to demonstrate there is no town centre or edge of centres sites or units that accommodate their proposal. For a site or unit to be able to accommodate a proposal it must be both suitable for the proposed development (noting that both

applicants and the Council should be flexible over issues such as format and scale) and likely to be available at the point in time that the proposal is expected to be delivered. For out of centre locations they will be required to assess whether there are any existing vacant out of centre units which can accommodate the proposal as it is sequentially preferable to occupy an existing unit in an out of centre location than develop a new unit.

**5.78** Extensions to existing, changes of use to or new A5 uses will not be permitted in edge of centre or out of centre locations unless the end user is accredited in accordance with the Council's Eat Well Croydon scheme, and the ward in which the proposal is located has a density of hot food takeaways which is at the national average or less. This will restrict the opening of unhealthy hot food takeaways in close proximity to schools and open spaces. In turn this will support the public health agenda of tackling obesity, particularly for children and young people, and promotes access to healthier food options.

**Figure 5.3 Density of takeaways in Croydon in 2016 – delete map**

**5.79** As set out in the National Planning Policy Framework, the purpose of an impact assessment is to understand the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal. It also assesses the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made.

**5.80** Where a proposed extension results in a unit greater than 2,500m<sup>2</sup> of floor space, an impact assessment will be required. Impact assessment will be required to assess the impact of the whole unit and not just the proposed extension.

**5.81** For major schemes where the full impact will not be realised in five years, the National Planning Policy Framework states impact should also be assessed up to ten years from the time the application is made. Impact assessments will be required to assess the impact of the whole unit if it results in a floor space greater than 2,500m<sup>2</sup>.

**5.82** The use of planning conditions on the subdivision, extensions and the range of goods and mix of convenience and comparison goods sold ensures that developments in edge of centre and out of centre locations do not have any significant adverse impact of the vitality and viability of the Metropolitan, District and Local Centres.

**5.83** New community facilities in edge of centre or out of centre locations are acceptable in principle. This does not apply to facilities considered to be an **assembly or leisure** D2 use. These main town centre uses will require a sequential test and an impact assessment.

### Key supporting documents

- Croydon's Monitoring Report (annual)
- Borough Wide Retail Needs Study Update (2008)
- Croydon Metropolitan Centre Retail Strategy (2009)

## Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 1
- Policy SP3.1
- Policy SP3.2

### Why we need this policy

~~5.84 Croydon continues to lose industrial/warehouse capacity at a rate which exceeds the forecast decline in demand. Croydon has extremely low industrial land vacancy rates and a high demand for industrial and warehousing spaces. A natural response to this situation is to could be to adopt a more restrictive approach to the loss of such premises than was previously the case. The London Plan and national planning policy guide the provision and maintenance of a sufficient supply of land and premises to meet current and future demand for industrial and related functions. This guidance supports the protection of industrial locations in Croydon given the high demand and lack of supply for industrial and warehousing land and floor space. However, such an approach would not be consistent with the London Plan or the National Planning Policy Framework.~~

~~5.85 Alternatively, the~~ The Council could seek to allocate more land for industrial/warehouse activities by extending one or more of the existing Strategic, Separated or Integrated Industrial Locations. However, the physical constraints associated with the

Locations (railway lines, quarry walls, Metropolitan Open Land and neighbouring residential uses) means this is not practical.

~~5.86 Based on this constraint the 2020 Employment Land Review recommends that the council increase protections on Strategic, Separated and Integrated Industrial Locations. The intensification of industrial sites through a holistic and strategic design approach is one way of making the borough's industrial land more efficient. The Office, Industrial & Warehousing Land/Premises Market Assessment recommends that the Council promote improved estate management at Purley Way North (Mill Lane area), Selsdon Road (north and central parts of estate) and Vulcan Way with the intention of encouraging redevelopment and intensification of land use, and improving environmental quality.~~

~~5.87 The Employment Land Review (2020) found that with an increase in e-commerce, demand for industrial and warehousing land in Croydon had increased since the 2013 Employment Land Review update. Along with growth in demand for B8 space, the~~

ELR pointed to a contraction in manufacturing employment indicating a reduction in demand floor space for heavy industrial uses (B2). The decreased demand for B2 space is balanced with an increase in demand for light industrial space, justifying the need to protect the borough's employment and industrial land. ~~The Employment Land Review Update (2013) found that forecasts for demand and supply of industrial/warehousing land in Croydon was broadly consistent with the Office, Industrial & Warehousing Land/Premises (2010) and the Land for Industry and Transport Supplementary Planning Guidance (2012).~~

**5.88** The Mayor of London's Supplementary Planning Guidance on Land for Industry and Transport sets out an annual indicative industrial land release benchmark for Croydon of 0.5 hectare with a total release benchmark for 2011 – 2031 of 9 hectares.

**Policy DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations**

**DM9.1** Within the Strategic, Separated and Integrated Industrial Locations identified in Table 5.2 of Policy SP3.2, the Council will encourage the redevelopment of low density industrial and warehousing premises with higher density industrial and warehousing premises **to enhance the function of the SIL.**

**DM9.2** Schemes that work to improve the function of the overall SIL while making more efficient use of land for business, heavy industry and warehousing uses or take opportunities to support the integration of research and development of processes and products, or uses related to education or training connected to industrial processes, without loss of industrial floor space will be supported. This approach must ensure no net of floor space for industrial or warehousing uses.

**DM9.3** In Strategic, Separated and Integrated Industrial Locations, and on Town Centre and Scattered Employment Sites development proposals and changes of use must accord with Table 5.13.

~~However, as Croydon lost 9 hectares of industrial land in a single five year period between 2006 and 2010, it is likely that expansion in Strategic and Separated Industrial Locations will be required to compensate for losses to the industrial stock elsewhere.~~ Croydon aims to become London's most enterprising borough by 2040. To achieve this support must be given to the full range of enterprise. Evidence from the 2020 Employment Land Review reflects increasing demand for small and medium sized businesses space as well as demand for affordable workspace in central locations. The need to protect existing affordable workspace in the borough has been seen through the uptake of the borough's centrally located Grade B office space by local businesses.



**Table 5.13 Development proposals and changes of use in Strategic, Separated and Integrated Industrial Locations, and on Town Centre and Scattered Employment Sites**

<b>Use</b>	<b>Tier 1: Strategic and Separated Industrial Locations</b>	<b>Tier 2: Integrated Industrial Locations</b>	<b>Tier 3: Town Centre Employment Sites</b>	<b>Tier 4: Scattered Industrial and Warehousing sites</b>
Research and Development, Light Industry, and Warehousing & storage	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> <li>New uses permitted</li> </ul>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> <li>New uses permitted</li> </ul>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> <li>New uses permitted</li> </ul>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> <li>New uses permitted</li> </ul>
General Industry, and Employment generating Sui-Generis uses <sup>46</sup>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> <li>New uses permitted</li> </ul>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> <li>New uses permitted</li> </ul>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> </ul>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> </ul>
Studio, managed workspace and small business space	<ul style="list-style-type: none"> <li>New uses permitted</li> </ul>	<ul style="list-style-type: none"> <li>New uses permitted</li> </ul>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> <li>New uses Permitted</li> </ul>	<ul style="list-style-type: none"> <li>Existing uses protected in this location</li> <li>New uses Permitted</li> </ul>

Use	Tier 1: Strategic and Separated Industrial Locations	Tier 2: Integrated Industrial Locations	Tier 3: Town Centre Employment Sites	Tier 4: Scattered Industrial and Warehousing sites
Residential	Not permitted	Not Permitted	<p>Limited Residential development will be permitted if:</p> <ul style="list-style-type: none"> <li>• There is no demand for the existing premises or for a scheme comprised solely of permitted industrial/warehousing uses;</li> <li>• There is no net loss of protected uses floor space unless the other uses are required to enable development of the site to be viable;</li> <li>• Residential does not harm the site and wider location's business function.</li> </ul>	<p>Residential development will be permitted if:</p> <ul style="list-style-type: none"> <li>• There is no demand for the existing premises or for a scheme comprised solely of permitted industrial/warehousing uses; or</li> <li>• It is provided as part of a mixed use scheme including permitted industrial/warehousing uses and the new industrial/warehousing space is designed to meet the needs of future occupiers.</li> </ul>
Gypsy and Traveller pitches	Only for Gypsies and Travellers with a qualified connection to Croydon	Not permitted	Not permitted	Not permitted

Use	Tier 1: Strategic and Separated Industrial Locations	Tier 2: Integrated Industrial Locations	Tier 3: Town Centre Employment Sites	Tier 4: Scattered Industrial and Warehousing sites
Food and drink	Only permitted as an ancillary function to industrial, if they do not harm the site and wider location's industrial function and are being provided to meet the need of people working in the Strategic or Separated Industrial Location	Not permitted	<p>Food and Drink development will be permitted if:</p> <ul style="list-style-type: none"> <li>• There is no demand for the existing premises or for a scheme comprised solely of permitted industrial/warehousing uses; and</li> <li>• There is no net loss of protected uses floor space unless the other uses are required to enable development of the site to be viable.</li> </ul>	Not permitted

Use	Tier 1: Strategic and Separated Industrial Locations	Tier 2: Integrated Industrial Locations	Tier 3: Town Centre Employment Sites	Tier 4: Scattered Industrial and Warehousing sites
Crèche or day nursery	<p>Only permitted as an ancillary function to industrial, if they do not harm the site and wider location's industrial function and are being provided to meet the need of people working in the Strategic or Separated Industrial Location</p>	<p>Permitted if they do not harm the site and wider location's industrial function</p>	<p>Crèches or day nurseries will be permitted if:</p> <ul style="list-style-type: none"> <li>• There is no demand for the existing premises or for a scheme comprised solely of permitted industrial/warehousing uses; and</li> <li>• There is no net loss of protected uses floor space unless the other uses are required to enable development of the site to be viable.</li> </ul>	<p>Crèches or day nurseries will be permitted if:</p> <ul style="list-style-type: none"> <li>• The site has a PTAL rating of 3 or above;</li> <li>• The existing use of the site is heavy industry or a Sui-Generis employment use; or</li> <li>• There is no demand for the existing premises or for a scheme comprised solely of permitted industrial/warehousing uses.</li> </ul>

Use	Tier 1: Strategic and Separated Industrial Locations	Tier 2: Integrated Industrial Locations	Tier 3: Town Centre Employment Sites	Tier 4: Scattered Industrial and Warehousing sites
Other community facilities	Not permitted	<p>Non-town centre community uses will be permitted if:</p> <ul style="list-style-type: none"> <li>• It is provided as part of a mixed use scheme including permitted industrial/warehousing/employment generating Sui-Generis<sup>47</sup> uses; <ul style="list-style-type: none"> <li>• The new industrial/warehousing space is designed to meet the needs of future occupiers; and</li> </ul> </li> <li>• They do not harm the site and wider location's industrial function.</li> </ul>	<p>Other community facilities will be permitted if:</p> <ul style="list-style-type: none"> <li>• There is no demand for the existing premises or for a scheme comprised solely of permitted industrial/warehousing uses; and</li> <li>• There is no net loss of protected uses floor space unless the other uses are required to enable development of the site to be viable.</li> </ul>	<p>Non-town centre community uses will be permitted if:</p> <ul style="list-style-type: none"> <li>• The site has a PTAL rating of 3 or above;</li> <li>• The existing use of the site is heavy industry or a Sui-Generis employment use; or</li> <li>• There is no demand for the existing premises or for a scheme comprised solely of permitted industrial/warehousing uses;</li> </ul>
Offices	Only ancillary offices associated with another use will be permitted	Only ancillary offices associated with another use will be permitted	Permitted	Only ancillary offices associated with another use will be permitted

Use	Tier 1: Strategic and Separated Industrial Locations	Tier 2: Integrated Industrial Locations	Tier 3: Town Centre Employment Sites	Tier 4: Scattered Industrial and Warehousing sites
Visitor accommodation	Not permitted	Not permitted	Visitor accommodation will be permitted if: <ul style="list-style-type: none"> <li>• There is no demand for the existing premises or for a scheme comprised solely of permitted industrial/warehousing uses; and</li> <li>• There is no net loss of protected uses floor space unless the other uses are required to enable development of the site to be viable.</li> </ul>	Not permitted
Other uses	Not permitted	Not permitted	Not permitted	Not permitted

### How the policy works

**5.89** The approach promoted by this policy is to encourage greater density of occupation within the current boundaries of the Strategic, Separated and Integrated Industrial Locations. There are isolated examples where higher densities have been achieved without compromising the operational ability of the premises and the Council is keen to see more of this type of development.

**5.90** The Council is aware that some community uses can struggle to find suitable premises. This has led, in the past, to situations where 'Tier 1' type premises have been lost to community uses to the detriment of the area's business function. Allowing the change of use or redevelopment of 'Tier 2 and 4' premises in the more accessible locations, to non-town centre community uses, not only helps safeguard 'Tier 1' for continued industrial uses, it also opens up a significant supply of premises for community uses/groups to consider. Restricting non-town

centre community uses to higher PTAL locations means that uses which attract large numbers of visitors will be able to make more use of public transport.

**5.91** Likewise Gypsies and Travellers also struggle to find suitable sites for new pitches. To enable provision of sites throughout the Plan period, particularly the last ten years of the Plan period, 'Tier 1' sites have been identified as suitable to use as Gypsy and Traveller pitches (for those families with a qualified connection to Croydon).

**5.92** Industrial and warehousing uses are important sectors for the employment of Croydon's residents. Planning conditions will be applied to schemes coming forward with research and development and light industry uses on 'Tier 1' and 'Tier 2' industrial sites preventing their conversion to non-industrial uses. This is necessary to ensure that the integrity of industrial land within the borough is not impacted by inappropriate uses that would undermine the areas overall function.

**5.93** As outlined in table 8.13 limited food and drink establishments as well as crèche and day nurseries are permitted within Tier 1 sites. The provision of a limited number of these uses can enhance the employment function of SIL, addressing the particular needs of those working within the SIL. The provision of ancillary child care facilities aims to reduce barriers to employment opportunities and increase the availability of opportunities to an increasingly diverse demographic. These uses should be ancillary to the areas industrial function, while designed as safe and nurturing spaces. Location, design access and orientation of these spaces within SIL should consider the function of the wider area, whilst also ensuring the safety and well-being of users.

**5.94** An acceptable way to demonstrate that there is no demand for a scheme comprised solely of research and development, industrial or warehousing uses in 'Tiers 3 and 4' locations would be the submission of evidence that a marketing exercise has been undertaken for a minimum of 18 months continuously. The Council will need to be satisfied that the site has been offered at a price commensurate with the value of the site for the permitted uses and that active promotion has been undertaken by agents marketing the site.

**5.95** The approach promoted by this policy is to retain a mix of employment units available across the borough while allowing for the redevelopment of older employment units. This policy recognises the value small and medium enterprise adds to the creative culture of Croydon. These small and medium employment spaces provide employment that is located within neighbourhoods and is easily accessible to residents. Having a variety of units is important for the retention of local business in the borough as it provides a range of spaces and opportunities for growing business to upsize their facilities.

**5.96** Businesses in Croydon are similar to that of London on average, 89% of which employ 10 or fewer people. These businesses typically demand a range of small scale premises or managed workspace for traditional small scale engineering activity, arts and other creative uses, the ELR suggest that the types of premises, many of which are located in the Purley Way are experiencing strong demand with low vacancy rates. Additionally, these premises often experience competition from larger schemes coming forward. With this in mind policy protects existing managed workspace in 'Tier 2 and 3' while encouraging this space coming forward across all employment land in order to maintain employment space for a variety of industries.

## **Key supporting documents**

- Office, Industrial & Warehousing Land/Premises Market Assessment (2010)
- Employment Land Review Update (2013)
- Land for Industry and Transport Supplementary Planning Guidance (2012)



## Protection and provision of affordable workspace

### Strategic Objectives and related Croydon Local Plan strategic policies

Strategic Objective 1  
Policy SP6.2B

#### Why we need this policy

**5.97** Croydon aims to become London’s most enterprising borough by 2040. To achieve this support must be given to the full range of enterprise. The borough’s business base includes a large number of small and medium sized businesses coming from the creative and manufacturing industries within the borough. Ensuring space and a range of scales and price points in the borough is essential to retaining workspace that is affordable, ensuring that local business can remain in the borough as they grow.

**5.98** The London Plan defines affordable workspace as workspace that is provided at rents maintained below the market rate for the space for a specific social, cultural, or economic development purpose. These types of workspaces, for example business incubators, accelerator spaces and creative production spaces, are an integral part of London’s ecosystem, including for creative and digital innovation.

**5.99** Evidence from the 2020 Employment Land Review reflects new demand for small and medium sized businesses and local business demand for affordable workspace in central locations. The uptake of the borough’s Grade B office space in central locations by local business illustrates the need to protect existing affordable workspace in the borough and provide additional

affordable workspace in these locations. The 2020 Employment Land Review findings also demonstrate that there is a need to provide “affordable workspace” to support the creative and cultural sectors in a variety of locations across the borough.

**5.100** Past trends show the redevelopment of the borough’s smaller employment units resulting in the loss of smaller units has left larger units that are often not affordable for local business. This policy aims to encourage the availability of workspace at a variety of sizes and affordability.

## Policy DM9A: Protection and provision of affordable workspace

DM9A.1 Proposals for the enhancement, and intensification of existing employment uses will be required to provide flexible and affordable space suitable for the creative and cultural sectors and/or small and medium enterprises, unless justified by the type and nature of the proposal and subject to viability

DM9A.2 Proposals resulting in the loss of existing affordable workspace will be resisted unless it can be demonstrated that the quantum of affordable workspace is replaced on-site or re-provided elsewhere in suitable locations in Croydon on equivalent terms.

DM9A.3 Provision of affordable workspace will encouraged in the following locations:

- a) Transformation Areas
- b) Croydon Opportunity Area
- c) All tiers of designated employment locations identified in Policy SP5

DM9A.4 Elsewhere proposals for affordable workspace may be appropriate in district, local and neighbourhood centres provided they do not undermine the primary retail and community functions of the centres.

## How the policy works

8.83D The approach promoted by this policy is to retain a mix of employment units available across the borough while allowing for the redevelopment of older employment units. This policy recognises the value small and medium enterprise adds to the creative culture of Croydon, while encouraging the preservation of existing employment space that is easily accessible to residents. Having a variety of units is important for the retention of local business in the borough as it provides a range of spaces and opportunities for growing business to upsize their facilities. All planning applications will be required to be supported by viability information to justify the amount of affordable workspace that is proposed. The viability information will be independently assessed and where this assessment determines that a greater level of affordable workspace could viably be supported, a higher level of affordable workspace will be required.

## Key supporting documents

Employment Land Review Update (2020)

## A Place to Belong

The content of this section is related to the vision theme of Croydon as 'A Place to Belong'. It looks at local character, community facilities and education and considers how the borough can become a place noted for its openness, safety and community spirit where all are welcome to live and work, in an attractive environment, where the past is valued and where the community is supported.

## 6. Urban Design, Heritage and Local Character

### Strategic policy

#### Where we are now

**6.1** The key issues to be addressed to ensure Croydon's spatial vision is realised are:

- Improving the image of Croydon is important in attracting new investment and encouraging people to want to live and work in the borough.
- Poor public realm, due to dominance of the car, vacant sites and empty shops and street furniture and adverts accumulating over the years make it unattractive and difficult to navigate and add to perceptions of poor safety.
- With growth, the public realm needs to be sustainable, adapting to climate change, robust and multifunctional, providing well designed, connected open spaces where people want to be, and assisting in the establishment of healthy, safe and cohesive communities.
- Croydon needs to ensure protection of its heritage assets and their settings **for the enjoyment of future generations and**, to retain local distinctiveness and character.
- New development will need to be designed to respect the local character and distinctiveness.

#### Where do we want to be

**Strategic Objective 4:** Reduce social, economic and environmental deprivation, particularly where it is spatially

concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

**Strategic Objective 5:** Ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.

**Strategic Objective 7** Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.

**Strategic Objective 9:** Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.

## How we are going to get there

### Policy SP4:Urban Design, Heritage and Local Character

**SP4.1** ~~The Council will require~~ Development **should be inclusive and** of a high quality ~~which respects~~ and **enhances** Croydon's varied local character, **heritage assets contributing** positively to public realm, landscape and townscape to create sustainable communities. ~~The Council will apply a presumption in favour of development provided it meets the requirements of Policy SP4 and other applicable policies of the development plan.~~

**SP4.2** ~~The Council will require~~ **Developments to will be required to:**

- g) Be informed by the distinctive qualities, **heritage, character,** identity, topography, **diversity, local needs** and opportunities of the relevant Places of Croydon;
- h) **Preserve and enhance Heritage Assets and their settings,** Protect Local Designated Views, Croydon Panoramas, the setting of Landmarks, other important vistas and skylines; ~~and~~
- i) Enhance social cohesion, **health** and well-being, **and**
- j) **Include well designed spaces for the proposed uses, ensuring any mixing of uses carefully integrates high quality amenity, access and servicing.**

**SP4.3** ~~Planning applications in areas identified in SP4.5 as suitable for tall buildings must be supported by an elevation plan of the roof.~~  
**Policy deleted**

#### Croydon Opportunity Area

**SP4.4** In the Croydon Opportunity Area the Council will support high quality, high density developments that are tailored to and help to protect or establish local identity.

#### Tall Buildings

**SP4.5** Proposals for tall buildings will be encouraged only in the Croydon Opportunity Area, areas in **District** Centres and locations where it is in an area around well-connected public transport interchanges and where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or **District** Centres. ~~Detailed criteria for the assessment of tall buildings, consideration of the~~

~~appropriateness of tall buildings on individual sites, and/or in District Centres, will be contained in the Croydon Local Plan's Detailed Policies and Proposals. Furthermore the Croydon Opportunity Area Planning Framework should be referred to when considering the location and design of tall buildings in the Croydon Opportunity Area.~~

**SP4.6** ~~Some locations within the areas listed in SP4.5 will be sensitive to, or inappropriate for tall buildings and applications for Tall, large, buildings~~ **and high density developments** will be required to:

- a) Respect and enhance local character, and heritage assets **and their settings**;
- b) ~~Minimise the environmental impacts, in particular but not limited to wind and microclimate and~~ **Create no net worsening to wind conditions**
- b) (1) Ensure optimum microclimate and wind conditions are created for a high quality public realm, and communal outdoor amenity spaces that are welcoming to occupy and** respond sensitively to topography;
- c) Make a positive contribution to the skyline and image of Croydon; and
- d) Include high quality public realm in their proposals to provide a setting appropriate to the scale and significance of the building and the context of the surrounding area.

#### Public Realm

**SP4.7** ~~The Council will work with partners (including private land owners) to improve the public realm within the borough.~~ **Policy deleted**

**SP4.8** The Council with its partners will improve Croydon's public realm to respect, enhance, create local character and distinctiveness, and integrate with the historic environment.

**SP4.9** The Council will establish a hierarchy of places and key strategic roads as part of a public realm framework which will guide the delivery of public realm improvements to assist regeneration focusing on Croydon's Metropolitan, **Town** District, and Local Centres, Conservation Areas, **Local Heritage Areas** and key strategic roads.

**SP4.10** ~~The Council will establish guidelines for materials and layout for the public realm as part of the borough's public realm framework~~ **deliver a Smart City vision and programme, with associated infrastructure integrated into public realm design.**

~~Character, Conservation and Heritage~~ **Conservation of Heritage Assets and the Historic Environment**

**SP4.11** ~~The Council and its partners will promote~~ The use of heritage assets and the **historic environment** ~~local character~~ will be promoted as a catalyst for regeneration and cohesion and to strengthen the sense of place.

**SP4.12** ~~The Council and its partners will respect, and optimise~~ **The Council will support** opportunities to enhance, Croydon's heritage assets, their setting and the historic landscape, through high quality new development and public realm that respects **and enhances** the **historic environment** ~~local character~~ and is well integrated.

**SP4.13** The Council and its partners will strengthen the protection of and promote improvements to the following heritage assets and their settings<sup>48</sup>:

- a) Statutory Listed Buildings;
- b) Conservation Areas;
- c) Registered Historic Parks and Gardens;
- d) Scheduled Monuments;
- e) Archaeological Priority Areas;
- f) Local Heritage Areas;
- g) Local List of Buildings of Historic or Architectural Importance;
- h) Local List of Historic Parks and Gardens;
- i) Croydon Panoramas;
- j) Local Designated Landmarks; and
- k) Local Designated Views.



**SP4.14** The Council will maintain a regularly updated schedule of Croydon’s designated heritage assets and locally listed heritage assets.

**SP4.15** The Council and its partners will promote improvements to the accessibility of heritage assets to allow enjoyment of the historic environment for all.

Intensification Areas

**SP4.16** In the locations identified as Areas of Focussed Intensification and Moderate Intensification, high quality developments that increase density and evolve character will be supported. They will be expected to enhance and sensitively respond to positive aspects of existing local character by being of high quality.

**Designations shown on the Policies Map**

Designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 6.1 below. Only those designations that exist because they are in the Croydon Local Plan are shown in the table. Other designations including Conservation

Areas and Statutory Listed Buildings have their own procedure for designation and can be adopted at any time:

**Table 6.1 Designations set by Policy SP4 shown on the Policies Map**

Name <b>Heritage Asset</b>	<del>New</del> <b>Name</b>
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Archaeological Priority Areas	Addington and Addington Park
	Addington Hills
	Ampere Way
	Ashburton Park

	Cane Hill
	Central Croydon
	Croham Hurst
	Croham Hurst Round Barrow

	<p>Croydon 19<sup>th</sup> Century Cemeteries</p> <p>Croydon Downs</p> <p>Deepfield Way</p> <p>Elmers End</p> <p>Farthing Down</p> <p>Haling Grove</p> <p>Hook Hill</p> <p>Lion Green Road</p> <p>London to Brighton Roman Road</p> <p>London to Lewes Roman Road</p> <p>Mere Bank</p> <p>Norwood Grove</p> <p>Old Coulsdon</p> <p>Pampisford Road</p> <p>Park Lane Anglo-Saxon Cemetery</p> <p>Pollards Hill</p> <p>RAF Kenley</p> <p>Riddlesdown Road</p>
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	<p>Russell Hill</p> <p>Sanderstead</p> <p>Waddon</p> <p>Watendone</p>
Local Heritage Areas	<p>Addiscombe College Estate</p> <p>Auckland Road</p> <p>Beatrice Avenue</p> <p>Bingham Road</p> <p>Birdhurst Road</p> <p>Bishops Walk</p> <p>Brighton Road (Purley)</p> <p>Campden Road and Spencer Road</p> <p>Chipstead Valley Road (St Dunstan's Cottages)</p> <p>Henderson Road</p> <p>Ingatestone Road</p> <p>Laud Street area</p> <p>London Road (Broad Green)</p>

	<p>London Road (Norbury)</p> <p>Pollards Hill South</p> <p>Portland Road (Market Parade)</p> <p>Portland Road Terraces</p> <p>St Peter's Road</p> <p>South End with Ye Market</p>
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	<p>Station Approach (Coulsdon)</p> <p>Stoats Nest Village</p> <p>Stuart Crescent</p> <p>The Dutch Village</p> <p>Thornton Heath High Street</p> <p>Upper Shirley Road</p>
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<p>Local List of Historic Parks and Gardens</p>	<p>Addiscombe Recreation Ground</p> <p>All Saints Churchyard, Sanderstead</p> <p>All Saints with St Margaret's, Upper Norwood</p> <p>Ashburton Park</p> <p>Beaulieu Heights</p> <p>Beulah Hill Pond</p> <p>Bradmore Green</p> <p>Chaldon Way Gardens</p> <p>Coombe Wood</p> <p>Coulsdon Manor (Coulsdon Court)</p>
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	<p>Coulsdon Memorial Ground</p> <p>Croham Hurst</p> <p>Croydon Airport, Purley Way West</p> <p>Duppas Hill</p> <p>Geoffrey Harris House</p> <p>Grangewood Park</p> <p>Haling Grove</p> <p>Hall Grange</p> <p>Heathfield</p> <p>Kenley Airfield</p> <p>Kings Wood</p>
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Lloyd Park
Millers Pond
Mitcham Road Cemetery
Norbury Hall
Park Hill Recreation Ground
Pollards Hill
Queen's Gardens
Queen's Road Cemetery
Royal Russell School
St John the Evangelist, Old Coulsdon
St John's Churchyard, Shirley
St John's Memorial Garden, Church Street
St Mary's Churchyard, Addington Village
St Peter's Churchyard, South Croydon
Sanderstead Pond (and Green)

Selsdon Park Hotel (and golf club)
South Norwood Lake & Gardens
South Norwood Recreation Ground
The Lawns
Thornton Heath Recreation Ground
Thomas Moore School- (frontage)
Upper Norwood Recreation Ground
Virgo Fidelis School inc St. Joseph's RC Infant and Junior Schools
Waddon Ponds
Wandle Park
Wettern Tree Garden
Whitehorse Road Recreation Ground
Whitgift Almhouses
Woodcote Village Green
Woodside Green

<p>Croydon Panoramas</p>	<p>(CP1) From Addington Hills of Croydon Metropolitan Centre (landmarks NTL Mast, Shirley Windmill, and No.1 Croydon)</p> <p>(CP2) From Biggin Beulah Hill of Croydon Metropolitan Centre (landmarks No.1 Croydon and Ikea Towers)</p> <p>(CP3) From Croham Hurst looking south west of Purley and the Downs</p> <p>(CP4) From Farthing Downs of Coulsdon (landmark No.1 Croydon) From Kenley Common of Riddlesdown (A good viewpoint to see a unique view of Riddlesdown, and the quarry on the hillside)</p> <p>(CP5) From land adjacent to Parkway and North Downs Crescent of Addington Palace and Shirley Hills (landmark Addington Palace)</p> <p>(CP6) From Norwood Grove of Croydon Metropolitan Centre (landmark No.1 Croydon)</p> <p>(CP7) From Pollards Hill of Croydon Metropolitan Centre (landmarks No.1 Croydon, George Street and Ikea Towers)</p> <p>(CP8) From Purley Way Playing Field of Croydon Metropolitan Centre (landmarks NTL mast, the Town Hall Clock Tower in</p>	<p>Katharine Street, No.1 Croydon and the Park Hill Water Tower)</p> <p>(CP9) From Riddlesdown of Kenley (A good viewpoint to see a unique view of Kenley)</p> <p>(CP10) From Ross Road of Ikea Towers (landmark Ikea Towers)</p>	<p>(1) Addington Palace</p> <p>(2) All Saints Church, Sanderstead</p> <p>(3) Cane Hill Water Tower</p> <p>(4) Clock Tower, High Street, Thornton Heath</p> <p>(5) Clock Tower, Station Road, South Norwood</p> <p>(6) Croydon Minster</p> <p>(7) Ikea Towers, part of former power station</p> <p>(8) No.1 Croydon, George Street</p> <p>(9) NTL Mast, South Norwood Hill</p> <p>(10) Park Hill Water Tower</p> <p>(11) Shirley Windmill</p>
<p>Local Designated Landmarks</p>			

	<p>(12) St. Andrew's Church, Woodmansterne Road, Coulsdon</p> <p>(13) St. Peter's Church, South Croydon</p>
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	<p>(14) The Town Hall Clock Tower, Croydon</p> <p>(15) Whitgift Almshouses, North End</p>
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Local Designated Views	<p>(LV1) From Addiscombe Road by Sandilands Tramstop of No.1 Croydon</p> <p>(LV2) From Church Street of Whitgift Almshouses and No.1 Croydon</p> <p>(LV3) From Crown Hill of Croydon Minster</p> <p>(LV4) From Farthing Downs of Cane Hill Water Tower</p> <p>(LV5) From George Street of No.1 Croydon, George Street</p> <p>(LV6) From Heathfield of Selsdon and New Addington (unique view of the collection of buildings of New Addington</p> <p>(LV7) From High Street north east, of the Clock Tower, South Norwood</p> <p>(LV8) From High Street of the Clock Tower, Thornton Heath</p> <p>(LV9) From High Street south west, of the Clock Tower, South Norwood</p>
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	<p>(LV10) From Limpsfield Road, near Wentworth Way of All Saints' Church</p> <p>(LV11) From North End of the Town Hall Clock Tower</p> <p>(LV12) From Oliver Grove of the Clock Tower, South Norwood</p> <p>(LV13) From Park Hill of Croydon Metropolitan Centre (unique collection of buildings, no landmarks)</p> <p>(LV14) From Roman Way north of Croydon Minster</p> <p>(LV15) From Roman Way south of Croydon Minster</p> <p>(LV16) From Selsdon Road of St Peter's Church</p> <p>(LV17) From South Norwood Hill of the Shirley Windmill</p> <p>(LV18) From Woodcote Grove Road of Cane Hill and St. Andrews Church (St</p>
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	Andrews in the foreground and land mark of Cane Hill Water Tower in the distance)
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## What it will look like

Figure 6.1 Policy SP4 (Public Realm) map **graphic updated**

Figure 6.2 Policy SP4 (Heritage) map **graphic updated**



## Why we have taken this approach

~~6.2 The National Planning Policy Framework sets out the requirements for the protection and enhancement of the borough's heritage assets. Croydon's built environment is characterised by rich, pioneering heritage and distinctive local characters that derive from its varied history, urban form, uses, architecture, topography, landscape and diverse communities. High quality new buildings, streets and open public spaces can respond to and enhance the positive elements of local character and heritage, whilst providing accessible, inclusive places that contribute to the identity of the borough and well-being of its diverse communities.~~

~~6.3 Croydon's vision is to be London's most enterprising borough, a city that fosters ideas, innovation and learning and provides skills, opportunity and a sense of belonging for all, and recognises the value of heritage assets and their contribution to local character.~~

### Urban Design

~~6.4 Croydon has been designated in the London Plan as an Opportunity Area, therefore it is critical that the borough addresses the implications of this growth through the Strategic Policies. Robust urban design policies are necessary for Croydon to encourage significant levels of growth in a sustainable way and ensure new development respects heritage assets and their settings, local character and the historic and natural landscape, including established suburban residential areas and open spaces.~~

~~6.5 National policy refers to the importance of good design and that DPDs should include policies that ensure development is sustainable, responds to local context and is visually attractive.~~

~~6.6 The Equalities Analysis advises that the Strategic Policies should ensure the well-being of new communities by promoting g~~ Good standards of design, and help to address the impacts of growth on ethnic minority communities by including policies that support diversity, equality, inclusivity and access for all. Design needs to consider inclusivity and accessibility from the beginning of the design process through to completion, occupation, management and maintenance.

### Croydon Opportunity Area

~~6.7 The Croydon Opportunity Area will be an area of significant growth and renewal. In this context, with available land and renewal opportunity, the substantial amount of new dwellings planned will require high density development and a number of tall buildings, all of high quality in order to deliver successful places.~~

### Areas of Intensification

~~6.7a In order to meet the development needs of the borough sustainable locations to support sustainable growth have been identified on the policies maps as Focussed areas of Intensification and Moderate intensification. Whist delivering tangible benefits including providing a richer mix of types and sizes of accommodation to suit different lifestyles, policies seek to ensure that development is of a good design, whilst reducing car dependency and promote local economic activity.~~

### Tall Buildings

~~6.8 To manage the more intense areas of growth, the Croydon Local Plan needs policies setting out an approach to tall buildings. This is supported by CABE and Historic England's Advice Note 4 which promotes a development plan led approach to tall buildings. In assessing the appropriateness of locations for tall buildings, Policy SP1.3 and the capacity of existing infrastructure, or the~~

capacity to grow with further sustainable infrastructure investment, should be considered. ~~The London Plan states that the development of tall and large buildings is one way of increasing an area's density and that Local Plans should identify where tall buildings should be located. For this reason Tall buildings are directed to the Croydon Opportunity area and Croydon Metropolitan Centre to reinforce the role of this area as the borough's main centre. To ensure the development of tall and large buildings creates positive change the design of tall, large and high density buildings should take into account the character of the area such as preserving and enhancing the heritage assets (and their surroundings) and complementing local architectural styles that positively contribute to character.~~

**6.9** ~~In the context of this policy a tall building is one that is significantly taller than most of the surrounding buildings or in excess of six storeys or 25m greater than 30m in height. The height at which buildings will be considered tall on individual sites, together with detailed criteria for assessing the design and impact of tall buildings and consideration of the appropriateness for tall buildings on individual sites or in District Centres will be set out in the Croydon Local Plan's Detailed Policies and Proposals. This will take account of the Croydon Opportunity Area Planning Framework and adopted Masterplans.~~

**6.10** ~~The London Plan states that tall and large buildings should be part of a strategic approach to changing or developing an area and should not have an unacceptably harmful impact on their surroundings. It also states that ideally tall buildings should form part of a cohesive group that enhances the skyline and improves legibility of the area.~~

**6.11** ~~The London Plan includes a policy on implementing the London View Management Framework (LVMF). Whilst the LVMF~~

~~does not include any protected views in or from Croydon, Local Designated Views and Croydon Panoramas are identified in the Appendix 5. The London Plan states that "Tall buildings should not impact on local or strategic views adversely", which justifies the requirement to sustain Local Views, Croydon Panoramas, the setting of Landmarks and other important vistas and skylines. All views are accessible and are indicated in Figure 6.2, on the Places maps and on the Policies Map.~~

**6.12** ~~The topography and landscape of Croydon is characterised by wooded hillsides with hillside ridges and valleys. The potential visual impact of tall and large buildings; therefore, requires careful consideration. to assess the impact of views to and from the wider area.~~

**6.13** ~~The Croydon Opportunity Area Planning Framework (COAPF) and the Croydon Local Plan's Detailed Policies and Proposals will provide detailed policies for tall buildings. The COAPF identifies areas that are appropriate for tall buildings in the Croydon Opportunity Area.~~

### Public Realm

**6.14** ~~In order to achieve Croydon's vision is to be a London's most enterprising borough that business wants to invest in. To achieve this vision and to respond to the increased demand on public realm from a growing population it is essential that Croydon's public realm reflects this aspiration and is The borough's public realm needs to be well-designed, safe, inclusive, and related to the local character and historic context. It also needs to be welcoming, simple, clean, accessible, sustainable, well managed and easy to understand, service and maintained. To encourage a new residential community and business to the Croydon~~

Opportunity Area and Town Centres, the quality and design of public realm needs to be improved.

~~6.15 The public realm policies are in conformity with local, regional and National Planning Policy.~~

~~6.16 The National Planning Policy Framework advocates attractive, inclusive and safe environments. Croydon's adopted Supplementary Planning Document No. 3: Designing for Community Safety also provides guidance which will help achieve Croydon's vision for creating safer places.~~

~~6.17 The public realm needs to be well maintained if it is to ensure civic pride, sense of belonging, encourage regeneration and reduce the perception of crime. The London Plan and SPD No. 3: Designing for Community Safety endorses this policy.~~

**6.18** Greater London Authority's mapping **and the Borough Natural Capital Accounting (NCA) Report** identified parts of the borough as being deficient in access to nature. **The NCA Report particularly notes a discrepancy between access to open space in the north of the borough, where there is more deficiency in access compared to the south. Public realm deficiency should be addressed as a first principle of design approach, by maximising the amount of amenity for future occupiers.** By ensuring easy access for all, this will encourage the increased use of facilities within open spaces and District and Local Centres helping to regenerate areas, encourage natural surveillance, making places feel safer and improving wellbeing.

**6.19** In order to ensure that the local distinctiveness is respected and enhanced, new public realm improvements will need to be in keeping with the identified character and in line with the Borough

Character Appraisal. **This will also help residents to continue to feel a connection to, and pride for their neighbourhoods.**

~~6.20 Many of Croydon's Places experience segregation caused by the transport network. This policy focuses on improving access to places most people visit or pass through.~~

~~6.21 The public realm framework includes areas where most of the community will interact. The District and Local Centres and the main connecting roads between the District Centres i.e. the routes that people travel which inform their perception of a place.~~

~~6.22 Creating a public realm framework enables resources to be allocated in order of priority, while the use of guidance allows resources to be creatively and efficiently matched in a sustainable manner to each place. This policy will ensure resources are focussed to achieve smart growth through continued regeneration and inward investment.~~

Character, Conservation and Heritage **Conservation of Heritage Assets and their Settings and Townscape**

~~6.23 The protection and enhancement of Croydon's heritage assets in line with National Planning Policy Framework is essential to achieve the 'We are Croydon' long-term vision. Conservation of the historic environment contributes to making Croydon sustainable by ensuring that new development enhances and integrates with the local distinctiveness and character of the Places of Croydon.~~

~~6.24 In the context of the protection and enhancement of Croydon's heritage assets the Council has de-designated Local Areas of Special Character and has designated Local Heritage Areas (LHAs). LHAs are distinctive locally significant heritage~~

assets that have been designated as a result of their heritage and architectural or townscape or landscape value. LHAs are characterised by their locally recognised distinctive and particularly high quality examples of more familiar types of local historic development. These form a more robust basis for the protection and enhancement of the borough's character and heritage. All LHAs are accessible and are indicated in Figure 6.2 and the *Policies Map*. Whilst the London View Management Framework does not include any views in or from Croydon, Croydon's topography and layout gives rise to a number of important local and strategic views. These views, and key landmarks within them, contribute directly to the identity and character of the borough. They also perform key orientation and wayfinding roles. The 'mini Manhattan' skyline of Croydon Metropolitan Centre is a particularly distinctive element of the borough's townscape. Key vistas where this skyline can be appreciated are designated as Panoramas. Buildings that particularly contribute to the identity of and navigation around the borough - such as the NLA Tower at East Croydon Station and the clock towers at the Town Hall, Thornton Heath and South Norwood - are identified as local landmarks, with key views toward them are also designated.

**6.25** Alongside Historic England, the Council has undertaken a review of the borough's Archaeological Priority Areas (APA's) to align with Historic England's (London) methodology and categorisation, which determines the likelihood of the presence of articles of archaeological importance. The APA's are identified on the *Policies Map*. Heritage assets including designated heritage assets (listed buildings, conservation areas, registered historic parks and gardens and scheduled monuments) and non-designated heritage assets (including locally listed buildings, local heritage areas, locally listed historic parks and gardens and non-designated archaeology identified through archaeological priority

areas) have been identified as being of heritage significance and worthy of conservation and enhancement for the enjoyment of this and future generations. Each type of heritage asset is subject to specific selection criteria and a robust assessment process. Further non-designated heritage assets may be discovered through the planning process. Croydon's heritage assets and their settings contribute to local character and a sense of place and identity, whilst being significant contributors to the local economy, communities and environment. They are a finite resource that cannot be replaced once lost. A sensitive approach is required to ensure their sustainable future whilst recognising the particular challenges climate change, inclusivity and accessibility can present.

<sup>6.26</sup> The detailed policies of the Croydon Local Plan address issues in relation to the detailed application of the Strategic Policy on heritage assets in the borough.

**6.27** In order to maintain Croydon's heritage assets, the borough needs to maintain lists of these to ensure regular monitoring to identify where further protection is required in line with the National Planning Policy Framework and the London Plan.

**6.28** Encouraging virtual and physical access to heritage assets, and the associated interpretation required to support this, and assisting in the understanding of Croydon's heritage will help to develop a greater understanding and sense of belonging.

## Design, and character and growth

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7
- Strategic Objective 8
- Strategic Objective 10
- Policy SP2.1

- Policy SP2.2
- Policy SP4
- Policy SP5.2
- Policy SP7.3
- Policy SP7.4

### Why we need this policy

**6.29** The Council recognises that the built environment and landscape play a vital role in creating and reinforcing positive perceptions, and engendering a sense of place. Croydon Local Plan Strategic Policy SP4, 'Urban Design, Heritage and Local Character' supports the creation of places that are well designed, safe, accessible, inclusive and enrich the quality of life for all those who live in, work in and visit the borough. To achieve this, the Council will encourage and continue to work with developers to ensure that all developments are of high quality. Croydon has strategic objectives to ensure that high quality new development both integrates respects and enhances the borough's natural environment and historic environment, to create spaces and buildings that foster safe, healthy communities. The borough has the largest population of any London borough. Provision of outdoor amenity space is important for health and wellbeing, particularly as the north of the borough is urban in character and has less open space compared to south, where most of the borough's Metropolitan Green Belt can be found. Private and

communal outdoor amenity space can assist in mitigation of climate change with vegetation that contributes to biodiversity and space that is multi-functional; for socialising, play, and sport, food growing and gardening. The provision of space that is easily accessible and designed in the context of local character will assist in providing a sense of ownership to the local community and will contribute to the health, well-being and perception of the security of Croydon's community.

**6.30** A fundamental part of achieving high quality built environments is through understanding the local character and the qualities which contribute to local distinctiveness.

**6.31** In specific areas where it is unclear which predominant character should be referenced, additional place specific development management policies have been included. These can be found in (The Places of Croydon) of this Plan.

**6.32** In other areas where no Place-specific development management policy applies, the character can be managed through other policies on urban design and local character within this Plan along with the masterplans, Conservation Area Appraisal and Management Plans, Local Heritage Areas and the Croydon Opportunity Area Planning Framework.

~~**6.33** The Place-specific policies in Section 11 (The Places of Croydon) also include all the Detailed Proposal sites in each Place. Full details of each Detailed Proposal including the reasons why particular uses are proposed can be found in Appendix 7. Paragraph deleted~~

~~**6.34** The National Planning Policy Framework paragraph 58 directs local authorities to develop a set of robust and comprehensive policies which are based upon objectives for the future of the area and an understanding and evaluation of its defining characteristics. Paragraph deleted~~

~~**6.35** Paragraph 56 of the National Planning Policy Framework states that 'Good design is indivisible from good planning'. It advocates good design to ensure attractive, usable, durable, adaptable and sustainable development.~~

~~**6.36** The Croydon Local Plan Strategic Policy SP4.1 and London Plan Policy 7.6 sets out the need to ensure that developments are of a high quality.~~

**6.37** The Croydon Local Plan provides policy on urban design, local character and public realm. However, in line with the National Planning Policy Framework, there is a need to provide detailed guidance on scale, density massing, height, landscape, layout, materials and access. This will provide greater clarity for applicants.

~~**6.38** Paragraph 57 of the National Planning Policy Framework advises planning authorities to 'plan positively for the achievement of high quality and inclusive design for all developments, including individual buildings, public and private spaces and wider area development schemes. Good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted.'~~

~~**6.39** Additionally a review of the borough's existing Unitary Development Plan, carried out by the Council's Development Management and Spatial Planning services, identified a need for policies relating to layout, form and design. Paragraph deleted~~

**6.40** The existing policy review identified a need for a roofscape policy that acknowledges the visual contribution roof-forms make and the need to provide guidance on the way in which the transition between new and old developments are addressed. Guidance for roof-form (roofscape) has not been included within the National Planning Policy Framework or the Strategic Policy.

~~**6.41** The National Planning Policy Framework in paragraph 50 encourages local authorities to plan for the delivery for a wide choice of high quality homes and sustainable communities. It advises that in doing so, development plans should be based on evidence of local needs and demands. The notions of balance and risk are also recognised in the National Planning Policy Framework, which states that the cumulative impact of standards and policies should not put the implementation of the plan at serious risk (paragraph 174). Paragraph deleted~~

**6.42** The need to deliver 32,890 a significant number of homes does not outweigh the need to respect the local character, and amenity and to protect biodiversity.

**6.43** The Mayor of London's Housing Supplementary Planning Guidance (2016) states that, alongside new build provision and turnover within the existing housing stock, extensions to existing homes and sensitive renewal and intensification of existing residential areas is likely to play an important role in meeting demand for larger properties in the capital, helping to address overcrowding and affordability issues.

~~**6.44** The Mayor of London's Housing Supplementary Planning Guidance March 2016 provides guidance on private garden land development (paragraph 1.2.44) and the implementation of London Plan Policy 3.5 Quality and Design of Housing Developments. It advises Borough's and developers of the strategic and local aspects and objectives when considering development of gardens and to strike a balance between these and other objectives when seeking to optimise housing provision on a particular site.~~

**6.45** This policy seeks to resist inappropriate development in residential gardens where it would cause harm to the local area in accordance with paragraph 53 of the Framework. The policy aligns with the Local Plan's Strategic Objective 5 ensuring new development integrates, respects and enhances the borough's natural environment and built heritage.

~~**6.46** The London Plan, Policy 3.5, states that borough's may introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified. In addition to this, the London Plan also states that new development, including that on garden land should avoid having an adverse impact on sites of European importance for nature conservation.~~

**6.47** Poorly planned piecemeal development of garden land can have significant negative impacts on local biodiversity, amenity, and character. It can also result in noise and visual intrusion into

neighbouring property, interrupt predominant building lines along streets and weaken the predominant built form and architecture. In landscape terms it can also result in weakened landscape character with loss of trees, including street trees, to make way for new access roads.

**6.48** The Borough Character Appraisal and the Character Typology identify the predominant type of building form and range of plot sizes for different residential forms. The Typology shows that nine per cent of the borough area is made up of buildings and thirty five percent occupied by residential garden space. Overall, sixty percent of the borough is made up of residential garden space, recreational space and woodland.

~~**6.49** The London Plan's Policy 3.2D introduces an additional requirement for nNew development to be mindful of health issues. New development should be designed, contracted and managed in ways that improve health and heathy lifestyles to help to reduce health inequalities. The provision of communal outdoor amenity will provide opportunities for outdoor activities and social interaction.~~

~~**6.50** The London Plan (in Policy 3.5B) also requires that 'all new housing dDevelopments should enhance the quality of local places, taking into account physical context, local character, density; tenure and land use mix; and relationships with, and provision of public, communal and open spaces, taking account of the needs of children and old people'. This supports the need to increase the communal amenity space standards from those identified in the Mayor of London's Housing Supplementary Planning Guidance for sites in the borough to reflect local character or where there is a deficiency in open space.~~ Moved to paragraph xx

~~**6.51** The Mayor of London's Housing Supplementary Planning Guidance expands on the London Plan's Policy 3.5 and Chapter~~

7 policies on design and acknowledges the need for site layout and design to consider the provision of useable amenity space alongside the siting of the building. This is incorporated in the preferred option. **Moved to paragraph xx**

**6.52** The Mayor of London's Housing Supplementary Planning Guidance in Annex 1 'Summary of the Quality and Design Standards for private outdoor space' has a minimum standard of 5m<sup>2</sup> of private outdoor space for 1-2 person dwellings and an extra 1m<sup>2</sup> to be provided for each additional occupant. **Moved to paragraph xx**

**6.53** Paragraph 4.10.2 of Annex 1 of the Mayor of London's Housing Supplementary Planning Guidance applies to all the borough and states that private outdoor spaces should have level access, and in 4.10.3 that the minimum depth and width of all balconies and other private external spaces is 1.5m. **Moved to paragraph xx**

**6.54** The minimum standard of 10m<sup>2</sup> per child of children's play space, where there are 10 or more children living in the development is from the Mayor's Housing Supplementary Planning Guidance (2.16) and, although it applies to publicly funded housing development and that on GLA land, it is considered best practice. The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation also recommends a minimum benchmark of 10m<sup>2</sup> of dedicated play space per child. **Moved to paragraph xx**

**6.55** The Mayor's Housing Supplementary Planning Guidance refers to the Baseline Standard 1.2.3 for communal open space which states that development proposals should demonstrate that the communal open space is overlooked by surrounding development, is accessible to wheelchair users and other disabled people, is designed to take advantage of direct sunlight, and has suitable management arrangements in place. It also

refers to the Baseline Standard 2.2.8 which explains that this will ensure the outdoor space remains useful and welcoming to all its intended users. With the exception of management arrangements which are a matter for residents and the body managing the building, this is incorporated in the preferred option. **Moved to paragraph xx**

**6.56** The London Housing Design Guide in 5.1.1 Standards identified that 'in the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes.' It says that 'these are still useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density'. **Paragraph deleted.**

**6.56a** The character and growth policies respond to the London Plan which says that gentle densification should be actively encouraged by boroughs in low and mid-density locations to achieve a change in densities in the most appropriate way. This should have regard to the target set for development on small sites by Policy H2 of the London Plan. To achieve the housing needs for the Borough, areas where sustainable development can be focused for growth according to a series of sustainable indicators and characteristics of an area have been identified.

**6.56b** The London Plan also says that where there are existing clusters of high density buildings, expansion of the clusters should be positively considered by boroughs. The character and growth policies also incorporate this steer from the London Plan by identifying clusters and where high density development can take place.



## Policy DM10: Design and character

**DM10.1** The following policies 0 to DM10.10 apply in circumstances other than those where intensification policies (DM10.11) and place-specific policies (DM34 to DM49 and Table 11.1) specify otherwise and will be interpreted with reference to the description of each of the Places of Croydon set out in the introduction to each policy DM34 to DM49 and in the Council's Borough Character Appraisal and by reference to Table 6.5.

Proposals ~~Development~~ should be of high quality and, whilst seeking to achieve a minimum height of 3 storeys, should respect **reflecting and maintaining the local character of the area including any heritage assets having regard to:**

- a) The **area's** development pattern, layout and siting;
- b) ~~The scale, height, massing, and density;~~ **line deleted**
- c) The **area's** appearance, existing materials and **roofscales, scale, height, massing and density of existing built form** ~~built and natural features of the surrounding area; the Place of Croydon in which it is located.~~ **And**
- d) **The heritage assets and natural features of the surrounding area and the Place of Croydon in which it is located.**

Where an extension or alteration is proposed, adherence to Supplementary Planning Document 2 Residential Extensions and Alterations or equivalent will be encouraged to aid compliance with the policies contained in the Local Plan.

Where a conversion or house in multiple occupation is proposed the Council will also consider the effects of noise, refuse collection and additional car parking on the character of an area. For this reason, the Council will seek proposals to incorporate parking within the rear, to the side or underneath building.

In the case of development in the grounds of an existing building which is retained, development shall be subservient to that building.

~~The council will take into account cumulative impact.~~

~~**DM10.2** Proposals should create clear, well defined and designed public and private spaces. The Council will only consider parking within the forecourt of buildings in locations where the forecourt parking would not cause undue harm to the character or setting of the building and where forecourts are large enough to accommodate parking and sufficient screening without the vehicle encroaching on the public highway. The Council will support proposals that incorporate cycle parking within the building envelope, in a safe, secure, convenient~~

and well-lit location. Failing that, the council will require cycle parking to be located within safe, secure, well lit and conveniently located weather-proof shelters unobtrusively located within the setting of the building. **Policy deleted**

**DM10.3** — The Council will seek to support proposals that restore and incorporate historic street furniture within the development. **Policy deleted**

**DM10.4** — All proposals for new residential development will need to provide private amenity space that:

- a) Is of high quality design, and enhances and respects the local character;
- b) Provides functional space (the minimum width and depth of balconies should be 1.5m);
- c) Provides a minimum amount of private amenity space of 5m<sup>2</sup> per 1-2 person unit and an extra 1m<sup>2</sup> per extra occupant thereafter;
- d) All flatted development and developments of 10 or more houses must provide a minimum of 10m<sup>2</sup> per child of new play space, calculated using the Mayor of London's population yield calculator and as a set out in Table 6.2 below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded; and
- e) In the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m<sup>2</sup> (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.

Adherence with Supplementary Planning document 3 Designing for Community Safety or equivalent will be encouraged to aid compliance with the policies contained with the Local Plan. **Policy deleted**

**DM10.5** — In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive. **Policy deleted**

**DM10.6** — The Council will support proposals for development that ensure that;

- a) The amenity of the occupiers of adjoining buildings are protected; and that
- b) They do not result in direct overlooking at close range or habitable rooms in main rear or private elevations; and that

~~e) They do not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling; and that~~

~~d) Provide adequate sunlight and daylight to potential future occupants; and that~~

~~e) They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers. Policy deleted~~

~~**DM10.7** — To create a high quality built environment, proposals should demonstrate that:~~

~~a) The architectural detailing will result in a high quality building and when working with existing buildings, original architectural features such as mouldings, architraves, chimneys or porches that contribute to the architectural character of a building should, where possible, be retained;~~

~~b) High quality, durable and sustainable materials that respond to the local character in terms of quality, durability, attractiveness, sustainability, texture and colour are incorporated; and~~

~~c) Services, utilities and rainwater goods will be discreetly incorporated within the building envelope<sup>49</sup>; and~~

~~d) To ensure the design of roof form positively contributes to the character of the local and wider area; proposals should ensure the design is sympathetic with its local context. Policy deleted~~

### Landscape

~~**DM10.8** To ensure a cohesive approach is taken to the design and management of landscape within the borough the Council will require proposals to:~~

~~a) Incorporate hard and soft landscaping; Provide landscaping as part of the overall design that enables the development to respect the character of the existing area and contributes to the integration of the buildings with the surrounding area;~~

~~b) Provide spaces **wildlife-friendly landscapes** which are visually attractive, easily accessible and safe **and inclusive** for all users, and provide a stimulating environment;~~

~~c) Seek to retain existing landscape features that contribute to the setting and local character of an area;~~

<sup>49</sup> The building envelope (also known as the building shell) refers to the outer structure of a building.

- d) Retain existing trees and vegetation including natural habitats<sup>50</sup>;
- e) In exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form; and
- f) Adherence with Supplementary Planning Guidance 12 Landscape and the Croydon’s Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan.

**DM10.9** To ensure a creative, sensitive and sustainable approach is taken to incorporating architectural lighting on the exterior of buildings and public spaces the Council will require proposals to:

- a) Respect enhance and strengthen local character;
- b) Seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; or seek to encourage the use of public spaces and make them feel safer by incorporating lighting within public spaces; and
- c) Ensure lighting schemes do not cause glare and light pollution.
- d) Adherence with Croydon’s Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan.

~~**DM10.10** — When considering the layout of new development, the council will support proposals that minimise the amount of blank and inactive frontages, increase the amount of natural surveillance and avoid dark and secluded areas.~~ **Policy deleted**

~~**DM10.11** — In the locations described in Table 6.3 and shown on the Policies Map as areas of focussed intensification, new development may be significantly larger than existing and should:~~

- ~~a) Be up to double the predominant height of buildings in the area;~~
- ~~b) Take the form of character types “Medium-rise block with associated grounds”, “Large buildings with spacing”, or “Large buildings with Continuous frontage line”;~~
- ~~c) Assume a suburban character with spaces between buildings.~~

<sup>50</sup> Natural Habitats are defined as the natural home or environment of an animal, plant or other living organism.

~~Developments in focused intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed. Policy deleted~~

### Character and growth – Urban Intensification

**DM10.11a** To deliver the homes that Croydon needs in suitable and sustainable locations that will accommodate higher levels of growth. In the areas of focused intensification, development should sustainably optimise site capacity. They may be significantly larger than existing and should:

- a) Achieve a step change of density, scale and height within the area of focussed intensification which enhances and evolves local characters, except for locations in the Places of Purley, Broad Green and Selhurst where place specific policy takes precedence;
- b) Have active well detailed frontages;
- c) Address the higher density of the development by providing amenity and communal facilities for intensified use including utilities infrastructure, play space, parking, cycle storage and refuse storage within the capacity of the site;
- d) Demonstrate innovative and sustainable design implementing mitigation measures to counter any identified flood risk; and
- e) Enhance landscape character, biodiversity and create opportunities for ecological, walking and cycling corridors.

**DM10.11b** Developments in areas of focused intensification should contribute to an increase in density and a change in character. They will be expected to enhance and sensitively respond to positive aspects of existing local character by being of high quality and respectful of the existing place in which they would be placed.

**DM10.11c** Developments within the areas of moderate intensification should be larger than the existing by delivering at least an additional storey. The increasing density should:

- a) Respect and enhance the character of the area and
- a) Provide amenity and communal facilities for intensified use including utilities infrastructure, play space, landscaping, parking, cycle storage and, refuse storage within the capacity of the site.

**DM10.11d** In other areas of the borough (excluding Conservation Areas and Local Heritage Areas) to support evolution without significant change, the developments should complement the predominant height, scale and density of buildings in the area.

**Table 6.2: Private amenity and play space standards in all flatted developments and all schemes of ten or more units**

<b>Unit size</b>	<b>Minimum private amenity space</b>	<b>Minimum play space (for affordable or social rented housing)</b>	<b>Minimum play space (for private market or intermediate shared ownership housing)</b>
1 bedroom house or flat	5m <sup>2</sup>	0.8m <sup>2</sup> per unit (based on 0.08 children per unit)	0.3m <sup>2</sup> per unit (based on 0.03 children per unit)
2 bedroom houses or flats	6m <sup>2</sup> or 7m <sup>2</sup> (depending on size of second bedroom)	8.1m <sup>2</sup> per unit (based on 0.81 children per unit)	1.2m <sup>2</sup> per unit (based on 0.12 children per unit)
3 bed houses or flats	Between 7m <sup>2</sup> and 9m <sup>2</sup> (depending on sizes of second and third bedrooms)	18.5m <sup>2</sup> per unit (based on 1.85 children per unit)	4.6m <sup>2</sup> per unit (based on 0.46 children per unit)
4 bed houses or flats	Between 8m <sup>2</sup> and 11m <sup>2</sup> (depending on sizes of second, third and fourth bedrooms)	19.0m <sup>2</sup> per unit (based on 1.9 children per unit)	10.4m <sup>2</sup> per unit (based on 1.04 children per unit)

**Designations shown on the Policies Map**

Each of the designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 6.3 below:

Table 6.3 Designations set by Policy DM10.11 shown on the Policies Map

Designation	Location
Areas of focussed intensification	<p>Area around Kenley station</p> <ol style="list-style-type: none"> <li>1. Around Forestdale Neighbourhood Centre</li> <li>2. Brighton Road (Sanderstead Road) Local Centre with its setting</li> </ol> <p><del>Settings of Shirley Local Centre and Shirley Road Neighbourhood Centre</del></p> <ol style="list-style-type: none"> <li>3. Environs of Coulsdon Town Centre</li> <li>4. Environs of Purley Town Centre/Reedham station</li> <li>5. London Road</li> </ol>

Designation	Location
Areas of Moderate Intensification	<ol style="list-style-type: none"> <li>1. <u>Addiscombe</u></li> <li>2. <u>Waddon</u></li> <li>3. <u>Selsdon</u></li> <li>4. <u>South Croydon/Sanderstead</u></li> <li>5. <u>Purley North</u></li> <li>6. <u>Purley East</u></li> <li>7. <u>Purley/Coulsdon</u></li> <li>8. <u>Purley/Kenley</u></li> <li>9. <u>Coulsdon South</u></li> <li>10. <u>Kenley Station</u></li> </ol>

### How the policy works

#### Character

**6.57** The Council recognises the need to proactively plan for the population growth **housing need**. The challenge for the Croydon Local Plan is to respect local character and distinctiveness whilst accommodating growth. Croydon's aspiration is for this to be done in a way that contributes to the improvement of each of Croydon's 16 places and accommodated in the following ways as set out in ~~Table 6.4~~, Figure 6.3 and Figure 6.4 below :

**Figure 6.3: Proposed approach to accommodating growth throughout the borough depending on character, ranging from places the character of which will be protected to places the character of which will actively be changed. ~~Figure deleted~~**



Figure 6.4: Visual presentation of the five character management options. **Figure updated**

Table 6.4 Accommodating growth and improving Croydon

Method of accommodating growth and improving Croydon	How it works	Applicable policies
Evolution without significant change of area's character	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant local character. Most development throughout the borough will be of this nature.	DM10.1— DM10.10
Guided intensification associated with enhancement of area's local character	Areas where the local character cannot be determined as a result of no one character being dominant, further growth can be accommodated through place specific enhancement policies.	DM34— DM49

Method of accommodating growth and improving Croydon	How it works	Applicable policies
Focussed intensification associated with change of area's local character	Further growth can be accommodated through more efficient use of infrastructure. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth.	DM10.11
Redevelopment	In larger areas where growth would result in a change to the local character it must be supported by masterplans or design codes.	DM36.2 DM38.1 DM49.1

Evolution without significant change of area's character **Urban and Suburban Evolution**

**6.58** There are existing residential areas which have the capacity to accommodate growth without significant impact on their character. **Character in most areas of the borough will evolve over time through the recycling of existing plots with denser forms of development without significant impact on their character.** In these locations new residential units can be created through the following interventions.

- a) Conversion – The conversion or subdivision of large buildings into multiple dwellings without major alterations to the size of the building.
- b) Addition – This can include one or more extensions to the side, rear, front or on the roof, and is often combined with conversion of the existing building into flats.
- c) In-fill including plot subdivision – Filling in gaps and left over spaces between existing properties. It can also include subdivision of large plots of land into smaller parcels of land with a layout that complements the existing urban pattern.
- d) Rear garden development – The construction of new buildings in rear gardens of the existing properties. Houses must be subservient in scale to the main house.
- e) ~~Regeneration~~ **Redevelopment** – The replacement of the existing buildings (including the replacement of detached or semi-detached houses with flats) with a development that increases the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular.

**6.59** The level of growth depends on existing local character. The capacity for natural evolution is dependent upon the local character typology. The new development should not adversely impact on the predominant character. The objective of the evolution of local character is to achieve an intensification of use without major impacts on local character. Each character type has capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant character.

**6.60** ~~Character in most areas of the borough will evolve over time through the recycling of existing plots with denser forms of development still within keeping of local character, the subdivision of larger properties, infill development and the development of the largest back gardens in the borough. Growth~~

~~will be accommodated with~~ **Evolution in urban and suburban areas will be accommodated as shown in Table 6.5.** Table 6.5 provides guidance as to what development types are likely to be acceptable compared to the predominant character of a local area.

**Table 6.5 Interventions suitable for each type of local character**

Local character types	Conversion	Additions	In-fill and Plot Subdivision	Rear garden development	Regeneration <b>Redevelopment</b>
PREDOMINANTLY RESIDENTIAL TYPOLOGIES					
Compact Houses On Relatively Small Plots					✓
Detached Houses On Relatively Large Plots	✓	✓	✓	✓	✓
Large Houses On Relatively Small Plots	✓	✓			✓
Local Authority Built Housing With Public Realm			✓		✓
Medium Rise Blocks With Associated Grounds		✓	✓		✓
Planned Estates Of Semi Detached Houses	✓	✓	✓	✓	✓
Scattered Houses On Large Plots	✓	✓	✓	✓	✓
Terraced Houses And Cottages	✓		✓	✓	✓

Local character types	Conversion	Additions	In-fill and Plot Subdivision	Rear garden development	Regeneration Redevelopment
PREDOMINANTLY MIXED USE CHARACTER TYPES					
Large Buildings With Continuous Frontage Line	✓	✓			✓
Large Buildings With Spacing	✓			✓	✓
Suburban Shopping Areas	✓	✓	✓	✓	✓
Tower Buildings	✓				✓
Urban Shopping Areas	✓	✓	✓		✓
PREDOMINANTLY NON-RESIDENTIAL CHARACTER TYPES					
Green Infrastructure					
Industrial Estates					
Institutions With Associated Grounds			✓		✓
Linear Infrastructure			✓		
Retail Estates & Business & Leisure Parks					
Shopping Centres Precincts & Town Centres					

Local character types	Conversion	Additions	In-fill and Plot Subdivision	Rear garden development	Regeneration Redevelopment
Transport Nodes		✓	✓		✓

**6.61** In areas where the predominant character is weakly defined or of poor quality, it is important that applicants **developments** take the opportunity to improve the overall quality of the area.

**6.62** ~~Conversions of large residential properties and the use of front gardens for car parking can cause unacceptable harm to the setting of building and the character of the local area.~~  
**Paragraph deleted.**

**6.62a** Developments proposed to support urban and suburban evolution are required to provide amenities on the site and sustainably optimise site capacity in accordance with the guidance in the supplementary planning document.

#### Moderate intensification

**6.62b** Moderate intensification will see developments that reasonably increase density in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant character. Developments will be scattered throughout areas, with a gradual change over time where the level of intensification will be limited by access to transport links, shops and green space.

**6.62c** In areas of moderate intensification shown in the policies map, new homes may be created by replacement of the existing buildings (including the amalgamation of sites) or the creation of new streets (such as a Mews development across multiple back gardens). Developments will increase the density and massing, within the broad parameters of the existing local character reflected in the form of buildings and street scene in particular.

**6.62d** Moderate intensification will not take place within in a Conservation Area or Local Heritage Area. Developments will have good access to services and public transport meaning either:

1. It is within 800m of Croydon Metropolitan Centre or a Town Centre designated as a District Centre in the London Plan;
2. It is within 800m of a Local Centre, Neighbourhood Centre or Shopping Parade and it is an area with a PTAL of 3 or above; or
3. It is within 800m of a Local Centre, Neighbourhood Centre or Shopping Parade and within 800m of a train or tram stop.

**6.62e** To accommodate growth which would complement the existing individual character of Places of Croydon and improve efficiency of land use, the Council promotes intensification by delivering at least an additional storey. The developments in the moderate intensification areas are required to provide amenities on the site in accordance with the guidance in the supplementary planning document.

Focused intensification

**6.62f** Focused intensification aims to maximise use of the existing growth capacity and to support sustainable spatial vision for the borough through an increase in density of development. Sites will be redeveloped with denser forms of development of an evolved and enhanced character to that which exists in the local area currently. At the heart of each area of focused intensification is an area with a variety of characters. As each area of focused

Intensification is currently low density it would not be justified, when there is unmet housing need, to seek to move towards a more consistent character that replicates surrounding low density development types.

**6.62g** Focused intensification areas shown in the policies map are identified using the following indicative criteria:

1. Within 800m of a school (secondary or primary);
2. Within 800m of open space (Green Belt, Metropolitan Open Land, Local Green Space or Other Open Space);
3. The area has capacity to change meaning either the local predominant character types are Detached Houses on Large Plots and Scattered Houses on Large Plots; or there are large development sites in the area and
4. It is not within in a Conservation Area or Local Heritage Area.

**6.62h** Additional indicative criteria used to ensure that the focused intensification areas have good access to services and public transport are as follows:

1. It is within 400m of Croydon Metropolitan Centre or a Town Centre designated as a District Centre in the London Plan;
2. It is within 400m of a Local Centre, Neighbourhood Centre or Shopping Parade and it is an area with a PTAL of 4 or above; or
3. It is within 400m of a Local Centre, Neighbourhood Centre or Shopping Parade and within 400m of a train or tram stop.

**6.62i** It has been identified that there are a number of heritage assets in several focused intensification areas. Any development proposals proposed in these locations must be informed by and enhance the design and character of heritage assets, and be subservient to them.

**6.62j** Each of the areas of focused intensification are, in part, at risk of fluvial, surface water or groundwater flooding. However, a

Strategic Flood Risk Assessment has identified that developments in these areas could be made safe from flooding without increasing flood risk elsewhere.

**6.62k** Developments located on the edge within the boundary of intensification areas should create a respectful transition in scale, height, and density, stepping down to lower density adjacent sites that fall outside of the boundary.

Guided intensification associated with enhancement of area's local character (Place specific policy)

**6.63** In line with the London Plan Policy 7.4, the local character of the borough's 16 Places has been mapped. There are places of inconsistent character that overlap with focused intensification areas. In such cases a Place Specific Policy will also apply. In locations within the places of Purley, Broad Green and Selhurst, the place specific policies will override the building height requirements of policy DM13.1a. In line with the London Plan, the local character of the borough's 16 Places has been mapped. The Borough Character Appraisal, the Opportunity Area Planning Framework and the Council's masterplans should be considered in conjunction with these policies. The applicable Place-specific development management policies should also be taken into account. Where the proposed development is located within a Conservation Area, further guidance should also be sought from Croydon's Conservation Area Appraisal Management Plan and the Conservation Area General Guidance. Where the development sits within the setting of a heritage asset, the significance of this heritage asset should be identified and should inform the design of the proposed development.

**6.64** Place specific policy guides development (and assists growth) by setting out policies on design in specific locations that seek to move towards a more consistent or appropriate character in these locations, deliver the spatial vision for the Borough and

wider Local Plan policies and objectives (including delivery of new homes). Paragraph deleted.

**6.65** The character of the areas will evolve towards a more consistent one (as opposed to multiple character typologies); or one that might be expected in a District or Local Centre as sites are redeveloped. The policies often seek to permit development that is one or two storeys higher than the predominant building height so as to facilitate a level of growth and enable development. However, they are character policies first and foremost, not a policy about growth. Paragraph deleted.

**6.66** To accommodate growth which would complement the existing individual character of Places of Croydon and improve efficiency of land use, the Council promotes a minimum building height of three storeys. Paragraph Deleted

Layout

**6.67** Streets form an integral part of a place, creating movement networks that serve the built form rather than dominate it. Consideration should be given at a sufficiently early stage of the design process to how the development site links to the local and wider area. Additionally, the creation of routes punctuated by landmark buildings or features, public squares or spaces helps to make a place easy to understand.

**6.68** The Council will require detailed design of roads, footpaths and cycleways to be clearly communicated. Early planning of road and site layouts enables applicants to incorporate parking and servicing in locations where their presence will not dictate the urban form and their visual impact can be minimised. When designing parking and road layouts, careful consideration should be given to creating layouts that are safe, secure, accessible, and permeable and balance the needs of all users. Particular attention should be paid to ensure safe and accessible pedestrian routes are accommodated within the development.

**6.69** When considering the layout, proposals should demonstrate a clear and logical arrangement of buildings that provides a high quality design solution on the site. Buildings, other than on back land developments, should positively address the street and the public realm and particular care should be taken to address how they enclose private secure spaces, car parks and servicing areas.

**6.70** Supplementary Planning Document No. 3 Designing for Community Safety or equivalent should be referred to for aspects of safety in layout, and design. The provision of sufficient lighting, in line with EU lighting uniformity requirements, will encourage greater pedestrian access, movement and reduce opportunity for undesirable behaviour.

**6.71** The Council considers the health and wellbeing of those living and working within the borough to be of the upmost importance. New developments can impact upon the amenity of the occupants of neighbouring properties. Site layouts should be designed to protect or improve conditions for occupants of nearby properties and future occupants. In line with the Housing Supplementary Planning Guidance, when assessing site layouts the Council will consider a development's impact on visual amenity, overlooking, outlook, and sunlight and daylight.

#### Amenity space

~~**6.72** Policies DM10.4 and DM10.5 apply to all new residential developments and conversions. Croydon's local character is the leading consideration on the quantum of private and communal open space to be provided for developments. When calculating the amount of private and communal open space to be provided the following elements should be excluded:~~

- a) Footpaths;
- b) Driveways;
- c) Front gardens;

- d) ~~Vehicle circulation areas;~~
- e) ~~Parking areas;~~
- f) ~~Cycle parking areas;~~ and
- g) ~~Refuse areas.~~ **Moved to homes chapter**

~~**6.73** Private open space is defined as amenity space which is accessible only to, useable for and screened for the purposes of individual dwellings at the rear or in the case of flatted schemes within the grounds.~~ **Moved to homes chapter**

~~**6.74** Communal open space is defined as amenity space that is shared, accessible to all within the development and could be for their exclusive use.~~ **Moved to homes chapter**

~~**6.75** Balconies, winter gardens or roof terraces may help to meet a development's private amenity space requirement but will have to comply with the privacy requirements of policy DM10.6 so enclosure may need to be opaque. They may be an innovative way of providing private or communal amenity space in areas of high density.~~ **Moved to homes chapter**

~~**6.76** In exceptional circumstances where site constraints make it impossible to provide private outdoor space for all dwellings, indoor private amenity space may help to meet policy requirements. The area provided should be equivalent to the private outdoor amenity space requirement and this area added to the minimum Gross Internal Area.~~ **Paragraph deleted**

~~**6.77** The provision of private and communal amenity space per unit, including child play space of 10m<sup>2</sup> per child, based on the calculation of numbers of children yielded from the development as set out in the Table 6.2 may be pooled to create a communal amenity space for a flatted development that meets all the requirements of this policy.~~ **Paragraph deleted**

~~6.78 The amenity space provided for play space can be part of the shared amenity area; it may be a void deck within a tall flatted development, possibly on the ground floor and in small developments of less than ten dwellings it could be part of the shared or private garden. Moved to homes chapter~~

~~6.79 The Play Space Standards are based on Wandsworth yield calculator which the London Plan Supplementary Planning Guidance (Supplementary Planning Guidance) Shaping Neighbourhoods: Children and Young People Play and Informal Recreation is based on. This Supplementary Planning Guidance should be referred to for the allocation and design guidance for play space. The requirements for play space will be calculated on the basis that all units are for affordable or social rent. This is because many applications are made by private developers which are then later sold, prior to occupation, to a Registered Provider of affordable housing and let on an affordable rent basis. In order to ensure that these affordable homes have sufficient play space for all the child occupiers, it is necessary to require that all developments meet the higher play space requirements of affordable and social rented homes unless there is a signed Section 106 agreement specifically stating a different mix of housing tenures in a development. Moved to homes chapter~~

~~6.80 Evidence will be required to demonstrate that privacy is protected, and the character of the area is respected in the layout of private and communal amenity space as part of development proposals. A minimum separation of 18-21m between directly facing habitable room windows on main rear elevations is a best practice 'yardstick' in common usage and should be applied flexibly, dependent on the context of the development to ensure that development is provided at an acceptable density in the local context. For new major developments, as long as the perimeter buildings take account of~~

~~this local context, the density may vary within the development. Paragraph deleted~~

~~6.81 Designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. Planning guidance has, in the past, been concerned with achieving visual separation between dwellings by setting a minimum distance of 18-21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terrace). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types and can sometimes unnecessarily restrict density. Paragraph deleted~~

~~6.82 A planning condition may require a management plan to provide the Council with some assurance that the communal amenity space will be maintained, and therefore continue to be useable. A well maintained appearance will assist with enhancement of the development, with a sense of ownership of residents, and increase the perception of safety in the neighbourhood. Moved to homes chapter~~

~~6.83 Amenity, including sunlight and daylight need to be considered in the layout of private and communal open space and Building Research Establishment Guidelines referred to. Paragraph deleted~~

### Design

~~6.84 The need for good design is supported in Paragraph 56 of the National Planning Policy Framework. Both the London Plan (policy 7.4b) and the Croydon Local Plan Strategic Policy SP4.1 identify the need for high quality design. To achieve high quality designs, proposals should consider the physical appearance and functionality of the development site and local area. In~~

accordance with the London Plan, Croydon is committed to working with applicants to create modern, high quality innovative and well-designed buildings and places that are, safe, accessible, and inclusive and enrich the quality of life for all those who live, work and visit them.

**6.85** The quality of materials can play an important role determining whether the integrity of the design concept is realised. The choice of materials and the quality of craftsmanship is vital to the overall success of the development in terms of function and appearance.

**6.86** The design, position and rhythm of windows and doors can contribute or detract from the overall appearance of the building and the character of an area. The Council will seek to encourage applicants at an early stage of the design process to give careful consideration to the detailing of the overall design (including setbacks and reveals) of windows and doors. ~~The Mayor of London's Housing Supplementary Planning Guidance provides guidelines on window sizes and the required levels of light to protect the residential amenity and well-being of future residents.~~

**6.87** Servicing equipment such as plant, utility boxes, ventilation systems (including heating and cooling), lift, mechanical equipment, fire escapes and rainwater goods form an integral part of the operational components of a building. Early consideration will enable it to be incorporated within the building envelope without compromising the integrity of the original design concept.

**6.88** Roof-form plays an important role in creating and contributing to the visual character of an area and in some instances their visual prominence creates local landmarks or

frames designated views. When considering the pitch, shape and materials of roofs, care should be taken to ensure that design is of high quality and appropriate to neighbouring buildings. The Council will also consider the impact of a scheme in terms of its effect on Local Designated Views (as shown on the Policies Map).

**6.89** Information and guidance about the relationships of proposed extensions to neighbouring properties is available in the Residential Extensions and Alterations Supplementary Planning Document or equivalent.

**6.90** The design of our built environment can affect our health, and our psychological and physiological well-being, and can have long-term implications for quality of life. Good house design should not be limited to the appearance of building and setting, it should also consider the wellbeing of the end user.

**6.91** Croydon's Local Plan Strategic Policies SP5.2b set out the Council's objective to ensure new development provides healthy living by encouraging good house design. This is increasingly important in locations where densities are increased and/or separation distances are reduced. In these locations, to assist in the creation of buildings that improve the health and wellbeing of future occupiers, developments will be expected to exceed the minimum standards outlined in the Mayor's Housing Supplementary Planning Guidance.

#### Public Realm

**6.92** A well-designed, cared for and high quality public realm<sup>51</sup> plays an important role in reinforcing the perception of Croydon

<sup>51</sup> The public realm is defined as public spaces that are accessible to all without charge. These can include public, semi-public and privately owned spaces.



as a welcoming, safe and accessible place. Croydon's aspirations for its public realm are outlined in SP4.6 to SP4.10.

**6.93** Most proposals include an element of public realm. This can range from large scale public realm improvements such as the design of hard and soft landscaped areas (including footways) throughout a site or smaller scale public realm improvements to the forecourt; and in some cases, the area adjoining it.

**6.94** Where public realm improvements have been included within a proposal, these should result in a high quality public realm that is usable, permeable, legible and accessible.

**6.95** ~~As outlined in the Strategic Policy SP4.10, the Croydon Public Realm Design Guide sets out materials and layout guidelines. Further details, including a materials palette can be found in the Croydon Public Realm Design Guide.~~

**6.96** Historic street furniture such as traditional red telephone boxes, post boxes, ornamental lamp columns, drinking fountains, cattle troughs, monuments and memorials can make a positive contribution to local character by reinforcing a sense of place. Opportunities to retain, restore and incorporate historic street furniture should be taken.

### Landscape

**6.97** The character of a place can be significantly affected by the quality of the landscape and the way it is maintained. Sensitively designed landscape can enrich and reinforce existing wildlife habitats and improve the ecological value of sites and their surroundings. **This includes the historic environment, such as historic landscapes and their settings, and the landscape character of heritage assets such as rural village conservation areas.** The Council considers landscape as an integral part of all development and would therefore require proposals for new

developments and extensions to be accompanied by plans detailing all existing and proposed hard and soft landscaping affected by or to be incorporated into the scheme.

**6.98** Supplementary Planning Guidance 12 Landscape Design is referenced in the policy and provides detailed guidance and clarity on what the Council is seeking from development proposals on providing safe well-designed landscaped schemes. The Croydon Public Realm Design Guide also sets out detailed guidance and clarity on what the Council is seeking from the public realm components of development proposals. If these documents are superseded the equivalent Council documents should be referred to.

### Lighting

**6.99** Lighting plays an important role in creating the perception of safe and welcoming place for people to use and interact with. A well-designed lighting scheme can improve the borough's image and if creatively implemented can give dimension to a building and the landscape surrounding it.

**6.100** Architectural lighting is most effective when used to highlight a few structural elements such as colonnades, towers spires, sculpture or walls or by emphasising texture, such as brick, stone and steelwork rather than flooding every surface with light.

### Design and Access Statements

**6.101** The Council will require applicants to justify and fully demonstrate how the principles of good design are being met. Design and Access Statements should be proportional to the size of the scheme and should fully demonstrate:

- a) A thorough understanding and analysis of the physical, social and economic and policy context;

- b) A clear understanding of the development objectives and brief;
- c) Clear design principles and design concept; and
- d) The evolution of the design and how the final design solution was arrived at.

**6.102** The Statement should refer to By Design, Supplementary Planning Document 3 Designing for Community Safety or equivalent and Supplementary Planning Guidance 12 Landscape Design or equivalent, and demonstrate how the National Planning Policy Framework, the London Plan and the Croydon Local Plan design policies are being met. Advice on the content of the Design and Access Statements can be found in the Council's advisory note 'Preparing Design Statements Advice Note for Applicants and Agents' and CABE's 'Design and Access Statements, How to write, read and use them'.

Focused intensification associated with gradual change of area's local character

~~**6.103** Focussed intensification aims to maximise use of the existing growth capacity and to support sustainable spatial vision for the borough through an increase in density of development and a gradual change in character to similar but higher density forms of development. Sites will be redeveloped with denser forms of development of a different character to that which exists in the local area currently. At the heart of each area of Focused Intensification is an area with no one predominant character type. As each area of Focused Intensification is currently low density it would not be justified, when there is unmet housing need, to seek to move towards a more consistent character that replicates surrounding low density development types.~~

~~Paragraph deleted~~

**6.104** Each of the Areas of focussed intensification are, in part, at risk of fluvial, surface water or groundwater flooding. However, a Strategic Flood Risk Assessment has identified that

~~developments in these areas could be made safe from flooding without increasing flood risk elsewhere. Paragraph deleted~~

### Key supporting documents

- CABE Design and Access Statements, How to write, read and use them (2006)
- **Suburban Design Guide SPD2 (2019)** Supplementary Planning Document 2 Residential Alterations and Extensions
- Supplementary Planning Document 3 Designing for Community Safety
- The Mayor Of London's Housing Supplementary Planning Guidance: The London Plan Implementation Framework (March 2016)
- The Mayor of London's Draft Sustainable Design and Construction Supplementary Planning Guidance (2013)
- The Borough Character Appraisal (2015)
- Character Typology (2015)
- The Mayor's Supplementary Planning Guidance – Shaping Neighbourhoods: Children and Young People's Play And Informal Recreation (2012)
- Croydon Public Realm Design Guide (2012<sup>9</sup>)
- Croydon's Conservation Area Appraisal Management Plans (various)
- Conservation Area General Guidance (2013)
- Croydon Opportunity Area Planning Framework (2013)
- East Croydon Masterplan (2011)
- Fair Field Masterplan (2013)
- Mid Croydon Masterplan (2012)
- West Croydon Masterplan (2011)
- Old Town Masterplan (2014)
- **Croydon Local Heritage Area Review (2016)**
- **Historic England's Streets for All (2018)**
- **MHCLG's National Design Guide (2019)**

- Historic England's Characterisation of London's Historic Environment (2016)
- Historic England's London's Local Character and Density (2017)
- Historic England's Keep it London: Putting Heritage at the heart of London's Future (2016)
- Building Better, Building Beautiful Commission's Living with beauty report (2020)

## Shop front design and security

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7
- Strategic Objective 10
- Policy SP4

### Why we need this policy

**6.105** Given the renewed interest in shop front security brought about as a result of the civil unrest on 8 August 2011, the Council acknowledges the key benefits of a robust shop front design. It is necessary to develop a security policy that will enable the delivery of secure well-designed shop fronts which improve Croydon's public realm, urban environment, and vitality of its town centres.

**6.106** There is a need to ensure that opportunities are taken to promote a succinct and cohesive approach to shop front design and security. Additional guidance that provides clear and concise policies is required to help commercial premises across the borough to incorporate shop front designs which maintain local distinctiveness and provide adequate levels of security whilst reducing the requirement for enforcement action.

**6.107** The new Shop Front Policy will apply greater emphasis in favour of quality shop front design and security in line with the revised addendum to Supplementary Planning Guidance No.1 Shop Fronts & Signs.

**6.108** Over recent years, changes in retail patterns and a growing demand for housing have led to many of these shops being converted into residential accommodation. Many of these conversions have been carried out in a way which often destroyed the inherent adaptability of shop units and the shop fronts. This policy will provide guidance to ensure that conversions are carried out sympathetically and flexibly to allow for future change.

**6.109** Paragraph 56 of the National Planning Policy Framework (requiring good design) outlines the need for robust and comprehensive policies that 'establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit'. Furthermore policies should aim to 'create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion'.

**6.110** The Council's Shop Fronts and Signs Supplementary Planning Guidance No.1 was published on 27th March 1996 and Shop Front Security Addendum to

Supplementary Planning Guidance No.1 Shop Fronts & Signs was adopted in April 2012. The Addendum provides advice on shop front security technology and innovation and offers greater clarity regarding acceptable forms of shop front security.

**6.111** The Converting Shops into Homes Addendum to Supplementary Planning Guidance No.1 Shop Fronts & Signs was adopted October 2004. This addendum provides guidance on how to sympathetically convert shops to residential development.

~~**6.112** The Strategic Policy SP4 makes no reference to detailed policies on shop front design. Paragraph deleted~~

~~**6.113** The existing policy requires updating to align with the Council's recently revised Shop Front Security Addendum to Supplementary Planning Guidance No.1 Shop Fronts & Signs adopted April 2012. Paragraph deleted~~

**Policy DM11: Shop front design and security**

**DM11.1** To ensure shop fronts are attractive, secure and of a high quality design, the Council will support proposals for new shop fronts and related alterations that respect the scale, character, materials and features of the buildings of which they form part.

**DM11.2** To ensure shop fronts are attractive, secure and of a high quality design, the Council will support proposals for new shop fronts and related alterations in the Metropolitan Centre, District and Local Centres, Shopping Parades and Restaurant Quarter Parades that:

- a) Do not include wholly solid or perforated/pinhole external shutters;
- b) Employ less obtrusive solutions which could include: security glazing, internal shutters, external open, tube and link grille, brick bond parallel pattern lattice type grilles and shutters, concertina or scissor grilles, removable shutters; or
- c) In some instances a mix of solid and open grille shutters may be acceptable as a solution where any element of solid external shutter proposed is transparent.

**DM11.3** To ensure shop fronts are sympathetically incorporated and to provide future flexibility, developments that convert shops into residential accommodation should:

- a) Respect the scale, character, proportions, materials and features of the buildings of which they form part;
- b) Retain and incorporate historic shop fronts, including signboards, roller blind boxes, corbels, stall risers, cornices, fanlights, console brackets, transoms, pilasters and lobbies into the design;
- c) For new elements, adopt and reinterpret the language of shop front design;

- d) Optimise window and door openings; and
- e) Ensure the design includes elements that provide privacy for the occupiers.

### How the policy works

**6.114** The Council expects all shop front design to be of a high design quality and craftsmanship and whenever possible, use sustainable or recycled materials.

**6.115** The Council encourages improved shop front security and public realm through the integration of innovative technologies.

**6.116** By encouraging shop owners to consider the inclusion of internal shop front shutters during the early stages of the design process. Proposals will respect the distinctive local character of an area whilst maintaining a welcoming environment and public realm.

**6.117** Those seeking planning permission for shop front improvements and new shop fronts should seek additional guidance from the Council's Shop Fronts and Signs Supplementary Planning Guidance No.1 published on 27th March 1996 and Shop Front Security Addendum to Supplementary Planning Guidance No.1 Shop Fronts & Signs adopted in April 2012 or equivalent guidance.

**6.118** Changes in retail patterns and a growing demand for housing have led to the piecemeal change of shops converted to residential. Construction works often associated with these changes in use (usually brick-infill) often destroy the inherent adaptability of shop units and shop fronts and detract from the character of the area.

**6.119** Wherever possible it is preferable to keep and adapt existing historic shop fronts. Key features such as large windows, details and proportions of the shop front can make for an unique, adaptable and attractive home that enhances and compliments the character of the local area.

**6.120** When designing conversions of retail units to residential use, careful consideration should be given to the designing-in of privacy, given that retail units are commonly hard against the pavement. This could include retention or replacement of existing shop fronts and integration of a winter garden space at the front of the former retail unit to create a degree of environmental protection, privacy and private amenity space. Those seeking planning permission to convert shops into homes should seek additional guidance from the Addendum to Supplementary Planning Guidance No.1 Converting Shops into Homes, adopted October 2004.

### Key supporting documents

- Shop Fronts and Signs Supplementary Planning Guidance No.1 (1996)
- Shop Fronts Security Addendum to Supplementary Planning Guidance No.1 (2012)
- Converting Shops into Homes Addendum to Supplementary Planning Guidance No.1, Addendum No. 2

## Advertisement hoardings

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7

### Why we need this policy

**6.121** Advertising is closely associated with urban life and can be one of the most dominant elements of the environment. In the right context advertisement hoardings can enhance the appearance and vitality of an area. However, where they are poorly designed or located and where too many signs have been installed they can cause considerable damage to visual amenity by cluttering the built environment and detracting from the quality of the area.

**6.122** Changes in legislation and national policy have resulted in the need for updated guidance. The provision of a policy for advertisement hoardings would align with paragraph 67 of the National Planning Policy Framework which highlights a need for controls on advertisements to be efficient, effective and simple in concept and operation. This policy provides guidance that is clear and concise.

**6.123** The National Planning Policy Framework acknowledges the impact that advertisements can have on the appearance of the built and natural environment. ~~It highlights the importance of the need for detailed assessment where~~ 'advertisements would have an appreciable impact on a building or on their surroundings'. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts<sup>52</sup>. The Advertisement and Hoardings & Other Advertisements Supplementary Planning Guidance No.8 (February 2003) provided guidance about acceptable locations, number, scale and type of advertisements such as wall mounted and Free standing hoardings and 'A' boards, panels, signs and window advertisements. The Supplementary Planning Guidance highlights the need to ensure advertisements are sensitively located and design to minimise the impact on residential areas and on heritage assets.

### Policy DM12: Advertisement hoardings

**DM12.1** To ensure advertisement hoardings positively contribute to the character and appearance of existing and new streets, the Council will require advertisement hoardings to:

<sup>52</sup> National Planning Policy Framework paragraph 67.

- a) Be designed to improve the public realm;
- b) Demonstrate that the rear of the signs are well designed;
- c) Reinforce the special character of heritage assets and other visually attractive parts of the borough; and
- d) Ensure the location and size of hoardings does not harm amenity or conflict with public safety.

**DM12.2** To ensure advertisement hoardings positively contribute to the character and appearance of the building on which they are attached:

- a) The design and proportions should complement the symmetry and proportions of the host structure;
- b) They should be located where they do not obscure or destroy interesting architectural features and detailing; and
- c) They should be located where they do not cover windows or adversely impact on the functioning of the building.

**DM12.3** A proposal to display advertisements in Areas of Special Advertisement Control will need to demonstrate that it would not:

- a) Significantly detract from residential amenity;
- b) Affect the setting or character of a heritage asset;
- c) Have a significant impact on the character of Metropolitan Green Belt, Metropolitan Open Land, or other rural spaces;
- d) Have a significant impact on public safety including potential for traffic hazards;
- e) Have a significant impact on environmentally sensitive and major gateway approaches to the borough;
- f) Visually separate areas such as car parks and other locations where a safety issue may arise as a result of obscured views into an area; and
- g) Result in numerous hoardings in an area where the cumulative impact would be detrimental to visual amenity.



## How the policy works

**6.124** Larger hoarding sizes are becoming increasingly prevalent, with new displays now incorporating high level brightly illuminated or flashing LCD screens. These are often mounted on large, poorly designed and unsightly platforms and gantries or on exposed flank brick walls which are intrusive in the street scene and can be a potential distraction for motorists. When assessing proposals for advertising hoarding, the Council will expect signs and their supporting structures to be of a high quality architectural design that positively enhances its setting.

### Hoardings affecting heritage assets

**6.125** In sensitive locations such as Conservation Areas, Local Heritage Areas, and adjacent to Listed Buildings and Locally Listed Buildings, an excessive number of advertisements and signs in close proximity can lead to visual clutter and can detract from their character, appearance and setting. To reduce their impact on the significance of these heritage assets in these locations, the number of advertisements will be restricted and proposals will need to demonstrate that they positively enhance and respect their immediate setting and context.

### Wall mounted hoardings

**6.126** Wall mounted advertisement hoardings are often difficult to sensitively integrate on buildings because they can be overbearing in scale, dominate the street scene and can create a poor relationship with building on which they are located. To ensure wall mounted hoardings can be sensitively incorporated on the side of buildings or on boundary walls, the Council will need to be satisfied that their design, scale, and siting would not have an adverse impact on the host building or structure on which it will be located.

### Areas of Special Advertisement Control

**6.127** To protect the open character of and visual amenity of the Metropolitan Greenbelt and the Bradmore Green Conservation Area, the Secretary of State designated these locations as Areas of Special Advertisement Control. This designation prohibits the display of certain advertisements without the consent of the Council.

**6.128** Assessments relating to amenity and safety will need to comply with Town and Country Planning (Control of advertisements) (England) (Amendment) Regulations 2012.

### **Key supporting documents**

- Advertisement and Hoardings & Other Advertisements Supplementary Planning Guidance No.8 (2003)

## Refuse and recycling

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7
- Policy SP4.5
- Policy SP4.6

### Why we need this policy

**6.129** Most residential and non-residential developments generate waste which will need to be temporarily stored on site. The current kerbside recycling scheme necessitates the need to provide sufficient room to store separated waste within all developments.

**6.130** Both the London Plan and the National Planning Policy Framework do not contain policies relating to refuse and recycling within developments. Additionally the Strategic Policies refer to the Detailed Policies and Proposals for specific design guidance.

**6.131** This policy will provide developers working on residential and non-residential schemes greater clarity about what the Council will expect them to provide.

**6.132** ~~The existing Unitary Development Plan policies have proved useful to both the Council and those applying for planning permission by providing guidance about the location and design of facilities which are integral to the functional running of each development.~~ Paragraph deleted

**6.133** The Mayor's Housing Supplementary Planning Guidance provides some general guidance, however, it states that it should be used in conjunction with local guidance. The Mayor's Housing Supplementary Planning Guidance does not address non-residential development.

Policy DM13: Refuse and recycling

**DM13.1** To ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design, the Council will require developments to:

- a) Sensitively integrate refuse and recycling facilities within the building envelope, or, in conversions, where that is not possible, integrate within the landscape covered facilities that are located behind the building line where they will not be visually intrusive or compromise the provision of shared amenity space;
- b) Ensure facilities are visually screened;
- c) Provide adequate space for the temporary storage of waste (including bulky waste) materials generated by the development; and
- d) Provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.

**DM13.2** To ensure existing and future waste can be sustainably and efficiently managed the Council will require a waste management plan for major developments and for developments that are likely to generate large amounts of waste.

## How the policy works

### Design considerations

**6.134** The Council considers the layout, siting, function and design of recycling and refuse storage facilities to all be of equal importance. It is important that these facilities are considered as an integral part of the development process.

**6.135** If considered at the initial stage of the design process, proposals for new developments can integrate refuse and recycling within the building envelope without causing undue noise and odour nuisance.

### Technical considerations

**6.136** It is important that refuse facilities are located in an area where they are easily accessible to all residents, including children and wheelchair users. This would include the provision of a safe route for those on foot as well as ensuring facilities are located on a hard level surface. Facilities must also be easily accessible for waste collectors.

**6.137** It is essential that developments incorporate enough suitable space to store the amount of waste and recycling likely to arise from the development once they are occupied and to build in capacity to meet future demand. This ensures that problems with rubbish being left on footways are minimised, occupants have space to recycle, commercial and household waste are kept separately and waste collection services can operate safely and efficiently. To ensure this demand can be met, major developments or those which are likely to generate large amounts of refuse and recycling will be required to submit a waste management plan.

**6.138** Additional guidance should be sought from Croydon Council's Public Realm and Safety Department.

## Key supporting documents

- The Mayor Of London's Housing Supplementary Planning Guidance(March 2016)
- British Standards BS 5906:2005 – Waste management in buildings – Code of practice
- 2010 No.2214 Building and Buildings, England and Wales – The Building Regulations 2010
- The Building Regulations 2000 – Approved Document H, Drainage and Waste Disposal (2000 edition)

## Public art

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7
- Policy SP4.5
- Policy SP4.6

### Why we need this policy

**6.139** Despite its size there are relatively few examples of public art within the borough. The Council acknowledges the important role that public art can play in enhancing the setting of a building and creating a visually stimulating public realm and strengthening local distinctiveness.

**6.140** There is a need to ensure that opportunities to incorporate public art within new developments or public realm improvements are taken and that it relates to the local character, contributes to the sense of place and reinforces local distinctiveness.

**6.141** The incorporation of public art offers the opportunity to work with the local community to create distinctive works that help engender a sense of ownership and strengthen the sense of place.

**6.142** Croydon's Supplementary Planning Guidance 19 provided a useful guidance for those wishing to incorporate public art within their development. However, this document referenced 'percent for art', a policy that is no longer live. The

Croydon Local Plan now refers to the Council's Public Realm Design Guide which provides more detailed guidance.

## Policy DM14: Public art

To enhance and express local character, the Council will support the inclusion of public art and require all major<sup>53</sup> schemes to include public art that:

- a) Is integrated into proposals at an early stage of the design process;
- b) Enhances and creates local distinctiveness and reinforces a sense of place;
- c) Responds to local character;
- d) Makes a positive contribution to the public realm; and
- e) Engages the local community in its creation.

### How the policy works

**6.143** By considering public art during the early stages of the design process and clarifying the scope at the beginning of the pre-application process, opportunities can be taken to integrate public art into the fabric of the development itself in more imaginative ways. Public art should not be confined to statues, but can be incorporated in imaginative, simple and cost effective ways such as bespoke paving, gates, lighting, signage, street furniture, playground equipment, railings and landscaping, murals (painted or ceramic), decorative bargeboards or works of art incorporated on elevations where they will be visible to pedestrians.

**6.144** The Council expects all public art to be of the highest design quality and craftsmanship and whenever possible, encourage the use of sustainable or recycled materials. When commissioning public art, developers should place equal weight on creating the right piece of work, the craftsmanship of the artist

and those installing the piece and the maintenance after it has been installed.

**6.145** Those commissioning public art should seek additional guidance from Croydon's Public Realm Design Guide.

### Key supporting documents

- Public Realm Design Guide (2012)

<sup>53</sup> Major schemes are defined as being over 0.5 hectares or residential schemes over 10 units or developments over 1000m<sup>2</sup>

## Tall and large buildings and high density developments

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7
- Policy SP4.5
- Policy SP4.6

### Why we need this policy

**6.146** The Council acknowledges the positive contribution that well-designed tall buildings and high density developments of high architectural quality can make. If sensitively and appropriately located, these buildings this development can facilitate regeneration through the provision of new jobs, homes and community facilities and an attractive built environment.

**6.147** The need for this policy has been identified in the Croydon Local Plan's Strategic Policies which sets out the Council's intention to include detailed tall buildings policies within the Detailed Policies and Proposals plan. The Detailed Policies and Proposals also provide a link to the Croydon Opportunity Area Planning Framework and contain the Place-specific development management policies which identify areas suitable for tall buildings and high density development.

**6.148** The borough's Open Space Needs Assessment identified significant gaps in the provision of amenity green space, particularly in the north of the borough. To address this there is a need to ensure tall and large high density residential developments are located in areas with sufficient green

infrastructure or provide new green infrastructure to meet the increased demand. These developments should also integrate with and enhance the green grid wherever possible.

**6.149** London Plan Policy 7.7 refers to tall and large buildings. It is a requirement of London Plan Policy D9 for boroughs to produce Tall Buildings Guidance based on the specific character of the borough's places. This policy advises boroughs to work with the Mayor to identify areas that are appropriate, sensitive or inappropriate for tall or large buildings.

**6.150** The Croydon Opportunity Area Planning Framework identifies locations within the Croydon Opportunity Area that are suitable for tall buildings. It provides guidance on indicative tall building heights, form and typologies. This approach reflects the Mayor's aspirations for new residential development within the Croydon Opportunity Area.

**6.151** The base line information used to select locations outside of the Croydon Opportunity Area included mapping of the

residential and non-residential character analysis and mapping,  
PTAL<sup>54</sup> ratings and open space deficiency mapping.

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<sup>54</sup> Public Transport Accessibility Level – a rating of accessibility provided by Transport for London



## Policy DM15: Tall and large buildings and high density developments

To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they meet the following criteria:

- a) They are located in areas identified for such buildings in Policies DM34 to DM49;
- b) They are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4, with direct public transport connections to the Croydon Opportunity Area;
- c) The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale;
- d) The building height, footprint and design relates positively to any nearby heritage assets, and conserves or enhances the significance and setting of the assets of the wider historic environment;
- e) To improve the quality of and access to open space, developments including buildings taller than 40 storeys will need to incorporate amenity space, whether at ground level such as atria or above ground level, such as sky gardens and roof terraces, that is accessible to the public as well as residents of the development; ~~and~~
- f) To ensure tall, and large **high density developments** buildings are well integrated with the local area, they should include at least an active ground floor and inclusive public realm. ~~and~~
- g) **Tall, large and high density developments shall positively respond to their surrounding environment, with no change to wind comfort category of all surrounding public realm and carriageways, particularly the experience of pedestrians and cyclists.**

### How the policy works

**6.152** Tall and large ~~high density~~ buildings have been defined as those which are significantly taller and larger; in terms of scale, mass and height than the predominant surrounding buildings, causing a significant change to the skyline **or over 30m in height.**

**6.153** When assessing whether a development can be considered to be tall or large ~~high density~~, the context within which the building is situated must be taken into account. This would mean that a proposal for six storeys; in an area where predominant building heights are two storeys, would be considered to be a tall building. In an area where an urban block<sup>55</sup> comprises of buildings with narrow frontages, a proposal

<sup>55</sup> An urban block is a rectangular area in a city surrounded by streets and usually containing several buildings.

for a building with a scale that differs from this would be considered to be large.

**6.154** This definition closely aligns with the Croydon Local Plan Strategic Policy SP4.5, London Plan Policy 7.25 D9 and CABE and Historic England’s guidance which refer to tall and large buildings.

**6.155** There is a need to expand the current definition of tall buildings to include large buildings. This policy will expand the definition of tall buildings to include large buildings and ensure development is sensitive to its local context.

**6.156** This policy in conjunction with **the policies for the Areas of Transformation (Policies DMxx to DMxx)** and Place-specific development management policies (Policies DM34 to DM49) will establish clear principles and more certainty for developers about the locations for tall and large buildings.

**6.157** Proposals for tall or large buildings will need to include urban design analysis that demonstrates how they align with the Opportunity Area Planning Framework and the Fair Field, Mid Croydon, Old Town and East and West Croydon Masterplans. In locations outside of these areas, proposals for tall or large buildings will be expected to demonstrate that they will not cause unacceptable harm to the character of the surrounding area and to the wider setting of heritage assets and meet all policy requirements, including those relating to tall buildings.

**6.158** Proposals for tall or large developments within sensitive locations<sup>56</sup> will be expected to demonstrate that it meets the requirements of the London Plan Policies 7.6 and 7.7.

**6.159** Paragraph 6.23 of the Croydon Opportunity Area Framework outlines the importance of creating slender tall buildings in locations where the proposed building will be taller than the predominant surrounding development heights. This criterion will help to minimise the impact that the proposed building will have upon the setting and character in terms of microclimate, overshadowing and wind turbulence. This criterion is equally applicable in locations outside of the Croydon Opportunity Area (as listed in the Places of Croydon Policies DM34 to DM49) where opportunities for tall or large buildings may be available.

**6.160** Due to their size and scale and the increased densities arising from tall buildings, their impact on surroundings are greater than those of more conventionally sized buildings. Tall and large buildings, in areas such as the Metropolitan Centre that have been identified for growth, will place additional pressure on existing resources such as community facilities and public space. There is an opportunity to address the shortage of space by incorporating high quality public amenity spaces such as sky gardens, atrium spaces and roof terraces in tall buildings. To ensure that these buildings address current and future need for amenity space, provision full public access to these spaces will be supported. The Council will work with developers to secure legal agreements for this type of amenity space provision.

**6.161** The design quality of the top of tall buildings is equally as important as the base. A base with a design that has

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<sup>56</sup> Sensitive locations include sites close to heritage assets, residential amenity spaces, schools, or where topography changes would result in the development crowding or blocking designated views or viewing corridors.,

been carefully considered can have a significant impact on the streetscape, local views and how the building physically and visually integrates with the street and the spaces surrounding it. To ensure a tall building is well integrated within its immediate local area, it should incorporate active ground and first floors and a stimulating and inclusive public realm. To make the public realm around the building feel safe and attractive for pedestrians, the façade should have sufficient openings to assist overlooking and passive supervision.

### **Key supporting documents**

- Croydon Opportunity Area Planning Framework (2013)
- East Croydon Masterplan (2011)
- West Croydon Masterplan (2011)
- Mid Croydon Masterplan (2012)
- Infrastructure Delivery Plan (annually updated)
- Borough Character Appraisal (2015)
- Character Typology (2015)
- **Historic England's Increasing Residential Density in Historic Environments (2020)**

## Promoting healthy communities

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 4
- Strategic Objective 6
- Strategic Objective 7
- SP5.2
- SP5.4

#### Why we need this policy

**6.162** The links between planning and health are well established. Chapter 8 of the National Planning Policy Framework sets out the role of the planning system in promoting healthy communities, facilitating social interaction and creating healthy and inclusive places. The National Planning Practice Guidance recommends that health and wellbeing and health infrastructure are considered in Local Plan and planning decisions.

**6.163** ~~Policy 3.2 of the London Plan, Improving health and addressing health inequalities, states that boroughs should work with key partners to identify and address significant health issues facing their areas and that new developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help reduce health inequalities. It recommends that Health Impact Assessments are used to consider the impact of major developments on health and wellbeing of communities. Paragraph deleted~~

**6.164** SP5.2 of the Croydon Local Plan sets out the Council will work in partnership with health authorities to improve health in Croydon and will ensure new developments provide opportunity for healthy living.

**6.165** Croydon, like many places, has a number of health inequalities. These health inequalities can be addressed by ensuring the planning system and new developments are considering health and wellbeing. This will allow local communities to lead healthy lifestyles and adopt healthy behaviours through living in quality homes, participating in physical activity and have access to quality open spaces.

## Policy DM16: Promoting healthy communities

**DM16.1** The Council, working with relevant organisations, will ensure the creation of healthy communities which encourage healthy behaviours and lifestyles by requiring developments to:

- a) Consider health and wellbeing during the design of a development to maximise potential health gains and ensure any negative impacts can be mitigated;
- b) Ensure access to open spaces and facilities for sport, recreation, play and food growing;
- c) Promote active travel and physical activity through cycling and walking opportunities that are well linked to existing pedestrian and cycling infrastructure;
- d) Create spaces for social interaction and community engagement which are designed to be safe and accessible to all; and
- e) Assess and mitigate pollutants and other environmental impacts on health.

**DM16.2** The Council will work with NHS partners to support the provision of new healthcare facilities and improvements to existing facilities which provide services important for the physical health, mental health and general wellbeing of communities.

### How the policy works

**6.166** Considering health and wellbeing as early as possible into the design of a development presents greater opportunities for maximising positive gains, addressing health inequalities and mitigating any negative impacts. For example, to ensure a positive impact on mental health, developments should consider exceeding internal space standards, provide private or semi-private open spaces, ensure a sense of privacy for residents but also provide opportunities for social interaction and should ensure access to natural daylight.

**6.167** Developments can support physical activity, promote healthy weights and address health problems associated with obesity. This can be done by considering the layout and access

to stairwells, ensuring the provision of accessible cycle storage in both homes and workplaces and providing changing facilities to encourage people to cycle to work. Developments should provide quality open spaces, particularly in areas identified as being deficient, for sport, recreation and play whilst improving links to existing spaces and sport facilities. The design of a development can also promote access to healthy food opportunities by providing food growing opportunities whilst protecting existing facilities.

**6.168** Air pollution affects everyone living and working in the borough but can have greater impact on children, older people and those with heart and respiratory conditions. Developments must assess and mitigate the impacts of pollution and look for opportunities to improve air quality. Developments

should also be designed to be energy efficient and well insulated to ensure residents are able to live in warm homes and are protected against noise pollution.

**6.169** Health Impact Assessments are a tool which can be used to assess the impact of development proposals on health and wellbeing. They should be used to set out how health and wellbeing have been considered during the design of a development, how positive impacts have been maximised and how any negative impacts have been mitigated, particularly where developments are located in the borough's most deprived wards. Health Impact Assessments should be undertaken as early in the process as possible to ensure the assessment is meaningful and can involve engagement from Croydon Public Health and NHS partners.

**6.170** New development in the borough needs to be supported by health and social infrastructure to ensure communities have access to facilities and services they require at every stage of their lives. Facilities should be accessible to all and should be easily reached by walking, cycling or public transport. The Council will continue to work with NHS partners to identify requirements for new facilities to meet the need arising from the borough's growing population. It will support improvements to existing facilities and will also work with NHS partners to identify opportunities for facilities to come forward as part of mixed-use schemes, particularly where there is an identified need. The impact of developments on existing healthcare facilities should be considered through a Health Impact Assessment.

### **Key supporting documents**

- The Mayor of London's Social Infrastructure SPG (2015)

## Views and Landmarks

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP4.2
- Policy SP4.6
- Policy SP4.9
- Policy SP4.13

### Why we need this policy

**6.171** Croydon has compiled a list of Local Designated Views of significance for the borough. These include Croydon Panoramas that reinforce Croydon's sense of local place and identity and Local Designated Landmarks that assist with way finding and contribute to local character of the borough.

**6.172** ~~The Unitary Development Plan Policy UD1 contained a list of Views and Landmarks. These have been assessed alongside others suggested in the Borough Character Appraisal, by Development Management Officers and from the previous consultation on the Detailed Policies (Preferred and Alternative Options) of the Croydon Local Plan in 2013 and 2015. The proposed Views and Landmarks are detailed in Policy SP4 and Appendix 5. Policy DM17 details what the Council will consider in terms of possible impact of proposed development on the Local Designated Views, Croydon Panoramas and Local Designated Landmarks.~~

## Policy DM17: Views and Landmarks

**DM17.1** The Council will consider the proposed development in relation to its impact on protected Local Designated Views such that developments should not create a crowding effect around, obstruct, or appear too close or high in relation to any Local Designated Landmarks identified in the Local Designated View.

**DM17.2** Developments should enhance Croydon Panoramas as a whole and should not tightly define the edges of the viewing corridors from the Croydon Panoramas. Developments should not create a crowding effect around, obstruct, or appear too close or high in relation to any Local Designated Landmarks identified in the Croydon Panoramas.

**DM17.3** Public access to all viewpoints to Local Designated Views and all Croydon Panoramas should be maintained.

### How the policy works

**6.173** When new development is proposed it should consider the effect on a Local Designated View to avoid detrimental impact on the quality of the View and ensure it is not sited too close to avoid overcrowding the View of a Local Designated Landmark. This is considered in the Croydon Local Plan Strategic Policy SP4.2 which states that development will be required to protect Local Designated Views, Croydon Panoramas, the setting of Local Designated Landmarks, other important vistas and skylines.

**6.174** ~~The London Plan Policy 7.11 'London View Management Framework' is reflected in the Croydon Local Plan Strategic Policy SP4.13 which states that the Council and its partners will strengthen the protection of and promote improvements to local views, Croydon Panoramas and Local Designated Landmarks. Paragraph deleted~~

**6.175** The Croydon Opportunity Area Planning Framework refers to the potential impact of tall buildings on views and assessment of impact on the skyline. It identifies townscapes along which people have generous views of the Croydon

Opportunity Area. Further to this, it identifies the need for development to demonstrate that it integrates with and improves the local character and, that new buildings will be assessed against their impact on these views to ensure they do not result in an overbearing wall of development.

**6.176** The Panoramas selected (listed in Appendix 5) are the wide expansive views of substantial parts of Croydon where public access to a view point to view the Panorama should be maintained.

**6.177** The important Local Designated Landmarks in the views are noted in the list of Croydon Panoramas and Local Designated Views in Appendix 5. This policy aligns with the London Plan, Policy 7.12.

### Key supporting documents

- Borough Character Appraisal (2015)
- Croydon Opportunity Area Planning Framework (2013)



## Heritage assets and conservation

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7
- Policy SP1
- Policy SP2.2
- Policy SP4.1
- Policy SP4.12
- Policy SP4.13

### Why we need this policy

**6.178** Croydon has a rich and varied heritage that provides depth of character **historic and architectural significance** to the borough's environment **and a sense of identity and belonging**. The historic environment contributes to local character and distinctiveness and enables an understanding of the pattern of historic development of an area. In order to maintain the borough's character, it is vital that heritage assets are protected and sensitively adapted and that their setting is not harmed. The historic environment is a finite resource and, once lost, cannot be replaced.

**6.179** The Council recognises the value of the historic environment, especially in relation to the positive contribution it can make to creating and maintaining sustainable communities,

and considers it to be important to conserve the valued components of the borough's historic environment for the future. This view is supported by the National Planning Policy Framework (Chapter 12), the London Plan (Chapter 7) and the strategic objectives and policies of the Croydon Local Plan. The strategic policies state that 'Croydon needs to ensure protection of its heritage assets and their settings, to retain local distinctiveness and character'. This is particularly important given the context of the significant change that Croydon, in particular the Croydon Opportunity Area, has seen in the last century and is likely to continue to experience. The Council also supports the principles of heritage-led regeneration.

**6.180** This policy seeks to improve the protection afforded to heritage assets in the borough. Heritage assets are the valued elements of the historic environment and make an important contribution to the quality of the borough's architectural, historic and townscape character. A heritage asset is a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets can be identified in various ways, for example through statutory designation as heritage assets of national significance, such as Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Historic Parks and Gardens, or through designation by the Local Planning Authority, which includes Locally Listed Buildings, Local Heritage Areas and Locally Listed Historic Parks and Gardens. Heritage assets can also be identified through area assessments, master planning or during the planning process itself.

**6.181** Through the planning process the Council will consider the significance of all sites and areas identified as having heritage significance. The Council will monitor proposed removals and additions to the established lists of heritage assets as and when appropriate. The Council will continue to make information relating to heritage assets available to view on the Croydon Council website. **There is the opportunity to further designate conservation areas across the borough to protect areas of particular special architectural or historic interest for future generations to enjoy.**

**6.182** Heritage assets may be nationally or locally designated, or undesignated: the reason for their being identified is their special interest. This may be historic, architectural, artistic, or archaeological and these are the attributes that make up their unique quality or significance.

**6.183** The setting of a heritage asset is defined in the glossary of the National Planning Policy Framework as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.'

**6.184** This policy addresses detailed issues that relate to the detailed application of the Strategic Policies to heritage assets in the borough and fulfils the aim outlined in strategic Policy SP4 to strengthen the protection afforded to heritage assets in the borough.

**6.185** ~~The National Planning Policy Framework paragraph 126 states that ‘local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment’.~~ Paragraph deleted

**6.186** ~~The London Plan Policy 7.8G states that boroughs should ‘include appropriate policies in their LDFs for identifying,~~

**Policy DM18: Heritage assets and conservation**

**DM18.1** To preserve and enhance the character, appearance and setting of heritage assets within the borough, the Council will determine all development proposals that affect heritage assets in accordance with the following:

- a) Development affecting heritage assets will only be permitted if their significance is preserved or enhanced;
- b) Proposals for development will only be permitted if they enhance the setting of the heritage asset affected or have no adverse impact on the existing setting;
- c) Proposals for changes of use should retain the significance of a building and will be supported only if they are necessary to keep the building in active use; and
- d) Where there is evidence of intentional damage or deliberate neglect to a heritage asset, its current condition will not be taken into account in the decision-making process.

**DM18.2** Applications for development proposals that affect heritage assets or their setting must demonstrate:

- a) How particular attention has been paid to scale, height, massing, historic building lines, the pattern of historic development, use, design, detailing and materials;
- b) That it is of a high quality design that integrates with and makes a positive contribution to the historic environment; and
- c) How the integrity and significance of any retained fabric is preserved.

~~protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area’.~~ Paragraph deleted.

**6.187** The Croydon Local Plan 2018 provides general policies SP4.11 to SP4.15 that relate to the historic environment. However, there is a need to provide detailed policy on specific issues in order to provide additional policy protection to the borough’s heritage assets and to enable the Council to meet its statutory duties.

**DM18.3** To preserve and enhance Listed Buildings, Scheduled Monuments and Registered Parks and Gardens within the borough, the Council will determine all development proposals that affect these heritage assets in accordance with the following:

- a) Substantial harm to or loss of a Grade II Listed Building or Registered Park and Garden should be exceptional;
- b) Substantial harm to or loss of a Grade I or II\* Listed Building or a Scheduled Monument should be wholly exceptional; and
- c) All alterations and extensions should enhance the character, features and setting of the building or monument and must not adversely affect the asset's significance.

**DM18.4** To preserve and enhance the character, appearance and setting of Conservation Areas within the borough, the Council will determine all development proposals that affect Conservation Areas in accordance with the following:

- a) The demolition of a building that makes a positive contribution to the special character and appearance of a Conservation Area will be treated as substantial harm;
- b) Where the demolition of a building in a Conservation Area is considered to be acceptable, permission for its demolition will only be granted subject to conditions linking demolition to the implementation of an approved redevelopment scheme; and
- c) All proposals for development must have regard to the development principles in the Conservation Area General Guidance Supplementary Planning Document and Conservation Area Appraisal and Management Plan Supplementary Planning Documents or equivalent.

**DM18.5** To preserve and enhance the character, appearance and setting of Locally Listed Buildings within the borough, the Council will determine all development proposals that affect Locally Listed Buildings in accordance with the following:

- a) Substantial weight will be given to preserving and enhancing Locally Listed Buildings; where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building;
- b) All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building; and
- c) All proposals for development must have regard to Croydon's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document or equivalent.

**DM18.6** To preserve and enhance the character, appearance and setting of Local Heritage Areas within the borough, the Council will determine all development proposals that affect a Local Heritage Area in accordance with the following:

- a) Substantial weight will be given to protecting and enhancing buildings, townscape and landscape features that make a positive contribution to the special character and appearance of a Local Heritage Area; and
- b) All proposals for development must have regard to the development principles in the Conservation Area General Guidance Supplementary Planning Document and the Local Heritage Area evidence base.

**DM18.7** Substantial weight will be given to conserving and enhancing landscape features or planting that makes a positive contribution to the special historic character and original layout of Registered and Locally Listed Historic Parks and Gardens.

**DM18.8** All development proposals must preserve and enhance War Memorials and other monuments, and their settings.

**DM18.9** In consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority.

### How the policy works

**6.188** While the Council recognises that many non-designated heritage assets do not benefit from statutory protection, the Council will seek to protect all heritage assets from demolition due to their national or local historic and architectural significance and the contribution they make to the borough's townscape character. The Council will seek to retain original features and detailing present on buildings and ensure that alterations and extensions to historic buildings are carried out in a manner that does not harm their significance and respects the scale, character, detailing and materials of the original building and area. Proposals that include the reinstatement of significant lost architectural or landscape features or the removal or harmful alterations, where this can be

demonstrably undertaken without harm to the significance of the heritage asset, will be supported in principle.

**6.189** In addition to the collective value of buildings and their relationship to each other, the character of Conservation Areas and Local Heritage Areas may be defined by the wider townscape, land uses, public realm, open spaces, road layout or landscaped areas. This character can be relatively consistent or in larger areas may contain several 'character areas' within the Conservation Area or Local Heritage Area. In addition to protecting individual buildings the Council will ensure that the wider character of an area is protected and enhanced.

**6.190** All planning applications submitted that relate to heritage assets should include a description of the significance of the heritage asset affected and analysis of the resultant impact of

the development on the heritage asset and its setting. The level of detail of this statement should be proportionate to the significance of the asset affected and will, if necessary, be directed by the Council.

**6.191** All development that relates directly to heritage assets or affects their setting must be of a high quality design that enhances their special character. New development ~~will be discouraged from copying existing buildings but rather~~ must be informed by and well integrated with the established character **and heritage significance** of the area.

**6.192** Development will be encouraged to enhance the setting of heritage assets, or at the very least not have any adverse impact on the current setting. In some cases there may be opportunities to better reveal the setting of heritage assets; however this must not have adverse impacts on local character or other heritage assets.

**6.193** Historic buildings should be maintained in their original use wherever possible unless fully justified by demonstration that this is necessary to secure its long term future viability. Where a proposed change of use is fully justified, it should be demonstrated how the building's original fabric and character is to be preserved.

**6.194** Historic landscapes, including Registered and Locally Listed Historic Parks and Gardens may have interest from their age, connection with historic buildings, events or people, presence of ornamental features and artefacts, style of layout, or work of an important designer. The Council will ensure that Historic Parks and Gardens are not adversely affected by new development.

**6.195** Croydon's archaeological heritage comprises of both above and below ground remains, previously identified through

individual finds, evidence of previous settlements and standing structures. At present, approximately a quarter of the borough is covered by archaeological priority areas, which are areas that have a high likelihood of archaeological significance. Due to its nature, much of the borough's archaeological heritage is likely to have been undiscovered and as a result is very sensitive. If a site is identified as having potential archaeological significance applicants will be required to undertake an archaeological desk-based assessment and, if necessary, a field investigation. Any discovered archaeological remains will be required to either be preserved in situ or through a programme of excavation, recording, publication and archiving, undertaken by an archaeological organisation approved by the Council, prior to the commencement of any development. The Council will consult with and follow the guidance of the Greater London Archaeological Advisory Service, or equivalent authority, on the archaeological implications of development proposals.

**6.196** Where development proposals affect heritage assets, the submission of a full planning application will be sought as opposed to an outline planning application, unless the Local Planning Authority has sufficient comfort that the level of detail submitted will ensure that the proposed development will preserve or enhance the affected asset or assets.

**6.197** The Council supports the principle of improving **physical and virtual access and improved interpretation of the historic significance of** the historic buildings but will ensure that works undertaken to achieve this are done so in the most creative manner possible and that any harm to significance is minimised and outweighed by the public benefit of securing access.

**6.198** The Council will maintain the 'Heritage at Risk Register', which is managed by Historic England, and monitors the condition of heritage assets where possible. If deemed

appropriate, the Council will exercise its legal powers to ensure that essential maintenance of designated heritage assets is undertaken. The Council will seek to work with partners to secure creative solutions that would contribute positively to local character and vitality.

**6.199** When, in exceptional circumstances, a heritage asset cannot be retained, the development will be required to conduct a full recording survey (including photographs) and deposit the information in the Croydon Local Studies Library and Archives Centre. This should be secured through a planning condition. This is in addition to the recording requirements imposed in respect of the loss of nationally significant designated heritage assets.

**6.200** This policy should be read in conjunction with existing and future Council guidance documents including the:

- a) Conservation Area General Guidance Supplementary Planning Document;
- b) Conservation Area Appraisal and Management Plan Supplementary Planning Documents;
- c) Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document; and
- d) ~~Residential Extensions and Alterations Supplementary Planning Document.~~ **Suburban Design Guide Supplementary Planning Document (SPD2) 2019**

- Borough Character Appraisal (2015)
- Croydon's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document (2007)
- Conservation Area Appraisal and Management Plans (various)
- Conservation Area General Guidance Supplementary Planning Document (2013)
- Local Heritage Areas Review (2016)
- Croydon Opportunity Area Planning Framework (2013)
- East Croydon Masterplan (2011)
- West Croydon Masterplan (2011)
- Mid Croydon Masterplan (2012)

### Key supporting documents

- The Setting of Heritage Assets, Historic England - Historic Environment Good Practice Advice in Planning 3 (2015)
- Conservation Area Designation, Appraisal and Management - Historic England Advice Note 1 (2016)
- Understanding Place: Historic Area Assessments – English Heritage (2011)

# 7. Community Facilities

## Strategic policy

### Where we are now

7.1 The main issues for the provision of community facilities and education facing Croydon are that:

- An increasing population will put more pressure on existing community facilities and is likely to require the provision of more.
- Over time the types of community facilities provided will need to change to reflect demographic change – the population becoming older and more ethnically diverse, more people living alone and changing lifestyles.
- There are, and will be changes to public policy on service provision and co-location of services.
- There will be a need to accommodate ~~1,900 extra burials in Croydon by 2031~~ **10,000 internments** in the borough.

### Where we want to be

**Strategic Objective 4:** Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

**Strategic Objective 6:** Provide and promote well designed emergency services, community, education, health and leisure facilities to meet the aspirations and needs of a diverse community.

**Strategic Objective 7** Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.

**Strategic Objective 8:** Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.



## How we are going to get there

### Policy SP5:Community Facilities

**SP5.1** The Council will have a presumption in favour of new ~~development~~ provided it is in accord with Policy SP5 and other applicable policies of the development plan and it ~~Development that provides for contributes to~~ the provision of infrastructure and community ~~facilities to meet the needs of the borough will be supported in appropriate locations.~~ through Community Infrastructure Levy and planning obligations requirements .

#### Health and wellbeing

**SP5.2** ~~The Council and its partners will create and safeguard opportunities~~ **Opportunities** for healthy, fulfilling and active lifestyles ~~will be created and safeguarded~~ by:

- a) Working in partnership with the health authorities to improve health in Croydon;
- b) Ensuring new developments provide opportunity for healthy living by the encouragement of walking and cycling, good housing design, sufficient open space and opportunity for recreation and sound safety standards;
- c) Improving education **facilities** and skills training in Croydon and encouraging life-long learning; and
- d) Promoting the growth and expansion of further and higher education to improve skills and act as a driver of growth and enterprise in the local economy.

**SP5.3** The Council and its partners will encourage the creation of healthy and liveable neighbourhoods by:

- a) Ensuring the provision of a network of community facilities, providing essential public services; and
- b) Protecting existing community facilities that still serve, or have the ability to serve, the needs of the community.

#### Providing new community facilities

**SP5.4** The pattern, scale and quality of community and education facilities will be adjusted:

- a) To meet the evolving needs of the community;

- b) To improve service provision; and
- c) To support housing and employment growth.

**SP5.5** Community facilities will be well designed and located so as to be accessible to all sections of the community where they provide an on-site service. The Council and its partners will encourage and plan for the co-location of services where this provides convenience to the user and resource efficiency and can be achieved in a timely way. Detailed location and site allocation policies are set out in the Detailed Policies and Proposals of the Croydon Local Plan.

**SP5.6** The Council will support and enable the provision and improvement of places of worship. Criteria for can be found in Policy DM19.2.

**SP5.7** The Council will support the temporary occupation of empty buildings and cleared sites for community uses where they contribute to regeneration and enhance the character of the area.

#### Burial space

**SP5.8** The Council will plan and provide additional space for burials. The site or sites will be selected through a study and should meet the following criteria:

- a) Meet burial needs until at least 2031 and be of sufficient size for that purpose;
- b) Be suitable for burial of all groups and faiths;
- c) Be accessible to all sections of the community; and
- d) Meet technical requirements for burial including the avoidance of risk to aquifers.

#### Education and skills

**SP5.9** The Council will support investment in the improvement and expansion of primary and secondary schools and special schools to meet the needs of the community and its growing population.

**SP5.10** The Council will support investment in new schools by identifying sites for new schools in the Croydon Local Plan.

**SP5.11** Children's Centres and pre-school facilities will be provided, enhanced and updated in alignment with the growing population.

**SP5.12** The Council will support the growth and improvement of further and higher education in the borough and in particular seek to bring a university or 'multiversity' to Croydon. Subject to progress, the Croydon Local Plan will define a campus location at a suitable site with high public transport accessibility.

**SP5.13** The Council will seek to encourage the new university/multiversity to be a centre for innovation, enterprise and associated employment.

**SP5.14** The Council will support skills training and further education of residents by modernising and enhancing the quality of libraries, assisting home learning and training at work, and supporting adult education and training.

**SP5.15** The Council will work with higher and further education services to better provide for the needs of employment and life enhancement training.

## Why we have taken this approach

~~7.2 The National Planning Policy Framework states that infrastructure provision is part of planning for prosperity. New housing, employment and other development brings with it additional requirements for community facilities. Government policy has enabled Councils to raise resources in support of social infrastructure through a Community Infrastructure Levy and through planning obligation agreements. Evidence of the needs for additional infrastructure is provided in the accompanying Infrastructure Delivery Plan and will be further specified in the Community Infrastructure Levy (CIL). This policy, as a first step, specifies the principle that Croydon will use a CIL to aid the funding of community infrastructure.~~

### Health and wellbeing

~~7.3 The Local Plan has a role to play in creating opportunities for healthier and more active lifestyles is part of evolving national policy, recently reaffirmed in the Government's White Paper on which contribute to better public health. The creation of opportunities requires local action jointly between the health, care and local planning authorities. Croydon's Sustainable Community Strategy endorses the need for people to have an active healthy lifestyle to increase independence and healthy life expectancy to help people stay healthy and independent so that they can improve their own health and wellbeing.~~

7.4 Creating a safe home and physical environment whilst encouraging physical exercise will have a positive impact on the physical and mental health of residents, workers and visitors to Croydon.

7.5 London and borough policies all seek to improve the education, training and skills levels of the population to improve their quality of life, increase life-long opportunities for employment and to improve the competitiveness of national, regional, and local economies. Local strategic policy is required to embed these educational, training and skills objectives into sustainable spatial development in Croydon.

7.6 Croydon's level of skills at degree level and above is now less than the London average. It is a disincentive to inward investment for high knowledge industry and investment. To overcome these deficiencies and to increase opportunities for degree level education and enhanced training for skills, the expansion of higher and further education is to be encouraged. In particular, the attraction of a university or complex of university facilities to Croydon is seen as important and was envisaged in the 'We are Croydon' Vision. This will require in time the expansion of existing colleges and the provision of a new university complex in or near Croydon Metropolitan Centre. ~~The London Plan identifies Croydon Opportunity Area as a Strategic Outer London Development Centre for higher education.~~

7.7 Local planning authorities are asked to ensure that infrastructure is provided in support of existing and growing communities. Modern society needs a wide range and network of facilities provided locally to support the population in its health, safety, sport, leisure, education and meeting place needs. The precise needs of these services vary but an essential requirement is that they are located so as to be reasonably accessible to the diverse population they serve.

**7.8** The pattern and extent of existing health facilities, schools and colleges, indoor and outdoor leisure, libraries, halls and of schools and Children's' Centres is described in the accompanying Infrastructure Delivery Plan. The pattern of service provision will need to change over time to reflect changing needs caused by demographic change (aging, more people living alone, more children, a more ethnically diverse population and changing lifestyles). Additionally the process of growth creates service pressures for more public service outlets in the community. The policy gives positive support for physical changes to accommodate more and improved community facilities.

**7.9** The expected growth in the borough's population means complementary community facilities will be required. In addition to seeking opportunities to provide new facilities, the Council will protect existing community facilities where they still serve, or have the ability to serve the needs of the community. The community facilities are largely outlined in the Croydon Infrastructure Delivery Plan. The needs of the community evolve, for example the borough's public houses have come under considerable pressure in recent years and are now considered a community facility. Whereas the borough has an over provision of care homes, residential homes and nursing homes, so these are no longer considered a community facility to be protected by policy.

**7.10** Provision and ease of access to health and community facilities have positive impacts on wellbeing and healthcare. Such facilities need to be accessible to all sections of the community, including those without a car, the disabled or others with social, economic or physical characteristics limiting their mobility. Where possible services will be co-located so as to enable multi-purpose trips, reduce the need to travel and for the convenience of the user. Additionally, the service providers through co-location will be able to share spaces and services and to reduce capital and

revenue costs. This policy is supported by Policy SP8 (Transport and Communication).

**7.11** Public satisfaction with local neighbourhoods increases with ready access to sport and leisure facilities. Likewise the probability of people enjoying an active and healthy lifestyle increases with access to leisure and sporting facilities.

#### Providing new community facilities

**7.12** Croydon has a wide range of faith groups, many of which for demographic and other reasons are growing and in need of new or expanded accommodation both for worship and for associated education, social and assembly needs. The Council will, as a general principle, enable development of this nature at appropriate and accessible locations. ~~Detailed policy on this is specified in the Croydon Local Plan's Detailed Policies and Proposals.~~

**7.13** The extensive need for community facilities, together with pressure on public and voluntary sector resources requires that resources are used carefully. Empty buildings and premises offer a low cost, if temporary, source of supply for some community facilities to commence their function pending a more permanent solution. Not all empty buildings will be suitable for community uses, for example where there is a shortage of parking or they are adjacent to noise sensitive uses. A policy to encourage temporary uses can enhance the public realm to help build social cohesion, support cultural diversity and engender a sense of safety and belonging.

#### Burial Grounds

**7.14** A burial needs study on behalf of the borough shows a need to accommodate 10,000 **deaths-interments** by 2031 ~~with a resultant need for 1,900 new burial spaces~~. The London Plan urges boroughs to consider supplying burial grounds close to the

communities they serve. The criteria for site selection is identified in the Croydon Local Plan's Detailed Policies and Proposals.

### Education and skills

**7.15** The quality of educational facilities needs continual renewal and improvement to meet modern standards. Additionally, the educational estate needs to be expanded to meet the requirements arising from housing and demographic growth and to fulfil the objectives of Croydon's Sustainable Community Strategy. ~~This will require both the expansion of existing schools and the provision of new schools.~~ The latest pupil projections indicate that there are sufficient primary school places across the majority of the borough to accommodate the planned growth up until 2026. Projections suggest that two new primary schools may be required, one to serve the Croydon Opportunity Area and another in the Purley/Coulsdon area after 2026. Two sites have been allocated to meet this projected need; Allocation 201 and Allocation 490. Any long-term future need for primary school places in the south of the borough will be taken into account in the review of this plan. Currently, the growth in the Purley Way Transformation Area is not projected to create a need for additional primary school places due to over-capacity within the existing schools in the area. The majority of the planned housing developments in the Purley Way Transformation Area are due to be delivered after 2026. To safeguard against a future rise in demand for primary school places, a site has been allocated in the Purley Way Transformation Area for a new 2FE primary school. Pupil projections suggest that the borough currently has enough secondary school places to meet the demand from the proposed housing numbers for the next 5-10 years. Any additional need for secondary school places in the south of the borough will be accommodated in the proposed school on the Heath Clark site and the existing site on Duppas Hill where St. Andrews CE High School (owned by the Diocese of Southwark, with Croydon

~~Council only owning the playing field) was located. This is further described in the Infrastructure Delivery Plan. Sites for additional schools will be identified in the Croydon Local Plan's Detailed Policies and Proposals~~

~~**7.16** The Council has a demographic model and methodology to estimate the need for form expansion in the state sector which is described in more detail in the Infrastructure Delivery Plan.~~

**7.17** The needs of children with learning difficulties or behavioural problems also requires physical improvement and expansion with more children educated close to home in the borough rather than further afield. Specialist provision is thus required in both existing and in special schools. ~~New sites will be identified in the second part of the plan period based on an updated Special Education Needs Estate strategy. The current Special Education Needs Strategy meets the need for the next 5 to 10 years.~~

**7.18** Croydon Council has recently provided 26 Children's Centres in line with current requirements. Over the period of the Plan these centres will need to be renewed and adapted to meet changing pre-school needs. At the same time housing growth will bring additional demands and in due course call for expansion of Children's Centres or other pre-school facilities. The principle of such expansion and adaptation is established in this policy.

**7.19** Universities and university sites with multiple university representation (multiversities), have a track record for innovation and technical developments, many of which have commercial applications. ~~There are now institutions offering university grade education in the borough~~ ~~One purpose for establishing a University or multiversity in Croydon is to provide~~ing the opportunity for the direct application of new technologies in young and growing enterprises. ~~For this reason, Policy SP5.13 The~~

**policy establishes** in principle that university presence in Croydon should be in a form and in a place with space and opportunity for there to be adjoining centre(s) of innovation.

**7.20** In a fast changing world, the skills needed for employment and wider knowledge, require constant informal and formal learning throughout life. The Council, as part of its effort to raise the quality of life for its residents, will continue to support this process through the work of the Adult Learning and Training Service, the provision of a central and hub libraries of an improving standard and through partnership with the higher education colleges. The end result is to give opportunities for and to stimulate life-long learning, as envisaged in Croydon's Sustainable Community Strategy.

## Providing and protecting community facilities

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 4
- Strategic Objective 6
- Strategic Objective 7
- Strategic Objective 8
- Policy SP5

### Why we need this policy

**7.21** ~~The National Planning Policy Framework in paragraph 69 states that the~~ The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The Council recognises the benefits of a healthy community and with the expected growth in the borough's population, existing community facilities that serve their current and future needs should be retained and new facilities provided.

**7.22** Croydon's population, as it grows, will put increasing pressure on community facilities. Consequently, a changing approach towards locating services and facilities is needed, especially to ensure they are provided in sustainable locations.

**7.23** ~~The London Plan Policy 3.16 cites~~ **requires** the protection and enhancement of social infrastructure which includes community uses and encourages London boroughs **to ensure that London's diverse communities' social infrastructure needs are met** ~~develop policies to protect these uses.~~



## Policy DM19: Providing and protecting community facilities

**DM19.1** The Council will permit the loss of existing community facilities where:

- a) It can be demonstrated that there is no need for the existing premises or land for a community use and that it no longer has the ability to serve the needs of the community;
- b) The existing use is located on the ground floor within a Main Retail Frontage, a ~~Secondary Retail Frontage~~, a Shopping Parade or a Restaurant Quarter Parade; or
- c) Community facilities for a specific end user (either on site or off site as part of a comprehensive redevelopment) that meet current or future needs are provided.

**DM19.2** The Council will support applications for community use where the proposals:

- a) Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion;
- b) Comply with the criteria for **D4 class community** uses in industrial locations set out in Table 5.1;
- c) Are accessible to local shopping facilities, healthcare, other community services and public transport or provides a community use in a location and of a type that is designed to meet the needs of a particular client group; and
- d) Are for a use that is a town centre use, as defined by the National Planning Policy Framework, are located within Croydon Metropolitan Centre or a District or Local Centre, have no more than 280m<sup>2</sup> of floor space (net) and are in the vicinity of a Neighbourhood Centre, or are a change of use of an existing unit in a Shopping Parade.

### How the policy works

#### Protection of existing community facilities

**7.24** Proposals involving the loss of a community facility may comply with the policy by:

- a) Explaining why the current use is no longer needed if the building/site is occupied; and

- b) Showing that the loss would not create, or add to, a shortfall in provision of floor space/sites for the existing community use by providing details of a marketing exercise that meets the criteria below or provide a replacement community facility for a specific end user either on site as part of a mixed use development or elsewhere on a site with no current community use.

**7.25** The marketing exercise associated with this evidence should be for a minimum period of eighteen months. Space should be offered at a reasonable charge for community groups/voluntary sector organisations reflecting its existing use value unfettered by any hope value. In the event that a community facility is listed on the Assets of Community Value register and is offered for sale, the local community is given six months to prepare a bid to buy it. In such circumstances, the marketing statement could be reduced to a period of a minimum continuous period of twelve months ~~in addition to~~ **including** the six months that the community has to prepare a bid to buy it.

**7.26** Developments subject to this policy may include proposals involving the loss of an existing profit-making community use (such as a private gym or cinema). These could submit evidence to demonstrate that the existing community use is not financially viable and so no longer has the ability to serve the needs of the community.

**7.27** In cases where a community use ceases, it has to be successfully demonstrated that there is no local need or demand for alternative community uses.

**7.28** Policy DM19.1(b) removes the protection of community facilities located in Main ~~Retail~~ Frontages, ~~Secondary Retail Frontages~~, Shopping Parades and Restaurant Quarter Parades as these are locations where Class **A-E (Commercial, Business and Service)** uses are the preferred uses. Policies DM22, DM24 and DM25 permit the extension and change of use of units in these designations ~~(with the exception that change of use is not permitted in Main Retail Frontages)~~. In order to allow any unit converted to a community use in one of these location to revert to a Class **A-E (Commercial, Business and Service)** use, the protection of community use does not apply within one of these designations. As Policies DM22, DM24 and DM25 permit the change of use of units in these designations to a community use

there should be a supply of units within the same area to replace a lost community use if needed. **The aim to retain an end user is to ensure that no existing function is lost. The replacement or consolidated community facility should meet the current and future needs of what the site provides already. An inventory of current uses needs to be submitted along with the application, which should provide a schedule of how these uses will be accommodated in the proposed premises alongside other uses. However, if a particular function/tenant no longer wishes to operate, then the space has to be open to alternative groups of the same function or new community uses, by way of marketing.**

#### Proposals for new community facilities

**7.29** The use of a building and the needs of communities can change over time. Therefore, new community facilities should be designed to be flexible and adaptable to changing circumstances including being capable of multi-use and expansion.

**7.30** New community facilities should be located so that they are close to schools, local shopping facilities and public transport and other community services to reduce the number of trips people need to make to access them. However, it is acknowledged that there may be circumstances where the needs of a particular group or client base mean that it that it does not need to be located close to other services. In such instances applications would need to be supported with information demonstrating how the lack of access to other services will not have a negative impact on the end users of the new community facility and the amenity of the surrounding area.

## Supporting Selhurst Park as the home stadium of Crystal Palace Football Club

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 1

#### Why we need this policy

**7.31** Selhurst Park has been home to Crystal Palace Football Club since 1924.

**7.32** The Council recognises the existing role that Crystal Palace Football Club has in the community identifying it as a large scale community and leisure facility that continues to make a significant contribution to local area regeneration, creating opportunities for people to share a sense of pride in where they live, as well as delivering initiatives that support community cohesion and facilitate greater social inclusion.

#### Policy DM20: Supporting Selhurst Park as the home stadium of Crystal Palace Football Club

The Council will continue to support Selhurst Park as the home stadium of Crystal Palace Football Club and ensure that any redevelopment would enhance the club's position with a football stadium which makes a significant contribution to the Borough.

#### How the policy works

**7.33** The presence of a major Football Club within Croydon brings many economic, social and cultural benefits. It is therefore important to protect the facilities that are considered necessary for the retention of such a club.

**7.34** London Plan policy 4.6 provides support for the continued success of professional sporting enterprises and the cultural,

social and economic benefits that they offer to residents, workers and visitors.

## Protecting public houses

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 6
- Policy SP5

### Why we need this policy

**7.35** ~~The National Planning Policy Framework in paragraph 69 states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.~~ The loss of public houses over recent years has increased due to rising property values. The importance of public houses as a community asset has been acknowledged through the National Planning Policy Framework which requires local authorities to 'plan positively' for such uses. There is also a body of evidence produced by organisations such as CAMRA (The Campaign for Real Ale), the All Party Parliamentary Beer Group and the Institute for Public Policy Research which also supports this view.

**7.36** The Institute of Public Policy Research's 'The Social Value of Community Pubs' details the social and community

#### Policy DM21: Protecting public houses

The Council will not grant planning permission for the demolition or change of use of a public house which displays the characteristics of a community pub such as:

- Space for organised: social events such as pub quizzes, darts competitions, pool leagues;
- Meeting rooms, performance spaces, room for hire (appropriately sound proofed);
- Ancillary facilities (skittles alley, children's play area); and
- Associated clubs and teams;

importance of public houses and their importance as hubs for development of social networks. It notes the significant long term consequences and associated costs for communities with a lack of social infrastructure which can support the wellbeing of individuals and communities. In May 2013 CAMRA advised that public house losses had been running at 26 per week in the six months to March 2013.

**7.37** The London Plan Policy ~~3.16~~ **HC7** cites the protection and enhancement of social infrastructure which can include ~~of~~ public houses and encourages London boroughs to develop policies to **as part of London's built, social and cultural heritage** as they are the hubs of social gatherings ~~protect public houses as a~~ **community asset.**

Unless:

- a) The loss of the public house would not result in a shortfall of local public house provision of this type;
- b) That the public house is no longer considered economically viable when considered against the CAMRA's Public House Viability Test; and that a range of measures have been undertaken to seek to improve viability including (but not restricted to):
  - Hosting quiz nights, craft fairs, live music or comedy;
  - Food offer diversification;
  - Providing B&B Accommodation;
  - Renting out space for meetings, classes or community events;
  - Maintenance, repair and visual improvements; and
  - Varied opening hours; and

The public house has been marketed as a public house, at a market rate for public houses, for a consistent period of ~~18~~ 24 months.

### How the policy works

**7.38** Public houses play an important role at the heart of many local communities. In many cases they have historically provided social hubs and make a positive contribution to townscape and local identity. A defined need can be demonstrated by the submission of a marketing statement for a period of ~~eighteen~~ 24 months and consideration against CAMRA's viability assessment. Other criteria which would be considered ~~edations~~ would include sustained and documented evidence of local objections to the loss of the public house and the public house being used for a wider variety of ancillary uses such as functions, social events and other community activities.

**7.39** Public houses can provide an important role in promoting community cohesion and can offer opportunities for people from different walks of life to mix. They are more than just a place to relax and drinks; they can host events, clubs and provide informal meeting spaces for local interest groups. In 2012 the

Institute of Public Policy Research (IPPR) report on Pubs and Places found that 23% of pub goers had made friends in their local public house with people "they would not normally mix with". Supporting such industries is particularly important given the importance of the food and drinks industry to Croydon. As a consequence, the Council will protect Public Houses as long as their benefit to the community can be justified.

**7.40** The Council will resist the loss of these facilities unless it can be demonstrated that is no longer required in its current use. Evidence will be required to show that the loss would not create, or add to, a shortfall in provision for the public house and demonstrate that there is no demand for such a use on the site. This would include the submission of evidence of suitable marketing activity for a period of ~~eighteen~~ 24 months. In the event that a public house is listed on the Assets of Community Value register and is offered for sale, the local community is given six months to prepare a bid to buy it. In such circumstances, the marketing statement could be reduced to a

period of a minimum continuous period of ~~twelve~~ **eighteen** months in addition to the six months that the community has to prepare a bid to buy it. This evidence should demonstrate that the existing use is no longer financially viable through the submission of financial evidence. Marketing details need to include a site description, photographs and reasonable terms commensurate with public house use. In cases where a public house use has ceased it has to be successfully demonstrated that there is no local need or demand.

### **Key supporting documents**

- CAMRA Guidance – Pub Planning Policy Tool Kit (2014)
- ‘How to save London’s pubs as community resources’- Steve O’Connell, London Assembly (2013)
- The Social Value of Community Pubs (2012)

## Providing for cemeteries and burial grounds

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 6
- Policy SP5

### Why we need this policy

~~7.41 In 2012 Croydon had less than two years supply of burial space remaining in its cemeteries within the borough and at Greenlawns Memorial Park in Tandridge district and Bandon Hill Cemetery in the London Borough of Sutton. Planning permission to extend Greenlawn Memorial Park, a council owned cemetery in Warlingham was obtained in January 2020.~~

~~7.42 A planning application was made to Tandridge District Council to extend the existing burial ground at Greenlawns Memorial Park following consideration of all known options within the London Borough of Croydon itself. The planning application was refused and the refusal was upheld upon appeal. In 2010,~~

the Council commissioned a study for future requirements of burial ground and the recommendations estimated that a need for 10,000 interments was required for the period up to 2031.

**7.43** Therefore, Croydon needs to find an alternative site for a new burial ground and a policy is proposed to guide the search for a site and to help determine any subsequent planning application.

~~7.44 The Burial Land Need and Provision Study identifies that space needs to be found for 1,900 burial spaces in the borough up to 2031. paragraph deleted~~

### Policy DM22: Providing for cemeteries and burial grounds

The Council will support applications for new cemeteries and burial grounds where the proposals:

- a) Have good means of access from roads and are near bus routes or other transport nodes;
- b) Are located in areas of with no risk of flooding from all potential sources of flooding;
- c) Are not located in a Groundwater Source Protection Zone; **and**
- d) Would not have unacceptable adverse impact on the biodiversity of the borough; **and**

~~e) Are not located in Metropolitan Green Belt or on Metropolitan Open Land, unless it has been demonstrated that there are no suitable sites that are not in Metropolitan Green Belt or on Metropolitan Open Land, there is no impact on openness and existing provision of public access is maintained. Paragraph deleted~~

## How the policy works

**7.45** A new cemetery or burial ground needs to be well accessed from roads and bus routes or other transport nodes in order to be accessible for residents of the borough to visit and attend to gravestones.

**7.46** Cemeteries and burial grounds would be particularly adversely affected by flooding. Therefore, they must not be located in areas of flood risk (from any source of flooding). Applications will be refused if there is any risk of flooding to the site irrespective of whether a sequential test demonstrates that there are no other suitable sites within the borough.

**7.47** They also have a greater potential to contaminate groundwater supplies. Groundwater provides a third of our drinking water in England and Wales, and it also maintains the flow in many rivers. In some areas of Southern England, groundwater supplies up to 80% tap water. It is crucial that these supplies and sources are looked after and ensure that tap water is completely safe to drink. The Environment Agency has defined Groundwater Source Protection Zones for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. Maps are available from the Environment Agency (on their website) showing the extent of Groundwater Source Protection Zones in Croydon.

**7.48** ~~The National Planning Policy Framework lists facilities for cemeteries as potentially being acceptable in Green Belt.~~

~~However, the presumption is that this is for existing cemeteries and that new cemeteries and burial grounds need to demonstrate exceptional circumstances before being permitted in Green Belt (and by default, Metropolitan Open Land). paragraph deleted~~

**7.49** ~~Therefore, a new cemetery or burial ground will only be permitted in Metropolitan Green Belt or Metropolitan Open Land if it has first been demonstrated that there are no suitable sites outside of Metropolitan Green Belt or Metropolitan Open Land. These sites do not have to be within the borough boundary of Croydon. Furthermore~~ Any ancillary facilities associated with a new cemetery or burial ground must be kept to a minimum so that there is no impact on openness of Metropolitan Green Belt or Metropolitan Open Land. Existing public access to any site in Metropolitan Green Belt or Metropolitan Open Land must also be maintained.

## Key supporting documents

- Burial Land Need and Provision Study (2010)



## A Place with a Sustainable Future

The content of this section is related to the theme of Croydon as 'A Place with a Sustainable Future.' It considers how the borough can become a sustainable, well connected place and an environment prepared for the impacts of a changing climate.

## 8. ~~Environment and Climate Change~~ Sustainable Design and Construction

### Strategic policy

#### Where we are now

8.1 The key issues that the borough faces in terms of planning for climate change up to 2036 are:

- Climate change is a global issue with impacts that are felt most acutely at the local level in terms of more extreme weather, including hotter summers and periods of heavy rainfall.
- There is a Council target **to be carbon neutral** of a ~~34%~~ reduction in carbon emissions in Croydon by ~~2030~~25.
- ~~25% of the heat and power used in London must be generated through the use of localised decentralised energy systems by 2025.~~
- Croydon is ranked the 4th settlement in England most susceptible to surface water flooding.
- The London Plan sets a target for the capital to become ~~100%~~**85%** self-sufficient in managing waste by ~~2026~~0.
- If Croydon ~~town centre~~ undergoes intensive development, more aggregate recycling facilities may be required to minimise waste and its transportation.

#### Where we want to be

**Strategic Objective 5:** Ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.

**Strategic Objective 9:** Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.

**Strategic Objective 10:** Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.

**Strategic Objective 11:** Tackle flood risk by making space for water and utilising sustainable urban drainage systems.

## How we are going to get there

### Policy SP6:Environment and Climate Change **Sustainable Design and Construction**

**SP6.1** In order to reduce greenhouse gas emissions and deliver development that is adaptable in a changing climate, the Council will apply a presumption in favour of development provided applications meet the requirements of Policy SP6 and other applicable policies of the development plan.

#### Energy and carbon dioxide (CO<sub>2</sub>) reduction

**SP6.2** The Council will ensure that future development makes the fullest contribution to minimising carbon dioxide emissions in accordance with the London Plan energy hierarchy (use less energy, supply energy efficiently and use renewable energy), to assist in meeting local, London Plan and national CO<sub>2</sub> reduction targets. The Council will promote the development of district energy networks where opportunities exist due to high heat density<sup>57</sup> or an increase in heat density brought about by new development. This will be achieved by:

- a) Requiring high density<sup>58</sup> residential developments of 20 or more units to incorporate site wide communal heating systems
- b) Requiring major development<sup>59</sup> to be enabled for district energy connection<sup>60</sup> unless demonstrated not to be feasible or financially viable to do so.

#### Sustainable design and construction

**SP6.3** The Council will seek high standards of sustainable design and construction from new development, conversion and refurbishment to assist in meeting local and national CO<sub>2</sub> reduction targets. This will be achieved by:

- a) Requiring new-build residential development of fewer than 10 units to achieve the national technical standard for energy efficiency in new homes (2015). This is set at a minimum of 19% CO<sub>2</sub> reduction beyond the Building Regulations Part L (2013);
- b) Requiring **all major development** ~~new-build residential development of 10 units or more~~ to achieve the London Plan requirements or National Technical Standards (2015) for energy performance, whichever the higher standard;

<sup>57</sup> 55 residential units or 1,000m<sup>2</sup> commercial development per hectare

<sup>58</sup> 55 residential units per hectare for developments of over 100 homes; 75 units per hectare for developments of 20 or more but under 100 homes

<sup>59</sup> 10 or more residential units, a site of 0.5 hectares or more or 1,000m<sup>2</sup> commercial development

<sup>60</sup> Enablement for district energy connection which incorporates provision of a communal heating system operating to defined temperatures with a suitable on site space for associated heat connection plant and pipe connection to the perimeter of the site.

- c) Requiring all new-build residential development to meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G;
- d) Requiring conversions and changes of use of existing buildings providing more than 10 new residential units to achieve a minimum of BREEAM Domestic Refurbishment Very Good rating or equivalent;
- e) Requiring new build non-residential development of 500m<sup>2</sup> and above to achieve a minimum of BREEAM Excellent standard or equivalent;
- f) Requiring conversions and changes of use to non-residential uses with an internal floor area of 500m<sup>2</sup> and above to achieve a minimum of BREEAM Very Good standard or equivalent;
- g) Requiring new build, non-residential development of 1000m<sup>2</sup> and above to achieve a minimum of 35% CO<sub>2</sub> reduction beyond the Building Regulations Part L (2013); and
- h) Requiring development to positively contribute to improving air, land, noise, and water quality by minimising pollution, ~~with detailed policies to be included in the Croydon Local Plan's Detailed Policies and Proposals,~~ and
- i) Taking a bespoke approach to the sustainability of historic buildings and heritage assets, giving consideration to their particular construction, fabric and character.

#### Flooding, urban blue corridors and water management

**SP6.4** The Council, as a Lead Local Flood Authority, will work in partnership with the Environment Agency, community groups, water and highways infrastructure providers, developers and other Lead Local Flood Authorities to reduce flood risk, protect groundwater and aquifers, and minimise the impact of all forms of flooding in the borough. This will be achieved by:

- a) Applying the Sequential Test and Exception Test where required by Policy DM25;
- b) Requiring major developments in Flood Zone 1 and all new development within Flood Zones 2 and 3 to provide site specific Flood Risk Assessments proportionate with the degree of flood risk posed to and by the development, taking account of the advice and recommendations within the Council's Strategic Flood Risk Assessment and Surface Water Management Plan;

c) Requiring all development, including refurbishment and conversions, to utilise sustainable drainage systems (SuDs) to reduce surface water run-off and provide water treatment on site; and

d) Requiring development proposals to account for possible groundwater contamination in Source Protection Zones 1 and 2.

**SP6.5** The Council and its partners will promote the implementation of ‘Urban Blue Corridors’, enabling a network of multifunctional spaces and corridors that provide safe routes and storage for flood water within the urban environment. This will be achieved by:

Supporting schemes that make space for water in flood events;

Supporting schemes to de-culvert sections of the River Wandle, Norbury Brook and Caterham Bourne;

Preserving and enhancing landscape, heritage and culture through protection and access improvements to the borough’s ponds, open water and water heritage sites; and

Maximising opportunities to establish overland flow paths, surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas in locations of high surface water flood risk and critical drainage areas.

Waste management

The Council supports the objectives of sustainable waste management set out in the London Plan and national policy. The Council will identify the necessary capacity in collaboration with the neighbouring boroughs of Merton, Kingston and Sutton to maximise self-sufficiency in managing the waste generated within the four boroughs. This will be achieved through the South London Waste Plan DPD and any further revisions.

Minerals

The Council will support schemes for aggregate recycling facilities within the borough and seek to reduce the environmental impact of aggregates by supporting the enhancement and development of aggregate recycling facilities where there is no significant detriment to local amenity (see Policy SP8 regarding freight movement and railheads).

## What it will look like

Figure 8.1 Map of Policy SP6 Environment and Climate Change **graphic updated**

## Why we have taken this approach

### Energy and carbon dioxide (CO<sub>2</sub>) reduction

**8.2** In 2016<sup>62</sup>, the London Borough of Croydon was responsible for **1,124** 1,544 kilo tonnes of carbon dioxide (CO<sub>2</sub>) emissions<sup>61</sup>.

While this level of emissions is eighth highest across the 33 London Boroughs, total emissions from Croydon's homes are the second highest across the boroughs. The London Plan includes a target **for London to become a zero carbon city by 2050** to reduce CO<sub>2</sub> emissions by 60% by 2025 and the Climate Change Act sets out that emissions will be reduced by 80% by 2050 (based on 1990 levels). **A Climate and Ecological Emergency was declared by the Council in July 2019 with one of the aims for the council to be carbon neutral by 2030.** The ~~Croydon Climate Change Mitigation Action Plan (Croydon Council "Croydon Climate Change Mitigation Action Plan" 2010) sets out targets for reducing borough wide CO<sub>2</sub> emissions. A key part of this action plan is the minimisation of CO<sub>2</sub> emissions arising from new and existing buildings, through sustainable design and construction and low/zero carbon energy generation. This approach is embedded in the 'We Are Croydon Vision' (We Are Croydon vision (page~~

45)<sup>62</sup>. The Sustainable Design and Construction Evidence Base<sup>63</sup> and District Energy Feasibility Study<sup>64</sup> highlights that there is significant potential, in the form of high heat densities, for district energy. National planning policy and the London Plan support the development of district energy as a cost effective means of achieving low (and zero) carbon development in urban areas. The National Technical standards (2015) for new housing and the London Plan set minimum levels for CO<sub>2</sub> reduction. The London Plan also allows for the offsetting of residual CO<sub>2</sub> emissions where it can be demonstrated that it is not feasible to achieve the required CO<sub>2</sub> target fully onsite. Development applications proposing the utilisation of biomass heating systems or biomass combined heat and power systems will be required to provide appropriate information to allow assessments to be made of the effectiveness of measures to minimise the impact on local air quality.

### Sustainable design and construction

**8.3** ~~The Sustainable Design and Construction Evidence Base<sup>65</sup> and District Energy Feasibility Study<sup>66</sup> highlights that t~~ There is significant potential, in the form of high heat densities, for district energy<sup>67</sup>. National planning policy and the London Plan support ~~t~~ **The development of district energy is recognised** as a cost effective means of achieving low (and zero) carbon development in urban areas. The National Technical standards (2015) for new housing and the London Plan set minimum levels for CO<sub>2</sub> reduction.

<sup>63</sup> LBC Sustainable Design and Construction Evidence Base 2010 (page 58-61)

<sup>64</sup> AECOM District Energy Feasibility Study 2009

The London Plan also allows for the offsetting of residual CO<sub>2</sub> emissions where it can be demonstrated that it is not feasible to achieve the required CO<sub>2</sub> target fully onsite. ~~Development applications proposing the utilisation of biomass heating systems or biomass combined heat and power systems will be required to provide appropriate information to allow assessments to be made of the effectiveness of measures to minimise the impact on local air quality.~~

#### Flooding, urban blue corridors and water management

~~8.5 The Strategic Flood Risk Assessment for Croydon, Sutton, Merton and Wandsworth (SFRA, 2015) identifies the main risks of fluvial flooding are in the vicinity of the Norbury Brook through Thornton Heath and Norbury and through Kenley, Purley and Waddon along the Brighton Road and Godstone Road valleys and around the culverted River Wandle<sup>68</sup>. Croydon has been ranked the 4th settlement in England most susceptible to surface water flooding<sup>69</sup>. The Surface Water Management Plan (SWMP) identifies p~~Parts of the borough ~~to be~~ **are** particularly susceptible to surface water flooding, including ~~the~~ Brighton Road through Purley up to Central Croydon and the A22 Godstone Road<sup>70</sup>. **There have been** SFRA identifies significant episodes of surface water flooding at Purley Cross, Kenley Station, Brighton Road Coulsdon, Hamsey Green, Purley Oaks Road, Norbury and Thornton Heath<sup>71</sup>. **The Strategic Flood Risk Assessment (SFRA) also identifies** ~~there are~~ areas in the borough where groundwater may occur and where groundwater may come close to the ground surface<sup>72</sup>. Croydon experienced severe flooding in 2014

associated with the Caterham Bourne and high groundwater levels.

~~8.6 The SFRA, SWMP scoping report, Sustainable Design and Construction Evidence Base and policies in the London Plan recommend the application of~~ Sustainable urban drainage (SuDs) **is recommended by a number of studies for the borough to** ameliorate flood risk, improve water management and reduce surface water run-off. The Council, as the Local Planning Authority and the Lead Local Flood Authority, is required to ensure that SuDS are implemented in all major developments. The requirement to utilise SuDS in all development, including those in low risk areas, is in view of the fact that surface water from one area of a catchment may contribute towards enhanced flood risk in another area of that catchment. In addition, flood events are expected to become more frequent and more significant in the future as the U.K.'s climate changes and this requirement will go some way to adapting to this change. The installation of SuDS, such as green roofs, can have several additional benefits: increasing biodiversity and urban cooling, providing additional open space in built-up areas and improvements to water quality. Flood Risk Assessments will highlight site specific issues and help inform the best solutions to reduce flood risk and improve water management. The Level 2 SFRA and SWMP can be used to guide which SuDS will be the most suitable based on site specific considerations.

<sup>72</sup> SFRA Appendix A Figure 2.4

~~8.7 A Department of Environment, Food and Rural Affairs (DEFRA) commissioned research report, involving Croydon Council, entitled ‘Developing Urban Blue Corridors’ proposes tackling pluvial flood risk in a more innovative and strategic manner through the establishment of a network of multifunctional spaces for water<sup>73</sup>. It propounds the establishment of safe flood corridors and setting development back from natural overland flow paths and ponding areas. Establishing a network of multifunctional spaces and corridors for flood water provides additional opportunities for improving biodiversity, recreation, urban cooling and access, commonly called “Blue Corridors”. The Local Plan will support development where improvements to ponds and open water sites such as South Norwood Lake and Waddon Ponds are delivered. The approach is supported by policy within the London Plan<sup>74</sup>. The Croydon Local Plan’s Detailed Policies and Proposals will set detailed policies for establishing Urban Blue Corridors in Croydon.~~

~~8.4 The Environment Agency has defined Source Protection Zones (SPZs), for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk.~~ A formation of chalk underlies Croydon. Fractures in the chalk rock allow groundwater to collect and flow underground. They also allow large quantities of groundwater to be brought to the surface through pumping of wells. The water from these wells supplies over 70% of Croydon’s drinking water, and should be protected to ensure water is available to current and future generations. Considerate planning is needed so that development does not have a detrimental effect on the public’s valuable water resource. Through this package of

measures Croydon has the potential to reduce urban diffuse pollution in its water bodies and help improve the ecological status of the borough’s surface waters such as the River Wandle, Norbury Brook and Caterham Bourne. **The Environment Agency has defined Source Protection Zones, for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk.**

#### Waste management

**8.8** The Council has developed the South London Waste Plan DPD with the neighbouring boroughs of Kingston, Merton and Sutton. The Waste Plan forms part of each borough’s Local Development Framework and ensures that collectively, the boroughs meet the London Plan, national and EU requirements. Detailed planning policies for the assessment and delivery of new waste management facilities are set out in the South London Waste Plan DPD. Policy ~~SI7 5.16~~ of the London Plan seeks to manage as much of London’s waste within London as practicable; working towards managing the equivalent of 100 per cent of London’s waste within London by 20**26**~~31~~ and creating positive environmental and economic impacts from waste processing working towards zero biodegradable or recyclable waste to landfill by 20**26**~~31~~. Within this context, the London Plan emphasises that boroughs should maximise self-sufficiency. The London Plan provides updated guidance and revised waste apportionment that the South London Waste Plan will seek to meet.



**8.9** When considering planning applications for new waste management facilities, the Council will have regard to the policies of the South London Waste Plan DPD, the site selection criteria to be set out in the Croydon Local Plan's Detailed Policies and Proposals and the additional location criteria set out in the London Plan and national policy. Within Croydon, some Strategic Industrial Locations have been identified as potentially suitable for waste management facilities and are identified in the South London Waste Plan DPD.

#### Minerals

**8.10** An aggregates company has access to a rail head at Purley; **this site is allocated and safeguarded in line with paragraph 204 of the National Planning Policy Framework and shown on the Policies Map.** Whilst the borough has no minerals for extraction the levels of growth envisaged over the plan period will require sustainable means with which to transport and distribute aggregates as well as recycling aggregates. **The operations of such sites should not be prejudiced by potential development in the vicinity, and therefore applications will be assessed in accordance with the agent of change principle.**

## Development and construction

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 9
- Strategic Objective 10
- Strategic Objective 11
- Policy SP6.2
- Policy SP6.3

### Why we need this policy

**8.11** As part of its commitment to achieving sustainable development and promoting the economic and social wellbeing of the borough, the Council needs to ensure that there is effective protection of the environment and prudent use of

natural resources. To do this the Council needs to assess the environmental impacts of development and take action to ensure that sustainable development objectives are met. The entire borough of Croydon is also an Air Quality Management Area.

### Policy DM23: Development and construction

The Council will promote high standards of development and construction throughout the borough by:

- a) Ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land;
- b) Ensuring that developments are air quality neutral and do not lead to further deterioration of existing poor air quality;
- c) Ensuring mitigation measures are put in place to reduce the adverse impacts to acceptable levels. Where necessary, the Council will set planning conditions to reduce the impact on adjacent land uses to acceptable levels, relative to ambient noise levels and the character of the locality; and

d) Encouraging the use of sustainable and innovative construction materials and techniques in developments.

### Why we are proposing this approach

**8.12** In Croydon, developments of 10 or more new homes or 500m<sup>2</sup> or more of non-residential floor space are expected to meet high sustainable construction standards in accordance with the Croydon Local Plan.

**8.13** Developers should seek to minimise the adverse environmental impacts of development during construction in line with the Sustainable Design and Construction Supplementary Planning Guidance 2014 and by considering the following best practice measures:

- a) Identifying potential sources of dust and other air pollution as early as possible from the earliest stages of project design and planning;
- b) Locating activities likely to generate air pollution or dust away from sensitive uses such as hospitals, schools, housing and wildlife sites where possible;
- c) Minimising dust generation by dampening stockpiles and covering skips;
- d) Dampening and sweeping construction sites, access roads and dust generating activities such as stone cutting as required;
- e) Accommodating wheel washer facilities as necessary; and
- f) Making use of techniques such as framed construction and prefabricated components in order to minimise construction noise and disruption on site.

**8.14** Solid wall insulation will also be encouraged in existing developments where planning permission may be required.

### Air quality

**8.15** The entire borough of Croydon is an Air Quality Management Area (AQMA) and therefore developers should give careful consideration to the air quality impacts of their proposed development through an Air Quality Assessment.

**8.16** Since very few developments are 'zero emission' developments, most development will have a negative impact on air quality. As Croydon is an AQMA, new developments should be at least 'air quality neutral'. Developers should consider measures to minimise emissions of air pollution at the design stage and should incorporate best practice in the design, construction and operation of the development. Where a development has a negative impact on air quality, developers should identify mitigation measures that will minimise or offset the emissions from the development. These mitigation measures should be implemented on-site. This is especially important where provision has been made for a large number of parking spaces, where the development will generate a significant number of trips, will give rise to other potentially significant sources of pollution or will be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people. Poor air quality is linked to the development of chronic diseases and can increase the risk of respiratory illness. Tackling poor air quality can improve health problems and minimise the impacts on vulnerable groups, especially asthma in children and heart and respiratory diseases in older people.

**8.17** The Council has produced an Interim Policy Guidance (Standards and Requirements for Improving Local Air Quality) on requirements for improving local air quality, which sets out situations when an assessment may be required and suggests methods of undertaking such an assessment within the Croydon

area. Developers or architects involved in new residential development, new industrial and commercial development, or mixed use development with housing should consult the Interim Planning Guidance on Improving Local Air Quality and the Mayor of London's Control of Dust and Emissions Supplementary Planning Guidance.

- The Mayor of London's Sustainable Design and Construction Supplementary Planning Guidance (2014)
- The Mayor of London's Control of Dust and Emissions Supplementary Planning Guidance (2014)

### Noise

**8.18** There is a need to ensure that residents and businesses are protected from environmental disturbance ~~during the construction of major developments.~~ **Proposed developments should design out exposure to noise and provide adequate sound insulation to minimise the adverse impact of noise from a railway or a busy road, aircraft or an industrial activity, in line with the Agent of Change Principle.**

**8.19** ~~The Council's Code of Practice has been prepared to help developers and their contractors ensure that they undertake their works in the most considerate manner, in order to reduce the impact of the work on local communities. It also provides guidance on a Construction Logistic Plan required for major developments and the assessment of traffic movements.~~

**8.20** ~~Most planning applications received by the Council are assessed for the impact of environmental noise on the new development. This to ensure that the proposed development has adequate sound insulation in order to minimise the adverse impact of noise from a railway or a busy road, aircraft or an industrial activity. Residential developments close to railways and other noise sensitive sites will need a noise assessment.~~

### **Key supporting documents**

- Standards and Requirements for Improving Local Air Quality Interim Policy Guidance (2014)

## Land contamination

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Policy SP6.3

### Why we need this policy

~~8.21 Whilst a site may contain elevated levels of 'contaminants', it may or may not be defined in legislation as contaminated land. Land contamination is likely to have arisen from the activities of past industrial and waste disposal practices. Elevated levels of heavy metals, oils, pesticides, and asbestos or landfill gas are a few examples of substances or materials which could be considered contaminants and which, where not properly managed, could cause harm to health or the environment.~~

~~8.22 The legislation defines contaminated land as 'any land which appears to the local authority in whose area it is situated, to be in such a condition, by reasons of substances in, on or under the land that:~~

- ~~a) Significant harm is being caused, or there is a significant possibility of such harm being caused; or~~
- ~~b) Significant pollution of controlled waters is being or is likely to be caused.'~~

~~8.23 Land contamination is likely to have arisen from the activities of past industrial and waste disposal practices. Elevated levels of heavy metals, oils, pesticides, and asbestos or landfill gas are a few examples of substances or materials which could be considered contaminants and which, where not properly managed, could cause harm to health or the environment.~~

~~8.24 The planning system aims to ensure that the effects of historical contamination do **should** not cause any harm to the future users of a site. Provisions in the planning process ensure that, w **Where** contamination is an issue on a site, **development is an opportunity for it to be** it is cleaned up or remediated before or as part of its redevelopment. Contaminated sites can be redeveloped into uses such as housing, schools and hospitals.~~

~~8.25 Before the introduction of the Environmental Protection Act 1990, there were instances where the previous controls dealing with contamination were not so effective, and going back further in time, controls were limited or non-existent. This may have resulted in contamination not being addressed or satisfactorily dealt with prior to or during the site's development. It is these sites that the legislation aims to deal with by ensuring that, where potentially contaminated sites do exist, they are found and cleaned up.~~

~~8.26 It is the responsibility of the Council to determine whether it considers the site to be contaminated. Planning controls through the imposition of conditions assists in helping to govern these sites.~~

## Policy DM24: Land contamination

**DM24.1** The Council will permit development proposals located on or near potentially contaminated sites, provided that detailed site investigation is undertaken prior to the start of construction in order to assess:

- a) The nature and extent of contamination; and
- b) The production of landfill gases and the potential risks to human health, adjacent land uses and the local environment.

**DM24.2** Where the assessment identifies unacceptable risks to human health, adjacent land uses or the local environment, site remediation and aftercare measures will be agreed or secured by condition to protect the health of future occupants or users.

**DM24.3** All development proposals on contaminated sites should be accompanied by a full risk assessment, which takes into account existing site conditions.

### How the policy works

**8.27** In addressing contamination, it is recognised that retrospective remedial actions, carried out after a site has been developed, will be significantly more expensive and difficult, than if the remediation is carried out prior to or as part of a site's development. As a consequence of this, when a site is to be developed, the Council will seek to ensure that any issues of contamination are addressed through the imposition of planning conditions prior to its development. The scale of remediation of the land should reflect the nature and risk posed by any contaminants. The Council's Contaminated Land Officer will advise on remedial measures and that measures are successfully implemented.

### Key supporting documents

- Environmental Protection Act 1990

## Sustainable Drainage Systems and reducing flood risk

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Strategic Objective 11
- Policy SP6.4
- Policy SP6.5

### Why we need this policy

**8.28** The National Planning Policy Framework states that development should be directed away from areas at a highest risk of flooding and that Local Plans should apply a sequential, risk-based approach to the location of development. Where development is required in areas at risk of flooding, it should be safe for the lifetime of development without increasing flood risk elsewhere.

**8.29** The National Planning Policy Framework and Planning Practice Guidance state that sustainable drainage systems should be given priority in major developments unless demonstrated to be inappropriate. However, the use of sustainable drainage systems in all developments provides the opportunity to manage surface water as close to the source as possible and provide wider amenity and biodiversity benefits.

Policy DM25: Sustainable Drainage Systems and reducing flood risk

**DM25.1** The Council will ensure that development in the borough reduces flood risk and minimises the impact of flooding by:

- a) Steering development to the areas with a lower risk of flooding;
- b) Applying the Sequential Test and Exception Test in accord with Table 8.1;
- c) Taking account of all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses; and
- d) Applying the sequential approach to site layout by locating the most vulnerable uses in parts of the site at the lowest risk of flooding.

**DM25.2** In areas at risk of flooding development should be safe for the lifetime of development and should incorporate flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.

**DM25.3** Sustainable drainage systems are required in all development and should:

- a) Ensure surface run-off is managed as close to the source as possible;
- b) Accord with the London Plan Sustainable Drainage Hierarchy;
- c) Achieve better than greenfield runoff rates;
- d) Be designed to be multifunctional and incorporate sustainable drainage into landscaping and public realm to provide opportunities to improve amenity and biodiversity;
- e) Achieve improvements in water quality through an sustainable drainage system management train; and
- f) Be designed with consideration of future maintenance.



Table 8.1 Application of Sequential test and Exception test and Flood Risk Assessment to applications in Croydon

Flood Zones	Land uses	Sequential Test	Exception Test	Flood Risk Assessment
Flood Zone 1	All uses are permitted	Required if identified at risk from other sources of flooding <del>Not applicable</del>	Not applicable	All major <sup>75</sup> developments and all developments in areas identified as at risk from other sources of flooding
Flood Zone 2	<p>Highly vulnerable uses will only be permitted if the Exception Test is passed</p> <p>More vulnerable and Highly vulnerable uses should set Finished Floor Levels a minimum of 300mm above the known or modelled 1% annual probability flood level (1 in 100 year) including climate change</p>	Required for all development unless allocated in the Croydon Local Plan 2018	Required for highly vulnerable uses	All development

<sup>75</sup> Developments of 10 or more residential units, 1,000m<sup>2</sup> or more of non-residential floor space or sites more than 0.5ha in extent

Flood Zones	Land uses	Sequential Test	Exception Test	Flood Risk Assessment
Flood Zone 3a	<p>Highly vulnerable uses will not be permitted</p> <p>More vulnerable uses should set Finished Floor Levels a minimum of 300mm above the known or modelled 1% annual probability flood level (1 in 100 year) including climate change</p> <p>Basements dwellings will not be permitted</p>	Required for all development unless allocated in the Croydon Local Plan 2018	Required for essential infrastructure and more vulnerable uses	All development
Flood Zone 3b	<p>Water compatible uses will be permitted</p> <p>Highly vulnerable, more vulnerable and less vulnerable uses will not be permitted</p> <p>Basements dwellings will not be permitted</p>	Required for all development unless allocated in the Croydon Local Plan 2018	Required for essential infrastructure	All development

### How the policy works

**8.30** When preparing Flood Risk Assessments regard should be had to the Strategic Flood Risk Assessment, Surface Water Management Plan, Local Flood Risk Management Strategy,

other local flood history, relevant flood defence asset information and Environment Agency flood maps. Flood Risk Assessments should assess the risk from all sources of flooding and should be informed by the latest evidence on climate change allowances.

**8.31** The Sequential Test and Exception Test are not required for sites allocated in this Plan, for minor development<sup>76</sup> or change of use<sup>77</sup>. For all other development in Flood Zones 2 and 3 the Sequential Test and Exception Test should form part of the Flood Risk Assessment, having regard to the guidance in the Strategic Flood Risk Assessment. ~~A Sequential Test is required for development in Flood Zone 1 if the area has been identified at risk from other sources of flooding.~~

**8.32** For residential development, a Sequential Test may be made against the Council's published five year supply of housing land and should demonstrate that the five year supply of housing land cannot be met on sites with a lower risk of flooding. For all other uses a Sequential Test should be based on the catchment of the proposed use.

**8.33** Where a site is at risk of groundwater **flooding**, the Council will request a Basement Impact Assessment as part of the Flood Risk Assessment for any **application with basement or lower ground floor development**. These assessments should be informed by ground investigations to help assess the flood risks to basement development **and the surrounding area**.

**8.34** ~~Croydon has experienced a number of surface water flood events and has been ranked by Department of Environmental, Food and Rural Affairs as the 4th settlement in England most susceptible to surface water flooding<sup>78</sup>. The Local Flood Risk Management Strategy identifies up to 33,614 residential~~

~~properties at risk from surface water in the borough<sup>79</sup>. Extensive records are held of surface water flooding across the borough with particularly significant episodes at Purley Cross roundabout and Brighton Road, Kenley station, Brighton Road (Coulsdon), Hamsey Green, Purley Oaks Road, Norbury and Thornton Heath<sup>80</sup>. Due to the risk posed by surface water flooding in Croydon, development should utilise sustainable drainage systems to achieve better than greenfield runoff rates from the site. Greenfield runoff rates are defined as the runoff rates from a site, in its natural state, prior to any redevelopment and are typically between two and eight litres per second per hectare<sup>81</sup>. If better than greenfield runoff rates cannot be achieved, this should be justified to the Local Planning Authority and Lead Local Flood Authority as part of a drainage strategy. In these instances greenfield runoff rates should be achieved as a minimum in line with the London Plan.~~

**8.35** Sustainable drainage systems should always be considered as early in the design process to inform the design of the development. Proposals should demonstrate an understanding of how surface water will flow across the site, taking account of topography and locating drainage features accordingly. A drainage strategy should demonstrate that the site will achieve better than greenfield runoff rates and that sustainable drainage systems have been designed in line with the London Plan drainage hierarchy. Drainage design should follow the principles of water sensitive urban design and demonstrate a sustainable drainage management train. A sustainable drainage

<sup>76</sup> In relation to flood risk, minor development means: minor non-residential extensions with a footprint less than 250 square metres; alterations that do not increase the size of buildings; household development within the curtilage of the existing dwelling and physical extensions to the existing dwelling itself. This excludes the creation of a separate dwelling within the curtilage of the existing dwelling.

<sup>77</sup> This excludes change of use to a caravan, camping or chalet site or to a mobile home or park home site.

<sup>78</sup> National Rank Order of Settlements Susceptible to Surface Water Flooding, DEFRA 2009

<sup>79</sup> London Borough of Croydon Local Flood Risk Management Strategy

<sup>80</sup> London Borough of Croydon, Merton, Wandsworth Strategic Flood Risk Assessment Level 1

<sup>81</sup> London Plan Sustainable Design and Construction Supplementary Planning Guidance

management train identifies the different stages of movement of water through and across a site, identifying suitable sustainable drainage techniques for each stage. For example, a management train could consist of a green roof, a soakaway and permeable paving used in different parts of a development. The drainage strategy should also demonstrate how the drainage system will be managed and maintained for the lifetime of the development.

**8.36** Sustainable drainage systems provide wider benefits than just reducing surface water runoff from a site. They provide opportunities to improve water quality by removing pollutants, improve the quality and attractiveness of public realm and open spaces and enhance biodiversity through the creation of habitats such as ponds and wetlands. Sustainable drainage systems should be designed to manage water as close to the source as possible and include treatment stages which not only manage the flow of water but provide wider benefits to the site. The contribution of trees in reducing flood risk should be recognised in developing sustainable drainage systems and the wider benefits that can be realised. Detailed guidance on sustainable drainage systems will be produced by the Lead Local Flood Authority.

**8.37** Developments which result in the need for off-site upgrades to the water or sewerage network, will need to ensure that the occupation is aligned with the delivery of necessary infrastructure upgrades and where appropriate, phasing of occupation. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements.

### Key supporting documents

- Stemming the flow – the role of trees and woods in flood protections (May 2014)
- Strategic Flood Risk Assessment (2015)
- Surface Water Management Plan (2011)
- Local Flood Risk Management Strategy (2015)
- Ministerial Statement HCWS161 (2014)
- Woodland actions for biodiversity and their role in water management (March 2008)

# 9. Green Grid

## Strategic policy

### Where we are now

9.1 The key issues that the borough faces in terms of planning for green space up to 2036 are:

- 50% of the borough’s residential areas are located more than 400m from a local park.
- Pressure on existing green spaces and play areas are likely to increase with the levels of growth planned for urban areas in the borough.
- Croydon lacks areas of open water e.g. lakes, rivers and large ponds.
- Due to limited land availability there are significant gaps in the access to nature in the northern parts of the borough.
- Allotments in the borough are well used and there is a large demand for allotments. There is a combined allotment waiting list across Croydon of approximately 600 people.
- There is a need to create and conserve habitats to ensure the borough is resilient to pressures like climate change and ensures a net gain in biodiversity in order to protect and improve Croydon’s ecological health and resilience.
- The green spaces do not comprehensively offer safe and pleasant walking and cycling connections and facilities to serve an increasing population.

### Where we want to be

**Strategic Objective 4:** Reduce social, economic and environmental deprivation, particularly where it is spatially

concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.
<b>Strategic Objective 7</b> Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.
<b>Strategic Objective 8:</b> Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
<b>Strategic Objective 9:</b> Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.
<b>Strategic Objective 10:</b> Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.
<b>Strategic Objective 11:</b> Tackle flood risk by making space for water and utilising sustainable urban drainage systems.

## How we are going to get there

### Policy SP7:Green Grid

**SP7.1** In order to deliver new and enhanced green **and blue** infrastructure commensurate with growth the Council will apply a presumption in favour of development provided applications assist in the delivery of a Green Grid and meet the requirements of Policy SP7 and other applicable policies of the development plan.

#### Green spaces

**SP7.2** The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land, ~~and Very~~ **Special Community Green Spaces** (Local Green Spaces), **and other Important Green Spaces**.

**SP7.3** The Council will establish a network of multi-functional open spaces, a 'Green Grid', comprising those parts of the All London Green Grid together with other green **and blue** spaces within the borough as shown in Figure 9.1. The Council and its partners will:

- a) **Encourage the development of a Green Grid structured around a network of strategic blue and green corridors across the borough ensuring interconnectivity with adjacent boroughs green spaces using transport corridors including ~~Seek~~ the provision and creation of new green **and blue** spaces. With particular focus for areas deficient in access to nature, play areas, and publicly accessible recreational open space;**
- b) Improve access and links to and through green spaces to encourage walking, cycling and horse-riding;
- c) ~~Assist in the delivery of the Mayor's All London Green Grid through the implementation of the London Downlands and Wandle Valley Area Frameworks~~ **Identify and provide for Green Grid connections between open spaces;**
- d) Maintain and improve the quality, function and offer of open spaces across the borough for all users; ~~and~~
- e) Maximise opportunities for street tree planting, green roofs, green walls and green landscaping to assist urban cooling in a changing climate.
- f) **Enable the Green Grid to be established in areas at risk from flooding;**
- g) **Enable and prioritise where the Green Grid can include Geological and Geomorphological Sites; and**

h) Identify areas where green grid connections can be used to improve the setting of heritage assets such as creating better access and improved landscape setting for historic monuments and assets.

#### Biodiversity

**SP7.4** The Council and its partners will enhance biodiversity across the borough, assist ecological restoration and address spatial deficiencies in access to nature by:

- a) Protecting and enhancing sites of importance for biological and geological diversity;
- b) Improving the quality of current sites through habitat management;
- c) ~~Exploring options to increase the size of~~ **Enhancing** wildlife areas of existing sites and creating new areas for wildlife;
- d) Enhancing connections between, or joining up sites, either through direct physical corridors, or through a series of linked sites **to assist in enhancing and protecting wildlife**;
- e) Reducing the pressures on wildlife and sensitive sites by improving the wider environment around wildlife sites by establishing buffer areas; and
- f) Promoting the naturalisation of landscapes **including deculverting the River Wandle** and the enhancement of Croydon's natural landscape signatures.
- g) Incorporate urban greening as a fundamental element of site and building design, through measures such as high-quality landscapes, trees, green and blue roofs, green walls and nature-based sustainable drainage, following Urban Greening Factor calculations
- h) Protect Regionally Important Geological Sites
- i) Retain and enhance existing habitats and features of biodiversity or geodiversity value, or if this is not possible, replace them within the development, as well as incorporating additional measures to enhance biodiversity, proportionate to the development proposed.
- j) Protect and **establish new tree planting**

- k) Through green infrastructure respond to climate change – through carbon sequestration and storage, temperature regulation, storm water regulation and air purification; and
- l) Improve environmental quality – by making positive contribution to biodiversity, heritage and landscape and taking pressure off environmental stresses whilst creating healthy ecosystems that support economic, social and ecological resilience with the ability to adapt to change.

Productive landscapes

**SP7.5** The Council and its partners will support the role of productive landscapes by:

- a) Protecting and enhancing allotments, community gardens and woodland;
- b) Supporting food growing, tree planting and forestry, including the temporary utilisation of cleared sites; and encouraging major residential developments<sup>82</sup> to incorporate edible planting and growing spaces at multiple floor levels; and
- c) Ensuring landscaping is flexible so that spaces may be adapted for growing opportunities.

**Table number x.xx Croydon’s Green Grid**

Name	Final Green Locations	Green spaces to link together	Green/Blue Opportunities	Possible Linking Routes
North/South Corridor	Norwood Park to North Downs - at Farthing Downs	<ul style="list-style-type: none"> <li>• Norwood Park</li> <li>• Convent Wood</li> <li>• St John’s Memorial Gardens</li> <li>• Stoats Nest Allotments                             <ul style="list-style-type: none"> <li>• Cane Hill</li> </ul> </li> <li>• Farthing Downs</li> </ul>	Purley Way London Road Wandle Trail RiverWandle	<ul style="list-style-type: none"> <li>• West Croydon – Sutton Rail line</li> <li>• London to Brighton Road and Railway Corridor                             <ul style="list-style-type: none"> <li>• A23 road</li> </ul> </li> </ul>

<sup>82</sup> 10 or more residential units or a site of 0.5 hectares



Name	Final Green Locations	Green spaces to link together	Green/Blue Opportunities	Possible Linking Routes
Great North Wood links	South Norwood to Norwood Grove (Streatham Common)	South Norwood Lake and Grounds Beaulieu Heights The Lawns (Spa Wood) Spa Hill Allotments Biggin Woods Norwood Grove	Spa Allotments All Saints Church and grounds Cypress Primary School (Between 1 and 2)	Covington Way Biggin Way Waddington Way Kingslyn Crescent & Spa Close
West/East Corridor	Wandle Park to Three Half Penny Wood	Waddon Ponds Wandle Park St. John's Memorial Gardens Queens Gardens Park Hill Lloyd Park Addington Park and Addington Hills Addington Golf Course Shirley Heath Three Half Penny Wood	River Wandle Wandle Trail Croydon Minster Fairfield	River Wandle South Quarter Rectory Grove (Church Street Katherine Street Stanhope Road A232/Barclay Road Coombe Road Tram Line

Name	Final Green Locations	Green spaces to link together	Green/Blue Opportunities	Possible Linking Routes
The Chalk Link	North Downs to Selsdon and beyond to Chipstead (Reigate & Banstead)	Selsdon Wood Kings Wood Hamsey Green Pond Riddlesdown Common Whiteleaf Recreation Ground (TDC) Kenley Aerodrome Coulston Common Happy Valley Farthing Downs Cane Hill Rickman Hill	Kenley Aerodrome Atwood School	Lime Meadow Avenue Whyteleafe Hill Hornchurch Hill Woodplace Lane Holymoak Road
The Downlands Link	Three Corner Grove to Purley Playing Fields/Roundshaw Park	Three Corner Grove Addington Court Golf Course Selsdon Wood Little Heath Woods Croham Hurst South Croydon Rec Purley Way Playing Fields	Purley Play Fields North Purley District Centre Allotments – Off Carlton Road	Ashen Vale Littleheath Road Westhill and Essenden Road Kingsdown Avenue & Edgehill Road

### Designations shown on the Policies Map

Each of the designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 9.1 below:

**Table 9.1 Designations set by Policy SP7 shown on the Policies Map**

<b>Designation</b>	<b>Location</b>
Metropolitan Green Belt	Across the Places of Addington, Addiscombe, Coulsdon, Kenley & Old Coulsdon, Purley, Sanderstead, Selsdon, Shirley and South Croydon
Metropolitan Open Land	<p style="text-align: center;">Croham Hurst</p> <p style="text-align: center;">Croydon Cemetery and environs</p> <p style="text-align: center;">Edenham High School</p> <p style="text-align: center;">Land at Love Lane</p> <p style="text-align: center;">Part of land at Shirley Oaks</p> <p style="text-align: center;">Norwood Grove and environs</p> <p style="text-align: center;">Purley Downs</p> <p style="text-align: center;">Purley Way playing fields and environs</p> <p style="text-align: center;">Sanderstead Plantation</p> <p style="text-align: center;">South Norwood Country Park to Ashburton Playing Fields</p> <p style="text-align: center;">South Norwood Lake and environs</p>

## What it will look like

Figure 9.1 Green Grid map **graphic updated**

Figure 9.2 Green Grid map 2 **graphic updated**

## Why we have taken this approach

### Green and Blue spaces

**9.2** The Green Grid concept aims to link environmental assets with existing and future proposed communities through a connected, easily accessible open space network. **Croydon's Green Grid is the network of green and blue spaces (rivers and ponds) and includes Metropolitan Green Belt and Metropolitan Open Land, public spaces, pocket parks, roof gardens, productive landscapes (such as allotments), railway verges, privately owned public spaces and private green spaces (including front and back gardens). The Green Grid can include Public Rights of Way, Strategic Walking Routes and Cycle Quietways. It also includes smaller, but important features such as street trees and green roofs. The whole Green Grid is important as it provides a range of benefits to animals, plants and people.** The Council will use the Green Grid concept to ensure that the access, quality and function of the borough's existing green space is maximised, as well as attempting to provide new green space via enabling development. Croydon's Green Grid policies support the Green Arc vision of "Bringing the Big Outdoors closer to people through the creation of an extensive and attractive and valued recreational landscape of well-connected and accessible countryside around London, for people and wildlife". The Council will ensure that the natural

~~signatures~~ **natural characteristics (geology, ecology and landform)** of the borough are maintained and enhanced in accordance with Natural England's 'London Landscape Framework.'

**9.3** The Council will protect and safeguard Metropolitan Green Belt and Metropolitan Open Land and **Special Community Green Spaces (Local Green Spaces), and other Important Green Spaces, as well as the South London Downs National Nature Reserve** as per national policy and the policies of the London Plan. ~~Local green~~ **Other non-designated open green spaces** spaces which make a contribution to the borough's heritage value, visual character, recreational opportunities, tranquillity, and amenity qualities will be protected and safeguarded. ~~Further policy detail is set out in the Croydon Local Plan's Detailed Policies and Proposals detailing a hierarchy of green spaces with subsequent designations added to the Proposals Map. These amendments will reflect the approach set out in the National Planning Policy Framework, London Plan and All London Green Grid Supplementary Planning Guidance.~~

**9.4** ~~In 2009 an 'Open Space Assessment'<sup>83</sup> and 'Outdoor Recreation Needs Report' were prepared for the Council and identified over 50% of the borough's residential areas as being deficient in access to all forms of open space (as defined by the~~

<sup>83</sup> Open Space Needs Assessment and Open Spaces Assessment Standards Report (2009)

superseded Planning Policy Guidance Note 17). These deficiencies are particularly pronounced in the north of the borough, in areas such as East Croydon, Thornton Heath and Broad Green. Assessments of the quality of Croydon's existing open spaces indicated, that in the south, where large areas of accessible countryside is found, they were of higher quality than other areas, with the lowest quality spaces located in the central areas of the borough. With the existing deficiency in some areas, along with limited opportunities to create more open space and a growing population, protection of the existing provision of open space and maximisation of its benefits will be vitally important. In 2019, a Natural Capital Accounting Report' found that the borough's parks are predominantly 'Fair' or 'Good' in relation to quality and health outcomes, with just two areas in the borough highlighted as being 'under provided'. One of these areas approximately corresponds to Selhurst, Bensham Manor and, South Norwood. A second area lies in the south-east of the borough within New Addington North and New Addington South Wards..

**9.5** Areas where the public realm is predominantly hard-surfaced (e.g. Croydon Opportunity Area and the District Centres) contribute to the heat island effect. Methods of cooling and climate change adaptation are promoted through the Green Grid policy. Green roofs, sustainable urban drainage systems (SuDS), street trees and green/soft landscaping measures can all contribute to cooling in urban areas.

Biodiversity

9.3 ~~The policy approach to biodiversity is informed by 'Climate Change Adaptation Manual' 'Making Space for Nature' and is consistent with national planning policy for biodiversity and geological conservation and guidance from Natural England the Department for Environment, Food and Rural Affairs. The policy seeks~~ Biodiversity is important to enhance the resilience and coherence of Croydon's ecological network. The Greater London Authority's 'Access to Nature' mapping shows there is a good distribution of natural and semi-natural green space provision in the south of the borough where larger sites are located. These policies in combination with the borough's Biodiversity and Habitat Action Plans and ~~London's Wandle Valley and Downlands Green Grid Area Framework~~ will enable biodiversity conservation and improvements in access to nature to be more easily and consistently integrated ~~into other strategic plans and projects~~. In the north of the borough where there are less green spaces the improvement of biodiversity is more of a challenge but it can be achieved through the existing parks, back gardens and pockets of green in places such as roads.

Productive landscapes

9.6 The London Plan includes several strategic policies promoting productive landscapes<sup>84</sup> and encourages London boroughs to identify other potential spaces that could be used for commercial food production or for community gardening, including allotments and orchards. The concept of productive landscapes goes beyond food production to include community gardens, sustainable forestry, urban farms and urban agriculture plots, where commodities such as flowers can be produced. Productive landscapes encourage healthy eating, physical activity outdoors,

greater biodiversity, regeneration of derelict or underused urban spaces (which can improve the perceived or actual safety of an area), increased community cohesion and the potential for economic development through learning new skills and exploring commercial options for dealing with surplus produce<sup>85</sup>.

<sup>84</sup> London Plan (Policies 2.18, 5.10, 5.11 and 7.22)

<sup>85</sup> Good planning for good food - How the planning system in England can support healthy and sustainable food (Sustain, 2011)

## Metropolitan Green Belt, and Metropolitan Open Land and Very Special Community Green Spaces

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Strategic Objective 10
- Policy SP7.2

### Why we need this policy

**9.7** Croydon has a strategic objective to ensure the responsible use of land and natural resources and also to increase the quality of, and access to, green spaces and nature. The borough's trees and green spaces are also important in mitigating higher temperatures as a result of climate change. Protecting the borough's Metropolitan Green Belt, Metropolitan Open Land and local green spaces ensures communities have access to open space for physical activity, recreation and play. Policy SP7 seeks to protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and local green spaces.

**9.8a** National Planning Policy Framework allows communities to identify and protect green areas of particular importance to them

for designation as Local Green Space through local and neighbourhood plans. Policies for managing Local Green Spaces should be consistent with those for Metropolitan Green Belt. To help differentiate between Local Green Spaces and other important open spaces in the borough, this Plan refers to Local Green Space as Very Special Community Green Spaces.

**9.8b** To be designated as a Very Special Community Green Space the green space must be:

- a) In reasonably close proximity to the community it serves;
- b) Demonstrably special to a local community and holds a particular local significance such that it is virtually irreplaceable; and
- c) Local in character and is not an extensive tract of land.

## Policy DM26: Metropolitan Green Belt and Metropolitan Open Land

**DM26.1** The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt and Metropolitan Open Land as designated on the Policies Map by applying the same level of protection afforded to Metropolitan Green Belt in national planning policy to Metropolitan Open Land in the borough.

**DM26.2** Extensions to existing buildings in Metropolitan Green Belt and Metropolitan Open Land should not be more than 20% of their original<sup>86</sup> floor space or volume, or 100m<sup>2</sup> (whichever is the smaller) unless they are for agricultural use, forestry, or facilities for outdoor sport, outdoor recreation or cemeteries.

**DM26.3** Extensions to existing buildings in Metropolitan Green Belt and Metropolitan Open Land that are less than 20% of the original floor space or volume, or less than 100m<sup>2</sup> in extent (whichever is the smaller) and extensions for agricultural use, forestry, or facilities for outdoor sport, outdoor recreation or cemeteries may still be disproportionate. In considering whether they are disproportionate and also whether a new replacement dwelling is materially larger or, if any proposed structure harms the openness of Metropolitan Green Belt or Metropolitan Open Land the Council will have regard to:

- a) Changes in the floor space and volume of buildings;
- b) The floor space and volume of all previous extensions (since 1948), alterations and developments within the curtilage of the dwelling;
- c) Use of basements and roof spaces as living areas;
- d) Whether there is an increase in the spread of buildings across the site, in particular where visible from public vantage points;
- e) The size of the curtilage and character of the surrounding area; and
- f) Whether ancillary structures have an urbanising effect.

### Very Special Community Green Spaces

**DM26.4** The Council will protect and safeguard the extent of the borough's Very Special Community Green Spaces. Development on Very Special Community Green Spaces will be inappropriate except for:

- a) The provision of facilities (in connection with the existing use of the Very Special Community Green Space or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the

<sup>86</sup> The original floor space and volume is as built, or as existed in 1948 for all buildings built prior to this date.



Very Special Community Green Space and do not undermine the reasons why the green space was designated as a Very Special Community Green Space;

- b) The replacement of an existing building, provided the new building is not materially larger than the one it replaces;
- c) The re-use of buildings provided that the buildings are of permanent and substantial construction; or
- d) The change of use of land to space for outdoor sport and recreation or allotments

## Designations shown on the Policies Map

Each of the designations set by this policy are shown on the Policies Map. The designations are summarised in Table 9.2 below:

**Table 9.2 Designations set by Policy DM46 shown on the Policies Map**

Sl. No.	Very Special Community Green Space	Place
<u>1</u>	<u>Addiscombe Railway Park</u>	<u>Addiscombe</u>
<u>2</u>	<u>Biggin Wood</u>	<u>Norbury</u>
<u>3</u>	<u>Coulsdon Memorial Ground</u>	<u>Coulsdon</u>
<u>4</u>	<u>Foxley Wood and Sherwood Oaks</u>	<u>Kenley and Old Coulsdon/ Purley</u>
<u>5</u>	<u>Higher Drive Recreation Ground</u>	<u>Kenley and Old Coulsdon</u>
<u>6</u>	<u>Millers Pond</u>	<u>Shirley</u>
<u>7</u>	<u>Park Hill Recreation Ground</u>	<u>Central Croydon</u>
<u>8</u>	<u>Portland Road Community Garden</u>	<u>South Norwood and Woodside</u>
<u>9</u>	<u>Purley Beeches</u>	<u>Sanderstead</u>
<u>10</u>	<u>Rotary Field Recreation Ground</u>	<u>Purley</u>
<u>11</u>	<u>Sanderstead Pond (and Green)</u>	<u>Sanderstead</u>
<u>12</u>	<u>Sanderstead Recreation Ground</u>	<u>Sanderstead</u>
<u>13</u>	<u>Shirley Oaks Village Playing Field and Wood</u>	<u>Shirley</u>
<u>14</u>	<u>Shirley Recreation Ground</u>	<u>Shirley</u>
<u>15</u>	<u>Spring Park Wood</u>	<u>Shirley</u>
<u>16</u>	<u>Stambourne Woodland Walk</u>	<u>Crystal Palace and Upper Norwood</u>
<u>17</u>	<u>Temple Avenue Copse</u>	<u>Shirley</u>

Sl. No.	Very Special Community Green Space	Place
<u>18</u>	<u>The Lawns</u>	<u>Crystal Palace and Upper Norwood</u>
<u>19</u>	<u>Wettern Tree Garden</u>	<u>Sanderstead</u>
<u>20</u>	<u>Woodcote Village Green</u>	<u>Purley</u>

## How the policy works

### Metropolitan Green Belt

**9.8** Metropolitan Green Belt is a national designation which aims to check the unrestricted sprawl of London, prevent Croydon from merging with towns in neighbouring local authorities, safeguard Croydon's countryside from encroachment, to preserve the setting and special character of Croydon, and to assist in its regeneration by encouraging the recycling of derelict and urban land.

### Metropolitan Open Land

**9.9** Metropolitan Open Land is a London designation which aims to protect land that either contributes to the physical structure of London, includes open air facilities which serve either the whole or significant parts of London, contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value, or forms part of a Green Chain or a link in the network of green infrastructure.

### Other open space

**9.10** ~~Other undesignated open space is protected by policies 2.18 and 7.18 of the London Plan in pursuit of paragraph 74 of the National Planning Policy Framework.~~

### National planning policy

**9.11** Between them the National Planning Policy Framework and London Plan apply the same level of protection to the

Metropolitan Open Land as is afforded to Metropolitan Green Belt.

**9.12** The National Planning Policy Framework says that new buildings in the Green Belt are inappropriate with the exception of:

- a) Buildings for agriculture and forestry;
- b) Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- c) The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- f) Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

**9.13** The National Planning Policy Framework also says that the following uses are also not inappropriate in the Green Belt provided they preserve the openness and do not conflict with the purposes of including land within the Green Belt:

- a) Mineral extraction;
- b) Engineering operations;

- c) Local transport infrastructure which can demonstrate a requirement for a Green Belt location;
- d) The re-use of buildings provided that the buildings are of permanent and substantial construction; ~~and~~
- e) Development brought forward under a Community Right to Build Order. **and**
- f) **Material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)**

**9.14** At a local level cemeteries, burial grounds and telecommunications development may be acceptable in Metropolitan Green Belt and on Metropolitan Open Land if it can be demonstrated that there are no other suitable sites and that there is no impact on the openness of the Green Belt or the reason for the site being designated as Metropolitan Open Land. In addition for cemeteries and burial grounds existing levels of public access to sites in Metropolitan Green Belt and Metropolitan Open Land need to be maintained. Neither cemeteries, burial grounds nor telecommunications development are acceptable on Local Green Space.

#### Extensions and replacement of existing buildings

**9.15** The policy defines disproportionate extensions for development proposals which are considered to be inappropriate development in the Green Belt, Metropolitan Open Land. Any extension of more than 20% of the original floor space or volume, or greater than 100m<sup>2</sup> in extent (whichever is smaller) of an existing building will be considered disproportionate.

**9.16** It does not apply to proposals to extend uses that the National Planning Policy Framework considers to be acceptable in Green Belt. For these uses, development proposals will still be required to preserve the openness of the Green Belt and not conflict with the purposes of including land within it.

9.17 In considering applications for the replacement of existing buildings in Metropolitan Green Belt or on Metropolitan Open Land, the Council may seek alterations in the position of the footprint on the site, or other changes that will reduce the impact on the open character of the area.

9.18 Where a proposed change of use of an existing building in Metropolitan Green Belt or on Metropolitan Open Land involves extensions or changes to the use of the surrounding land the Council will exercise strict control to ensure that the proposal does not conflict with openness or the purposes of including land in the designation. The form, bulk and general design of any new structures should be in keeping with their surroundings. In considering such proposals, the Council will have regard to the history of the building and will not look favourably on the conversion of buildings constructed under permitted development rights, if it is considered that there was an intention of early conversion to another use. Conditions removing

- Strategic Objective 9
- Strategic Objective 10

- Policy SP10.1
- Policy SP10.2
- Policy SP10.3

**Why we need this policy**

9.19c Other green spaces in Croydon are still important even if they are not designated as Metropolitan Green Belt, Metropolitan Open Land or Very Special Community Green Spaces. Access to

permitted development rights and legal agreements may be sought to achieve these aims.

Very Special Community Green Spaces

9.19a As Croydon's Very Special Community Green Spaces are virtually irreplaceable all uses will need to preserve the green space and the way that it is used by the community. Some development may be allowed such as sport or community facilities provided that the support the further use and enjoyment of the Very Special Community Green Spaces.

Other Important Green Spaces

**Strategic Objectives and related Croydon Local Plan strategic policies**

high quality open spaces and opportunities for sport and physical activity are important for the health and well-being of communities in Croydon. As such they also need to be protected.

9.19d The London Plan says that Local Plans should include designations and policies for the protection of open space to meet needs and address deficiencies. It also says that development proposals should not result in the loss of protected open space.

9.19e Other green spaces can take a variety of different forms, sizes and functions. The Local Plan needs to provide clarity as to how any proposal that would result in the loss of all or part of each different type of Other Important Green Space would be considered.

### Policy DM30: Other Important Green Space

DM30.1 Other important green spaces are identified in the borough that add to character and wellbeing of the residents. These spaces will be protected unless

- a) An equivalent green space is reprovided as part of any development that allows for the local community to continue all existing lawful uses of the Other Important Green Space;
- b) The existing Other Important Green Space is no longer used by the local community so is no longer an important open space; or
- c) Other equivalent green space is available for the local community to continue all existing lawful uses of the Other Important Green Space within the distances set out in Table 9.3.

**Table 9.3 Maximum distance to Other Important Open Space for the purpose of assessing equivalent open space**

Type of Other Important Open Space	Function	Maximum distance to Other Important Open Space for the purposes of assessing equivalent open space
Town parks and natural open spaces	Large areas of open space that provide a landscape setting with a variety of natural features. They provide a wide range of activities, including outdoor sports facilities and playing fields, children’s play for different age groups and informal recreation pursuits. The category also includes larger areas of natural open space. They will usually provide recreation for an entire Place and can be up to 20ha in size. They are shown on the Policies Map.	1.2km

Type of Other Important Open Space	Function	Maximum distance to Other Important Open Space for the purposes of assessing equivalent open space
Local parks and natural open spaces	Providing for court games, children's play, sitting out areas and nature conservation areas; or they are slightly larger areas of natural open space. They serve more than the neighbourhood in which they are located, but won't serve an entire Place. Usually they will be under 2ha in size. They are shown on the Policies Map.	400m
Neighbourhood parks and natural open spaces	Serving the neighbourhood in which they are located but will be more formal green spaces. They include public gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas. Generally they are under 1ha in size. Most Neighbourhood Parks are shown the Policies Map.	200m
Informal green spaces	Small areas of informal open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and small amounts of play equipment. Typically they will serve only the neighbourhood in which they are located, and are generally under 0.4ha in size. They are not shown on the Policies Map.	200m

Type of Other Important Open Space	Function	Maximum distance to Other Important Open Space for the purposes of assessing equivalent open space
Linear open spaces	<p>Paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space. They are not shown on the Policies Map.</p>	200m

## Designations shown on the Policies Map

Each of the designations set by this policy are shown on the Policies Map. The designations are summarised in Table 9.4 below:

**Table 9.4 Designations set by Policy DM47 shown on the Policies Map**

Sl. No.	Other Important Green Space	Place
1	Addiscombe Recreation Ground	Addiscombe
2	All Saints Churchyard, Sanderstead	Sanderstead
3	All Saints Graveyard, Sanderstead	Sanderstead
4	All Saints with St Margaret's Churchyard, Upper Norwood	Crystal Palace and Upper Norwood
5	Allder Way Playground	Purley
6	Apsley Road Playground	South Norwood and Woodside
7	Ashburton Park	Addiscombe
8	Ashen Grove	Selsdon
9	Beaulieu Heights	Crystal Palace and Upper Norwood
10	Beulah Hill Pond	Crystal Palace and Upper Norwood
11	Boulogne Road Playground	Broad Green and Selhurst
12	Bourne Park	Kenley and Old Coulsdon
13	Brickfields Meadow	South Norwood and Woodside
14	Canterbury Road Recreation Ground	Broad Green and Selhurst
15	Castle Hill Avenue Playground	Addington
16	Chaldon Way Gardens	Coulsdon

Sl. No.	Other Important Green Space	Place
17	Convent Wood	Crystal Palace and Upper Norwood
18	Copse Hill Spinney	Purley
19	Coulsdon Coppice (Bleakfield Shaw)	Coulsdon
20	Coulsdon Coppice (North)	Coulsdon
21	Coulsdon Coppice (Stonyfield Shaw)	Coulsdon
22	Dartnell Road Recreation Ground	Addiscombe
23	Duppas Hill	Waddon
24	Former Godstone Road allotments	Kenley and Old Coulsdon
25	Freelands Avenue on junction with Tedder Road	Selsdon
26	Glade Wood	Shirley
27	Grangewood Park	Thornton Heath
28	Green Lane Sports Ground	Norbury
29	Green outside post office, Elmfield Way	Sanderstead
30	Haling Grove	South Croydon
31	Heavers Meadow & allotments	South Norwood and Woodside
32	King Georges Field Recreation Ground	Broad Green and Selhurst
33	Land to r/o YMCA, Sylvan Hill	South Norwood and Woodside
34	Balancing pond and land to rear of Honeysuckle Gardens	Shirley
35	Land rear of Hilliards Heath Road	Coulsdon
36	Layton Crescent	Waddon
37	Little Road Playground	Addiscombe
38	Norbury Hall	Norbury



Sl. No.	Other Important Green Space	Place
39	Norbury Park	Norbury
40	Normanton Meadow	South Croydon
41	Northwood Road Recreation Ground (Playground)	Norbury
42	Palace Green	Selsdon
43	Parkfields Recreation Ground	Shirley
44	Peabody Close playing field	Shirley
45	Pollards Hill Triangle	Norbury
46	Pollards Hill	Norbury
48	Promenade du Verdun	Purley
49	Queen's Road Cemetery	Broad Green and Selhurst
50	Roffey Close/ Wontford Road Green	Kenley and Old Coulsdon
51	Roke Playspace	Purley
52	Sanderstead Plantation	Sanderstead
53	Scrub Shaw	Coulsdon
54	Selsdon Recreation Ground	Selsdon
55	South Croydon Recreation Ground	South Croydon
56	South Norwood Recreation Ground	South Norwood and Woodside
57	St James' Church Garden	Central Croydon
58	St John's Church Memorial Garden	Central Croydon
59	St John's Church	Shirley
60	St John's Memorial Garden (east)	Central Croydon
61	St John's Memorial Garden (north)	Central Croydon
62	St Peter's Churchyard	South Croydon
63	The Green on Shrublands	Shirley

Sl. No.	Other Important Green Space	Place
64	The Green, Covington Way/ Crescent Way	Norbury
65	The Green, Semley Road,	Norbury
66	The Queen's Gardens	Central Croydon
67	The Ruffet	Selsdon
68	Thornton Heath Recreation Ground	Thornton Heath
69	Trumble Gardens	Thornton Heath
70	Upper Norwood Recreation Ground	Crystal Palace and Upper Norwood
71	Waddon Ponds	Waddon
72	Wandle Park	Central Croydon
73	Westow Park	Crystal Palace and Upper Norwood
74	Whitehorse Meadow	Thornton Heath
75	Whitehorse Road Recreation Ground	Broad Green and Selhurst
76	Whitgift Pond	Addiscombe
77	Wilford Road Playground	Broad Green and Selhurst
78	Woodside Green	South Norwood and Woodside

### How the policy works

**9.19f** The presumption when considering development proposals that would result in the loss of Other Important Green Spaces is that they are not appropriate unless there is evidence that indicates otherwise.

**9.19g** Evidence to support the loss of Other Important Green Space will need to be based on a comprehensive survey of residents who might use the green space. In considering which residents should be surveyed regard should be given the maximum distances set out in Table 9.3. These are direct distances rather than actual walking distances. The Council will need to be satisfied that the survey made all reasonable attempts to establish who uses the Other Important Green Space and how they use the space.

**9.19h** Any survey should seek to establish how residents use the Other Important Green Space in order to establish if the space is actually used, if there are alternative spaces within an acceptable distance that could be used for the same purposes, or the type of open space that will need to be re-provided in any redevelopment.

**9.19i** Not every type of Other Important Green Space can be shown on the Policies Map. In particular, Informal green spaces and Linear open spaces are too small to be individually mapped. These types of spaces will often consist of the original amenity land in planned housing estates or pockets of semi-natural spaces in built up areas. Land leftover by the original developer is unlikely to constitute Other Important Green Space unless indicated otherwise that it is used by residents for specific purposes that cannot be carried out elsewhere. Highway verges and central reservations are not considered to be Other Important Green Spaces.

## Protecting and enhancing our Biodiversity

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Strategic Objective 10
- Policy SP7.4
- Policy SP7.5

### Why we need this policy

**9.19** Croydon has strategic objectives to ensure the responsible use of land and natural resources to mitigate and adapt to climate change, to increase the quality of and access to green space and nature, and to protect and enhance biodiversity.

The Review of Sites of Nature Conservation Importance identified a nine areas not currently designated as Sites of Nature Conservation Importance that are of an equivalent standard to those already designated

**9.21a** Improved and enhanced green infrastructure can lead to better physical health and well-being, improved air quality and reduced exposure to air pollution, storm water regulation, more resilient biodiversity and enhanced urban cooling.

**9.21b** Developments should achieve biodiversity net gain. In order to address this, an approach to measuring the Urban Greening Factor of developments. It is recognised that development can achieve multiple benefits from incorporating green infrastructure, taking opportunities to achieve environmental net gain and enhancing the borough's green grid.

## Policy DM27: Protecting and enhancing our biodiversity and Urban Greening

To enhance biodiversity across the borough and improve access to nature, development proposals should:

- a) Incorporate biodiversity **net gain** on development sites to enhance local flora and fauna and aid pollination locally;
- b) Incorporate **urban greening and biodiversity measures around,** within and on buildings in the form of green roofs, green walls or equivalent measures;
- c) Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments<sup>87</sup>;
- d) Have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map; ~~and~~
- e) Have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a protected species would be affected.
- f) **Incorporate nature-based, sustainable urban drainage solutions, such as rain gardens.**

**DM27.2** To secure urban greening a borough specific Urban Greening Factor (UGF) set out in Table 9.6 identifies the appropriate amount of urban greening developments required for new build developments with 5 units or more as follows

- a) All residential development of more than one unit 0.40
- b) For commercial business and service uses 0.3, and
- c) For general industrial and storage or distribution 0.2

### Table 9.6 Urban Greening Factor

<sup>87</sup> Developments of 10 or more residential units, 1,000m<sup>2</sup> or more of non-residential floor space or sites more than 0.5ha in extent.

<u>Greening Type</u>	<u>Value</u>
<u>Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.</u>	<u>1</u>
<u>Wetland or open water (semi-natural; not chlorinated) maintained or established on site.</u>	<u>1</u>
<u>Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions. (a)</u>	<u>0.9</u>
<u>Standard x planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree – see Trees in Hard Landscapes for overview. (b)</u>	<u>0.8</u>
<u>Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of Green Roof Organisation Code 2014. (c)</u>	<u>0.8</u>
<u>Flower-rich perennial planting – see RHS perennial plants for guidance. (d)</u>	<u>0.7</u>
<u>Rain gardens and other vegetated sustainable drainage elements – See CIRIA for case-studies. (e)</u>	<u>0.8</u>
<u>Hedges (line of mature shrubs one or two shrubs wide) – see RHS for guidance. (f)</u>	<u>0.6</u>
<u>Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.</u>	<u>0.6</u>
<u>Green wall –modular system or climbers rooted in soil – see NBS Guide to Façade Greening for overview. (g)</u>	<u>0.6</u>
<u>Groundcover planting – see RHS Groundcover Plants for overview. (h)</u>	<u>0.5</u>
<u>Amenity grassland (species-poor, regularly mown lawn).</u>	<u>0.4</u>
<u>Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014. (i)</u>	<u>0.3</u>
<u>Water features (chlorinated) or unplanted detention basins.</u>	<u>0.2</u>
<u>Permeable paving - see CIRIA for overview. (j)</u>	<u>0.1</u>
<u>Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).</u>	<u>0</u>

A <https://livingroofs.org/intensive-green-roofs/>

B <http://www.tdag.org.uk/trees-in-hard-landscapes.html>

C <https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>

D <https://www.rhs.org.uk/advice/profile?pid=868>

E <http://www.susdrain.org/case-studies/>

F <https://www.rhs.org.uk/advice/profile?pid=351>

G <https://www.thenbs.com/knowledge/the-nbs-guide-to-facade-greening-part-two>

H <https://www.rhs.org.uk/advice/profile?PID=818>

I <https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>

J <http://www.susdrain.org>

## Designations shown on the Policies Map

Each of the designations set by this policy are shown on the *Policies Map*. The designations are summarised in Table 9.5 below:

**Table 9.5 Designations set by Policy DM27 shown on the Policies Map**

Designation	Location
Site of Nature Conservation Importance	Addington Court Golf Course
	Addington Golf Course and Shirley Heath (including land surrounding 170 Shirley Church Road)
	Addington Hills
	Addiscombe Railway Park & Selsdon & Addiscombe railsides
	Addiscombe, Woodside and Shirley Leisure Gardens
	Ashen Grove
	Bear's Wood
	Beaulieu Heights
	Beulah Hill Pond
	Biggin Wood
	Bradmore Green Pond
	Bramley Bank

Designation	Location
	Brickfields Meadow Doorstep Green
	Cane Hill Hospital
	Chipstead Chalk Pasture
	Convent Wood
	Copse Hill Spinney
	Coulsdon Common
	Coulsdon Court Wood & Betts Mead
	Coulsdon Quarry & Wood
	Croham Hurst
	Croydon Cemetery Complex
	Duppas Hill
	Falconwood Meadow
	Farthing Downs, Devilsden Wood and Happy Valley
	Foxley Wood
	Grangewood Park
	Grounds of Heathfield House
	Haling Grove Park

Designation	Location
	Hall Grange
	Hamsey Green Pond
	Heavers Meadow and Norbury Brook
	Hooley Farm Pastures
	Hutchinson's Bank, Frylands Wood and Chapel Hill
	Kenley Aerodrome
	Kenley Common
	Kenley House Pastures
	Kings Wood
	Kingswood Shaw, Mossy Hill & Beech Way Woodland
	Ladygrove
	Land at Kent Gateway
	Littleheath Woods
	Lloyd Park & Coombe Farm
	Long Lane Wood
	Mitchley Wood
	Norbury Hall

Designation	Location
	Norbury Park and Norbury Brook
	Norwood Grove and Nettlefold Field
	Oakland Wood
	Oaklands, Kenley
	Park Hill
	Parkfields Woodland
	Pinewoods
	Plantation
	Pollards Hill
	Purley Beeches
	Purley Downs Golf Course
	Riddlesdown and The Rose and Crown Chalk Pit
	Roundshaw Park
	Rowdown and Birch Wood
	Royal Russell School and Ballards
	Sanderstead Plantation
	Sanderstead Pond

Designation	Location
	Selhurst Railway Triangle
	Selsdon Wood
	Shirley Triangle
	Southeastern tip of Croham Hurst Golf Course
	South Norwood Country Park
	South Norwood Lake and Surrounds
	Spices Yard Tree Belt
	Spring Park Ponds
	Spring Park Wood
	Spring Wood and Threehalfpenny Woods
	Stonefield and Bleakfield Shaws
	Stream and Pond at Shirley Park Golf Course
	Temple Avenue Copse
	The Glade
	The Lawns
	The Ruffet
	Upper Norwood Recreation Ground

Designation	Location
	Waddon Ponds
	Wandle Park
	Westow Park
	Whitehorse Meadow
	Whitgift Pond
	Whitgift School Wood

### How the policy works

**9.20** The borough's natural wildlife heritage, including individual species of particular interest or scarcity, is not confined to the designated Sites of Nature Conservation Importance. Small open spaces, ponds, streams, back gardens, hedgerows, trees, unimproved grassland, heathland or 'wasteland' habitats can be important support for the borough's biodiversity and enable people to access and enjoy nature.

**9.21** Creating a patchwork of flower-rich meadows, field edges and flowery road verges, and extending this into urban gardens, parks and open spaces, would assist bees and other pollinating insects and could reverse their decline.

**9.22** Development proposals provide opportunities for protecting and enhancing existing habitats and incorporating new wildlife attracting habitats into landscaping and on buildings. In the built environment, 'green roofs' can be a particularly useful way of providing a new wildlife habitat as they have a number of other benefits. These include absorbing rainfall and reducing storm



water run-off, helping cool buildings and reducing the 'urban heat island' effect. The plants absorb air pollution and dust and green roofs provide green oases amongst built-up areas. They can provide health benefits, protect the building structure from sunlight and temperature fluctuations and they can cut the cost of drainage, heating and air conditioning. Carefully chosen plants can also provide a habitat and meet the needs of local wildlife.

**9.23** Incorporating productive landscapes into the design and layout of buildings and landscapes provides opportunities for local food growing, supports the creation of healthy and active communities, improves the quality of open spaces and enhances biodiversity. Productive landscapes can take the form of allotments, community garden & growing spaces, green roofs & walls and productive planting.

**9.24** Where there is limited outdoor space, there are opportunities for providing productive landscapes in roofs, walls and balconies in the form of rooftop allotments or raised beds. Productive planting can be incorporated into green roofs & walls through the planting of herbs, fruit, vegetables and edible plants. Productive planting can also be incorporated in soft landscaping where fruit and nut trees could also be used.

**9.25** In major developments where productive landscapes can be managed by a school, community group or residents' associations, opportunities for the provision of allotments, and community gardens and growing spaces should be explored.

**9.26** Croydon contains many sites of biodiversity or geo-diversity value from Sites of Nature Conservation Importance, which are of local importance, to Sites of Special Scientific Interest (SSSIs), which are of national importance. The borough also contains four Local Nature Reserves and one Regionally Important Geological site (the Croham Hurst Cemented Blackheath Pebble Beds).

**9.27** The Review of Sites of Nature Conservation Importance carried out in 2013 and 2014 provides details on all sites with a rating of Grade I and Grade II, and all sites of local importance.

**9.28** Some types of habitats are rare in Croydon compared with other parts of London and are therefore particularly valuable here, for example open and running water. The size and shape of a site is also a consideration. Long, narrow sites, such as railway corridors and 'fingers' of open land, are more valuable than their size alone would suggest as they bring wildlife close to a larger number of adjacent properties and people.

**9.29** Proposals that might affect such sites will therefore need to be carefully assessed. Any assessment should take into account both operations during construction and the changes likely to be brought about by the new use.

**9.30** Occasionally, protection of nature conservation features may be outweighed by the need to provide essential infrastructure to support growth in the borough and beyond when there is no other suitable site. When assessing whether there are no other suitable sites, the cost of site acquisition is not a consideration and applicants will need to demonstrate that the proposed infrastructure cannot be disaggregated on to smaller sites within the borough or elsewhere. In circumstances where it is deemed that the need to provide essential infrastructure outweighs the protection of nature conservation features, harm may be permitted. Compensatory measures of an equivalent nature conservation value will be required to offset the harm caused by the development. It should be noted that some habitats take hundreds of years to become established in their current form and therefore it may be impossible to secure a like-for-like replacement.

**9.31** Some species of flora and fauna are protected by national and international legislation. The habitats of certain wildlife

species are also specifically protected, although the retention of the habitats and adequate foraging areas of all protected species are considered essential for their survival. Specially protected species can be found throughout the borough and are not restricted to designated sites of nature conservation interest. It is therefore always necessary to consider the presence of specially protected species.

**9.32** An ecological assessment will be required for developments which will impact land with biodiversity or geodiversity value. An assessment is also required if a development impacts on species or habits protected by British or European law, included within a Biodiversity Action Plan or when the Council is presented with evidence of protected species.

### **Key supporting documents**

- Review of Sites of Nature Conservation Importance (2013 and 2014)

## Trees

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Strategic Objective 10
- Policy SP7.3
- Policy SP7.4
- Policy SP7.5

### Why we need this policy

**9.33** Croydon has strategic objectives to ensure the responsible use of land and natural resources to mitigate and adapt to climate change, to increase the quality of and access to green space and nature, and to protect and enhance biodiversity.

**9.34** There is now a wealth of evidence on the many benefits of planting more trees to increase canopy cover, including improving physical and mental health; air quality; water management (reducing flooding); shading; cooling through evapotranspiration; as well as the more obvious benefits of improving biodiversity.

**9.35** Increasing tree cover in urban areas can help mitigate the urban heat island through direct shading and by reducing ambient air temperature through the cooling effect of water evaporation from the soil via plant leaves. The shading provided by trees can also reduce energy use for heating and cooling buildings.

### Policy DM1: Trees

The Council will seek to protect and enhance the borough's woodlands, trees and hedgerows by:

- a) Ensuring that all development proposals accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent;
- b) Not permitting development that results in the avoidable loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area;
- c) Not permitting development that could result in the future avoidable loss or excessive pruning of preserved trees or trees that make a contribution to the character of the area;
- d) Not permitting development resulting in the avoidable loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees; and
- e) Producing a tree strategy outlining how the local authority will manage its tree stock and influence the management of those trees subject to a Tree Preservation Order.

### How the policy works

**9.36** The London Plan and the London Tree and Woodland Framework outline the Right Place Right Tree approach. Available space, the relationship to buildings and ultimate mature tree size will be taken into account by the Council when designing/accepting layouts to avoid causing future relationship issues. The presumption should be in favour of larger trees.

**9.37** Examples of types of development that could result in the future loss or excessive pruning of preserved trees or trees that make a contribution to the character of an area include new buildings in close proximity to the tree; or new roads within or accessing a development that pass within close proximity to a tree.

**9.38** In all cases where the proposed development could result in the future loss or excessive pruning of preserved trees or trees that make a contribution to the character of an area, an application will need to be accompanied by sufficient information

in accordance with BS5837 Trees in relation to design, demolition and construction (2012), or any successor British Standard to determine the future impact upon the trees.

**9.39** The loss of preserved trees that make a contribution to the character of the area is occasionally unavoidable. In these instances the council will be guided by BS5837: Trees in relation to design, demolition and construction, Recommendations, 2012 when determining which trees can be removed, although, it is accepted that trees are only one consideration when addressing the competing needs of development. In such cases where trees are to be removed, the Council may impose a condition to require its replacement either, if practical and acceptable on site, and if not possible nor acceptable on site, in another location where it might contribute to the amenity and biodiversity of the local area. When replacing tree proposals should meet the requirements of policy DM10.8.

## **Key supporting documents**

- London Tree and Woodland Framework (2005)
- BS5837 Trees in relation to design, demolition and construction (2012) or any successor British Standard
- Residential Development and Trees (2015)
- Trees in the Hard Landscape (2014)

# 10. Transport and Telecommunications

## Strategic policy

### Where we are now

**10.1** The main issues in terms of planning for transport and communication up to 2036 are:

- The population of the borough is expected to rise by approximately 78,000 by 2036, with over 10,000 homes being proposed for the Croydon Opportunity Area, which **The planned growth in the borough to meet housing needs and to support economic and social well-being** will increase pressure on all transport services **particularly as there is a major transport hub in the Croydon Metropolitan Centre.**
- Croydon is part of the 'Coast to Capital' Local Enterprise Partnership (LEP), which aims to increase business and employment in the area which would put additional pressure on transport services.
- **There is an ongoing climate emergency highlighting the** ~~There is~~ a need to encourage more active and sustainable transport in order to reduce road congestion, which contributes to air pollution and is a cause of climate change, tackle rising obesity and associated conditions and improve both quality of life and quality of place.
- As well as the many people requiring access, there is a large amount of freight movement on Croydon's road network and hence a need to ensure that the efficient movement of people and goods is maintained.

- ~~Less~~ **Fewer** people regularly cycle in Croydon than in the rest of London and Croydon Metropolitan Centre has been identified as the London Metropolitan Centre with the greatest potential for cycling.
- There is the opportunity to improve Wi-Fi and broadband services to increase the attractiveness of Croydon to businesses and make it easier to do computer based work from home and thus reduce the need to commute to work.
- **As emphasised by the Covid-19 pandemic there is a shift towards homeworking for computer based industries. With the shift towards homeworking** demand for telecommunications equipment will increase.

### Where we want to be

<b>Strategic Objective 8:</b> Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
<b>Strategic Objective 9:</b> Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.
<b>Strategic Objective 10:</b> Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.
<b>Strategic Objective 11:</b> Tackle flood risk by making space for water and utilising sustainable urban drainage systems.

## How we are going to get there

### Policy SP8:Transport and Communication

**SP8.1** ~~In order to deliver a transport and communications network capable of supporting growth over the plan period the Council will apply a presumption in favour of development for new transport schemes which meet the requirements of Policy SP8 and other applicable policies of the development plan.~~ **The transportation and communication network should support the community, environmental, and economic health of the borough by connecting communities, promoting physical activity through transport, reducing vehicle emissions, and creating vibrancy through foot traffic in the borough's centres. A functioning and accessible network is essential to accommodating growth.**

#### Airport City

**SP8.2** ~~The Council and its partners will enhance the borough's sub-regional transport role to support its position as a major business, hotel and conferencing destination serving London's airports and the Coast to Capital economic area (see Policy SP3.8).~~ **East Croydon station and the surrounding area is the borough's main transport hub. Development should enhance the station's sub-regional transport role as a major business, hotel and conferencing destination serving London's airports and the Coast to Capital economic area. This enhancement should support the establishment of cycle hubs at East and West Croydon stations, including safeguarding land**

#### Pattern of development and accessibility

**DM1.1** ~~The Council will actively manage the pattern of urban growth and the use of land to make the fullest use of public transport and co-locate facilities in order to reduce the need to travel.~~ **Development will be supported if it improves conditions for active travel and encourage modal shift by:**

- a) **Furthering Healthy Streets principles; and**
- b) **Reducing the need to own a private car or reduce the number of cars owned in a household and encourage active sustainable modes of travel through design.**

**SP8.4** ~~Major development proposals will be required to be supported by transport assessments, travel plans, construction logistics plans and delivery/servicing plans.~~ **Improving public transport within Croydon is a key way to encourage modal shift. This will help to improve Croydon's transport network overall. Development should promote and support public transport improvements, including enhancements and extensions to the bus and tram networks and related facilities, bus rapid transit routes and metroisation of rail services.**

#### Sustainable travel choice and Telecommunication's

**SP8.5** ~~The Council will support improvement in the borough's Wi-Fi, fibre optic broadband and mobile broadband in order to reduce the need to travel, encourage higher levels of home working, assist independent living, support inward investment and improve the economic competitiveness of Croydon Opportunity Area and the borough's District Centres.~~ **The Council will support improvement in the borough's Wi-Fi, fibre optic broadband and mobile broadband in order to reduce the need to travel, encourage higher levels of home working, assist independent living, support inward investment and improve the economic competitiveness of Croydon Opportunity Area and the borough's District Centres**

**SP8.6** The Council and its partners will improve conditions for walking and enhance the pedestrian experience by: **Croydon's topography is characterised by large hills, particularly to the south of the borough making walking and cycling more difficult and encouraging car dependence. With the creation of sustainable communities in mind development must consider to the pattern of urban growth and make the fullest use of public transport. Where supported by multi-modal accessibility and within 800m of the Croydon Opportunity Area or Town Centres development density should reflect the sites ability to reduce the need to travel and enable sustainable travel when travel is necessary.**

- ~~a) Ensuring "access for all" principles are adhered to;~~
- ~~b) Increasing permeability, connectivity and legibility of redeveloped sites;~~
- ~~c) Improving crossings, in particular within Croydon Opportunity Area, District Centres and around schools;~~
- ~~d) Enhancing footpaths, strategic walking routes and links through green spaces to ensure a coherent pedestrian network;~~
- ~~e) Creating pedestrian streets from underused side streets and delivery lanes off main streets in Croydon Opportunity Area and the District Centres;~~
- ~~f) Improving way finding in the Croydon Opportunity Area, District Centres and on cycle routes (including the implementation of the 'Legible London' scheme);~~
- ~~g) De-cluttering the streetscape and avoiding unnecessary footway interruptions in new schemes and existing public realm;~~
- ~~h) Enabling the widening of footways where feasible on overcrowded routes; and~~



i) Promoting the identification and implementation of accessible, safe, visible and convenient direct cycle and walking routes to Croydon Opportunity Area, the borough's District Centres, transport interchanges, schools and community facilities through detailed policies within the Croydon Local Plan's Detailed Policies and Proposals.

**SP8.7** The Council, its partners and developers will provide new and improved cycle infrastructure by:

- a) Enhancing and expanding the cycle network to deliver a more coherent network;
- b) The creation of new cycle routes through development sites improving permeability and connectivity;
- c) Promoting the creation of segregated and priority cycle lanes;
- d) Providing clear cycle advance stop lines and other markings at junctions;
- e) Ensuring new development and improvements to public transport interchanges include adequate provision for cyclists that meet, or exceed, minimum security/design standards;
- f) Enabling the establishment of cycle hubs at East and West Croydon Station, safeguarding land where necessary;
- g) Improving cycle facilities at the borough's schools, colleges, District Centres and railway stations; and
- h) Requiring the provision of cycle parking in new developments and at key transport hub stations to encourage multi-modal journeys and reduce the need for car use. **Policy deleted**

**SP8.8** The Council and its partners will prioritise tram infrastructure provision and network improvements that **Centred in Croydon, London Trams is currently the city's only tram network. The tram network supports good growth, helps tackle the climate emergency and enables sustainable movement within the borough. For this reason support will be to development that encourages and supports the provision of tram infrastructure, network improvements and tram extensions through:**

- a) Provide **Provision of** extra capacity to the existing network which serves Croydon Opportunity Area and eases overcrowding on the central sections of the network;
- b) Relieve congestion in the tram network overall;

- c) Increase track capacity at pinch points to speed up journey times;
- d) ~~Support the Mayor's and Transport for London's intentions for extension and investment generally in the tram system; Support the potential development of a tram depot in New Addington or other locations in the borough; and~~
- e) ~~Subject to funding, promote extensions: Streatham, Brixton, Tooting, Bromley, South Wimbledon, Sutton, and Crystal Palace. Consideration of opportunities to support extensions to the tram network, both within the borough and with the adjacent authorities.~~

**SP8.9** The Council and its partners will encourage rail infrastructure provision and network improvements that:

- a) Provide additional track capacity at East Croydon station, and in the area north thereof, to increase train services and improve performance on the Brighton Main Line railway;
- b) Enable improved interchange facilities, pedestrian links and increased capacity at the Strategic Interchanges at East and-West Croydon railway stations;
- c) Enable access and movement improvements in areas next to rail stations to encourage greater use of the train services; and
- d) ~~Facilitate 'Metroisation' of South London's rail services; and~~
- e) Make stations accessible to wheelchair users.

**SP8.10** The Council and its partners will encourage bus infrastructure provision and network improvements that:

- a) ~~Seek to ease the pressure on West Croydon Bus Station by providing new bus stopping/standing;~~ Improve bus services in the underserved areas in the south of the borough, including Kenley, Selsdon and Sanderstead including demand responsive services where appropriate
- b) Seek improvements to ~~orbital~~ bus priority and capacity improvements leading to the Croydon Opportunity Area. ~~by resolving problems along key bus corridors leading to the Croydon Opportunity Area;~~
- c) Improve bus interchange in the Croydon Opportunity Area at peak times including improvements to bus stops and stands; and
- d) Improve bus journey times and reliability.

**SP8.11** Land used for public transport and land required to facilitate future transport operations will be safeguarded unless alternative facilities are provided to enable existing transport operations to be maintained. Land and route alignments to implement transport proposals that have a reasonable prospect of delivery will be incorporated into development proposals.

Motor vehicle transportation

**SP8.12** The Council and its partners will enable the delivery of electric vehicle charging infrastructure throughout the borough to improve air quality and decarbonise private transportation over the plan period.

**SP8.13** New development will be required to contribute to the provision of electric vehicle charging infrastructure, car clubs and car sharing schemes.

**SP8.14** The Council will work with developers and all relevant partners to ensure enough space is provided in the Croydon Opportunity Area and District Centres for taxi ranks/waiting and coach parking, as well as seeking to improve interchanges at East and West Croydon for these modes.

Parking

**SP8.15** ~~The Council will encourage car free development in Centres, Car free development will be encouraged in Centres~~ where there are high levels of PTAL<sup>88</sup> or when a critical mass of development enables viable alternatives, such as car clubs (while still providing for ~~disabled people-people with disabilities~~). ~~Detailed car parking standards are contained within the Croydon Opportunity Area Planning Framework and the Croydon Local Plan's Detailed Policies and Proposals.~~

**SP8.16** The Council and its partners will seek to limit parking spaces in the borough and aim to reduce the overall amount of surplus car parking spaces in the Croydon Opportunity Area in accordance with the Croydon Opportunity Area Planning Framework parking strategy. ~~The character of streets is a key factor in the perception of pedestrian safety. On street parking blocking sight lines can negatively impact this character. The lack of on-street parking controls should not be a limiting factor for development, street parking availability must be taken into account when applying a flexible approach to car parking in town centres. Controlled parking zones should be introduced in areas of the borough to protect street character and enhance safe travel.~~

~~**SP8.17** Outside high PTAL areas the Council will apply the standards as set out in the London Plan<sup>89</sup>. In District Centres where there are identified issues of vitality and viability, the need to regenerate such Centres may require a more flexible approach to the provision of public car parking. Parking standards for the boroughs District Centres will be assessed based upon the following considerations:~~

- ~~a) The need for regeneration;~~
- ~~b) Adverse impact on congestion or air quality;~~
- ~~c) A lack (now and in future), of public transport;~~
- ~~d) A lack of existing on or off street parking;~~
- ~~e) A commitment to provide space for electric and car club vehicles, and parking for disabled people above the minimum thresholds; and~~
- ~~f) A requirement, via Travel Plans, to reduce provision over time. **Policy deleted**~~

Efficient and clean movement

**SP8.18** The Council and its partners will seek to improve the efficiency with which people and goods are moved and reduce the impacts associated with that movement by:

- a) Addressing pressure points in the street network, including strategic road junctions, by improving conditions for pedestrians, cyclists and public transport and maintaining the efficient movement of freight; and
- b) Ensuring travel plans for new and existing facilities, address issues with local congestion and promote sustainable travel choices.

**SP8.19** The Council and its partners will promote efficient and sustainable arrangements for the transportation and delivery of freight by:

- a) Safeguarding existing sites and identifying new sites to enable the transfer of freight to rail;
- b) Safeguarding existing and supporting the provision of new consolidation and ‘break bulk’ facilities through policy to be contained within the Croydon Local Plan’s Detailed Policies and Proposals; and

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<sup>89</sup> London Plan Policy 6.13

c) Requiring major developments to include transport emission reduction plans to encourage the use of less polluting forms of transport.

**SP8.20** Croydon is a key business centre and main transport hub in London. Ensuring business as usual despite development is important to support the continued prosperity of these functions. Developments, particularly high rise developments, must be phased to ensure the uninterrupted movement of the transportation network. Development should seek to avoid disruption to the successful function of the Metropolitan Centre and the borough's commercial centres taking into account peak business hours.

## What it will look like

Figure 10.1 Policy SP8 map **graphic updated**

## Why we have taken this approach

### Airport City

~~10.2 Croydon is strategically positioned between the Gatwick Diamond/south coast and central London. Croydon's vision aspires for the borough to maintain and build on its position as an economic hub serving London and the South East region<sup>90</sup>. Croydon's involvement in the Coast to Capital Local Enterprise Partnership reflects this ambition and seeks the creation of 900 new businesses, 20,000 new jobs and 4,000 additional exporting businesses over the next 5 years. The Strategic Policies and its associated delivery programmes aim to ensure capacity on the transport system, and favour movement of people and goods to maintain the borough as a major destination and interchange in support of Croydon's objectives to remain and grow as the principal point of business, major retailing, leisure and education in South London.~~ **A key focus of the Croydon Local Plan to improve the community, environmental, and economic health of the borough allowing for growth. Transportation in the borough provides a key opportunity to further health goals in all these areas. A modal shift is essential to support growth in homes, jobs and associated facilities (major generators of travel demand). Active travel is well known to promote population health, increase economic prosperity and improve air quality with reduced car travel. This shift in travel modes while addressing current issues on the network are essential in enabling growth.**

### Pattern of development and accessibility

~~10.3 Growth in homes, jobs and associated facilities (major generators of travel demand) will be focussed in the Croydon Opportunity Area and the District Centres near to areas highly accessible by walking and cycling and with high Public Transport~~

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<sup>90</sup> We are Croydon Vision (pages 15-19)

Accessibility Levels, (PTAL), or in areas with development opportunities where PTALs or accessibility by walking and cycling can be increased by infrastructure improvements. Population in the borough is expected to rise by approximately 30,000 by 2031. Evidence shows that Croydon Opportunity Area can accommodate approximately 10,650 new homes; this will be assisted by improved public transport accessibility. Both East and West Croydon Stations are designated as Strategic Interchanges within the South sub-region of the Mayor's Transport Strategy. The Strategic Interchange concept, in partnership with the Mayor, aims to improve orbital public transport travel opportunities, in particular linkages between outer London town centres, to ease pressure on the central London transport system, and passenger dispersal pressures at London's rail termini. East Croydon has the potential for a future link to the High Speed 2 train network via Old Oak Common Station, which would also improve access to Crossrail; there is also an opportunity to facilitate Gatwick stopping services, as well as Thameslink improvements that will provide longer and more frequent trains. West Croydon presents opportunities for improving interchange between bus, rail, tram and Overground services. The Overground East London Line already links Croydon with London Underground and the Dockland Light Rail and in the future will provide direct services to Crossrail via Whitechapel. At present very few people live in Croydon Opportunity Area, yet it has the highest public transport accessibility levels in the borough with good connectivity to London and the wider sub-region. Retention of land used for public transport and land required to facilitate future transport operations is necessary to enable existing transport operations to be maintained and improved, such an approach is in line with the

London Plan. The Council's 4 tier employment policy (see Policy SP3.2) will assist this process. **Directing the borough's growth to the Croydon Metropolitan Centre as well as town centres decreases residents need to travel and creates sustainable transport links between residents the borough's main employment centres and the main transportation hubs for when travel is necessary.**

**10.4** Directing over a third of the borough's growth up to 2036 to Croydon's Opportunity Area will help to minimise the need to travel in order to gain access to services and employment. The opportunity for linked trips is maximised by co-location of homes, workplaces and other facilities. Croydon Metropolitan Centre is rivalled only by the West End and the City of London in terms of public transport accessibility and connectivity. As well as focussing growth in the Croydon Opportunity Area, it will also be directed to those areas and District Centres with high public transport accessibility. Improving connectivity assisted by improved way finding will also be important to enable a shift to more sustainable modes by widening choice and improving alternatives, for example the use of car clubs where there is a critical mass of development. Improving telecommunications is another measure that would help reduce the need to travel; along with more flexible working patterns, such as working from home and teleconferencing<sup>91</sup>. **This is the borough's main activity centre and also the main transport node, it has high Public Transport Accessibility Levels (PTAL) as well as multimodal accessibility. Development should make the fullest use of these facilities or take advantage of sites where PTALs are high and/or accessible by walking.**<sup>92</sup>.

#### Sustainable travel choice

<sup>92</sup> South Sub-regional transport plan (page 28)

**10.5** Urban realm improvements to increase active travel are priorities within the London Plan ~~South sub-regional transport plan~~. TFL's Healthy Streets Approach provides a framework for improving the conditions for active travel on the street. This approach provides the 10 Healthy Streets indicators, these indicators can be addressed in a variety of ways such as design and provision of infrastructure, in many cases the provision of well thought through design and infrastructure provision can improve more than one of the indicators. Provision of e-bike/e-scooters<sup>93</sup>, racks and charging is one way development can support the Healthy Streets Approach. Enabling the use of e-bike/e-scooters encourages a shift to active transportation which ties into to population health, this also helps to decrease the number of private vehicles on the network reducing congestion and improving air quality. The provision of sustainable transport in developments and micro-mobility hubs and docking stations are important ways to reduce the need for the private car and encourage active transport across the borough. ~~Issues related to walking include concerns about safety, crossing busy roads, and indirect/incomplete walking routes to local amenities<sup>94</sup>. Promoting high quality places is aided by a complementary public realm policy (see Policy SP4).~~

**10.6** Sites should be designed to include ways to increase public access. Where possible sites should enhance green connections and integrate lighting to encourage safety and enable 24hour use of active transport routes. Improving connectivity assisted by improved way finding will also be important to enable a shift to more sustainable modes by widening choice and improving alternatives, for example the use of car clubs where there is a

~~critical mass of development. Other examples include improvements to pedestrian and cycle crossings across the borough especially at locations identified in the Croydon Vision-Zero Action Plan. Transport for London's research indicates that the number of residents of Croydon that cycle at least twice a week, is among the lowest quartile in London (less than 5%), and lower than the neighbouring boroughs to the west. However, the level of potential cycle trips is in the highest quartile of Outer London boroughs. The trend based on Department for Transport monitoring suggests cycling levels will increase to a level 250% higher than the 2000 level by 2026. While this is by no means an insignificant increase, it is well below the London Mayor's objective of a 400% increase. This implies that to continue doing "more of the same" will not lead to sufficiently rapid growth in cycling to meet the Mayor's target. With the expected population growth, if new residents behaved in broadly the same way as existing residents, an increase in car use would be likely with substantially increased pressure on the road network. More physically active travel such as walking and cycling will bring benefits in terms of individual wellbeing; taking pressure off the street and public transport networks; and reducing emissions from transport.~~

**10.7** Parts of the TFL's London Trams ~~Tramlink~~ are congested during peak times, with the network unable to accommodate additional trams during peak passenger times ~~network currently have passenger congestion. To allow for additional trams to run, relieve network congestion and improve journey times pinch points in the network at Phipps Bridge and Wandle Park need to be addressed. Planned additional trams are predicted to facilitate~~



continued growth in use<sup>95</sup>. Tramlink extensions could enable a further mode shift on a number of corridors in between Croydon and elsewhere Bromley, Tooting, Streatham, Brixton, South Wimbledon<sup>96</sup> and possibly Sutton and Crystal Palace if tram extension proposals these extensions were to come forward.

**10.8** In 2014 Transport for London undertook public consultation on the principle of the Dingwall Loop, which proposes extending London Tramlink along Dingwall Road and linking to Wellesley Road. The proposed loop would allow Tramlink to continue to run a reliable service, provide more network capacity and would allow more tram services to operate between central Croydon and the eastern branches in the future. Tramlink currently operates on a oneway loop along George Street, Church Street, Tamworth Road and Wellesley Road. In 2020 the Council commissioned the Croydon Corridor Improvement Study to assess the suitability of the boroughs corridors to accommodate public transport improvements with the goal of unlocking housing and jobs. The corridors were evaluated as appropriate for supporting a transit based solution. The Tier 1 corridors were evaluated as being the most suitable for a transit based solution.

**10.9** Transport for London has consulted on three different options and undertook a further round of consultation in 2015. Subject to the consultation, funding and the proposal being endorsed by the Mayor, an application will be made to the Department for Transport for a Transport and Works Act Order. Construction is anticipated to begin in spring 2018 and be complete by autumn 2020. Improving telecommunications is another measure that would help reduce the need to travel; along

with more flexible working patterns, such as working from home and teleconferencing.

**10.10** In addition to the Dingwall Loop, TfL London Trams Tramlink is currently developing a number of other improvements to support frequency and capacity increases on the network including; the Wandle Flyover Doubling proposal involves double-tracking of the single-track tramway between Wandle Park and Reeves Corner tram stops to enable an increase in frequency to up to 23 trams per hour. The Old Town Loop/ Reeves Corner Turnback proposal involves a turnback facility on the western side of Croydon Town Centre to enable proposed services from South Wimbledon to turn back without crossing the town centre, allowing frequency improvements on the Wimbledon branch. Transport for London also has aspirations for Tramlink the tram network to connect to the Northern Line at Colliers Wood South Wimbledon and Crossrail 2 at Wimbledon. The Reeves Corner westbound tram stop proposal involves the potential introduction of a westbound tram stop on Cairo New Road, opposite the existing eastbound platform. The Beckenham Junction doubling proposal involves double-tracking of part or all of the tramway between Harrington Road and Beckenham Junction to enable more reliable and higher frequency services. The Elmers End line enhancements will provide a second platform, siding and some new double-tracking; this will reduce reducing eastbound journey times, increase increasing network resiliency and enable Tramlink enabling trams to run a more flexible timetable; and there is also potential for a Tramlink tram extension beyond New Addington tram stop and twin tracking as part of the redevelopment and regeneration of New Addington District Centre and other tram extensions (and new related facilities) to the current network.

Further improvements that would improve the trams service would be investing in more trams, upgrades to power systems and increasing the stabling and maintenance capacity for the trams

**10.11** . Improvements to East and West Croydon Stations will play an important role in the proposed radial corridor solutions for the South London sub-region. Planned/funded improvements on the East Croydon-London Bridge/Victoria Corridor are predicted to reduce passenger overcrowding through the medium term.

**10.12** Network Rail's proposed Brighton Main Line (BML) upgrade seeks to enhance the capacity and performance of the BML in Network Rail's Control Period 6 (2019-2024). It is an uncommitted scheme, but the Council supports the BML upgrade. Network Rail is currently working up the technical detail to inform choices by Government on investment priorities.

**10.13** The major operational constraints on the BML are principally in Croydon, and the BML upgrade seeks to alleviate these. Specifically in Croydon the proposed work would include:

- 2 extra platforms at East Croydon station, making eight in total;
- Additional passenger circulation/concourse space in East Croydon station to tie in with the above, and also to provide a much improved station experience;
- An additional track or tracks north of East Croydon station, in addition to the present five (this is the element that requires land outside the existing railway boundary); and
- Grade separation of numerous flat junction conflicts in the Selhurst/Norwood Junction/East Croydon/West Croydon area.

Paragraph deleted

**10.14** Network Rail's analysis suggests that at least a third more peak trains will be achievable by 2043 through an upgrade to the Brighton Main Line, of which the East Croydon area is the biggest element. Paragraph deleted

**10.15** The South Sub-Regional Transport Strategy and the Borough Wide Transport Strategy (final draft), identify introducing further bus priority measures on bus routes to and from the Croydon Opportunity Area as a means of increasing bus capacity/improving service. The draft Croydon Metropolitan Centre Bus Strategy proposes changes to bus routing, standing, stopping and interchanges to respond to and facilitate growth. Paragraph deleted

**10.16** Transport for London is currently investigating potential options for improvements to Addington Village bus station and interchange. Paragraph deleted

#### Motor vehicle transportation

**10.17** The requirement for developers to provide a plan (on certain developments) to reduce car use and promote low emission vehicles and alternative forms of transport originates from the need to improve the borough's air quality, reduce carbon emissions and achieve a shift to more sustainable lower impact modes of transport in order to improve quality of life in Croydon. In locations with high public transport accessibility and good connections to walking and cycling routes, housing developments that are car free or have low car ownership, or car clubs can provide a feasible option.

**10.18** Ensuring adequate coach<sup>97</sup> and taxi interchange at East and West Croydon<sup>98</sup> and other District Centre railways stations, such as Purley and Norbury, will be important<sup>99</sup> in encouraging the reduction of private transportation.

### Parking

**10.19** Parking in the Croydon Opportunity Area requires rationalisation<sup>100</sup>; to ensure car parks are where they need to be to serve the business and residential community. Specific details are set out in the Croydon Opportunity Area Planning Framework. Car parking must be considered in the context of capacity on the road network, particularly the A23 and A232. Pressure on the A23 and within the Croydon Opportunity Area will be addressed over the plan period through detailed transport feasibility studies, site specific proposals contained in the Croydon Opportunity Area Planning Framework, Infrastructure Delivery Plan and interventions through the Croydon Local Plan's Detailed Policies and Proposals. **Improving and maintaining the character of the borough's streets is important to improving accessibility. On narrow streets cars often park on both sides of the road detracting from the multi modal use of the street. Controlled parking zones can be used to protect street character in areas where parking accommodated on the street would impede the safe use of the public highway. Controlled parking zones can be implemented to, ensure parking related to development does not impede active transport on the street and allows existing residents to park safely and effectively. Where this is a requirement the developer will be required to wholly or partially fund the CPZ implementation and**

**the development will be excluded from obtaining resident parking permits.**

### Efficient and clean movement

**10.20** Motor transport is the third largest sector contributing to CO2 emissions in Croydon. Of these CO2 emissions, up to 66% are from car use. Estimated traffic flow in the borough has remained fairly constant with levels in 2008 a little over 1993 levels. Transport for London studies indicate that about half of all car trips here are of less than two kilometres. **Segregated cycle routes indicate a safe and recommended route for cyclists. Providing segregated cycle lanes leading to the Croydon Growth Zone encourages a safe, direct and sustainable route to the CMC. Segregated cycle routes such as London Road, Mitcham Road, Addiscombe/Barclay road and South End/Brighton Road would be supported.**

**10.21** Parts of the road network across the south sub-region operate at capacity, with the inner areas being particularly affected. Population and employment growth anticipated in this area will lead to an increase in economic activity. Even with currently funded public transport improvements it is likely that 'vehicle kilometres', particularly lorries and vans, will increase. Without the right measures in place this will affect the resilience of the network, reducing journey time reliability and increased journey times<sup>101</sup>. **Croydon is strategically positioned between the Gatwick Diamond/south coast and central London. Croydon's vision aspires for the borough to maintain and build on its position as an economic hub serving London and the South East region. Development is an essential part of growth in Croydon and is**

<sup>97</sup> Mayor's Transport Strategy (page 150)

<sup>98</sup> South Sub-Regional Transport Plan (page 20)

<sup>99</sup> Borough wide Transport Study(final draft) (page 272)

<sup>101</sup> Borough Wide Transport Study(final draft) (page 53)

necessary to furthering the borough's strategic role as the premier business location in South London. With an increasing number of developments proposed in the borough's centres proximate developments will need to be phased in order to ensure freight and construction vehicles are not locking up the network in multiple locations at the same time.

**10.22** Improving conditions on the A23 for pedestrians, cyclists, public transport and freight will be a key priority over the plan period, with the aim of reducing congestion along A roads and the approach roads which can suffer disproportional delays. Approach road delays at the Fiveways junction is a key disincentive to orbital movements across the borough. Improvements will need to consider the A23 corridor as a whole to ensure the needs of street users and improvements of public realm are coordinated. Key junctions for consideration include Purley Cross gyratory, and Fiveways. The main orbital route through Croydon in the east-west direction is the A232, connecting Croydon with Bromley and Sutton. The A232 meets the main north-south route of A23 from the east at, and just north of the Fiveways junction, and from the west at Purley Way/Croydon Road. The South London Sub-Regional Transport Plan informed the London Plan and supports the levels of growth contained in the London Plan and consequently the growth outlined in Policy SP2 and SP3. Furthermore the South Sub-Regional Transport Plan identifies Croydon Opportunity Area, the A23 Fiveways junction and A23 Purley Cross/Godstone Road junction as areas with opportunities to improve footways, cycle ways, lighting, crossings and bus lanes that could result in significant improvements to the urban realm and the regeneration of central Croydon. Transport for London undertake feasibility studies for all proposed transport schemes, such studies look at both the financial and engineering considerations. In the case of improvements to the A23 and Croydon Opportunity Area, it is

acknowledged that some interventions may not always be deliverable, as such the Strategic Policies proposes to monitor conditions for all modes at pressure points in the street network and at key junctions (see Appendix 8). This will be carried out alongside ensuring that the impact of specific development proposals on the network are assessed and mitigated. As a premier business location in London the function of the transport network is essential to maintaining business as usual. While delivery to and servicing of developments is a necessary function, where possible should it take place outside peak hours (i.e. avoiding deliveries between 7am-10am, 12pm-2pm and 4pm-7pm on weekdays).

**10.23** Transport for London and Croydon announced the preferred option on 9 February 2016, to widen the existing A23 bridge over the railway and Epsom Road, allowing the removal of A232 traffic from Fiveways Corner. The preferred option delivers traffic benefits and improvements to the local pedestrian and cycle facilities. Further design work will be completed ahead of a public in Autumn 2016 on the highway design of the preferred option. Construction is due to start in winter 2018/19. Safe and efficient movement across the borough is an important factor in accommodating growth. Construction and delivery traffic are to essential element to enable this growth. Traffic related to construction and deliveries can have negative impacts on local amenity, air quality and the environment. When proposing development, measures to better manage freight and construction vehicles must be demonstrated to mitigate adverse the adverse effects these vehicles may have on the network. This mitigation should limit the risk of damage to existing infrastructure such as tram and rail tracks. Where developments are located close to train lines further measures should be taken to ensure development does not pose any safety issues on the network leading to disruption to service.

**10.24** Freight movements form a significant component of traffic flows on Croydon's road network, with demand generated from the major retail outlets in the Croydon Metropolitan Centre and the extensive retail and business park areas to the west of the borough. The borough also has many Local and District Centres whose businesses rely on deliveries being made on-street from a multitude of suppliers<sup>102</sup>. The sidings at Purley, currently occupied by an aggregates company, is an active rail freight site.

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<sup>102</sup> Borough Wide Transport Study(final draft) (page 267)

## Ensuring the safe and effective movement of the network

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 8
- Policy SP11.20

#### Why we need this policy

**10.24A** Croydon has a strategic objective to improve accessibility, sustainability and ease of movement to, from and within the borough.

**10.24B** Strategic Policy SP11 sets out the framework for ensuring business as usual despite development. This policy provides the detail to this structure identifying the detailed approach to ensuring the continued safe and effective movement of the network.

**10.24C** To enable growth and the continued functioning of the transport network the phasing of development must take into account other developments coming forward with regards to phasing.

**10.24D** This policy provides further requirements in terms of the phasing and managing development so as to ensure the continued safe and efficient movement of the network.

## Policy DM 28 Ensuring the safe and effective movement of the network

DM28A 1 To ensure the continued movement of the road network while enabling growth, major development must:

- a) Take into account the development of the overall area;
- b) Be phased while on site; and,
- c) Support innovative solutions to ensure the lowest amount of disruption during development.

DM28A 2 The amount of construction associated with growth in the Croydon Opportunity Area and the Purley Way Transformation Area needs to be delivered through careful management and a reduction in the number of deliveries and freight traffic. To support this, development should:

- a) Minimise the need for freight trips and seek to manage freight and servicing on an area-wide basis;
- b) Provide for freight consolidation;
- c) Adopt new technologies to enable efficient servicing and deliveries to sites; and
- d) Provide onsite servicing areas to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded.

### How the policy works

**10.24E** While growth is a priority for the borough, this growth should not interfere with the day-to-day prosperity and function of the borough's centres and transit network. Development deliveries are contribute to large volumes of congestion caused by servicing and deliveries. Innovative solutions such as the implementation of last mile deliveries by foot, cycle or zero emission vehicles will be supported. Development is encouraged to identify opportunities for last mile logics hubs.

**10.24F** With large amounts of development ongoing in the borough, appropriate phasing across an area is necessary to

ensure to the ongoing safe and secure movement of the transit network. This requires development to be sensitive to the context in which it is taking place giving consideration to proximate schemes coming forward at similar times. Potential impacts on the network related to the movement of large construction vehicles from multiple sites should be mitigated through planning and coordination between schemes.

**10.24G** While on site, major development requires large amounts of deliveries and servicing, these activities require the use of heavy construction vehicles and often result in disruption on the network. Site phasing must be under taken in order to reduce the impact of these activities on the network. During construction

development can mitigate disruption to existing residents and businesses by providing off street servicing space or implementing freight reduction measures development can ensure that deliveries and servicing requirements do not have a negative impact on the road network. This is particularly important for high density residential or commercial developments in the Croydon Metropolitan Centre or town centres that are forecast to generate significant freight and deliveries movements.





## Promoting sustainable travel and reducing congestion

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 8
- Policy SP8.3
- Policy SP8.4
- Policy SP8.6
- Policy SP8.7

### Why we need this policy

**10.25** Croydon has a strategic objective to improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

**10.26** Strategic Policy SP8 provides a strategic overview for reducing congestion and improving highway safety. This policy extends this approach to ensure that individual developments consider these matters.

**10.27** Cycling, walking and increasing use of public transport promote physical activity, improve mental health and reduce physical obesity.

**10.28** Croydon suffers from congestion in a number of locations identified in the Croydon Opportunity Area Planning Framework - Strategic Transport Study. Congestion hinders Croydon's economic regeneration and development. A study from Portland, USA has calculated that congestion costs it \$844m annually<sup>103</sup>. Congestion and use of private transport also leads to increased carbon emissions in the borough. Croydon produces 1,660kt of CO<sub>2</sub> a year which puts it at seventh highest out of 33 London boroughs. The London Plan includes a target to reduce CO<sub>2</sub> emissions by 60% by 2025, the Climate Change Act sets out that emissions will be reduced by 80% by 2050 (based on 1990 levels).

Policy DM29: Promoting sustainable travel and reducing congestion

<sup>103</sup> [http://www.portofportland.com/PDFPOP/Trade\\_Trans\\_Studies\\_CoC\\_Report1128Final.pdf](http://www.portofportland.com/PDFPOP/Trade_Trans_Studies_CoC_Report1128Final.pdf)

**DM29.1** To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:

- a) ~~Promote measures to increase the use of public transport, cycling and walking.~~ Create, enhance and promote measures to increase active travel and reduce the need to make private vehicle trips; Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and
- c) Not result in a severe impact on the transport networks local to the site which would detract from the economic and environmental regeneration of the borough by making Croydon a less accessible and less attractive location in which to develop.
- d) Reduce the impacts of suburban intensification development in low PTAL areas (PTAL 2 and below) by integrating and providing for enhanced active travel measures within the development;
- e) Implement measures that support the Mayor of London's Healthy Streets Approach, including the design of development.
- f) Ensure that the movement of pedestrians, cycles, public transport and emergency services are not impeded by deliveries and servicing requirements.

### How the policy works

**10.29** All development has an impact on traffic movement in the borough. In order to reduce the impact on traffic movement the Council will require new development to promote measures to increase the use of public transport, cycling and walking. This includes ensuring new development has good access to public transport and has good links to main pedestrian and cycle routes in the borough. Other measures might include bike hire schemes, car clubs, other shared transport schemes, bus stop infrastructure, bus services, on demand transport services, cycle routes, cycle parking, public rights of way, footpaths, pedestrian facilities and crossings, tram stops and infrastructure. The design of new developments should prioritise walking and cycling routes into and through developments over routes for cars. Designs should also prioritise access to public transport over accessibility to private motor cars. Deliveries and servicing requirements can

also have a negative impact on the road network. The impacts could be reduced by providing off street servicing space or implementing freight reduction measures for high density residential or commercial developments in sensitive locations such as the Croydon Metropolitan Centre or District and Local Centres.

**10.30** Some development would result in an unacceptable impact on the local transport networks. Such development will not be permitted. Transport for London and Network Rail will be consulted on planning applications that could result in such an impact on the borough.

**10.31** All major development proposals<sup>104</sup> should demonstrate by means of a Transport Assessment; Travel Plan; Construction Logistics Plan; and Delivery & Servicing Plan, or equivalents, how they will promote measures to increase the use of public transport, cycling and walking and that they will not result in a severe impact on the local transport networks.

**10.32** The extent of the local road network will vary depending on the location, scale and type of the development but will always include the routes from the development site to the Strategic Road Network. For developments located on a Strategic Road the local road network will include the entire Strategic Road Network within and leading into the borough.

**10.33** The extent of the local public transport network includes bus routes within a 10 minute walk, tram routes and train stations within a 15 minute walk and cycle and walking routes within 15 minutes of the development. The exact extent of the local transport networks should be considered in the Transport Assessment.

**10.34** The Strategic Policies require new developments to increase the permeability and connectivity for pedestrians and cyclists of their sites and to create new cycle routes in their developments.

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<sup>104</sup> Residential development of 10 or more units, 1,000m<sup>2</sup> of non-residential floor space or a development of 0.5ha or more in extent

## Car and cycle parking in new development

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 8
- Strategic Objective 9
- Policy SP8.15
- Policy SP8.16
- Policy SP8.17

#### Why we need this policy

**10.35** Croydon has strategic objectives to improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough and to ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.

**10.36** Croydon Local Plan Strategic Policy SP8 sets basic car parking standards by referring to pan-London standards set by the London Plan. These are sufficient for managing the overall provision of car parking in new development. However as some potential users of car parking have particular requirements these need to be covered in a Croydon-specific policy.

**10.37** This policy provides further requirements in terms of the quality of provision and how the parking should be provided.

**10.38** Occupiers of affordable housing also require car parking spaces although on average car ownership is 30-60% less than that of owner occupied homes.

## Policy DM30: Car and cycle parking in new development

**DM30.1** To manage the impact that parking provision has on traffic generation, and the impact of traffic on the climate development must ensure that car parking provision is in accordance with the standards set out in Table 10.1.

To promote sustainable growth in Croydon and reduce the impact of car parking new development must:

- a) Reduce the impact of car parking in any development located in areas of good public transport accessibility<sup>105</sup> or areas of existing on-street parking stress;
- b) Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;
- c) Ensure that highway safety is not compromised by the provision of car parking including off street parking where it requires a new dropped kerb on the strategic road network and other key roads identified on the Policies Map;
- d) If the development would result in the loss of existing car parking spaces, demonstrate that there is no need for these car parking spaces by reference to occupancy rates at peak times;
- e) Provide car and cycle parking spaces as set out in table 10.1

Ensure that cycle parking is designed so that it is secure and can also be used for parking for mobility scooters and motor cycles; and

Provide car parking for affordable homes at an average rate not less than  $\frac{2}{3}$  that of other tenures.

**DM30.1** Provide parking on-site to ensure that parking generated by the development does not contribute more than 5% increase in parking stress within a 200m catchment of the development; On site parking stress in Croydon is assessed as being at capacity when 85% of parking stress is reached.

**DM30.2** Provide a dedicated area for motorcycle parking with ground anchors (in any location in the borough);

**DM30.3** Ensure that there is not a significant detrimental impact on the movement of pedestrians, cycles, public transport and emergency services due to the provision of car parking;

<sup>105</sup> Public Transport Accessibility Level (PTAL) rating of 4 or more

- DM30.4** Ensure that highway safety is not compromised by the provision of new off-street parking where it requires a new drop kerb or cross over (including on roads identified on the policies map where planning permission is required for any new drop kerb or crossover); and,
- DM30.5** Ensure that entrances or vehicle crossovers for new development do not have any detrimental impact on the functioning of bus and cycle routes to maintain the effective operation of sustainable transport routes;
- DM30.6** To support reduced on-site parking provision in areas of adequate public transportation and multimodal accessibility<sup>[00]</sup> major developments must provide car club or pool car spaces (which may include on street spaces subject to assessment by the council) or use existing, local car clubs where the operator confirms that there is availability for use of the existing car club by the new residents. There will be a requirement for the residents to be made members of the car club for 3 years at cost to the developer.
- DM30.7** Reduced provision of car parking, car-lite and car-free development will be supported in areas of high public transport and active travel accessibility<sup>106</sup> where on street parking can be managed through the presence of parking controls.
- DM30.8** Cycle parking provision will be in accordance with the London Plan standards, including secure, waterproof, enclosed with charging provision for electric bicycles and mobility scooters and space for cargo bikes and adapted bikes where necessary.

Table 10.1 Car parking in new development

Public Transport Accessibility Level	Minor non-residential developments	Major non-residential	1 and 2-bedroom homes in an area with a Controlled Parking Zone	3 or more bedroom homes in an area with a Controlled Parking Zone	All homes in an area with no Controlled Parking Zone
5, 6A or 6B	Car Free – as per London Plan	Car Free – as per London Plan	Car free with no rights for a parking permit (with the exception of disabled parking)	Car free with no rights for a parking permit (with the exception of disabled parking)	Car free (with the exception of disabled parking) subject to parking stress surveys

Public Transport Accessibility Level	Minor non-residential developments	Major non-residential	1 and 2-bedroom homes in an area with a Controlled Parking Zone	3 or more bedroom homes in an area with a Controlled Parking Zone	All homes in an area with no Controlled Parking Zone
4	As per London Plan	As per London Plan	Car free with no rights for a parking permit (with the exception of disabled parking)	<ul style="list-style-type: none"> <li>• Up to 0.4 spaces per dwelling.</li> <li>• In areas within 400m of a train station or tram stop lower levels of car parking will be expected.</li> <li>• . all rights for parking permits will be removed</li> </ul>	<ul style="list-style-type: none"> <li>• Up to 0.5 space per unit for 1 and 2-bedroom homes</li> <li>• 1 space per unit for homes with 3 or more bedrooms</li> <li>• In areas within 400m of a train station or tram stop lower levels of car parking may be appropriate subject to parking stress surveys</li> </ul>
3	As per London Plan	As per London Plan	<ul style="list-style-type: none"> <li>• Up to 0.5 spaces per unit</li> <li>• all rights for parking permits will be removed</li> </ul>	<ul style="list-style-type: none"> <li>• Up to 0.6 spaces per unit</li> <li>• In areas within 400m of a train station or tram stop lower levels of car parking will be expected</li> <li>• all rights for parking permits will be removed</li> </ul>	<ul style="list-style-type: none"> <li>• 0.75 space per unit for 1 and 2-bedroom homes</li> <li>• 1 space per unit for homes with 3 or more bedrooms</li> <li>• In areas within 400m of a train station or tram stop lower levels of car parking may be appropriate subject to parking stress surveys</li> </ul>



Public Transport Accessibility Level	Minor non-residential developments	Major non-residential	1 and 2-bedroom homes in an area with a Controlled Parking Zone	3 or more bedroom homes in an area with a Controlled Parking Zone	All homes in an area with no Controlled Parking Zone
2	As per London Plan	As per London Plan	<ul style="list-style-type: none"> <li>Up to 0.5 spaces per unit</li> <li>In areas with parking stress levels above 85% all rights for parking permits will be removed</li> </ul>	<ul style="list-style-type: none"> <li>In areas more than 800m from a train station or tram stop 1 space per unit must be provided</li> <li>In areas within 800m of a train station or tram stop a of 0.6 spaces per unit must be provided</li> <li>In areas with parking stress levels above 85% all rights for parking permits will be removed</li> </ul>	<ul style="list-style-type: none"> <li>0.75 space per unit for 1 and 2-bedroom homes</li> <li>1-2 spaces per unit for homes with 3 or more bedrooms subject to parking stress surveys</li> </ul>
0, 1A or 1B	As per London Plan – all parking demand must be accommodated on site	As per London Plan – all parking demand must be accommodated on site	1 space per unit	1.5 space per unit	<ul style="list-style-type: none"> <li>1 space per unit for 1 and 2-bedroom homes</li> <li>1.5 space per unit for homes with 3 or more bedrooms</li> </ul>

### How the policy works

**10.38A**-Parking provision must be managed to ensure sustainable travel, free and active movement of the network as well as ensure that on-street parking is equitably distributed between developments to maintain consistent character of development in an area. If a development is forecast to have an impact upon on-street parking then a parking stress survey to determine whether

there is sufficient capacity within the existing on-street parking bays to accommodate the increased demand will be expected. Severe parking stress is considered to be where 85% of capacity of the kerbside parking space is met or exceeded. Managing the balance between on and off street parking ensures that the character of development remains balanced along a street

minimising the risk of a development taking all the on-street parking meaning an adjacent development must accommodate all parking on-site. To manage this parking stress attributable to each development is limited to a maximum of 5%. In line with industry best practice, parking stress surveys should be undertaken in line with the Richmond methodology. The survey methodology outlines how parking stress should be calculated indicating elements such as the time of day and the area of the road to be measured. The Richmond methodology uses a 5m car space for the survey, calculating stress based on actual number of parked cars and available spaces on the night of the survey, rather than the theoretical space available. The cumulative impacts of development that is permitted or is under construction within the parking stress survey area must be taken into account when calculating the capacity of on street parking.

**10.39** ~~The London Plan sets out maximum car parking standards for residential developments based on public transport accessibility levels and local character. In many schemes in areas such as Croydon Opportunity Area and District Centres where there is a minimum Public Transport Accessibility Level<sup>22</sup> rating of 5, the Council will consider developments with a reduced amount of parking. If a reduced amount of car parking is provided then a corresponding proportionate increase in~~ **The provision of car club or pool car spaces will be supported in order to supplement public transport provision. Provision of other car sharing schemes such as peer to peer sharing, a method of sharing that facilitates private car rental and car sharing schemes will be supported.** ~~need to be provided to compensate for the reduction in private car parking. This will need to be at a rate of one car club or pool car space for every twenty private car parking spaces that have not been provided. This is to ensure that reduced overall levels of car parking do not result in~~

increased pressure on street parking, particularly in those areas without Controlled Parking Zones.

**10.40** Growth will take place throughout the urban area of the borough through development that complements and enhances the character of each area. As each area of the borough becomes more sustainable through growth it should encourage greater provision of public transport in areas that currently have a low Public Transport Accessibility Level. Therefore, no allowance is proposed for higher levels of car parking in residential development in these areas.

**10.41** It is recognised that sustainable growth of the suburbs will take place over the whole Plan period and that in the early years the public transport infrastructure necessary to support that growth may not exist in all areas with a low Public Transport Accessibility Level of 0, 1a or 1b. Therefore, in the early years of the Plan, it may therefore be acceptable for an increased provision of private car parking to be provided in developments in areas with a low Public Transport Accessibility Level if justified by a Transport Assessment. The Transport Assessment needs to demonstrate that the public transport provision will not be sufficient to service the development within the first three years following granting of planning permission, that it is not reasonable to walk or cycle to the nearest railway station, and that there is no interest from car clubs in operating from the location at the time planning permission is sought.

**10.42** Car parking in new development can be visually intrusive and reduce the amount of land available for outdoor private amenity space within developments. ~~In areas of good public transport accessibility new~~ **where provided** developments must reduce the visual impact of car parking. This may include use of underground car parking, reduced provision of car parking spaces within the development or **should start with** active promotion of alternatives to private car use including car clubs,

encouraging use of public transport by residents and enhanced provision of covered and secure cycle parking **may also include use of underground car parking and/or reduced provision of car parking spaces within the development. Providing easy access to alternatives to the private car is the first step in encouraging modal shift. The provision of Cycle Stores on site that are easy to access encourages this modal shift.** ~~Cycle stores can be provided in a number of ways on site dependent on the location and character of the area. In tighter urban areas Cycle Stores can be provided within the building with access from outside, where in suburban areas with good size plots, they can be unobtrusively located in the site without having a detrimental impact.~~

**10.43** Car parking, when integrated into new development, can enhance the street scene. However, car parking can also be a barrier to pedestrians, cycles and emergency services as well as detracting from the character of an area. Therefore, it is important that car parking provision is considered at the outset of a development, **including safe segregated pedestrian access to the site to encourage walking,** and is fully integrated in the design **of the development. To encourage safe access to off street parking and servicing areas development should be designed to allow for all vehicles to enter and exit in forward gear for highway safety reasons.**

**10.44** Some areas of the borough already have a street parking permit system in operation and existing on-street parking is at a premium. In these locations developments will also need to promote alternatives to private car use, again including car clubs, encouraging use of public transport by residents and enhanced provision of covered and secure cycle parking.

**10.45** Not all existing car parking is needed and sometimes the redevelopment of an existing car park (either public or private) will help to provide much needed homes, social

infrastructure and employment. In order to ensure that sufficient car parking is provided in schemes involving the redevelopment of an existing car park, applicants will need to demonstrate that there is no need for any car parking spaces that are proposed to be lost. Need should be demonstrated through occupancy surveys of both the existing car park and other car parks serving the same area and must cover a range of times and dates such that peak operating times are surveyed.

**10.46** It is important that spaces provided for an on-site car club or pool car are used by a provider of these vehicles. The Council will enter a legal agreement with developers of qualifying developments to ensure that the spaces are used for their intended purpose.

**10.47** In circumstances where the car club is not accessible to the wider community, in low density areas or where it is not commercially viable, the Council will expect developers to work with a car club operator to find a suitable site from which a car club would operate. In these circumstances the developer will be expected to fund a Traffic Regulation Order and the lining and signing of an on-street parking bay. This will ensure the parking space will be used by a car club operator and is accessible to both the development and the wider community.

**10.48** Croydon recognises that in many residential developments parking spaces are allocated to particular units and that electric car charging points may not be provided in the correct spaces. Therefore, all spaces in residential developments need to be enabled for future use by electric cars by ensuring the necessary infrastructure with the exception of actual charging points is integrated from the start.

**10.49** Non-residential developments are less likely to have a single assigned parking space per unit. Therefore, electric car

parking spaces should be provided in accord with London Plan standards.

**10.50** The Croydon Opportunity Area Planning Framework provides further guidance on provision of car parking within the Croydon Opportunity Area.

#### **Key supporting documents**

- Croydon Opportunity Area Planning Framework

## Restricting temporary car parks

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 1
- Strategic Objective 5
- Strategic Objective 9
- Policy SP1.1

#### Why we need this policy

**10.51** Croydon has strategic objectives to be the premier business location in South London and the Gatwick Diamond, to ensure that new development is high quality and integrates with the borough's built heritage, and to ensure the responsible use of land. Croydon Local Plan Strategic Policy SP1.1 requires all new development to contribute to enhancing a sense of place and improve the character of an area.

**10.52** The Strategic Policies of the Croydon Local Plan encourage temporary uses to use under used and vacant spaces and buildings in the borough. This approach to the re-use of vacant spaces would be undermined if temporary car parks were allowed on these spaces as they can be easier to set up compared to other temporary uses. Temporary car parks could also undermine future car parking strategies for the borough.

**10.53** The Strategic Policies of the Croydon Local Plan support the use of vacant buildings and cleared sites by cultural and creative industries and community uses. It also supports their use for food growing and tree planting.

## Restricting temporary car parks

To enhance a sense of place and to improve the character of an area, permission will only be granted to use empty spaces for temporary uses that are not car parks, unless in temporary substitution for a nearby permanent car park undergoing redevelopment.

## How the policy works

**10.54** Cultural and creative industries and community uses are considered preferable to temporary car parks as they are likely to bring greater economic and regeneration benefits to the borough. Temporary car parks are also less likely to improve the character of an area or contribute to enhancing a sense of place.

**10.55** Temporary uses can include both specialist organisations such as ACAVA and Acme Studios and community groups, along with temporary landscaping or urban agriculture.

**10.56** Where a temporary car park is required because a nearby permanent car park is undergoing redevelopment (including replacement car parking), the Council may accept a proposal for a temporary car park to ensure that there is continued provision of car parking in a locality whilst redevelopment takes place.

## Facilitating rail and tram improvements

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 8
- Policy SP8

### Why we need this policy

**10.57** Network Rail, as part of a programme of capacity improvements on the Brighton Mainline railway, are proposing to construct an additional island platform at East Croydon station complete with two additional tracks. In addition, a new track is proposed to run from East Croydon station to Windmill Bridge Junction (where the routes to London Victoria and London Bridge divide) as well as a new grade separated junction. This will mean that trains running to and from London Victoria and London Bridge will be able to run into and out of East Croydon station simultaneously which they cannot do at the moment.

**10.58** The additional platform at East Croydon station, additional track to and grade separated junction at Windmill Bridge Junction will each require some land currently outside of Network Rail's ownership. To ensure that developments which would prevent the upgrading of this section of the Brighton Mainline from taking place do not occur in this area, a policy is proposed to safeguard the land for works required to upgrade the railway line.

**10.59** Network Rail also requires additional land whilst the improvement works are underway to support them (such as supply sites and access points). Therefore, additional land is identified on which Network Rail must be consulted about all

proposals for development and safeguard against any development which would have a negative impact on the ability to upgrade the Brighton Mainline.

**10.60** ~~Tramlink~~ **The Transport for London London Trams** is currently developing a number of improvements to support frequency and capacity increases on the network including:

- A loop around Dingwall Road;
- The Wandle Flyover Doubling proposal involving double-tracking of the single-track tramway between Wandle Park and Reeves Corner tram stops;
- The Old Town Loop/Reeves Corner Turnback proposal;
- A Reeves Corner westbound tram stop;
- Double-tracking of part or all of the tramway between Harrington Road and Beckenham Junction;
- Elmers End line enhancements;
- **Tram fleet enhancements; and**
- Potential for a tram ~~Tramlink~~-extension **with a turn around facility beyond the current** New Addington tram stop and twin tracking as part of the redevelopment and regeneration of New Addington District.

## Facilitating rail and tram improvements

Development will not be supported where it might prejudice<sup>107</sup> the implementation of:

- a) Station improvement schemes or other proposals to upgrade train services along the Brighton Main Line corridor; or
- b) Infrastructure extensions or other operational improvements to increase capacity of the Tramlink network.

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<sup>107</sup> A prejudicial impact on the upgrading of the Brighton Mainline is defined as any impact which would prevent improvement works taking place including but not limited to conflicting construction works or use that would not be compatible with works associated with the construction of the Brighton Mainline. Likewise, a prejudicial impact on infrastructure extensions or other operational improvements to increase capacity of the Tramlink network is defined as any impact which would prevent improvement works taking place including but not limited to conflicting construction work or use that would not be compatible with Tramlink improvements.



## Telecommunications

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP8

#### Why we need this policy

**10.61** A policy on telecommunications is proposed as there are specific locational criteria regarding telecommunications equipment that would not be adequately covered by other policies of the Plan.

## Telecommunications

When planning permission is required, proposals for telecommunications development will be permitted provided that:

If proposing a new mast, it has been demonstrated that there are no existing buildings, masts or other structures on which the proposed apparatus can be sited;

If proposing telecommunications development in Metropolitan Green Belt it has been demonstrated that there are no suitable sites that are not in Metropolitan Green Belt and there is no impact on openness;

If proposing telecommunications development on Metropolitan Open Land it has been demonstrated that there are no suitable sites that are not on Metropolitan Open Land and there is no impact on the existing purpose of the site and its reason for it being designated as Metropolitan Open Land; and

The siting of the proposed apparatus and associated structures minimises the impact on the operation of other electronic devices within the surrounding area.

Telecommunication development on a building or other existing structure should be sited and designed to minimise impact to the external appearance of the host building or structure.

## How the policy works

**10.62** Not all telecommunications development requires planning permission. Part 16 of the General Permitted Development Order (2015) sets out the circumstances when planning permission is required and when this policy will, therefore, apply. Under the General Permitted Development Order most masts under 10m in height do not require planning permission and all masts over 15m will require planning permission.

**10.63** Telecommunications equipment should be located on existing structures where possible. If locating equipment on an existing telecommunications structure then information will need to be submitted with any application for prior approval or planning permission that the cumulative exposure, when operational, will not exceed International Commission on non-ionising radiation protection guidelines.

**10.64** The National Planning Policy Framework does not list telecommunications equipment as being acceptable in Green Belt. Proposals for new telecommunications equipment need to demonstrate exceptional circumstances before being permitted in Metropolitan Green Belt (and by default, Metropolitan Open Land).

**10.65** Therefore, new telecommunications equipment will only be permitted in Metropolitan Green Belt or Metropolitan Open Land if it has first been demonstrated that there are no suitable sites outside of Metropolitan Green Belt or Metropolitan Open Land. These sites do not have to be within the borough boundary of Croydon. Furthermore, any ancillary facilities associated with a new telecommunications equipment must be kept to a minimum so that there is no impact on openness of both Metropolitan Green Belt or Metropolitan Open Land and its

reason for being designated as Metropolitan Open Land, if it is a site on Metropolitan Open Land.

## Key supporting documents

- National Planning Policy Guidance
- General Permitted Development Order

# The Places of Croydon

This section informs Policy SP1 on the Places and provides the visions and frameworks demonstrating how the borough-wide thematic policies will shape the Places over the plan period ~~up to 2036~~. It should be noted that where a policy applies to all the Places, to avoid repetition it has not been mentioned in the text. For example Policy SP6 on Climate Change applies to all Places, but only the physical attributes, constraints and measures are identified here.

Furthermore, it is considered the Places provide some context to the possible formulation of Neighbourhood Plans. The Croydon Local Plan 2018 sets out the strategic planning policies that provide the opportunity for the production of Neighbourhood Plans. This will enable communities to influence the planning of their Place, in conformity with the Strategy Policies. All future Development Plan Documents will be carefully managed to ensure their content does not unnecessarily trespass on the intended function of Neighbourhood Plans.

This section also contains the Council's policies that would specifically apply to a Place and all the Detailed Proposals.

The Places appear in alphabetical order from Addington to Waddon.

# 11. The Places of Croydon

The Place-specific policies

## Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7
- Strategic Objective 8
- Strategic Objective 10
- Policy SP1
- Policy SP2.2
- Policy SP4.1

### Why we need these policies

**11.1** The main objective of these policies will be to provide additional Place-specific development management policies to provide greater clarity and certainty that proposed developments are in line with the objectives of Croydon Local Plan Strategic Policy SP4. These policies should be read in conjunction with the Borough Character Appraisal including the Character Typology.

**11.2** The aspiration to achieve good design while retaining and improving the distinctiveness of each of Croydon's Places has created the need to provide further design detail in the form of Place-specific development management policies. These additional policies will provide greater clarity and provide

management guidelines for proposals within District and Local Centres and in locations outside of the masterplan areas, Conservation Areas, Local Heritage Areas or the Croydon Opportunity Area.

**11.3** An evaluation of local character was conducted to identify the locations in each of Croydon's 16 Places where Place-specific development management policies would be beneficial.

**11.4** The consistent theme within these Places was the need to identify management guidelines for major junctions, District Centres and Local Centres. These additional Place-specific

development management policies will only be applicable within the areas identified on the Policies Map.

### Designations shown on the Policies Map

The Place-specific development management policies identify specific locations with less consistent character where the criteria of Policies DM34 to DM49 apply. These designations they will be shown on the Policies Map. A list of all Place-specific policies is shown in Table 11.1 and *Policies Map* has details of all proposed areas where a proposed Place-specific development management policy will apply.

**Table 11.1 Proposed Place-specific development management policies (see Policies DM34 to DM49 and *The Policies Map* for full details)**

Place-specific development management policy	Policy ref
New Addington District Centre	DM34.1
Addiscombe District Centre	DM35.1
Area between Addiscombe Railway Park & Lower Addiscombe Road (section between Leslie Park Road & Grant Road)	DM35.2
Broad Green Local Centre	DM36.1
Potential new Local Centre at Valley Park	DM36.2
Area of the Lombard Roundabout	DM36.3
Area north of Broad Green Local Centre	DM36.4
Area of the junction of Windmill Road and Whitehorse Road	DM36.5
Croydon Opportunity Area (all)	DM38.1
Croydon Opportunity Area (New Town and the Retail Core)	DM38.2
Croydon Opportunity Area (Central area)	DM38.3
Croydon Opportunity Area (Edge area)	DM38.4
Croydon Opportunity Area (London Road area)	DM38.5
Croydon Opportunity Area (area along Sydenham and Lansdowne Road)	DM38.6
Norbury District Centre	DM41.1

Place-specific development management policy	Policy ref
Pollards Hill Local Centre	DM41.2
Purley District Centre and its environs	DM42.1
Environs of Reedham station	DM42.2
Area of the junction of Brighton Road and Purley Downs Road	DM42.3
Sanderstead Local Centre	DM43.1
Hamsey Green Local Centre	DM43.2
Selsdon District Centre	DM44.1
Shirley Local Centre	DM45.1
Area between 518 and 568 Wickham Road	DM45.2
Area of the Wickham Road Shopping Parade	DM45.3
Brighton Road (Selsdon Road) Local Centre	DM46.1
Section of Portland Road between the South Norwood Conservation Area and Watcombe Road	DM47.1
Section of Portland Road between Watcombe Road and Woodside Avenue	DM47.2
Thornton Heath District Centre and environs	DM48.1
Thornton Heath Pond Local Centre and environs	DM48.2
Waddon's potential new Local Centre	DM49.1

## Addington

**11.4A** Addington has a rich history and varied local character, located on the eastern borough boundary and surrounded by extensive areas of Metropolitan Green Belt including the North Downs, Rowdown Fields, Addington Vale and Milne Park. It has two distinct residential areas Addington Village and the New Addington and Fieldway estates.

**11.4B** Addington Village has origins dating to at least the 12th century and is set in the backdrop of the Grade II\* Addington Palace and Grade II Registered Park and Garden, collectively forming the Addington Village Conservation Area. The Grade I listed church of St. Mary, the Blessed Virgin is at the heart of the village, and surrounded by historic farmworker's cottages, service buildings and village amenities, now primarily in residential use. There are limited services in the village and no shops. The combination of its historical and green setting, along with minimal vehicular access and public transportation means that Addington Village retains a rural and isolated aspect unlike much of the rest of the borough.

**11.4D** New Addington and Fieldway estates consist of interwar and late twentieth century housing in a landscaped setting with interlinked public open space. New Addington Estate was built between 1935 and 1963 with most housing built in a uniform semi-detached style on a series of crescents radiating out from Central Parade. Fieldway Estate was built from 1963 onwards and is generally more compact, arranged in small blocks or terraces with individual back gardens and communal garage blocks. There is also a small centre of local shops and community facilities.

**11.4E** New Addington is one of the most deprived areas in Croydon and Fieldway also has high levels of deprivation. Tram and bus

services run throughout New Addington and Fieldway linking it to Croydon Metropolitan centre and beyond. The majority of Addington's retail and community facilities are located along the spine of Central Parade and include Addington Library and New Addington Community and Leisure Centre.

### Vision, opportunities, constraints and change up to 2036

#### Vision

**11.5** A self-contained community, Addington comprises the distinct Addington Village, New Addington and Fieldway. It will be a location for growth, capitalising on good links to Croydon Metropolitan Centre and its concentration of supporting infrastructure. Addington will continue to comprise interwar and late 20th Century housing surrounded by Green Belt. Addington will be enhanced with appropriate infill development and a rejuvenated District Centre, with a mixture of homes, community and cultural facilities and a range of retailing, including many independent shops. Fieldway Neighbourhood Centre will support the existing and future community with services and facilities beyond a retail function. Addington Village Conservation Area will retain its distinct rural village character and its setting within the Green Belt. Addington Palace and associated parkland will continue to contribute to its character, setting and the historic environment of the area.

#### Homes

**11.6** With good supporting infrastructure provision, opportunities for new development will comprise of mainly infill development, as land is physically constrained by the Green Belt. Residential

development in **New Addington and Fieldway** will respect and evolve the existing character and distinctiveness of the local areas; whilst protecting, enhancing the historic character and setting of Addington Village and its heritage assets.

#### Employment, Skills and Community Facilities

**11.7** There will be continued protection for industry and warehousing in the Vulcan Way Separated Industrial Location. This is located within proximity to Biggin Hill Strategic Outer London Development Centre (SOLDC), within the neighbouring Authority area. The Bromley Local Plan (adopted 2019) has allocated this for strategic employment development, which is proposed to comprise of a business park, servicing and maintenance of aircrafts, a business park, light industrial units, to create about 2,300 jobs over the next 15-20 years. New Addington District Centre will maintain its support of the local community, providing retailing, some employment and services. The conference centre of Addington Palace also provides further local employment opportunities, supporting its future preservation and public enjoyment. Community facilities will be encouraged to be located in or near enough to support the success and vibrancy of the centre, focussing on leisure, community and health facilities.

#### Character, Heritage and Design

**11.8** New development will respect the existing local character and local distinctiveness, referring to the Borough Character Appraisal and Addington Village Conservation Area Appraisal and Management Plan to inform design quality. Public realm improvements will focus on the New Addington District Centre to assist in the regeneration of the area and improve community and social cohesion, with a rejuvenated designated Village Green placed at the centre. Any buildings and conversions should be of a high standard of design to ensure the character of the District centre and the Conservation Area are respected. The Historic and

Local Historic Parks and Gardens in the area will be retained and new links provided where possible to incorporate them into the Green Grid network.

#### Environment and Climate Change

**11.8A** Addington is characterised by a steeper topography and more rural land. Due to this water drains from it into the tributaries of the River Ravensbourne that flows northwards into London Borough of Bromley, this has historically resulted in severe surface water flooding from intense rain flow (e.g. north of Field Way and Kent Gateway Road). New development will be required to incorporate Sustainable Drainage Systems to manage surface water runoff and flooding, taking into account the topography of the area and overland flow routes.

#### Green Grid and Open Space

**11.9** Walking and cycle links to local schools, the District Centre, Vulcan Way industrial location and surrounding open space will be improved where possible. These will connect to the ancient Roman road on the borough boundary with Bromley. Opportunities to provide green grid connections across the Fieldway area and around Addington Palace Golf Course will be supported.

#### Transport

**11.10** ~~The tram, with improved services and investment in rolling stock, will continue to provide a valued link to the Croydon Metropolitan Centre and connections to Central London and Gatwick Airport.~~ **The tram line is one of the key assets of Addington. This enables easy access to the Croydon Metropolitan Centre and connections to Central London and Gatwick Airport. The community will enjoy better quality, more frequent and reliable bus services connecting with Croydon Metropolitan Centre. Public parking provision will be better managed to give priority for local**

residents, visitors to local businesses and community amenities; over commuter parking in the vicinity of New Addington Central Parade. There are opportunities for direct and safe cycle routes linking New Addington with Croydon Metropolitan Centre and neighbouring communities as well as the existing National Cycle Route 21 which encourages longer distance cycle journeys through the area. The public realm can be upgraded and the residential streets improved in line with the Healthy Streets Approach to encourage higher levels of active travel and reduce road danger in the local area which has suffered from a high number of collisions involving vulnerable road users.



Figure 11.1 Addington **graphic updated**

**General character**

~~DM1.1~~ The character of Addington is defined by extensive areas of Metropolitan Green Belt such as Birch Wood, Frith Wood, Rowdown Wood and North Downs. These green areas provide the setting for the Addington Village; and the 20th century housing estates in New Addington which consist of 'Local Authority Built Housing With Public Realm' and 'Compact Houses On Relatively Small Plots' in Fieldway, both with scattered sections 'Medium Rise Blocks With Associated Grounds' and 'Tower Buildings'.

Paragraph deleted

~~DM1.2~~ Apart from the historic Addington Village, the Place is served by two 'Suburban Shopping Areas', Central Parade in New Addington (the District Centre) and Wayside in Fieldway.

Paragraph deleted

~~DM1.3~~ The spine of Central Parade separates the less green 'Suburban Shopping Area' of New Addington's District Centre from the area containing leisure and community facilities, with a character of 'Institutions With Associated Grounds'. In addition to these character types, Addington has a number of areas, located to the west and east of Central Parade, with an 'Industrial Estate' character. With the exception of Central Parade, these character areas are generally consistent and can be successfully managed through the policies of this Plan. Paragraph deleted

~~DM1.4~~ The Addington Village Conservation Area incorporates a historic village with medieval origins in a rural setting. The village's architecture represents a variety of character types from various historical periods. The predominant types are: 'Scattered Houses On Large Plots' and 'Detached Houses On Relatively Large Plots'.

Paragraph deleted

**Policy DM34: Addington**

<p><b>DM34.1</b></p> <p>a) Make use of opportunities to create buildings with a larger footprint to the west of Central Parade that have a height of up to 8-11 storeys; or</p> <p>b) Create buildings with smaller footprints that complement existing predominant building heights of 3 storeys up to 12 storeys within Central Parade.</p> <p><b>DM34.2</b></p>	<p>Within the New Addington District Centre, to ensure that the District Centre characteristics are respected and enhanced proposals should:</p> <p>Within Addington allocate sites for development as set out in Table 11.2.</p>
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**How the policy works**

New Addington District Centre

**11.11** The area in which DM34.1 applies is shown on the Policies Map.

**11.12** The 'Suburban Shopping Area' character on Central Parade is characterised by consistent building lines, setbacks and rhythm of facades and fenestration. This uniformity can be

managed through other policies in the Croydon Local Plan  
 However, additional policies are required to manage the area to the west of Central Parade where there are precedents of large and tall buildings. This location presents opportunities for a **greater range and mix of services to support** growth through the creation of large or tall buildings.

Allocating land for development

**11.13** Table 11.2 below sets out the proposed use on specific sites in Addington. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.2 Proposals for uses of land of specific sites in Addington**

Ref no	Site name	Proposed use
1.	Land Fronting North Downs Road and Overbury Crescent	Residential development
44.	Central Parade West, Central Parade	Mixed development including residential, community, healthcare facility, leisure, retail and open space
120	Timebridge Community Centre, Field Way	<del>Secondary School buildings (with playing fields in adjacent Green Belt)</del>

## Addiscombe

**11.17A** Addiscombe is a suburban residential settlement, framed by green areas on the eastern side and the high density Croydon Opportunity Area to the west. The District Centre is focused on Lower Addiscombe Road, which also serves as one of the main transport corridors through the area along with Addiscombe Road.

**11.17B** Addiscombe has a varied character which has evolved historically over time, with development in the area encouraged by the opening of East Croydon station in the mid 1800's. Two Conservation Areas can be found in Addiscombe; the East India Estate Conservation Area which has a distinctive layout and architecture for a residential suburb, built on land owned and occupied by the former East India Trading Company Military Academy, and the St Bernards Conservation Area is a notable section of the Park Hill Estate completed in 1971 to an award winning international design by Swiss firm Atelier 5. Two Local Heritage Areas, Addiscombe College Estate and Bingham Road, can also be found in Addiscombe which recognises the specific heritage significance of them.

**11.17C** Due to the proximity of central Croydon there is a relative deficiency in the range of community services in Addiscombe. There are good road links east to west and the introduction of the Tramlink in 2000 increased public transport accessibility for residents.

### **Vision, opportunities, constraints and change up to 2036**

#### Vision

**11.14** Addiscombe will continue to be centred on the vibrant District Centre with an historic Conservation Area, a mixture of homes, community and cultural facilities and a range of retailing including many independent shops. Ashburton Park and Lower Addiscombe Road/Cherry Orchard Road Neighbourhood Centres will be supporting the existing and future community with services and facilities beyond a retail function. Addiscombe will continue to provide for a large residential community with good accessibility to Croydon Metropolitan Centre, and through tram and rail networks, good connections to London and Bromley.

#### Homes

**11.15** Sustainable growth of the suburbs including some opportunity for windfall sites, and limited infilling with dispersed integration of new homes that respect existing residential character and local distinctiveness will be encouraged. An Area of Moderate Intensification has been designated to the south of Addiscombe, This is currently a low density residential area, which is considered to have good access to tram stops and local services within the area's District Centre. Due to this, it is considered a sustainable location for moderate renewal, intensification via new residential development that results in a reasonable increased in the density of the area.

#### Employment, Skills and Community Facilities

**11.16** Recognising Addiscombe's retail vitality and potential, the central shopping area has been re- is designated as a District Centre. Community facilities will be encouraged to locate in close proximity to the Centre. The Leslie Arms, a prominent historic public house, will be refurbished and incorporate a community use, reactivating its important position as an active frontage onto the street. A new Integrated Industrial Area has been designated

on Hastings Road to protect the local industrial and employment offer

#### Character, Heritage and Design

**11.17** New development will respect the existing local character and distinctiveness referring to the Borough Character Appraisal to inform design quality. Addiscombe's designated heritage assets and landmarks will be protected. Opportunities for public realm improvements will primarily focus on the District Centre with building and conversion works of a high standard of design to ensure the character of the Centre and Conservation Areas are respected.

#### Green Grid and Open Space

**11.18** Improvements to, and expansion of the Green Grid will be sought to promote strategic east-west and north-south links through Addiscombe Linear Railway and Ashburton Parks. These will connect with the Croydon Metropolitan Centre, Wandle Valley Regional Park, Lloyd Park and South Norwood Country Park.

#### Transport

**11.19** Addiscombe will continue to be a highly accessible Place with its six tram stops and connections to East Croydon, Beckenham Junction and Elmers End railway stations. It will benefit from improved tram services, from investment in tram stock and more frequent services. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys.

Figure 11.2 Addiscombe **graphic updated**

**General character**

**11.20** Addiscombe is a suburban residential settlement, framed by green areas on the eastern side and the high density Croydon Opportunity Area to the west. This Place is influenced by and evolved as an extension of the Croydon Metropolitan Centre. The non-residential character consists of 'Urban Shopping Areas' (concentrated along the Lower Addiscombe Road corridor and the Shirley Road/Bingham Road Junction); and 'Industrial Estates' within the interiors of blocks, interlaced with houses. **Paragraph deleted**

**11.21** The residential character consists of a varied yet balanced mix of 'Terraced Houses And Cottages' in the north west of this Place, mix of 'Medium Rise Blocks With Associated Grounds' and 'Compact Houses On Relatively Small Plots' in the south west (between East Croydon and the Addiscombe tram stop and Lloyd Park, 'Detached Houses On Relatively Large Plots' in south east and 'Local Authority Built Housing With Public Realm' in the north. Some isolated residential 'Tower Buildings' and 'Large Buildings With Spacing' are scattered in the centre, in the vicinity of Lower Addiscombe Road. **Paragraph deleted**

**11.22** The East India Estate Conservation Area protects and preserves the historic character of 'Large Houses On Relatively Small Plots'. The Conservation Area covers a distinctive layout and architecture of residential suburb built on land owned and occupied by the former East India Trading Company Military Academy. **Paragraph deleted**

**11.23** The St Bernards Conservation Area contains 'Compact Houses On Relatively Small Plots'. It is a notable section of the Park Hill Estate completed in 1971 to an award winning international design by Swiss firm Atelier 5. **Paragraph deleted**

**11.24** The Addiscombe College Estate Local Heritage Area designation recognises the historical significance of the collection of preserved Victorian houses built between 1862 and 1900 on the land belonging to East India Trading Company. It represents mix of 'Terraced Houses And Cottages' and 'Large Houses On Relatively Small Plots'. **Paragraph deleted**

**11.25** Bingham Road Local Heritage Area designation recognises the heritage significance of the authentic and distinctive architecture of the Edwardian Addiscombe, 'Planned Estates Of Semi-Detached Houses'. **Paragraph deleted**

**Policy DM35: Addiscombe**

**DM35.1** Within the Addiscombe District Centre, to ensure that the District Centre characteristics are respected and enhanced proposals should:

- a) Complement existing predominant building heights of 2 storeys up to 4 storeys and a maximum of 5 storeys around the Lower Addiscombe Road and Blackhorse Lane Junction;

- b) Retain the rhythm, size and the continuity of ground floor active frontages<sup>108</sup>;
- c) Allow flexibility at first floor and above for mixed use;
- d) Retain, enhance and positively reference corner features such as the articulation of corner buildings and architectural features such as domed projecting bays with finials and the projecting double gable ends running at 90 degree angles interrupting the running cornices;
- e) Incorporate or retain traditional shop front elements such as stall risers, fascias and pilasters; and
- f) ~~Incorporate multi-stock brick as the predominant facing materials of the whole building.~~ Respond to the character of the area including the predominance of multi-stock brick.

**DM35.2** In the area between Addiscombe Railway Park & Lower Addiscombe Road (Section between Leslie Park Road & Grant Road), to ensure changes to the character of this area are carried out in a way that strikes a balance between enhancing the existing character and facilitating growth, proposals should:

- a) Retain the predominant residential building lines and the open character of front gardens;
- b) Respond to the fine grain<sup>109</sup> of the existing residential developments;
- c) Complement the existing predominant building heights of 3 storeys up to 4 storeys;
- d) Incorporate multi-stock brick and white render as the predominant facing materials of the whole building **or a material which complements multi-stock brick and white render**; and
- e) Enhance existing and provide new direct public walking and cycling routes to Addiscombe Railway Park by working with the Council and its partners to incorporate sections of the route as part of schemes.

**DM35.3** Within Addiscombe allocate sites for development as set out in Table 11.3.

<sup>108</sup> These buildings have few or no blank facades. At ground floor the buildings contain uses that frame the street or space and active upper floors with little or no obscure or frosted glazing. Active frontages encourage visual and/or physical interaction between the private uses inside and the public uses outside. Visual interaction is achieved by creating views or glimpses through windows, projecting bays, balconies and doors into or out of a building. Physical interaction encourages people to come into a building or has indoor uses that spill out onto the street.

<sup>109</sup> Grain also called urban grain. It describes the pattern of the arrangement and size of buildings within a settlement and the degree by which an area's pattern of streets-blocks and junctions are respectively small and frequent (fine grain) or large and infrequent (course grain).



## How the policy works

**11.26** The areas in which Policies DM35.1 and DM35.2 apply are shown on the Policies Map.

### Addiscombe District Centre

**11.27** The character of Addiscombe District Centre is defined by the predominance of the 'Urban Shopping Area' character along the northern side of Lower Addiscombe Road. The beginning and end of this character is marked by two triangular urban spaces, **of which the westernmost triangular space is within the East India Estate Conservation Area.**

**11.28** Addiscombe District Centre has managed to retain the village feel that contributes to its distinctive sense of place. The fine urban grain and consistent rhythm, frontage widths and setback of the buildings reinforce the relationship with the architecturally consistent Victorian and Edwardian 'Terraced Houses And Cottages' sited on the southern side of Lower Addiscombe Road.

**11.29** The Lower Addiscombe Road/Inglis Road junction area has a distinctive block composition and architectural detailing. The junctions are defined by symmetrical buildings with consistent heights and strongly defined corners. Detailing, such as domed projecting bays with finials and the projecting double gable ends running at 90 degree angles interrupting the running cornices, contributes to Addiscombe's distinctiveness. Additionally, features, such as the articulation of corner buildings including ground floor entrances that address corners, are a characteristic feature throughout the District Centre and should be referenced.

**11.30** The western section of the 'Urban Shopping Area' has a distinct non-residential appearance. This is reflected in the building heights and facing materials which are predominantly

red multi stock brick. The eastern side mirrors the character of the adjacent residential areas. These buildings have ground floors that have been converted into commercial premises, whilst preserving the residential appearance of the upper floors. The treatment of facades of these buildings gradually changes from multi stock brick to render. In order to preserve the distinction in appearance between the residential areas and the District Centre, new development should be encouraged to incorporate multi-stock brick **or material which is complementary..**

**11.31** The Lower Addiscombe Road/Blackhorse Lane junction area is a formal, well defined urban public space framed on three sides by buildings with a predominant height of two to five storeys.

**11.32** The District Centre location and good transport links provides opportunities for densification of up to 5 storeys, preferably in locations on corner plots. It is considered that the retention of small traditional type shop frontages (including stall riser's fascias and pilasters) reinforces the distinctiveness of Addiscombe District Centre. Therefore it would not be appropriate to incorporate large and tall buildings within this location. Policy DM35.1 balances the need to facilitate growth and respect the existing character.

**11.33** This policy seeks to retain the continuity of plot widths, setbacks and traditional shop frontages (in line with the Shop Front Security Addendum to Supplementary Planning Guidance No.1 Shop Fronts & Signs). This should not preclude growth, as growth may be still be achieved through creative design solutions such as amalgamating shop units to create one larger unit.

Area between Addiscombe Railway Park & Lower Addiscombe Road (Section between Leslie Park Road & Grant Road)

**11.34** In this area the character of consists of 'Industrial Estates', 'Mixed Flats And Compact Houses', and sections of 'Terraced Houses And Cottages' and 'Local Authority Built Housing with Public Realm'.

**11.35** The character of this area has become fragmented as a result of development with an (urban) grain that is not in keeping with the character of the neighbouring buildings. This area is still undergoing change which will need to be managed. Policy DM35.2 will provide guidance to enable this to be carried out in a sensitive way.

#### Allocating land for development

**11.36** Table 11.3 below sets out the proposed use on specific sites in Addiscombe. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.3 Proposals for uses of land of specific sites in Addiscombe**

<b>Ref no</b>	<b>Site name</b>	<b>Proposed use</b>
68.	130 Oval Road	Residential development
116	Rees House & Morland Lodge, Morland Road	Secondary School
474	Rear of The Cricketers, 47 Shirley Road	Residential development

## Broad Green and Selhurst

**11.40A** Broad Green is a heavily urbanised area consisting of a variety of local character types including the retail and business parks of the Purley Way and the heavily trafficked London Road. Selhurst is a residential area with its eastern edge dominated by railway infrastructure and associated industrial estates. Broad Green and Selhurst lies to the north-west of Croydon Metropolitan Centre bordering the London Borough of Sutton with the greenery of the adjacent Mitcham Common.

**11.40B** The area is less car dependent than areas further south in the borough owing to its good public transport accessibility; however the area suffers from congestion on its many busy roads. Green open spaces are limited in the area although there is a significant amount of other types of open space in the north east of the area provided by school playing fields and Mitcham Road Cemetery.

**11.40C** Two Local Heritage Areas can be found in Broad Green and Selhurst; the London Road Broad Green Area includes buildings with unique Arts and Crafts inspired architectural design from the beginning of the 20th Century, and the Henderson Road area is a distinctive example of well-preserved terraces of small Victorian maisonettes adjacent to the Local Historic Park of Whitehorse Recreational Ground.

**11.40D** Broad Green and Selhurst includes part of the Purley Way Transformation Area.

## Vision, opportunities, constraints and change up to 2036

### Vision

**11.37** Broad Green and Selhurst comprise three distinct areas, characterised by Purley Way, a regenerated London Road and Whitehorse Road. As a broad location, growing residential areas will be interspersed within a network of busy streets with improved connectivity to open spaces and the expanded Green Grid network of the borough. Selhurst Road and Sumner Road/London Road Neighbourhood Centres will be supporting the existing and future community with services and facilities beyond a retail function. The diversity of employment activity and cultures will enliven the area just north of the Croydon Opportunity Area, as well as being part of the borough's principal industrial location the Place will have a share in the borough's improving prosperity.

### Homes

**11.38** New residential growth, with opportunities for renewal, will focus on London Road and a new Local Centre at Valley Park, Ampere Way, as part of the Purley Way Transformation Area. An area of Focused Intensification (AFI1) has been designated at the London Road Transport Corridor, which is located on the northern edge of the Broad Green Local Centre, parts of which cross over into Thornton Heath to the north. This is within an accessible distance of West Croydon Station, the tram network, as well facilities within the Broad Green Local centre. Due to this, it is considered a sustainable location, where high density residential and renewal will be encouraged. Residential development will need to respect the existing residential character and local distinctiveness. The Valley Park Local Centre will accommodate

residential use within new mixed-use neighbourhoods that are well integrated with existing neighbourhoods. Housing investments will address the high deprivation and inequality in this Place.

Employment, Skills and Community Facilities

**11.39** The three integrated Industrial Locations at Union Road, Gloucester Road and Thornton Road will continue to be provided with protection for industrial and warehousing activities, alongside an allowance for limited new high quality residential development provided it does not harm the area's business function. Purley Way, a Strategic Industrial Location and industrial heartland of the borough, will remain a preferred area for industrial and warehousing activity, whilst also accommodating a new Local Centre that provides space for leisure and community facilities to support new and existing residential communities, and local workers and businesses. Local employment is also provided by the Place's proximity to Croydon University Hospital. A thriving evening economy will be centred on the regenerated London Road running from West Croydon to the re-built Local-Centre at Broad Green. The BRIT School, in Selhurst, will continue to be a unique and much valued educational asset to the borough, and will be supported to continue to thrive. The Sumner Road/London Road Neighbourhood Centre will continue to reflect the local, diverse community and provide local employment and services with community facilities encouraged to locate in close proximity. Improvements to the public realm on the high street will be supported through the London Road Corridor scheme.

Environment and climate Change

**11.44A** Development will be required to incorporate Sustainable Drainage Systems (SUDS) measures. Developers will need to liaise with the Council Local Lead Flooding Authority team and the Environmental Agency, to investigate the suitability of SUDS to

manage surface water runoff and flooding issues (where necessary), as well as whether other measures may need to be implemented due to the geological characteristic, to reduce the risk of groundwater flood risk. The Council will continue to work with Thames Water (the sewerage undertaken) and other stakeholders, to ensure sewerage water flooding events are reduced, to protect and enhance the ecological status of Norbury Brook, in line with the Water Framework directive.

Character, Heritage and Design

**11.40** New development will respect the existing local character and distinctiveness of Broad Green and Selhurst, referring to the Borough Character Appraisal to inform design quality. Opportunities for public realm improvements will primarily focus on the re-built Local Centre at Broad Green on London Road with any building and conversions of a high standard of design to ensure the future vitality of the centre. The former Croydon B Power Station chimneys will continue to act as a key local landmark. The Purley Way Transformation Area policies set out how development along the Purley Way will draw upon the positive characteristics of Broad Green and Selhurst's area and enhance the quality of the built environment.

Green Grid and Open Space

**11.41** New Green Grid links will be sought to improve connectivity with the green space of Wandle Park, just south of Broad Green, with Croydon Cemetery and Mitcham Common all linking to the Wandle Valley Regional Park. Emphasis will be placed on improving access to and quality of the local open spaces within and adjacent to Broad Green as this is identified as an area deprived of access to nature. The Purley Way Transformation Area policies set out where additional open spaces and improvements to the public realm are planned across this area.

## Transport

**11.42** To encourage walking and cycling, high quality connections within an attractive environment will be pursued. **Growth will be further supported by promoting public transport improvements along the London Road corridor to Thornton Heath and Norbury, and beyond.** As the attraction of the Croydon Metropolitan Centre increases, the quality, capacity and reliability of bus services connecting to it will also be improved. ~~Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys.~~

Figure 11.3 Broad Green and Selhurst **graphic updated**

## General character

**11.43** Broad Green is a heavily urbanised area consisting of a variety of local character types. The south-western edge is defined by large 'Retail Estates & Business & Leisure Parks' along Purley Way and the greenery of Archbishop Lanfranc's playing field and Croydon Cemetery. The dominant and high density area along London Road corridor identifies the centre of this Place. The eastern edge is dominated by the railway and associated 'Industrial Estates' of the Selhurst area. Smaller scale historical industrial estates are often interlaced within the urban fabric. The predominant residential character type is 'Terraced Houses And Cottages', with scattered areas of 'Local Authority Housing With Associated Public Realm' with sections of 'Compact Houses On Relatively Small Plots' and 'Medium Rise Blocks With Associated Grounds' scattered in the east and in the

Policy DM36: Broad Green and Selhurst

vicinity of Whitehorse Road. 'Large Buildings With Continuous Frontage Line' and 'Large Buildings With Spacing' dominate along London Road. Paragraph deleted

**11.44** The London Road Broad Green Local Heritage Area represents an 'Urban Shopping Area'. It includes buildings with unique Arts and Crafts inspired architectural design from the beginning of the 20<sup>th</sup> century. Paragraph deleted

**11.45** Henderson Road Local Heritage Area is a distinctive example of 'Terraced Houses And Cottages' character. The designation recognises the heritage significance these well-preserved terraces of small Victorian maisonettes adjacent to the Local Historic Park of Whitehorse Recreational Ground Paragraph deleted.

**DM36.1** Within the Broad Green Local Centre, to ensure that proposals positively enhance and strengthen the character of Broad Green Local Centre, and facilitate growth, developments should:

- a) Sympathetically relate to the predominant building massing within the Local Centre boundaries;
- b) Positively reference, respect and enhance architectural features such as the consistent rhythm and articulation of windows and doors;
- c) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and
- d) Incorporate multi-stock brick as the predominant facing materials of the whole building, or a material which complements multi-stock brick.

**DM36.2** Within the area of the potential new Local Centre at Valley Park, to ensure development opportunities including public realm improvements are undertaken in a cohesive and coordinated manner and that they result in the creation of a Local Centre with a sense of place and distinct character, a masterplan with elements of design code will be developed. Policy deleted

**DM36.3** ~~In the area of the Lombard Roundabout, to facilitate growth and to enhance the distinctive character of the Lombard Roundabout Area proposals should: **Policy deleted**~~

- ~~a) Complement the existing predominant building heights of 3 storeys up to a maximum of 6 storeys;~~
- ~~b) Create a sense of continuity by setting back buildings from the street and create building lines and frontages which positively reference and respond to the junction;~~
- ~~c) Address the deficiency in green infrastructure within the area by incorporating tree planting and greenery within the development; and~~
- ~~d) Retain the extent and enhance the quality of the existing public realm within the development, including introducing large trees and other vegetation to balance the impact of large or tall buildings.~~

**DM36.4** In the area north of Broad Green Local Centre, to ensure that proposals enhance and strengthen the character of the area north of the Broad Green Local Centre, and facilitate growth, developments should:

- a) Retain and create glimpses and separation distances between buildings in order to improve the openness of London Road;
- b) Incorporate main pedestrian entrances onto London Road;
- c) Complement the existing predominant building heights of 3 storeys up to a maximum of 8 storeys; ~~and~~
- d) Retain the extent and enhance the quality of the existing public realm within the development, including introducing large trees and other vegetation to balance the impact of large and tall buildings. **And**
- e) **Preserve and enhance setting of West Croydon United Reformed Church**

**DM36.5** In the area of the junction of Windmill Road and Whitehorse Road, to create a sense of place of this area proposals should:

- a) Create building lines and frontages which positively reinforce and respond to the form of the junction **whilst allowing realignment of the carriageway widths of the junction to facilitate bus priority and provide pedestrian crossing facilities;**
- b) Use tree planting to reinforce the street alignment; and



c) Complement the existing massing of the immediate area around the Windmill/Whitehorse Road Junction, by ensuring that the overall height of the building does not exceed 5 storeys; or complement the existing predominant building heights of 2 storeys up to a maximum height of 3 storeys; or ensure the ridge line is no taller than those adjacent to it.

**DM36.6** Within Broad Green and Selhurst (**outside of the Purley Way Transformation Area**) allocate sites for development as set out in Table 11.4.

## How the policy works

**11.46** The areas in which Policies DM36.1 to DM36.5 apply are shown on the Policies Map.

### Broad Green Local Centre

**11.47** Broad Green Local Centre is dominated by the London Road traffic. It is an area with potential for growth.

**11.48** The edge of the Broad Green Local Centre is eroding and is beginning to lose its separate identity and sense of place. This could lead to the Local Centre being amalgamated into the homogenous urban form of the London Road.

**11.49** The detailed policies in DM36.1 will help to strengthen the identity of the Local Centre by setting design parameters such as consistent scale, street frontage treatment and public realm requirements.

### Potential new Local Centre at Valley Park

**11.50** The area is currently dominated by large scale 'Retail Estates & Business & Leisure Parks' and associated parking, separated from the adjoining area by embankments, Purley Way and the tram infrastructure. **Deleted paragraph**

**11.51** There is a mix of uses similar to an urban centre. However, large amounts of car dominated spaces make this area less pedestrian and cycle friendly. Additionally, the presence of

~~large undefined spaces has contributed to this area's lack of a sense of place. Deleted paragraph~~

~~**11.52** There is potential for growth and for transformation into a new Local Centre. To enable potential development opportunities to be undertaken in a cohesive and coordinated manner, a masterplan will be considered. Deleted paragraph~~

### Lombard Roundabout area

~~**11.53** This is an area at the edge of two character types that contrast in scale. These are 'Terraced Houses And Cottages' and 'Large Buildings With Continuous Frontage Line'. The area has potential for growth. The Place-specific development management policy is required to facilitate growth that enhances the distinctive character of the Lombard Roundabout Area. Deleted paragraph~~

~~**11.54** These policies will encourage new developments to establish a transitional zone between the existing uniform low rise residential areas and the larger scale structures around the Lombard Roundabout. Deleted paragraph~~

### Area north of Broad Green Local Centre

**11.55** The area north of Broad Green Local Centre is already experiencing growth. A cohesive approach needs to be taken to ensure that Local Centre edge is well defined and that the buildings along London Road have spacing.

#### Area of the junction of Windmill Road and Whitehorse Road

**11.56** There is a poor relationship between the street layout and the building frontages at the Windmill Road/Whitehorse Road junction area. This has resulted in an area lacking a sense of place. The character within this area is a mix of low rise 'Terraced Houses And Cottages', 'Industrial Estates' and 'Retail Estates & Business & Leisure Parks'.

**11.57** There is a potential for growth and an opportunity for improving the definition of frontages and street edge, as well as overall quality of urban environment. This could include addressing the deficiency in green infrastructure by ensuring tree planting and greenery is an intrinsic part of the development.

#### Allocating land for development

**11.58** Table 11.4 below sets out the proposed use on specific sites in Broad Green and Selhurst (**excluding sites in the Purley Way Transformation Area**). The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.4 Proposals for uses of land of specific sites in Broad Green and Selhurst**

Ref no	Site name	Proposed use
13.	Boyden Tiles, Mayday Road	Mixed use residential and industrial/warehousing development
20.	98 – 100 Lodge Road and 1 – 3 Frederick Gardens	Residential development
22.	Whitehorse Road garages and parking area, Whitehorse Road estate (Johnson Road/Cromwell Road)	Residential development

Ref no	Site name	Proposed use
78.	114-118 Whitehorse Road	Residential conversion and extension
157	Canterbury Mill, 103 Canterbury Road	New primary school
314	Valley Park (B&Q and Units A-G Daniell Way), Hesterman Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre
334	Valley Leisure Park, Hesterman Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre.
337	Zodiac Court, 161-183 London Road	Residential redevelopment
348	Homebase & Matalan stores, 60-66 Purley Way	Mixed use residential and retail development
396	Praise House, 145-149 London Road	Redevelopment for mixed use residential and community use
404	Vistec House & 14 Cavendish Road, 185 London Road	Residential development

Ref no	Site name	Proposed use
416.	Challenge House, 618 Mitcham Road	Residential redevelopment or conversion. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.
471.	Masonic Hall car park, 1-1B Stanton Road	Residential development
517	<del>Milton House, 2-36 Milton Avenue</del>	<del>Residential and employment uses</del>

## Coulsdon

**11.62 A** Coulsdon is a small suburban settlement surrounded by areas of Green Belt. The Green Belt in this area is characterised by uninterrupted views of open spaces including Farthing Downs and wooded mature tree belts. Coulsdon lies on the southernmost boundary of the borough and its built environment is located within the valleys alongside railway lines and main roads.

**11.62B** Coulsdon has a significant employment base and many shops and services for a town of this size, including a library and several schools. It has excellent road and rail links north to London and south to Gatwick Airport and Brighton and benefits from a bypass to prevent congestion in the District Centre. There is access to large tracts of open spaces and the area is framed and dominated by the North Downs and Farthing Downs to the south and south west with Coulsdon Common and Dollypers Hill to the east.

**11.62C** There is a rich history in Coulsdon, notably that there is evidence of early settlement at Farthing Downs with Neolithic and Bronze age finds. Three Local Heritage Areas can be found in Coulsdon which reflect a more modern historical significance. The Chipstead Valley Road Area recognises the distinctive architecture of workers' houses from c.1900 and their layout reveals the location of the historic site of the former Surrey Iron Railway. Station Approach (Coulsdon) Local Heritage Area contains modest Victorian railway cottages with aesthetic style inspired features set in the distinctive townscape. The Dutch Village Area around Wilhelmina Avenue and The Netherlands Road, form a distinctive estate designed by the Dutch architect Wouter Hamdorff as a 'modern Dutch garden village' in late 1930's.

## Vision, opportunities, constraints and change up to 2036

### Vision

**11.59** Croydon's southernmost District Centre, with a mixture of homes, community and cultural facilities, and a range of retailing including many independent shops, will revive its day and evening economy with the support of the new residential community and associated facilities on the Cane Hill site. The Strategic Industrial Location of Marlpit Lane will be retained and development to improve or increase capacity will be supported.

### Homes

**11.60** Residential growth based on available land will be focussed on Coulsdon District Centre, and its surrounding area with a new residential community, recently delivered in Cane Hill. Areas of Focused Intensification has been designated near Coulsdon South Railway Station (AFI2) and to the north of the Coulsdon District Centre (AFI3). These are considered highly sustainable locations, where high density residential development and renewal will be encouraged due to their proximity to the Railway Station, as well as access to/services/facilities within the District Centre. Further Areas of Moderate Intensification have been designated to the south and north east of Coulsdon (crossing into Purley). These are currently a low density residential areas, which are considered to have good access to the Coulsdon Town and South Railway Stations, as well as local services the District Centre. Due to this, these are considered a sustainable location for moderate renewal, intensification via new residential development that results in a reasonable increase in the density of area. Residential development will need to be well designed, respect, reflect, evolve the existing residential character and local

distinctiveness Residential development will respect and evolve the existing character and local distinctiveness of the area.

#### Employment, Skills and Community Facilities

**11.61** Marlpit Lane, with its close proximity to the M25 and good separation from surrounding residential areas will remain an important location for employment growth for Croydon and London retaining strong protection (as a Strategic Industrial Location). The Coulsdon District Centre will continue to support the local community, providing retailing, employment and services with further opportunities for skilled employment where possible, within the Coulsdon Area including Cane Hill. Community facilities will be encouraged to locate in close proximity to the District Centre.

#### Character, Heritage and Design

**11.62** Coulsdon will remain mainly residential with tree-lined streets becoming more urban in character towards the District Centre. New development will respect the existing local character and distinctiveness of Coulsdon, referring to the Borough Character Appraisal to inform design quality. **The Dutch Village Local Heritage Area and Local Historic Parks and Gardens such as Coulsdon Memorial Recreation Ground and Chaldon Way Gardens** -will be retained and new links will be provided (where possible) to incorporate them into the Green Grid network. Opportunities for public realm improvements will continue to focus on enhancements to the Centre, with any new buildings and conversions will be of a high design standard to ensure the character of the Centre is respected. **The Surrey Iron Railway embankment Scheduled Monument comprises a former railway embankment which is located approximately 130m south-west of Lion Green Road. This large earthwork is one of few surviving remnants of the first fully independent public railway in the world, dating to c.1805. Better interpretation and access to the Surrey Railway Embankment Scheduled Monument provided through**

**nearby development will enable it to play a greater role in the local heritage context. The Cane Hill Legacy Buildings act as key landmarks in the area.**

#### Environment and Climate Change

**11.63** Coulsdon District Centre and the surrounding area may be suitable for a district heat network. **Development will be required to incorporate Sustainable Drainage Systems (SUDS) measures (where necessary), to reduce surface water run off issues and reduce the risk of surface water flooding impacts to local residents and businesses**

#### Green Grid and Open Space

**11.64** Opportunities for orbital movements for walking and cycling will be sought with way finding and provision of new links and connections to the strategic Green Grid. Coulsdon Memorial Ground, a Local Historic Park, and links to it, will be improved as part of a parks improvement scheme.

#### Transport

**11.65** New cycle facilities will be introduced at Coulsdon Town railway station. Linkages with the railway stations of Coulsdon South and Coulsdon Town and the District Centre will be improved to provide links to an expanded Green Grid network and to encourage sustainable modes of travel. Accessibility will be improved where possible to **Coulsdon South, Reedham and Woodmansterne stations through step free access improvements.** As the number of jobs and services in the Croydon Metropolitan Centre increase, the capacity and reliability of bus services connecting the Coulsdon community to this Centre will be improved. ~~Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys.~~

Figure 11.4 Coulsdon **graphic updated**

**General character**

**11.66** Coulsdon is a small suburban settlement surrounded by areas of Green Belt. The Green Belt in this area is characterised by open views of open spaces and wooded mature tree belts. Coulsdon's District Centre has a well defined and consistent 'Urban Shopping Area' character and two parallel strips containing 'Retail Estates & Business & Leisure Parks' and 'Industrial Estates' separated by the bypass and railway lines.

Paragraph deleted

**11.67** Coulsdon's built environment is located within the valleys alongside railway lines and main roads. The predominant residential characters are 'Detached Houses On Relatively Large Plots With Minimum Public Realm' to the north and east, an estate of 'Compact Houses On Relatively Small Plots' to the east, 'Planned Estates Of Semi Detached Houses' with garages, and low density, 'Scattered Houses On Large Plots' in the south.

Paragraph deleted

**11.68** The Chipstead Valley Road (St Dunstan's Cottages) Local Heritage Area designation recognises the distinctive architecture of workers' houses from c.1900 representing the 'Terraced Houses And Cottages' character. Their layout reveals the location of the historic site of the former Surrey Iron Railway.

Paragraph deleted

**11.69** The Station Approach (Coulsdon) Local Heritage Area represents the 'Terraced Houses And Cottages' character. It contains modest Victorian railway cottages with aesthetic style inspired features set in the distinctive townscape.

Paragraph deleted

**11.70** The Dutch Village Local Heritage Area has the 'Detached Houses On Relatively Large Plots' character. This distinctive estate was designed by the Dutch architect Wouter Hamdorff as a 'modern Dutch garden village' in late 1930's.

Paragraph deleted

**Policy DM37: Coulsdon**

**DM37.4** Areas of focused Intensification (AFI) have been designated close to Coulsdon South Rail Station (AFI2) and to the north of Coulsdon District Centre (AFI3), where high density residential development and renewal will be supported. The boundaries of these are shown on the map below.

**DM37.5** An Area of moderate intensification has been designated to the north east of Coulsdon. The sustainable moderate, intensification and renewal of areas within this via proposals for new residential development will be supported, providing they result in a reasonable increase in density.

**DM37.6** Development within these should:

- a) Be Well designed to protect, enhance the suburban character, setting of the settlement, particularly on Marlpit Lane that is a gateway.
- b) Assess and mitigate any potential noise pollution impacts, near the Station (AFI2), to create a healthy environment for future residents

**DM37.7** An Area of moderate intensification has been designated to the north east and south of Coulsdon. The sustainable moderate, intensification and renewal of areas within this via proposals for new residential development will be supported, providing they result in a reasonable increase in density. Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of this is shown on the map below.

**DM37.8** Within Coulsdon allocate sites for development as set out in Table 11.5.

**How the policy works**

**11.71** Coulsdon has the potential for growth. Much of this is concentrated within the Cane Hill area.

**11.72** The District Centre and environs is an area with a broad mix of uses. This has resulted in a variety of character areas with diverse set of transitions between characters.

**11.73** Coulsdon District Centre is well served by public transport. This provides an opportunity for it to function as a destination. The sense of place requires strengthening and enhancing of its attractiveness to residents and those visiting the area.

**11.74** Each of the character areas within Coulsdon is well defined and consistent. Future development can be successfully guided by general policies and there is no place specific development management policy for this area.

Allocating land for development

**11.75** Table 11.5 below sets out the proposed use on specific sites in Coulsdon. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.5 Proposals for uses of land of specific sites in Coulsdon**

Ref no	Site name	Proposed use
60	Cane Hill Hospital Site, Farthing Way	Residential development with new community, health and educational facilities
372.	Car park, Lion Green Road	Mixed use development comprising leisure, community facilities and retention of car parking spaces. Also retail so long as the current planning permission is extant
945.	Waitrose, 110-112 Brighton Road	Residential, retail, car parking (and healthcare facility if required by the NHS)



## Croydon Opportunity Area

**11.79A** Croydon Opportunity Area is the urban centre of the borough with a very diverse character, a principle location for office, retail and cultural and hotel activity. It is the largest public transportation hub in the borough with bus, tram and rail interchanges and is one of the few areas outside of Central London to hold the highest public transport accessibility rating.

**11.79B** The centre of Croydon is typically characterised by the dominance of the roads (such as the Wellesley Road, Park Lane and the Flyover), rail and tram lines which create distinct separations between areas. Retail including the Whitgift Centre is primarily focused around North End. Offices are clustered in the New Town area, around East Croydon station and adjacent to Edridge Road, Fell Road and the High Street. Housing in the Opportunity Area is typically found at the outer edges where it consist of a mix of historical terraced homes; or in modern apartment blocks in more central locations.

**11.79C** Croydon Opportunity Area has evolved historically and its development is intrinsically linked to the railway and East Croydon Station. Its role as a major office, retail and culture hub does not detract from the historical attributes and heritage assets of the area which are protected and enhance this role.

**11.79D** The Central Croydon Conservation Area is focused on Croydon's historic civic and commercial heart, including a great variety of historic Listed and Locally Listed Buildings from several centuries, including the Grade I listed Whitgift Almshouses and Croydon Town Hall and landmark clocktower. Church Street Conservation Area is focused on the historic thoroughfare which curves through Croydon's Old Town, linking the High Street with the area around the Croydon Minster. The Conservation Area has a

number of Listed and Locally Listed Buildings dating from the early 18th century onwards. Croydon Minster Conservation Area is focused on the heart of Croydon's old town, encompassing the highly significant medieval and Victorian Croydon Minster (Parish Church of St John) and the former Archbishop's Palace, both Grade I Listed Buildings. The Chatsworth Road Conservation Area contains well-preserved large Victorian and Edwardian houses, in a range of notable styles. Wellesley Road (North) Conservation Area is a collection of early/mid Victorian houses, which are some of the oldest surviving properties in the town centre and a remarkable contrast to the redeveloped adjacent modernist areas. The Laud Street Local Heritage Area recognises the heritage significance of its well-preserved historic architecture and townscape of terraced houses and cottages.

### Vision, opportunities, constraints and change up to 2036

#### Vision

**11.76** Croydon Opportunity Area has the greatest potential for positive change and will be a focus for growth through flexible and pragmatic planning, with its improved public realm and open space-delivered through a series of masterplans contributing to the centre's economic prosperity and vitality. It will be home to a new residential community, a thriving employment and renewed mixed use destination with retail, office, arts and culture (including a diverse evening/night-time economy), leisure and sports, entertainment, learning and workspace activity. Croydon's connectivity will have continued as its main strength and attraction, being Outer London's largest regional transport hub, further improved by the Brighton Main Line improvements. Its

location at the northern tip of the Gatwick Diamond, alongside its access to people, markets and goods will put Croydon Opportunity Area at the top of the list of successful centres in the region.

**11.77** The Council has produced an Opportunity Area Planning Framework which sets out detailed guidance on how the vision for the Croydon Opportunity Area is to be achieved. **The Council has also produced a series of masterplans which cover the following areas: East Croydon, Old Town, Fair Field, Mid Croydon, and West Croydon. A future New Town Masterplan will consider the area between the East Croydon, Mid Croydon and Fair Field Masterplans. In addition, a Conservation Area Appraisal and Management Plan has been produced for each of these areas. The North End Quarter Transformation Area chapter sets out vision and principles for how new development and public realm improvements will transform this.**

**11.78** South End/Parker Road/St Peter's Church Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function.

#### Homes

**11.79** Residential growth of over 10,650 homes will provide almost one-third of all the new homes in the borough and create a new residential community in the centre of Croydon. High quality residential development will respect **and evolve** the existing residential character and local distinctiveness.

#### Employment, Skills and Community Facilities

**11.80** With a regenerated and revitalised North End/Retail Core at its heart, the Croydon Metropolitan Centre will **develop as a unique mixed-use destination in the borough and the region, with retail, office, arts and culture (including a diverse evening/night-time economy), leisure and sports, entertainment,**

**learning and workspace activity. It will also be a strategic commercial centre in South London.** ~~remain the foremost retail location outside of Central London.~~ The Council will adopt a flexible approach to leisure, visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre. It will be a major office and residential location in London and the South East retaining its status as a Strategic Office Location with up to 92,000m<sup>2</sup> of new and refurbished office floor space and an office retention area around East Croydon Station and New Town. It will have a varied evening economy, including the Restaurant Quarter, attracting both new residents of the Croydon Metropolitan Centre and existing residents from across South London. Taking advantage of good links and location relative to the City, West End, Docklands and Gatwick Airport, hotels and conferencing will be a growth sector in the Opportunity Area. A renewed Fairfield Halls will continue to be a major regional arts facility. A new creative industry Enterprise Centre will capitalise on Croydon's local arts scene and Croydon will look to expand upon its existing higher and further education facilities. The GP health centre at Impact House will continue to provide a healthcare facility for Croydon Opportunity Area. **The North End Quarter Transformation Area chapter sets out detailed principles for how the North End will enhance and expand upon its existing uses for the ongoing resilience and prosperity of the Town Centre**

#### Character, Heritage and Design

**11.81** **The historic Old Town will continue to form an important part of Croydon's medieval core, alongside Central Croydon's prosperous Victorian commercial quarter and mid-century modernist heritage.** Through the masterplanning process opportunities to improve the public realm of the Opportunity Area will be sought, retaining the best of the existing built environment. New development in the area will respect the existing local character and heritage referring to the Borough Character

Appraisal and Conservation Area Appraisal and Management Plans to inform design quality, ensuring that the character for the Conservation Areas are respected, and enhancing the public realm with improved pedestrian connections. The provision of new public realm and public spaces within the Croydon Opportunity Area will serve the daytime community as well as new and existing residents of the area. . **Development within the New Town area will complement both the distinct mid-Century architecture of the wider town centre and any adjacent heritage sites**

### Environment and Climate Change

**11.82** ~~By enabling development, potential exists to implement flood mitigation and adaptation measures from Old Town towards the Brighton Road. There is also the potential for carbon reduction from a district energy network within Croydon Metropolitan Centre.~~ **Development has the potential to enable the implementation of flood mitigation and adaptation measures in areas such as the Old Town towards the Brighton Road. Development in the flood zones will be guided by the policies of the Plan, to reduce flood risk to properties, residents and ensure safety. Where possible, flood risk will be mitigated through naturally based sustainable drainage systems. There is also the potential for carbon reduction from a district energy network within Croydon Metropolitan Centre. The North End Quarter Transformation Area chapter sets out principles for this location, which will help tackle climate change**

### Green Grid and Open Space

**11.83** Proposed improvements to Wellesley Road and improved east-west links will provide more access to the three major parks on the outskirts of Croydon Opportunity Area, (Wandle Park, Park Hill and Duppas Hill), other Local Historic Parks and Gardens, and the wider Green Grid **through routes such the Wandle River Trail. Green Grid improvements will also**

**draw on heritage interpretation using key heritage assets and landmarks such as Croydon Clocktower, the Minster and the Water Tower at Park Hill Park to facilitate wayfinding. The North End Quarter Transformation Area chapter sets out detailed principles for how the North End will positively contribute to Croydon's Green Grid network.**

### Transport

**11.84** Croydon will remain a major interchange on both the National Rail network and London Overground. The masterplans at East and West Croydon will seek to further improve the good access and transport connections including cycle hubs that provide improved facilities. The area will benefit from improved tram services, ~~including the Dingwall Loop,~~ with investment in tram stock, more frequent services and an expanded network. The Council and its partners will seek to improve bus services to and from the Places of Croydon and beyond to ensure capacity increases as the Metropolitan Centre grows. The passenger waiting environment will be enhanced at both East and West Croydon Stations as well as elsewhere in the Metropolitan Centre.

**11.88A** The Council will work with TfL to explore the feasibility of creating a north-south tram extension via Croydon Metropolitan Centre. This will improve the reach and capacity of the tram network, support good growth and better connectivity, to help create a greener, more liveable borough.

**11.88B** Pedestrians and cyclists should be able to easily traverse the town centre east to west from Wandle Park to East Croydon Station. There are barriers and severance created by Roman Way, Old Town, Croydon Flyover and Wellesley Road that need to be addressed to allow easy access by foot and cycle. Pedestrianisation is a key to lowering carbon emissions from this area and creating a pedestrian friendly, successful town centre.

**11.88C** The future development of the town centre will be successful, through the effective management of the volume, timing and movement of vehicles (including for deliveries and freight) into and out of it via development management processes, as well as implementation of parking standards and sustainable transport measures. This will help minimise any impacts on the operations of existing businesses and the environment.

**11.88D** There will be a network of mobility hub centres around the edge of the town centre and in proximity to public transport hubs to accommodate hire schemes for cycles, e-bikes, e-scooters and other micro-mobility modes as well as bays for electric car sharing vehicles.

Figure 11.5 Croydon Opportunity Area **graphic updated**

## General character

**11.85** Croydon Opportunity Area is an urban area with diverse character types. It is the only one of Croydon's 16 Places to contain all nine non-residential character types, each of which influences the way in which this Place has developed. The centre of Croydon is typically characterised by the dominant intersecting 'Linear Infrastructure' of the roads (such as the Wellesley Road, Park Lane and the Flyover) rail and tram lines which create distinct separations between the different character types. The 'Shopping Centres Precincts & Town Centres' and 'Tower Buildings' are located to the west and east of the central spine along Wellesley Road. These areas have a larger grain and predominantly contain modern and contemporary buildings. The character of Wellesley Road has also been influenced by the number of 'Large Buildings With Spacing' which are concentrated to the north and east of this road and in close proximity to the 'Transport Nodes'. There are also a small number of 'Large Buildings With Continuous Frontage Line' located to the south. Radiating southwards from the 'Shopping Centres Precincts & Town Centres' are the 'Urban Shopping Area' character. The urban grain of these areas reflects the surrounding residential character with a smaller finer grain. **Paragraph deleted**

**11.86** The residential areas are located around the edge of this place and consist of a predominant mix of 'Large Houses On Relatively Small Plots', 'Terraced Houses And Cottages' and 'Medium Rise Blocks With Associated Grounds'. Interspersed amongst the residential areas are small pockets of 'Industrial Estates', 'Retail Estates & Business & Leisure Parks', and 'Institutions With Associated Grounds'. **Paragraph deleted**

**11.87** The Central Croydon Conservation Area represents the historic character of 'Urban Shopping Areas'. It is focused on Croydon's historic municipal and commercial heart, including a

great variety of historic Listed and Locally Listed Buildings from several centuries. **Paragraph deleted**

**11.88** The Church Street Conservation Area represents the historic character of 'Urban Shopping Areas'. It is focused on the historic thoroughfare which curves through Croydon's Old Town, linking the High Street with the area around the Croydon Minster. The Conservation Area has a number of Listed and Locally Listed Buildings dated from the early 18th century onwards. **Paragraph deleted**

**11.89** The Croydon Minster Conservation Area represents the historic character of 'Urban Shopping Areas' and 'Institutions With Associated Grounds'. It is focused on the heart of Croydon's old town, encompassing the highly significant medieval and Victorian Parish Church of St John and the former Archbishop's Palace, both Grade I Listed Buildings. **Paragraph deleted**

**11.90** The Chatsworth Road Conservation Area represents the authentic residential character of 'Large Houses On Relatively Small Plots'. It contains well-preserved large Victorian and Edwardian houses, in a range of notable styles. **Paragraph deleted**

**11.91** The Wellesley Road (North) Conservation Area represents the authentic residential character of 'Large Houses On Relatively Small Plots'. It is a collection of early/mid Victorian houses, which are some of the oldest surviving properties in the town centre and a remarkable contrast to the redeveloped adjacent modernist areas. **Paragraph deleted**

**11.92** The Laud Street Local Heritage Area recognises the heritage significance of its well-preserved historic architecture and townscape of 'Terraced Houses And Cottages' character. **Paragraph deleted**

## Policy DM38: Croydon Opportunity Area

**DM38.1** To enable development opportunities, including public realm improvements, to be undertaken in a cohesive and coordinated manner a Croydon Opportunity Area Planning Framework complemented by masterplans with elements of design code for Fair Field, Mid Croydon, West Croydon, East Croydon and Old Town have been adopted.

**DM38.2** To ensure development opportunities positively transform the local character and include public realm improvements that are undertaken in a cohesive and coordinated manner, a masterplan with elements of design code will be considered for the area within New Town and the Retail Core<sup>110</sup>.

**DM38.3** Within the Central area as shown on Figure 11.6 and on the Policies Map proposals for tall buildings **are considered appropriate** ~~will be considered on their own merits, including a detailed assessment of building form, treatment, urban design and height along with an assessment of the impact on views, heritage assets, shading and environmental impacts.~~

**DM38.4** Within the Edge Area as shown on Figure 11.6 and on the Policies Map, where it can be demonstrated that there will be limited negative impact on sensitive locations and that the form, height, design and treatment of a building are high quality then a tall building may be acceptable.

**DM38.5** In the London Road area to ensure that proposals positively enhance and strengthen the local character and setting of Locally Listed Buildings, the development should:

- a) Complement the existing maximum height of 4 storeys;
- b) Incorporate multi-stock brick as the predominant facing material;
- c) Retain, enhance and positively reference existing setbacks of the major massing above ground floors; and
- d) Retain, enhance and positively reference architectural detailing on Locally Listed Buildings.

**DM38.6** In the area along Sydenham and Lansdowne Road, to facilitate growth and enhance the sense of place, developments should retain and create glimpses and separation distances between buildings in order to improve openness within the edge of the town centre.

**DM38.7** Within Croydon Opportunity Area allocate sites for development as set out in Table 11.6.

<sup>110</sup> As defined in the Croydon Opportunity Area Planning Framework, pg 167

## How the policy works

**11.93** The areas in which Policies DM38.2 to DM38.6 apply are shown on the Policies Map.

**11.94** The extent of Croydon Opportunity Area is mostly covered by the Masterplans for Fair Field, Mid Croydon, Old Town, West Croydon and East Croydon which address the complex issues within these areas. With the exception of the London Road area and along Sydenham and Lansdowne Roads the character elsewhere in the opportunity area can be successfully managed by the general policies.

## Tall buildings in the Croydon Opportunity Area

**11.95** Figure 11.6 below shows the extent of the Central and Edge areas referred to in Policies DM38.3 and DM38.4.

**Figure 11.6 Plan of the Central and Edge areas for tall buildings (Policies DM38.3 and DM38.4) graphic updated**

## London Road area

**11.96** London Road is the northern gateway to Croydon Metropolitan Centre. Buildings range from Listed Victorian high street buildings to large modernist residential and commercial buildings along with run down and derelict units. Similarly, there is a mixed quality public realm, from the welcoming and colourful entrance at West Croydon station to large unused spaces and car yards to the north of London Road. West Croydon station, the Lidl supermarket and the proximity of the Retail Core and the University Hospital are some of the major attractions that draw people into the area. The area has been undergoing change due to proximity to the town centre and a major transport interchange of West Croydon station. Additionally a number of redevelopment opportunities have arisen from the civil unrest damages.

**11.97** The London Road area has a variety of fine examples of architecture which has been recognised by being designated as Locally Listed Buildings. Though their articulation varies, they have a number of common characteristics such as regular rhythm of elevations marked by windows and the way they are framed, high quality workmanship and materials. There are fine examples of brickwork and render. A number of buildings, which were originally set back from the street, have been extended on the ground floor. These create a feel of openness, more human scale and introduce formal diversity to the street.



**11.98** In order to accommodate growth in a way that respects and enhances the diversity of the London Road character, new development should be informed and inspired by these qualities.

#### Area along Sydenham and Lansdowne Road

**11.99** Areas along Sydenham and Lansdowne Road have a very mixed character due to undergoing densification and redevelopment. The original character of 'Large Buildings on Relatively Small Plots' is being gradually replaced with 'Mixed Type Flats'. Residential buildings of a detached form, with spacing between them, set back and forecourts are key features of urban pattern in the area.

**11.100** In order to maintain and enhance the distinctive character of the residential edge of the town centre, and to prevent further erosion of it, a cohesive approach needs to be taken to ensure new developments retain and reference this urban pattern.

#### Allocating land for development

**11.101** Table 11.6 below sets out the proposed use on specific sites in Croydon Opportunity Area. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.6 Proposals for uses of land of specific sites in Croydon Opportunity Area**

Ref no	Site name	Proposed use
5.	AIG Building, 2-8 Altyre Road	Redevelopment including residential and non-retail town centre uses

Ref no	Site name	Proposed use
21.	Former Royal Mail Sorting Office, 1-5 Addiscombe Road	Residential led mixed use development incorporating either hotel, office, leisure and/or class A2-A5 uses. Also retail so long as the current planning permission is extant.
31.	Croydon College car park, College Road	Mixed use redevelopment comprising hotel & residential
32.	4-20 Edridge Road	Residential development
33.	26-28 Addiscombe Road (Go Ahead House)	Residential, office and/or hotel
34.	Land Bounded By George St, Park Lane, Barclay Road, And Main London To Brighton Railway Line	Mixed use development incorporating residential use on land behind the Fairfield Halls.
37.	45 Lansdowne Road	Residential development
40.	West Croydon Bus Station	Redevelopment over the bus station to incorporate residential uses and town centre uses (office, leisure, food & drink or hotel). The bus station is to be retained as part of any redevelopment.
41.	Direct Line House, 3 Edridge Road	Residential and/or office development
42.	The Lansdowne, 2 Lansdowne Road	Mixed use development of office and residential

Ref no	Site name	Proposed use
45.	East Croydon Station	Redevelopment of the existing railway station including a square with associated public realm
47.	3-9 Park Street	Mixed use residential and ground floor town centre use
50.	44-60 Cherry Orchard Road	Residential development
104	Former Taberner House site, Fell Road	Residential development
123.	Prospect West and car park to the rear of, 81-85 Station Road	Residential (with healthcare facility if required by NHS). It is recommended that basements are not considered at this site. Further ground investigations would be required at this site to confirm the likelihood of groundwater occurrence. There is one historic record of surface water flooding held by the Council in this location.
133	Woburn and Bedford Court	Additional residential development.

Ref no	Site name	Proposed use
138.	<del>Cherry Orchard Gardens and site between railway line and Cherry Orchard Road, Cherry Orchard Road</del> Land adjacent to East Croydon Station and land at Cherry Orchard Road, Cherry Orchard Gardens	Mixed use development of residential with offices, restaurant/café, hotel and/or community facilities
142.	1 Lansdowne Road	Mixed use development comprising residential with offices, leisure and/or hotel
148	Canterbury House	Mixed use development including residential (but not retail)
155	<del>St Anne's House &amp; Cambridge House, 20-26 Wellesley Road</del>	Conversion of building to residential and hotel
162	St George's House, Park Lane	<del>Conversion and extension of existing building to provide retail and other Class A activities and/or leisure on the ground floor with residential accommodation on upper floors. There is one historic record of surface water flooding held by the Council in this location.</del>

Ref no	Site name	Proposed use
172.	<del>North site, Ruskin Square and surface car park, 61 Dingwall Road and Lansdowne Road</del>	<del>Mixed use development comprising residential, offices, restaurant/café and fitness centre</del> <b>Mixed use redevelopment with residential and offices and/or hotel and/or town centre uses except retail</b>
173	<del>28-30 Addiscombe Grove</del>	<del>Redevelopment to provide more homes</del>
174.	30-38 Addiscombe Road	Residential development. It should be noted that ordinary watercourses have not have been included in the fluvial modelling of the River Wandle and therefore a fluvial flood risk from this watercourse may be present. As set out in Section 11.3.2 of the Level 1 SFRA, applicants considering development of this site may need to prepare a simple hydraulic model to enable a more accurate assessment of the probability of flooding associated with this ordinary watercourse to inform the site specific FRA. This should be carried out in line with industry standards and in agreement with the LLFA.

Ref no	Site name	Proposed use
175.	Stephenson House and Knollys House, Cherry Orchard Road	Residential and/or office
178	<del>Arcadia House, 5 Cairo New Road</del>	<del>Residential development</del>
182.	St Mathews House, 98 George Street	Redevelopment for residential and/or offices and/or retail (on George Street frontage)
184.	1-19 Derby Road	Residential development above, community uses on lower floors
186	<del>Jobcentre, 17-21 Dingwall Road</del>	<del>Offices and/or residential and/or hotel and/or replacement Class A2 (Finance) premises (with healthcare facility if required by the NHS)</del>
187.	28 Dingwall Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)
189	<del>Car parks, Drummond Road</del>	<del>Residential development</del>
190.	Car park to the rear of Leon House, 22-24 Edridge Road	Residential development. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface' (BGS Susceptibility to Groundwater Flooding.

Ref no	Site name	Proposed use
192.	Suffolk House, George Street	Mixed use redevelopment with offices or residential dwellings above retail units at ground level
193	100 George Street	<del>Mixed use development with offices or residential dwellings above retail units at ground level</del>
194.	St George's Walk, Katharine House, <u>Segas House</u> and Park House, Park Street	Residential with new civic space and a combination of retail, other Class A uses, leisure and/or office use.
195	Leon House, 233 High Street	<del>Conversion to residential or mixed use residential/office with retention of retail on the ground floor. It should be noted that ordinary watercourses have not have been included in the fluvial modelling of the River Wandle and therefore a fluvial flood risk from this watercourse may be present. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface' (BGS Susceptibility to Groundwater Flooding).</del>
196	Stonewest House, 1 Lamberts Place	Residential development

Ref no	Site name	Proposed use
197	<del>Emerald House, 7-15 Lansdowne Road</del>	Office and residential and/or hotel (with healthcare facility if required by the NHS)
199.	20 Lansdowne Road	Residential development with light industrial workshops and studio spaces
200.	Multi-storey car park, Lansdowne Road	Mixed use, public car park and residential
201.	Lidl, Easy Gym and car park, 99-101 London Road	Primary school with residential development on upper floors
203.	West Croydon station and shops, 176 North End	Remodelling of station and redevelopment to provide an improved transport interchange, cycle hub, retail & office units with residential development above. In the surrounding area, surface water flood risk is generally low. However, Station Road and the A212 have areas shown to be at high risk from surface water flooding. There are two historic records of surface water flooding held by Croydon Council in this location.

Ref no	Site name	Proposed use
211.	Poplar Walk car park and, 16-44 Station Road	A more intensive use of the site with 232 residential units as part of an overall redevelopment of the site which includes re-provision of retail uses, car and cycle parking and a public square.
218.	Lunar House, Wellesley Road	Office and residential and/or hotel (with healthcare facility if required by the NHS) if the site is no longer required by the Home Office.
220.	9-11 Wellesley Road	Residential and/or hotel and/or retail and/or finance
222.	Multi-storey car park, 1 Whitgift Street	Residential with community facilities commensurate in size and functionality to that currently on the site
231.	Segas House, Park Lane	Residential conversion with cultural uses if required (with town centres uses considered if there is no interest in delivery of cultural uses).
234.	Southern House, Wellesley Grove	Offices and residential and/or hotel (with healthcare facility if required by the NHS)

Ref no	Site name	Proposed use
236.	Apollo House, Wellesley Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS) if the site is no longer required by the Home Office. There is one record of sewer flooding.
242	<del>Davis House, Robert Street</del>	<del>Residential development with limited retail to replace existing floor space</del>
245.	Mondial House, 102 George Street	Office and/or residential development or offices or hotel and/or retail (on George Street frontage)
247	<del>Norwich Union House, 96 George Street</del>	<del>Offices with residential development or hotel and/or retail (on George Street frontage)</del>
294.	Croydon College Annexe, Barclay Road	Residential redevelopment with community uses and Creative and Cultural Industries Enterprise Centre. There is one record of sewer flooding.
311.	Mott Macdonald House, 8 Sydenham Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)

Ref no	Site name	Proposed use
374.	Reeves Corner former buildings, 104-112 Church Street	Mixed use with residential to upper storeys and retail on ground floor. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface' (BGS Susceptibility to Groundwater Flooding). A high risk of surface water flooding surrounds the site, particularly across the road network such as Cairo New Road and Church Street. There is one historic record of surface water flooding held by Croydon Council in this location.
375	Northern part of 5 Cairo New Road	<del>Residential redevelopment above community use. The surrounding areas of Cairo New Road and Roman Way are shown to be at a high risk of surface water flooding.</del>
392	Carolyn House, 22-26 Dingwall Road	<del>Offices and residential and/or hotel (with healthcare facility if required by the NHS)</del>

Ref no	Site name	Proposed use
393.	Whitgift Centre, North End	Expansion of shopping centre, improved public realm and residential development and car parking provision. The majority of the site is shown to be at a very low risk. The surrounding areas are generally at a low risk of surface water flooding with the areas of the road network (i.e. Wellesley Road) being shown to be at high risk. There are three historic records of surface water flooding and one historic record of sewer flooding.

Ref no	Site name	Proposed use
398	Coombe Cross, 2-4 South End	<del>Residential development. It should be noted that ordinary watercourses have not have been included in the fluvial modelling of the River Wandle and therefore a fluvial flood risk from this watercourse may be present. There are further areas of medium risk of surface water flooding to the west of the site. The surrounding area is generally an area of low to medium surface water flood risk. However, there are areas of high risk in regards to surface water flooding in areas such as Parker Road and South End. There are two historic records of surface water flooding.</del>
417.	Stonemead House, 95 London Road	Residential
488	<del>Ganius House, 1 Scarbrook Road</del>	<del>Residential conversion</del>
489.	Corinthian House, 17 Lansdowne Road	Retention of offices with residential conversion, and/or hotel (with healthcare facility if required by the NHS)
492	5 Bedford Park	Residential conversion

Ref no	Site name	Proposed use
493.	Pinnacle House, 8 Bedford Park	Mixed use of residential with offices (or a healthcare facility if required by the NHS) on the ground floor
522	Surface car park, Wandle Road	<del>Bus stand underneath the flyover and a district energy centre and residential development on the remainder of the car park. The majority of the site is within Flood Zone 3a to the south-west and the rest of the site are within Flood Zone 1. This More Vulnerable development should be preferably located in Flood Zone 1. If it is essential to build on Flood Zone 3a, then all residential uses should be located in the first floor level or above. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface' (BGS Susceptibility to Groundwater Flooding).</del>
950.	Norfolk House, 1-28 Wellesley Road	Mixed use development to include retail, residential, office and hotel uses.
952	103-111A High Street, Croydon	

## Crystal Palace and Upper Norwood

**11.105A** Crystal Palace and Upper Norwood are historic Victorian settlements, located on hills in the north-east of the borough bordering the London boroughs of Lambeth, Southwark and Bromley. The District Centre is focused in the area known locally as the Crystal Palace Triangle, where most employment and retail opportunities are found.

**11.105B** A significant landmark is the television mast visible from long distances and various locations across London. Crystal Palace and Upper Norwood is primarily residential where houses are interlaced with large parks such as The Lawns, Beaulieu Heights, Stambourne Woodland and Upper Norwood Recreation Grounds which were laid out in Victorian and Edwardian times, with much of the development prompted by the relocation of Crystal Palace to Crystal Palace Park in 1851 and the subsequent gentrification of the surrounding areas. In Crystal Palace and Upper Norwood there are four Conservation Areas and one Local Heritage Area, highlighting the quality of surviving character in this area.

**11.105C** Owing to steep hillsides and limited access to public transport which is predominantly confined to main roads, Crystal Palace and Upper Norwood is relatively car dependent. Congestion occurs on the main road links through the area, particularly in the Triangle. There are a number of train stations which provide access to central London and beyond

### Vision, opportunities, constraints and change up to 2036

#### Vision

**11.102** The vibrant historic centre, sitting at the apex of four London boroughs, will offer a mixture of homes, community, cultural and leisure facilities; a range of retailing including many

independent shops; an employment hub with a thriving arts and creative scene centred on a new Enterprise Centre. The South Norwood Hill Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function. The good **relatively** transport links, a unique creative atmosphere, its heritage and its links to Crystal Palace Park, will continue to attract many visitors.

#### Homes

**11.103** Sustainable growth of the suburbs with some opportunity for windfall sites, and limited infilling, with dispersed integration of new homes will respect **and evolve** existing residential character and local distinctiveness.

#### Employment, Skills and Community Facilities

**11.104** Alongside the District Centre's retail offer and evening economy, the potential for small scale employment will be realised. The established art scene will be strengthened by a dedicated Enterprise Centre. Cross borough working will ensure links to Crystal Palace Park are made, development is planned across the borough boundaries and potential employment opportunities, including tourism and related visitor accommodation, are captured. Other community facilities will be encouraged to locate in close proximity to the District Centre.

#### Character, Heritage and Design

**11.105** ~~Heritage assets and landmarks will be protected, ensuring that new development respects the local character and distinctiveness by referring to the Borough Character Appraisal to inform design quality.~~ **Crystal Palace and Upper Norwood has many high-quality heritage assets and examples of original character, many of which have Conservation Area Appraisals and**



Management Plans defining their character and future management. This includes the Upper Norwood Triangle Area which contains a wide variety of historic buildings and adjoins two further Conservation Areas in neighbouring boroughs. The Church Road Area represents one of Upper Norwood's grandest and most historic streets in stunning landscape settings. Harold Road Conservation Area contains a significant grouping of substantial and well-detailed late Victorian Villas laid out on wide sweeping roads. Beulah Hill Conservation Area contains a number of Georgian and Victorian Villas within the historic affluent Beluah Spa. Area. The Auckland Road and Howden Road Local Heritage Area contains early vernacular houses with well-preserved original features dating from the 1880's including some bespoke Gothic inspired detailing. Opportunities for public realm improvements will primarily focus on the District Centre with any buildings and conversions of a high standard of design to ensure the character of the Centre and Conservation Areas are respected. The Local Historic Parks and Gardens in the area will be retained and new links provided where possible to incorporate them into the Green Grid network.

#### Green Grid and Open Space

**11.106** Opportunities for new planting will be sought to enhance the character of the wooded hillside. Introduction of a new east/west link will be supported with improvements to the links between green spaces and way finding connecting to the existing Capital Ring alongside drawing on the historic connection to the Great North Wood. Working with neighbouring boroughs, connectivity to Crystal Palace Park will be improved where possible to support opportunities for new cycle route connections through green spaces and parks.

#### Transport

**11.107** Improvements will be sought to create an environment more pleasant to walk and cycle through, with better connections and permeability for cyclists and pedestrians alike. The community will enjoy better quality, more frequent and more reliable bus services connecting with Croydon Metropolitan Centre. The tram system in Croydon Public Transport will be further supported by promoting a new branch link to line or other public transport improvements serving Crystal Palace. The one way gyratory system acts as a barrier to pedestrians and cyclists and is dominated by through traffic ways a way to address this would be to reverse the gyratory. The residential neighbourhoods in Upper Norwood are subject to high volumes of through traffic. The Council is intending to introduce measures in this area, to increase walking, cycling and reduce car use via making the streets quieter, safer, healthier. The community will enjoy better quality, more frequent and more reliable bus services connecting with Croydon Metropolitan Centre, however this can only be supported by the provision of more bus standing capacity in the Triangle area that should be delivered alongside any significant development in the area. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys.

Figure 11.7 Crystal Palace and Upper Norwood **graphic updated**

## General character

**11.108** ~~Crystal Palace and Upper Norwood are historic Victorian settlements, picturesquely located on green hills. It has a number of significant landmarks such as the Croydon television mast visible from long distances and various locations across London.~~ Paragraph deleted

**11.109** ~~Crystal Palace and Upper Norwood is primarily residential Place where houses are interlaced with large parks such as The Lawns, Beaulieu Heights, Stambourne Woodland and Upper Norwood Recreation Grounds which were laid out in Victorian and Edwardian times. The original local character contained 'Large Houses On Relatively Small Plots'. Much of the historical architecture has been transformed into contemporary residential characters types such as 'Planned Estates Of Semi Detached Houses' and 'Medium Rise Blocks With Associated Grounds' and 'Compact Houses On Relatively Small Plots'. There are areas where high quality examples of the original character have survived. These have been designated as Conservations Areas.~~ Paragraph deleted

**11.110** ~~The Upper Norwood Triangle Conservation Area predominantly contains the historic character of 'Urban Shopping Areas'. It is focused around the historic district centre where several London boroughs meet. The Upper Norwood Triangle Conservation Area adjoins the Crystal Palace Park Conservation Area in Bromley and the Westow Hill Conservation Area in Lambeth and contains a wide variety of historic buildings.~~ Paragraph deleted

**11.111** ~~The Church Road Conservation Area predominantly encompasses the character of 'Large Houses On Relatively Small Plots' mixed with the historic green open areas of Westow Park, Stambourne Woodland and Beaulieu Heights. It is focused on one of Upper Norwood's grandest and most historic streets in~~

~~a stunning landscape setting, the area also encompasses Beaulieu Heights, Sylvan Hill and Grange Hill as well as several Listed and Locally Listed Buildings.~~ Paragraph deleted

**11.112** ~~The Harold Road Conservation Area predominantly encompasses the character of 'Large Houses On Relatively Small Plots'. It is an area centred on one of Upper Norwood's grandest residential streets with associated Upper Norwood Recreation Ground, and formed of large Victorian villas which were built for residents drawn to the area in the late 19th century by the relocated Crystal Palace.~~ Paragraph deleted

**11.113** ~~The Beulah Hill Conservation Area encompasses the mix of 'Large Houses On Relatively Small Plots' and 'Detached Houses On Relatively Large Plots'. It is a significant grouping of Georgian and Victorian Villas within the historic affluent Beulah Spa area, partly located in the woodland setting, including a number of Listed and Locally Listed Buildings.~~ Paragraph deleted

**11.114** ~~The Auckland Road and Howden Road Local Heritage Area consists of 'Large Houses On Relatively Small Plots'. It contains early vernacular houses with well-preserved original features dating from the 1880's. These include some bespoke Gothic inspired detailing.~~ Paragraph deleted

## Crystal Palace and Upper Norwood

Within Crystal Palace and Upper Norwood allocate sites for development as set out in Table 11.7.

### How the policy works

**11.115** Crystal Palace and Upper Norwood has a predominately consistent character which can be managed by other policies. Additionally, the high concentration of heritage assets within this Place will enable its character to be managed through Conservation Area Appraisals and Management Plans and Croydon's Conservation Area General Guidance.

### Allocating land for development

**11.116** Table 11.7 below sets out the proposed use on specific sites in Crystal Palace and Upper Norwood. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

Ref no	Site name	Proposed use
80	Victory Place	Ground floor retail, restaurant and studio space with hotel, office/or and residential uses on other floors
126.	Spurgeons College, 126 Norwood Hill	Higher education and residential development
357.	Norwood Heights Shopping Centre, Westow Street	Retail, replacement community use and residential and office

**Table 11.7 Proposals for uses of land of specific sites in Crystal Palace and Upper Norwood**

Ref no	Site name	Proposed use
28.	Bowyers Yard, Bedwardine Road	Cultural and Creative Industries Enterprise Centre
58.	140 & 140a Hermitage Road	Residential development
59.	Garages at rear of 96 College Green and land at Westow Park, Upper Norwood	Residential development

## Kenley and Old Coulsdon

**11.120A** Kenley and Old Coulsdon is a suburban area in the south of the borough bordering Surrey with green wooded hillsides (Dollypers Hill, Roydons Wood) and green open spaces (Kenley Common, Riddlesdown, Kenley Aerodrome) located within and around it. There is a strong link between the green infrastructure and the built environment. This creates a feeling of spaciousness or openness and can be seen in the layout of the built environment.

**11.120B** Kenley's limited shopping and community facilities are concentrated in the area between the Godstone Road and Kenley station and on Old Lodge Lane. The area is framed by green space of Riddlesdown to the north and railway to the south. In Old Coulsdon, shopping and community facilities are concentrated on the north side of Coulsdon Road. Nearby Purley provides many facilities for residents of this area.

**11.120C** Kenley Aerodrome is one of the most complete fighter airfields associated with the Battle of Britain to have survived, making it a battlefield site of particular national historic significance. The Bradmore Green Conservation Area is the heart of the historic Old Coulsdon and preserves the historic rural village character made by the green spaces of Bradmore Green and Grange Park.

**11.120D** The Kenley Community Plan (2020) outlines the key economic, social and environmental issues facing the area. Based on this, it sets out key priorities for investment in facilities, services and infrastructure identified by the local community, as this area is expected to change and growth in the future. A summary of the key issues identified by this area; a need to enhance public transport, increasing provision of parking near the station and shopping parades, safety of cyclist/pedestrians; a lack of community spaces for residents of all ages; a need to enhance the quality of the public

realm and facilities in the Neighbourhood centre and more employment opportunities for the young. This plan is a key piece of evidence that has informed the content of the Local Plan and will be a material consideration for determining applications

### Vision, opportunities, constraints and change up to 2036

#### Vision

**11.117** Kenley and Old Coulsdon, linked by Kenley Common will continue to be wooded hillside residential settlements retaining their suburban character. Connectivity between Kenley Aerodrome, Kenley railway station, Bradmore Green and the numerous green spaces will be improved where possible by enhanced Green Grid links for walking and cycling. **Focused enhancements to community hubs will support the vitality of local organisations and improve the offer of activities for local residents.** Upgrades to the public realm, new/enhanced walking, and cycling routes will support active and sustainable travel, as well as reduce congestion as part of a wider good growth vision for Kenley and Old Coulsdon

#### Homes

**11.118** ~~An area of sustainable growth of the suburbs, Kenley and Old Coulsdon will see the sustainable growth of the suburbs with some opportunity for windfall sites will see growth mainly by infilling with dispersed integration of new homes respecting existing residential character and local distinctiveness.~~ **An area of Focused Intensification has been designated to the north of Kenley, near Godstone Road Neighbourhood Centre and Kenley Railway Station (AFI4) that provides good access to Purley District Centre. This is considered a highly sustainable location, where high density residential development and renewal will be**

encouraged. Further Areas of Moderate Intensification have been designated to the north of Kenley and Old Coulsdon and north east (near Kenley Station) and south east (near Whyteleafe Station). These are currently low density residential areas, which are considered to have good access to railway station, as well as local services within the District Centres and a Neighbourhood Centre. Due to this, it is considered a sustainable location for moderate renewal, intensification via new residential development that results in a reasonable increase in the density of area. Development will need to be well designed-respect and help evolve the existing suburban residential character and local distinctiveness of the area.

#### Employment, Skills and Community Facilities

**11.119** The shopping parades in the area provide some jobs with Coulsdon Manor Hotel providing further employment opportunities. The Old Coulsdon and Kenley (Godstone Road) Neighbourhood Centres will be supporting the existing and future community with services and facilities beyond a retail function.

#### Character, Heritage and Design

**11.120** ~~New development will respect the local character and distinctiveness, referring to the Borough Character Appraisal to inform design quality. Opportunities for public realm improvements will focus on the Conservation Area of Bradmore Green. Any buildings and conversions should be of a high standard of design to ensure the characters of the Conservation Areas are respected.~~ Within the Bradmore Green and Kenley Aerodrome areas, development should seek to protect and enhance the character, setting and significance of this area and its heritage assets. The green spaces and openness of these heritage assets will need to be protected and enhanced, with opportunities to link these spaces into the green grid. The scheduled monuments on and near Kenley Aerodrome will be maintained and restored to

address their heritage at-risk status. Opportunities for public realm improvements will focus on the Conservation Area of Bradmore Green, Godstone Road and Old Lodge Lane

#### Environment and Climate Change

**11.121** Where possible the Caterham Bourne should be de-culverted to create a more natural environment, whilst encouraging biodiversity. Kenley has areas with steep catchments and private roads with little or no drainage resulting in regular flooding occurrences and as such is especially susceptible to climate change. Development in the flood zone, and where groundwater flooding is prevalent, such as Kenley Lane, will be guided by the policies of the Plan to reduce flood risk. Wherever possible, flood risk will be mitigated through naturally based sustainable drainage system including attenuation tanks and soakaways.

#### Green Grid and Open Space

**11.122** Links to existing green spaces and the extensive Green Grid network of paths from the residential areas will be improved and added to where possible, to provide more opportunities for cycling and walking. New/enhanced links will be provided to/from the archaeological sites, Local Historic Parks and Gardens, and Conservation Areas in the area and where feasible these will be incorporated into the Green Grid network. Green Grid links will develop a stronger direct connection to the South London Downs National Nature Reserve.

#### Transport

**11.123** With its topography of steep hillsides the existing transport arteries are likely to remain, with local bus services, connections and levels of access maintained. Access will be improved where possible to an expanded Green Grid network with improved walking and cycling links to Kenley Reedham, and

Purley railway stations and as well as linkages to Whyteleafe railway station in the adjoining Tandridge District. A new cycle and bridleway linking Riddlesdown, Kenley Aerodrome, Kenley Common, and Coulsdon Common is planned to improve orbital movement throughout the area. Improvements to the public realm, including safer pedestrian and cycling infrastructure and traffic calming measures, will improve the experience of pedestrians and cyclists and encourage sustainable travel options, whilst addressing vehicular traffic issues. The community will enjoy better quality, more frequent and reliable bus services connecting to Purley and Croydon Metropolitan Centre. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys. Roads in the area will need to be improved. General traffic volumes will need to decrease and footpaths will need to be provided (where necessary), to ensure that pedestrians and cyclists are prioritised, and to accommodate further development sustainably.

Figure 11.8 Kenley and Old Coulsdon **graphic updated**



**General character**

**11.124** Kenley and Old Coulsdon is a suburban area with green wooded hillsides (Dollypers Hill, Roydons Wood) and green open spaces (Kenley Common, Riddlesdown, Kenley Aerodrome) located within and around it. There is a strong link between the green infrastructure and the built environment. This creates a feeling of spaciousness or openness can be seen in the layout of the built environment. **Paragraph deleted**

**11.125** The built areas of Kenley and Old Coulsdon predominantly consist of the following residential character types: ‘Detached Houses On Relatively Large Plots’ and ‘Planned Estates Of Semi-Detached Houses’. The residential character is reinforced by consistent building lines and setbacks that create large green front gardens or (in the case of flatted development) grounds and rear gardens with tree planting. **Paragraph deleted**

**11.126** Kenley and Old Coulsdon's shopping and community facilities are concentrated in the area between the Godstone Road and Kenley station. The area is framed by green space of Riddlesdown to the north and railway to the south. **Paragraph deleted**

**11.127** Kenley’s public realm, with features such as grass verges with tree planting, reflects the close coexistence of nature and built environment. Narrow lanes with extensive tree canopy cover and streets often with one footway and green areas of planting on the opposite side are all characteristic features of the public realm. **Paragraph deleted**

**11.128** In areas where there are no grass verges, mature trees located within front gardens of residential developments provide extensive tree canopy cover, contributing to the impression of tree lined streets. **Paragraph deleted**

**11.129** The Bradmore Green Conservation Area is the heart of the historic Old Coulsdon. It preserves the historic village character made by the green spaces of Bradmore Green and Grange Park mixed with ‘Suburban Shopping Area’, ‘Detached Houses On Relatively Large Plots’ and ‘Planned Estates Of Semi-Detached Houses’. The area contains a number of historic Listed and Locally Listed Buildings such as the 18<sup>th</sup> century farmhouse and the 13<sup>th</sup> century Grade I Listed church of St John. **Paragraph deleted**

**11.130** The Kenley Aerodrome Conservation Area is one of the most complete fighter airfield associated with the Battle of Britain to have survived, making it a battlefield site of particular national historic significance. The Conservation Area includes a number of scheduled monuments. **Paragraph deleted**

**Kenley and Old Coulsdon**

An area of focused Intensification (AFI4) has been designated close to Kenley Rail Station, where high density residential development and renewal will be supported. The boundaries of these are shown on the map below. Development within this should:

- Well designed to protect, enhance the suburban character, setting of the settlement and nearby heritage assets
- Assess and mitigate any potential noise pollution impacts, near the Station, to create a healthy environment for future residents

Include adequate measures to demonstrate; development will minimise and mitigate any flood risk on areas to the south of Godstone Rd, it will be safe for future residents and not increase risk elsewhere.

Include measures to protect and enhance the biodiversity of nearby ecology assets and ensure net gains in biodiversity.

Area of moderate intensification have been designated to the north, the north east and south east of Kenley and Old Coulsdon. The sustainable moderate, intensification and renewal of areas within these via proposals for new residential development will be supported that result in a reasonable increase in the density. Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of this is shown on the map below

Within Kenley and Old Coulsdon allocate sites for development as set out in Table 11.8.

**How the policy works**

**11.131** Kenley and Old Coulsdon has a predominantly consistent character with capacity for growth managed by other policies.

Allocating land for development

**11.132** Table 11.8 below sets out the proposed use on specific sites in Kenley and Old Coulsdon. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.8 Proposals for uses of land of specific sites in Kenley and Old Coulsdon**

Ref no	Site name	Proposed use
937.	Kempsfield House, 1 Reedham Park Avenue	Residential development with community use

## Norbury

**11.136A** Norbury is a suburban town in the north-west of the borough with its District and Local Centres (Norbury and Pollards Hill) located along the long linear and dominant route of London Road. Scattered amongst Norbury's residential areas are the green spaces of Norbury Park through which Norbury Brook flows, Norwood Grove, Biggin Wood, Norbury Hall Park and Pollards Hill Park.

**11.136B** There is high accessibility to bus and rail transportation which reduces car dependency in the area. The London Road is an important thoroughfare between London and the south, as well as locally as there are a limited number of roads travelling north/south through the area.

**11.136C** Two Conservation Areas and three Local Heritage Areas can be found in Norbury. Norwood Grove Conservation Area is focused around the historic Grade II Listed mansion and Grade II registered landscape of Norwood Grove and contains a number of well preserved and distinctive Listed and Locally Listed Georgian and Edwardian houses. The Norbury Estate Conservation Area is a dense development from 1914-1921 and represents a unique example of Arts and Crafts terraces and is the first outer London cottage estate built by the London County Council.

**11.136D** London Road (Norbury) Local Heritage Area is an example of an 'Urban Shopping Area' character type. The shopping parades represent a high quality cross-section of architectural styles from the turn of the 19th and 20th centuries, with the unified form of shopfronts at ground floor level and rhythms of red brick facades with decorative brick and sandstone features above. Beatrice Avenue Local Heritage Area predominantly consists of well-preserved late Victorian suburban houses laid out between

1900 and 1936, with many original and bespoke Arts and Crafts inspired features. The Local Heritage Area in part of Pollards hills South consists of terraced houses which complement the predominant character of the area in a particularly creative way. This distinctive grouping represents a unique example of individual Arts and Crafts terraces laid out to appear as large U-shaped buildings with a number of distinctive architectural features.

### **Vision, opportunities, constraints and change up to 2036**

#### Vision

**11.133** Norbury, the northern gateway to Croydon, will continue to be characterised by its numerous open spaces. The **Norbury** District Centre will be home to a wide variety of businesses, reflecting the diversity of the local population. With a mixture of homes, community and cultural facilities and a range of retailing including many independent shops, it will have improved links to the railway station and Norbury Park. The Green Lane/Upper Northwood Road Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function. Improvements to green links from and to the District Centre will enhance its unique suburban and urban qualities **qualities and draw on historic links to the Great North Wood**.

#### Homes

**11.134** Sustainable growth of the suburbs with some opportunity for windfall sites and infilling, together with dispersed integration of new homes will respect **and evolve** existing residential character and local distinctiveness.

#### Employment, Skills and Community Facilities

**11.135** The **Norbury** District Centre will continue to reflect the local, diverse community and provide local employment and services with community facilities encouraged to locate in close proximity. **Norbury Trading Estate (Integrated Industrial Location) will provide employment work space locally. A refurbished Norbury Library will continue to act as a key community support and learning hub.**

#### Character, Heritage and Design

**11.136** New development will respect the local character and distinctiveness of Norbury with its open spaces and historic park and heritage assets referring to the ~~Borough Character Appraisal to inform design quality.~~ **The Norbury Estate and Norwood Grove** Conservation Area Appraisal and Management Plans inform design quality. **Norwood Grove** Registered Historic **Park** and **the other** Local Historic Parks and Gardens in the area including Pollards Hill and the Grounds of Norbury Hall will be **preserved and enhanced with** new links provided (where possible) to incorporate them into the Green Grid network..

#### Environment and Climate Change

**11.137** **There are parcels of land at particular risk of fluvial flooding in Norbury, including areas within the Recreation Ground and Norbury Park that are designated Flood Zone 3b Functional Floodplain. Areas within Norbury are also at risk of surface water flooding and a number of specific episodes of have been recorded in the last decade.** Where possible, the Norbury Brook should be de-culverted to create a more natural environment, encourage biodiversity and increase access to nature. Development in the flood zones will be guided by the policies of the Plan to reduce flood risk.

#### Green Grid and Open Space

**11.138** Emphasis will be placed on improving quality and access to local open spaces. New and existing Green Grid links to Biggin Wood (a remnant of the Great North Wood), Norbury Park and other open space in Norbury, will be focussed on, with way finding to encourage use.

#### Transport

**11.139** Linkages with the District Centre and railway station will be improved where possible through an expanded Green Grid network, encouraging more sustainable travel. Cycling to Norbury railway station will be more attractive ~~as cycle facilities are~~ **via enhanced facilities.** ~~The tram system in Croydon will be further supported by promoting a new line to Streatham, Brixton and Tooting through Norbury.~~ The quality, frequency and reliability of bus services connecting to Croydon Metropolitan Centre, will be improved as the attraction of the Metropolitan Centre increases. **Along the London Road Corridor, walking, cycling and public transport will be prioritised by reallocating road space and creating safer and more attractive environments for these modes of transport.** ~~Travel plans will look to ease congestion at peak times in the District Centre by encouraging walking, cycling or public transport especially for school journeys.~~

Figure 11.9 Norbury **graphic updated**

## General character

**11.140** ~~Norbury is a suburban town with its District and Local Centres located along the long linear route of London Road. The built form of 'Large Buildings With Continuous Frontage Line' and 'Medium Rise Blocks With Associated Grounds' emphasises this linear route and its dominance on the area.~~ Paragraph deleted

**11.141** ~~Norbury has a residential character that predominantly consists of 'Terraced Houses And Cottages', 'Large Houses On Relatively Small Plots' and 'Local Authority Built Housing with Public Realm', enriched by green spaces of Norbury Park through which Norbury Brook flows, Biggin Wood, Norbury Hall Park and Pollards Hill Park.~~ Paragraph deleted

**11.142** ~~The Norwood Grove Conservation Area is focused around the historic Grade II registered landscape of Norwood Grove predominantly surrounded by 'Detached Houses On Relatively Large Plots'. It contains a number of well preserved and distinctive Listed and Locally Listed Georgian and Edwardian houses. The Conservation Area adjoins the Streatham Common Conservation Area in Lambeth.~~ Paragraph deleted

**11.143** ~~The Norbury Estate Conservation Area represents the unified and consistent residential character type of 'Local Authority Built Housing With Public Realm'. This dense development from 1914-1921 represents a unique example of Arts and Crafts terraces and is the first outer London cottage estate built by the London County Council.~~ Paragraph deleted

**11.144** ~~The London Road Norbury Local Heritage Area is an example of an 'Urban Shopping Area' character type. The shopping parades represent a high quality cross-section of architectural styles from the turn of the 19th and 20th centuries, with the unified form of shopfronts at ground floor level and rhythms of red brick facades with decorative brick and sandstone features above.~~ Paragraph deleted

**11.145** ~~The Beatrice Avenue Local Heritage Area predominantly consists of 'Terraced Houses And Cottages'. It has a good range of well-preserved late Victorian suburban houses laid out between 1900 and 1936, with many original and bespoke Arts and Crafts inspired features. The prominent St Phillip's Church terminates views from the tree-lined residential street.~~ Paragraph deleted

**11.146** ~~The Pollards Hill South Local Heritage Area consists of terraced houses which complement the predominant character of the area of 'Planned Estates Of Semi-Detached Houses' in a particularly creative way. This distinctive grouping represents a unique example of individual Arts and Crafts terraces laid out to appear as large U-shaped buildings with a number of distinctive architectural features. The well preserved and distinctive 1930's townscape is an example of an innovative approach to defining street frontages through sequence of courtyards.~~ Paragraph deleted

## Norbury

Within Norbury District Centre, to facilitate growth and to enhance the distinctive character, developments should:

Complement the existing predominant building heights of 2 storeys up to a maximum of 5 storeys;

Ensure proposal for large buildings are visually consistent with the predominant urban grain; and

Seek opportunity to provide direct access from the south of London Road to Norbury railway station.

Within Pollards Hill Local Centre, to ensure that proposals positively enhance and strengthen the character developments should:

Retain the edge and separation of Pollards Hill Local Centre from other adjoining character areas by limiting the urban grain within its boundaries;

Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;

Incorporate multi-stock brick as the predominant facing materials of the whole building **or a material which complements multi-stock brick;** and

Retain the extent and enhance the quality of the existing public realm within the development, including reinforcing a consistent building line.

Within Norbury allocate sites for development as set out in Table 11.9.

### How the policy works

**11.147** The areas in which Policies 0 and 0 apply are shown on the Policies Map.

**11.148** The areas identified for Place-specific development management policies are Norbury District Centre and Pollards Hill Local Centre. These Place-specific development management policies are required to ensure the distinctions, edge and separation between the centres and adjoining areas are maintained.

**11.149** These areas have potential for growth. There are precedents on London Road of large and tall buildings however these are mainly located outside designated centres. In order to retain the distinctiveness of each of Norbury's centres and to reinforce the prominence of the scale of built environment within these areas policies 0 and 0 identify the maximum buildings heights along with key architectural features to enable growth and retain local distinctiveness.

### Allocating land for development

**11.150** Table 11.9 below sets out the proposed use on specific sites in Norbury. The location and boundary of each detailed proposal can be found on the Policies Map and further

details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.9 Proposals for uses of land of specific sites in Norbury**

Ref no	Site name	Proposed use
106.	CACFO, 40 Northwood Road	Mixed use residential and community use (to retain equivalent floor space or functionality of the community use)
284.	Asharia House, 50 Northwood Road	Residential development including replacement community facility
951.	1485-1489 London Road	Redevelopment for residential and retail



## Purley

**11.154A** Purley is focused around a District centre. It is located to the south west of the borough bordering the London Borough of Sutton. Purley's residential areas are generally located on steep partially wooded hillsides, with the District Centre found in the valley at the important junction of Brighton Road and Godstone Road.

**11.154B** Despite two train stations and frequent bus services, the residential areas of Purley are more car dependent than areas further north in the borough, which is typical of its twentieth century suburbs. Purley has a high proportion of homes with gardens, as well as the Rotary Field Recreation Ground and Foxley Wood open spaces within walking distance of the District Centre. The large expanse of playing fields of Purley Way lie on the hill and slope to the north of Purley.

**11.154C** Purley has a rich heritage, notably there is evidence of Bronze Age settlement found on Promenade de Verdun in the Webb Estate, and the Brighton Road is a historic thoroughfare with Roman origins. One Conservation Area and one Local Heritage Area are found in Purley. The Webb Estate and Upper Woodcote Village Conservation Area with its consistent character is a notable Edwardian garden suburb created by developer William Webb based upon his Garden First Principles. Its model village, laid out around Woodcote Green, is the focus of the area. Both parts of the conservation area are rich in historic buildings which are set amidst mature landscaping. The Brighton Road (Purley) Local Heritage Area contains a collection of shopping parade buildings from the late 19th and 20th century, that demonstrate a variety of styles with well-preserved and distinctive architectural features.

**11.154D** The Council has produced a Purley Strategic Regeneration Framework which sets out how the regeneration of

the District Centre and its environs could be achieved and this has informed this section of the Local Plan. The overall objective of the Framework is influence developers working in the area. It also supports the community seeking funding opportunities to benefit the wider community for social and physical infrastructure and public realm improvements. This contains a number of interlinked strategies relating to; place making, frontages, culture, the public realm environment, as well as movement and access; in order to deliver sustainable development. This Framework will be helpful in considering development within the Centre.

### Vision, opportunities, constraints and change up to 2036

#### Vision

**11.151** ~~Purley will be a regenerated District Centre, retaining its historic local character with a mixture of homes, community and cultural facilities and a range of retailing including many independent shops. The Purley South/Brighton Road/Downlands Road Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function. An enhanced public realm with improved accessibility and good links to open space and a new Enterprise Centre will all contribute to the regeneration of Purley.~~ A regenerated Purley District Centre will provide a vibrant heart for Purley. It will be a destination with community and cultural facilities and a range of retailing including independent shops, cafes, restaurants and an Enterprise Centre, together with new housing. Purley District Centre will be an inclusive place to dwell and socialise, with the High Street providing space for outdoor sitting, strolling and events. Its existing open spaces and Local Heritage Area will be safeguarded and new development will help transform hostile main roads into urban streets that give less space to traffic and

more space to people. New locally distinctive buildings and additional multi-functional high performing open spaces and routes will integrate existing and future residential and business communities and strengthen Purley's unique sense of place within the Borough. High quality, safe, direct and active pedestrian routes will connect buildings and spaces in the Purley District Centre with Purley Station and the growing number of new homes in the surrounding hinterland. The Purley South/Brighton Road/Downlands Road Neighbourhood Centre will help support the existing and future community with services and facilities beyond a retail function and a new primary school close to Reedham Station will strengthen the nearby Neighbourhood Centre and support growth in the Place as a whole.

#### Homes

**11.152** ~~As a broad location the main focus of major residential growth will be in and around the District Centre with high quality residential development that will respect the existing residential character and local distinctiveness.~~ The main focus of growth will be in and within 800m of the Purley District Purley Centre and station, with a lower level of growth close to/within the Neighbourhood Centre. To enable growth a transportation corridor will be promoted along the London Road, Brighton Road and Purley Way corridors. This will also be supported by improvements in the Croydon Transport Hub transformation area that will enable the metroisation of the borough's suburban rail network that connects to Purley. An Area of Focused Intensification (AFI) has been designated at Purley Way District Centre. A small part of this AFI falls within the District Centre (.i.e. Site 347) and a large part of it is located on the edge of this. It is also located near Purley and Reedham Railway Stations. This is considered a sustainable location, where high density residential development and renewal will be encouraged, as well as high density mixed use development on Site 347; due to its proximity to

the station and services/facilities within the District Centre .Further, Areas of Moderate Intensification have been designated to the north, east of Purley, as well as to the south west (crossing into Coulsdon) and south (crossing into Kenley and Old Coulsdon), These are currently a low density residential areas, which are considered to have good access to Purley, Purley Oaks and Reedham Rail stations, as well as local services within Purley District Centre, Brighton Road Sanderstead Local Centre (.i.e. areas to north and east). Due to this, it is considered a sustainable location for moderate renewal, intensification via new residential development that results in a reasonable increase in the density of area. Developments ~~will~~ need to respect and evolve the existing suburban character and local distinctiveness

#### Employment, Skills and Community Facilities

**11.153** ~~Realisation of the potential of Purley for creative industries through the development of a new Enterprise Centre will support the local economy.~~ A new Enterprise Centre, a multi-purpose space that facilitates commercial, community and cultural activities, will be located as part of a newly provided leisure centre. Purley District Centre is also well placed to accommodate additional office and shared workspace to cater for businesses that chose to establish in or relocate to outer London centres. There may be opportunities to re-locate the library to a more central location in the Centre, to the north of Godstone Road. Independent shops and restaurants will be encouraged in the Purley District Centre with enhanced public realm and open spaces and community facilities in close proximity to rejuvenate the centre's daytime and evening economy. The retail, leisure and business offer in the Purley District Centre will complement Croydon Metropolitan Town Centre and new Local and Neighbourhood Centres along Purley Way. At Purley Station there is rail head that distributes aggregates and is safeguarded in the South London Waste Plan

## Character, Heritage and Design

**11.154** New development will respect and evolve the existing local character and distinctiveness of Purley, referring to the Borough Character Appraisal, Suburban Design Guide and the Webb Estate Conservation Area Appraisal and Management Plan to inform design quality. Purley is known for its diverse urban and suburban areas and its tree-lined streets and gardens. This leafy character will be strengthened with opportunities for new Blue and Green Infrastructure in the Purley District Centre and along Brighton Road to help mitigate flood risk, the urban heat island effect and the negative impact of heavy through-traffic. Any buildings and conversions should be of a high standard of design to ensure the character and significance of the Centre its Local Heritage Area; Nationally and Locally Listed Buildings; and the nearby Webb Estate and Upper Northcote Village Conservation Area and its setting are respected. New links will be provided to/from the Registered Historic and Local Historic Parks and Gardens in the area will be retained and new links provided where possible, to incorporate them into the Green Grid network. Blue and Green infrastructure will be woven in to an enhanced public realm in ways which respond positively to and help evolve local character.

## Environment and Climate Change

**11.155** Through enabling development, potential exists to implement flood mitigation and adaptation measures along the Brighton Road and south east towards Kenley. Purley District Centre and the surrounding area may be suitable for a district heat network. Brighton Road and the Purley Cross roundabout is the most frequent area in the borough to be susceptible to surface water flooding, with many historic and severe flooding events occurring within the last 20 years. Severe groundwater flooding

has also occurred in Purley when sustained periods of heavy rainfall raised groundwater to exceptionally high levels. Owing to the geology and topography of parts of Purley being Upper Chalk bedrock, infiltration Sustainable Urban Drainage Systems should not be considered in these locations<sup>111</sup>. Developers may need to liaise with the Council Local Lead Flooding Authority team and the Environmental Agency, to investigate the suitability of SUDS in certain locations and whether any other measures may need to be implemented due to the geological characteristic and topography of the area, to reduce flood risk-Purley District Centre and the surrounding area may be suitable for a district heat network. The area's south facing slopes and suburban character provide excellent opportunities for Photo Voltaics, air source heat pumps and other renewable energy technologies to be integrated with new development.

## Green Grid and Open Space

**11.156** Opportunities to improve links to existing open spaces, along with way finding around Purley, and to and from the District Centre will be sought. The High Street, Brighton Road, Whytecliffe Road, the District Centre's lanes, public spaces and roofscape are all considered to be part of a Blue and Green Infrastructure where accessibility, quality will be prioritised.

## Transport

New bus route measures and improvements, will be developed where possible along the Brighton Road linking Croydon Metropolitan Centre with Purley District Centre. Cycle facilities will be expanded at Purley railway station. Measures to improve connectivity for pedestrians in Purley District Centre will be explored. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for

<sup>111</sup> London Borough of Croydon SFRA Level 1 (2020)

school journeys. Realisation of the potential for the Warren Road railhead to transfer freight to rail will be supported. The Purley Cross gyratory arrangement creates notable severance through the centre of Purley and restricts connectivity for pedestrians and cyclists. Significant improvements to the gyratory will focus on safe pedestrians and cycling routes, as well as improvements for buses. These improvements will enhance the District centre and allow for a possible extension of the tram network (either along Purley Way or from Croydon Metropolitan Centre to Coulsdon along Brighton Road). The Council will work with TfL and other stakeholders to develop a holistic strategy which significantly improves the road network, allows for necessary access and servicing, avoids displacing traffic on to local streets, reduces severance and transforms the public realm by stitching together the District Centre on both sides of a reconfigured Godstone Road. This will also include a review of local bus routing and standing provision within the Purley District Centre to retain bus efficiency and connectivity whilst being able to accommodate public realm improvements. Purley station is the 5<sup>th</sup> busiest station in Croydon with over 3 million journeys made each year to or from the station<sup>112</sup>. The Council will work with Network Rail, the train operating company and other stakeholders to maximise opportunities to improve train frequency and reliability (including the Brighton Mainline Upgrade programme). The introduction of other storage and delivery collection facilities is also proposed for convenience and to reduce delivery vehicle trips. A network of mobility hubs will be delivered around the District centre, including at Purley station, to accommodate shared transport services such as electric car clubs, e-bikes and e-scooter hire schemes. 'Mobility Hubs' will support promotion of active travel, particularly from

other areas that provide significant commuter demand for rail services at Purley Station

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<sup>112</sup> Network Rail Estimates of Station Usage 2018-19

Figure 11.10 Purley **graphic updated**

## General character

**11.157** Purley is a suburban market town located on wooded hillsides and in the valley. Its spatial structure is organised along the strong dominant corridor of the Brighton Road and Godstone Road where a wide variety of character types coexist. These are 'Urban Shopping Areas', 'Industrial Estates', 'Retail Estates & Business & Leisure Parks' and moderate density residential areas such as 'Terraced Houses And Cottages', 'Medium Rise Blocks With Associated Grounds', 'Compact Houses On Relatively Small Plots', and 'Planned Estates Of Semi-Detached Houses'. 'Large Buildings With Continuous Frontage Line' dominate in the District Centre and its vicinity. **Paragraph deleted**

**11.158** The residential character outside of Brighton Road is fairly uniform and consists of large detached houses on relatively large plots with minimal public realm and low density scattered houses on relatively small plots. **Paragraph deleted**

**11.159** The Webb Estate and Upper Woodcote Village Conservation Area with its consistent character of 'Scattered Houses On Large Plots' is a notable Edwardian garden suburb created by developer William Webb based upon his Garden First Principles. The model village, laid out around Woodcote Green, is the focus of the area. Both Conservation Areas are rich in historic buildings which are set amidst mature landscaping. **Paragraph deleted**

**11.160** The Brighton Road (Purley) Local Heritage Area has an 'Urban Shopping Area' character. It contains collection of shopping parade buildings from the late 19<sup>th</sup> and 20<sup>th</sup> century, that demonstrate a variety of styles with well-preserved and distinctive architectural features. **Paragraph deleted**

## Purley

Within Purley District Centre and its environs, to ensure that proposals positively enhance and strengthen the character and facilitate growth, developments should:

Reinforce the continuous building line which responds to the street layout and include ground floor active frontages;

Complement the existing predominant building heights of 3 to 8 storeys, with a potential for a new landmark of up to a maximum of 16 storeys; and

Demonstrate innovative and sustainable design, with special attention given to the detailing of frontages.

- a) Facilitate new pedestrian routes/laneways and manage servicing and deliveries in ways that provide attractive and active streets and spaces and celebrate the distinctive spaces at the rear of Brighton Road;
- b) Facilitate works that reduce the dominance of the Purley Cross gyratory and better connect different part of the Purley District Centre and its environs;
- c) Facilitate the delivery of a network of mobility hubs for shared transport services around the edge of the District Centre. And

d) Respond to the historic context, and preserve and enhance the significance of heritage assets and their settings including the listed Purley Library, locally/nationally listed buildings ,Conservation Areas and their settings;

In the environs of Reedham station, to create the sense of place and facilitate growth proposals should:

Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys;

Reinforce the predominant building lines and frontages which positively respond to the form of the Brighton Road/Old Lodge Lane junction;

Improve pedestrian and cycle permeability, accessibility and connectivity across the railway between Brighton Road, Watney Close, Aveling Close and Fairbairn Close; and

e) Enhance the suburban shopping area character of this section of Brighton Road; and

**Preserve and enhance the listed Purley Town Hall and its setting**

In the area of the junction of Brighton Road and Purley Downs Road, to reduce the impact of Brighton Road as a linear route, clearly differentiate the area from Purley District Centre and Brighton Road (Sanderstead Road) Local Centre and strengthen the sense of place, proposals should:

Retain and create open glimpses and vistas between buildings;

Introduce building with landscapes that respond and reflect the layout of the 1930s blocks of Lansdowne Court and Purley Court; and

Complement the existing predominant building heights of 2 storeys up to a maximum of 5 storeys.

**SP5.3** An Area of focused Intensification has been designated near/within Purley District Centre (AFI5). High density residential development and renewal will be supported within this location and the boundaries of these are shown on the map below. Development should:

(a) Be well designed to protect, enhance the suburban character, setting of this transport corridor into/out of the settlement

(b) Include adequate measures to demonstrate development; will minimise and mitigate any flood risk (where necessary), it will be safe for future residents and not increase risk elsewhere.

(c) Assess and mitigate any potential noise pollution impacts, near Purley and Reedham Railway Stations, to create a health environment for future residents

**SP5.4** Areas of moderate intensification have been designated to the north, east of Purley, as well as south west of this crossing into Coulsdon and south (crossing into Kenley and Old Coulsdon). The sustainable moderate, intensification and renewal of areas within these via proposals for new residential development will be supported that result in a reasonable increase in the density. Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of these are shown on the map below

Within Purley allocate sites for development as set out in Table 11.10.

**How the policy works**

**11.161** The areas in which Policies 0 to 0 apply are shown on the Policies Map.

Purley District Centre and its environs

**11.162** Purley District Centre is a well-defined urban town with a high concentration of commercial and community uses. The road network and a large scale roundabout divide the centre. The vision for Purley Place and Policy DM63 seek to ensure that opportunities can be taken to reduce the dominance of the Purley Cross gyratory, through lane reduction, cycle lane provision, bus priority measures and enlarging and improving the public realm in order to significantly improve the function and attractiveness of Purley District Centre.

**11.163** This area has a varied topography which presents opportunities for tall buildings and the availability of vacant land creates the potential for growth. Policy 0 facilitates this growth and identifies architectural features that should be referenced in the design of the development to enhance the distinctive character of Purley District Centre.

**11.67 A** The Purley Regeneration Framework calls for the development of Purley-specific guidance on the key architectural features that should be referenced in the design of the development to enhance the distinctive character of the District

Centre and its environs. Proposals for new development within District Centre will need to consider the Purley Strategic Regeneration Framework and demonstrate how it will help achieve the successful delivery of the vision, objectives and strategies for delivering sustainable development. Development proposals will be supported that make adequate funding, or set aside land (if necessary) to deliver local projects, social, physical infrastructure and public realm improvements identified within this.

**14.168B** The Policy also encourages the meanwhile use/interim frontage treatment of prominent vacant/derelict sites in the Purley District Centre, which currently include the Purley Baptist Church and Old China sites

The environs of Reedham station

**11.164** The environs of Reedham station have good public transport accessibility and a varied character including ‘Urban Shopping Area’, ‘Large Buildings with Continuous Frontage Line’, ‘Large Buildings With Spacing’, ‘Medium Rise Blocks With Associated Grounds’ and ‘Planned Estates Of Semi-Detached Houses’. The environs includes the listed Purley Town Hall.

**11.165** A Place-specific development management policy is required to facilitate growth, improve pedestrian and cycle permeability across the railway line and to create the sense of place.



The area of the junction of Brighton Road and Purley Downs Road

**11.166** The Brighton Road/Purley Downs Road junction area forms the edge between South Croydon and Purley. Capella Court forms a visual marker which closes the vistas along the Purley and South Croydon sections of Brighton Road. The massing of Capella Court dominates the residential and industrial buildings within the surrounding area. This area's distinct qualities are informed by the landmark building surrounded by low rise structures set in greenery.

**11.167** Detailed policies are required to strengthen the character of the Brighton Road and Purley Downs Road junction area.

Allocating land for development

**11.168** Table 11.10 below sets out the proposed use on specific sites in Purley. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.10 Proposals for uses of land of specific sites in Purley**

Ref no	Site name	Proposed use
30.	Purley Leisure Centre, car park and former Sainsbury's Supermarket, High Street	Mixed use redevelopment incorporating public car park, new leisure facilities, including a swimming pool, and other community facilities, healthcare facility, creative and cultural industries enterprise centre, retail or residential accomodation.
35.	Purley Baptist Church, 2-12 Banstead Road	Mixed use redevelopment comprising new church, community facility and residential, with development located outside Flood Zone 2 and 3a.
61.	Purley Station Car park, 54-58 Whytecliffe Road South	Residential use with retention of car parking spaces
64.	112a and 112b Brighton Road	Residential, with leisure uses (up to existing floor space)
130.	1-9 Banstead Road	Residential
324.	Purley Oaks Depot, 505-600 Brighton Road	20 Gypsy and Traveller pitches
325	Telephone Exchange, 88-90 Brighton Road	Conversion of existing building to residential use if no longer required as a telephone exchange in the future

Ref no	Site name	Proposed use
347.	Tesco, 2 Purley Road	Mixed use residential, healthcare facility (if required by the NHS) and retail development
405.	Capella Court & Royal Oak Centre, 725 Brighton Road	Residential development and health facility, and the retention and reconfiguration of existing uses and their floor space with no net loss of flood storage capacity
409	<del>Beech House, 840 Brighton Road</del>	<del>Conversion of the office building to residential uses.</del>
410.	100 Brighton Road	Mixed use residential and retail development
411.	Palmerston House, 814 Brighton Road	Residential redevelopment
490.	95-111 Brighton Road and 1-5, 9-15 and 19 Old Lodge Lane	Primary school (on up to 0.4ha of the site) and residential development, to be brought forward in one phase, and limited retail/food and drink (up to existing floor space)
495.	Dairy Crest dairy, 823-825 Brighton Road	Conversion of buildings fronting Brighton Road to studio space (with potential for a Creative and Cultural Industries Enterprise Centre serving Purley) with new light industrial units to the rear

Ref no	Site name	Proposed use
683.	Purley Back Lanes, 16-28 Pampisford Road	Residential development and public car park including new industrial units to replace those currently on the site

## Sanderstead

**14.173A** Sanderstead is a suburban residential area located to the south east of the borough bordering the district of Tandridge in Surrey. The historic settlement is focused on Addington Road, and the junction with Limpsfield Road. It is surrounded by large scale green open spaces and Green Belt such as Mitchley Wood, Riddlesdown and Kings Wood.

**14.173B** Sanderstead is a historic settlement that has evolved slowly over time with many significant historical buildings and landmarks remaining to this day, including the 13th Century All Saints Church. The surrounding Green Belt and golf courses have held back outward expansion of Sanderstead helping it to retain a rural and village identity.

**14.173C** Access to public transport is limited and car dependency is high. There are train stations near to Sanderstead but they are not in the Local Centres or near the main community facilities. At peak times, some of the minor roads towards the valley bottom running parallel to Brighton Road are used as alternative routes increasing congestion.

### Vision, opportunities, constraints and change up to 2036

#### Vision

**11.169** Sanderstead will continue to be a predominantly 1930s suburb, with an historic village character focussed on the pond and All Saint's church, which includes a number of heritage assets, surrounded by substantial green space with improved cycle and pedestrian links, served by the Sanderstead and Hamsey Green Local Centres.

#### Homes

**11.170** An area of sustainable growth of the suburbs with some opportunity for windfall sites, growth will mainly be of infilling with dispersed integration of new homes that respect existing residential character and local distinctiveness. An area of sustainable growth of the suburbs with some opportunity for windfall sites, growth will mainly be of infilling. This is currently a low density residential area, which is considered to have good access to Sanderstead, Purley Oaks and South Croydon Railway Stations, as well as local services within Purley District Centre and Brighton Road (Seldson Road) Local Centre. Due to this, it is considered a sustainable location for moderate renewal, intensification via new residential development that results in a reasonable increase in the density of area. Residential development will need to be well designed, so that it respects and evolves existing residential character and local distinctiveness

#### Employment, Skills and Community Facilities

**11.171** Employment opportunities will be concentrated in the two Local Centres of Sanderstead and Hamsley Green with predominantly independent shops supporting the local community.

#### Character, Heritage and Design

**11.172** New development will respect the character of the historic village, including its heritage assets and their settings, and the area's broader local character and distinctiveness referring to the Borough Character Appraisal to inform design quality. Any opportunities for public realm improvements will focus on the two Local Centres of Sanderstead and Hamsey Green. Any buildings and conversions should be of a high standard of design to ensure the characters of the Centres are respected. The distinct identities between the northern and southern ends of Limpsfield Road will

continue to be defined through differences in the density, of the urban grain.

Environment and Climate Change

**14.177A** There have been a number episodes of surface water flooding in Sanderstead, particularly in the Hamsey Green Local Centre area and along main roads through the area.

Green Grid and Open Space

**11.173** As a key link in the east part of the Green Grid network of the borough, links to existing green spaces from the residential areas will be improved with further connections added where possible. The additional green links, with way finding, will enable more opportunities for walking and cycling within and through the area particularly on orbital routes linking Kenley, Hamsey Green and Selsdon. The Local Historic Parks and Gardens of Kings Wood and the landscape settings of heritage assets including All Saints Church, Sanderstead Pond, and Selsdon Park Hotel will be retained and new links will be provided where feasible to incorporate them into the Green Grid network.

Transport

**11.174** ~~With its topography of steep hillsides, the existing transport arteries are likely to remain with local bus service connections and level of access maintained.~~ Despite having poor public transport accessibility, the existing bus services along the existing key radial and orbital roads will be improved offering even more frequent and reliable service and access into Purley and Croydon with their fast train links. With its topography of steep hillsides-cycling and walking will be difficult for some people. Access will be improved where possible to an expanded Green Grid network with improved walking and cycling links to Sanderstead railway station. The community will enjoy better quality, more frequent and reliable bus services connecting with

Croydon Metropolitan Centre. The residential area to the north of Sanderstead which had no public transport provision will now be covered by a demand responsive transit service which covers an area focused on Sanderstead and Selsdon. ~~Travel plans will look to ease congestion at peak times in the Local Centre by encouraging walking, cycling or public transport especially for school journeys.~~

Figure 11.11 Sanderstead **graphic updated**

## General character

**11.175** ~~Sanderstead is a suburban Place located on a hilltop, with residential areas of Purley Downs, Riddlesdown, Hamsey Green and Sanderstead surrounded by large scale green open spaces such as Mitchley Wood, Riddlesdown and Kings Wood.~~ Paragraph deleted

**11.176** ~~The predominant residential character consists of detached 'Housing on Relatively Large Plots' on the hillsides leading to the Local Centre, 'Planned Estates Of Semi-Detached Houses' at the top of Sanderstead Hill, and some 'Local Authority Built Housing With Public Realm' towards the Local Centre of Hamsey Green.~~ Paragraph deleted

## Sanderstead

Within Sanderstead Local Centre, to respect and enhance the distinctive qualities proposals should:

Reinforce the suburban shopping area character;

Reference, respect and enhance architectural features such as the consistent rhythm of pairs of buildings with identical frontages and the articulation of openings;

Retain features such as the projecting bay windows;

Retain wide vistas and strengthen visual connections to green open spaces **including the village character of open spaces to the north**; and

a) Improve walking and cycling connectivity and access to open space. ; and

**Respect the setting of nationally and locally listed buildings.**

Within Hamsey Green Local Centre, to respect and enhance the distinctive 'Suburban Shopping Area' character of Hamsey Green, proposals should:

Reinforce the suburban shopping area character;

Positively reference, respect and enhance architectural features such as the consistent rhythm and articulation of window and doors;

Ensure the extent of the public realm within the vicinity of the development is retained and improved; and

Incorporate multi-stock brick or white render as the predominant facing material, **or a material which is complementary to multi-stock brick or white render**

**DM44.2A** An Area of moderate intensification has been designated to the north east of Sanderstead. The sustainable moderate, intensification and renewal of areas within this via proposals for new residential development will be supported that result in a reasonable increase in the density. Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of these are shown on the map below.

Within Sanderstead allocate sites for development as set out in Table 11.11.

## How the policy works

**11.177** The areas in which Policies 0 and 0 apply are shown on the Policies Map.

### Sanderstead Local Centre

**11.178** Sanderstead Local Centre has visual and physical links onto neighbouring green areas to the west. It has a consistent building line to the east. The character of the low rise 'Urban Shopping Area' is enriched by 'Institutions With Associated Grounds', 'Retail Estates' and 'Terraced Houses And Cottages'.

**11.179** The 'Urban Shopping Area' contains distinctive architectural features such a consistent rhythm created by pairs of multi-stock brick buildings with matching facades containing windows and doors identically articulated. Within this area detailed policies are required to strengthen the identity of the Local Centre.

### Hamsey Green Local Centre

**11.180** Hamsey Green is defined by its 'Suburban Shopping Area' character with Green verges and tree planting. Sections of the Local Centre have a consistent character. This can be seen through elements such as the rhythm and articulation of window and doors. In areas where the character is inconsistent the Place-specific development management policy in 0 will help enhance Hamsey Green's local identity and encourage growth.

### Allocating land for development

**11.181** Table 11.11 below sets out the proposed use on specific sites in Sanderstead. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.11 Proposals for uses of land of specific sites in Sanderstead**

Ref no	Site name	Proposed use
71.	2 Red Gables, Beech Avenue	Residential development
79.	Waitrose, Sanderstead	Mixed use residential and retail development
306.	The Good Companions Public House site, 251 Tithe Pit Shaw Lane	Mixed use of residential and retail
947	359-367 Limpsfield Road	Residential with 1 - 3 commercial units on ground floor.



## Selsdon

**11.186B** Selsdon is a suburban residential area situated in the south east of the borough bordering the district of Tandridge in Surrey. The area is focused on Addington Road and Selsdon Park Road with a well-defined District Centre, surrounded by large scale green open spaces such as Selsdon Wood, Heathfield and Littleheath Woods.

**11.186B** Car dependency is high in Selsdon due to the lack of public transport and convenient rail stations, as well as the hilly nature of the area. The landscape character of Selsdon is one of being on the edge of suburbia next to the countryside, and the area has a number of local and longer distance views of adjacent countryside and Croydon Metropolitan Centre.

**11.186C** The Selsdon Community Plan (2020) outlines the key economic, social and environmental issues facing the area; as well as sets out the key priorities for investment in facilities, services and infrastructure identified by the local community, as this area is expected to change and grow in the future. A summary of the key issues identified by this are; a need to protect, enhance promote use of green spaces (including children's play areas); a need a enhance public transport and provide bus shelters, increasing provision of parking near shopping areas, a need to provide new/enhanced community facilities for all ages and sports facilities, a need to limit fast food places and increase variety of other uses to promote viability, vitality of the District centre. The Community Plan is a key piece of evidence that has informed the content of the Local Plan.

### Vision, opportunities, constraints and change up to 2036

#### Vision

**11.182** Selsdon District Centre will continue to provide a range of services for the residential population in a suburban setting with good links to its green open spaces and countryside. Selsdon Park Road/Featherbed Lane Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function.

#### Homes

**11.183** An area of sustainable growth of the suburbs with some opportunity for windfall sites will see growth mainly confined to infilling. ~~with dispersed integration of new homes respecting existing residential character and local distinctiveness.~~ An area of Focused Intensification (AFI6) has been designated to the east of Selsdon, near Gravel Hill Tram Stop, which is also located within proximity to Selsdon District Centre. This is considered a highly sustainable location, where high density residential development and renewal will be encouraged. This is due to its proximity to the tram network and services/facilities within the District Centre. Further an Area of Moderate Intensification has been designated to the North of Selsdon, This is currently a low density residential area, which is considered to have good access to the tram network (via Coombe Lane Stop) and well as local services within Seldom District Centre. Due to this, it is considered a sustainable location for moderate renewal, intensification via new residential development that results in a reasonable increase in the density of area. The more dense eastern and more suburban western areas will continue to be distinct characteristics of the areas

#### Employment, Skills and Community Facilities

**11.184** Selsdon District Centre will continue to be the main focus for employment, with the adjacent Selsdon Park Hotel also

providing local job opportunities. Community facilities will be focused on the District Centre.

combined with the uptake of new technology such as e-bikes are necessary to reduce car dependence in Selsdon

#### Character, Heritage and Design

**11.185** New development will respect the existing local character and distinctiveness referring to the Borough Character Appraisal to inform design quality. Any public realm improvements should primarily focus on the District Centre. Any building and conversions should be of a high standard of design to ensure the character of the Centre is respected.

#### Green Grid and Open Space

**11.186** Links to existing green spaces from the residential areas will be improved where possible with additional connections to strategic green links enabling more opportunities for walking and cycling in the area.

#### Transport

**11.187** ~~With a tram stop to the north edge of Selsdon, local bus services, connections and access will be maintained, but with improved walking and cycling routes where possible via improvements to the Green Grid. The community will enjoy better quality, more frequent and reliable bus services connecting with Croydon Metropolitan Centre. Travel plans will look to ease congestion at peak times in the District Centres by encouraging walking, cycling or public transport especially for school journeys.~~ Selsdon's steep topography makes walking, cycling challenging and, with generally poor public transport accessibility this makes it difficult to promote active transport. With a single tram stop to the north edge of Selsdon, public transport users are currently reliant on local bus services. Any road segregated cycle routes proposals for Selsdon Park Road will need to create a link to Addington Village and these routes will be complimented by further tram routes towards the District Centre. These enhanced connections

Figure 11.12 Selsdon v

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## General character

**11.188** ~~Selsdon is a suburban residential Place with a well-defined District Centre, surrounded by large scale green open spaces such as Selsdon Wood, Heathfield and Littleheath Woods. The predominant residential character types consist of 'Planned Estates Of Semi-Detached Houses', some 'Local Authority Built Housing with Public Realm', 'Compact Houses On Relatively Small Plots' and 'Medium Rise Blocks With Associated Grounds'. Paragraph deleted~~

## Selsdon

Within Selsdon District Centre, to enhance the character of Selsdon District Centre proposals should:

Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;

Ensure large buildings are sensitively located and of a massing no larger than buildings within this area;

Ensure that the front elevation of large buildings are broken down to respect the architectural rhythm of the existing street frontages; and

Should incorporate red multi-stock brick as the predominant facing material.

**DM45.1 A** To address the future housing needs of Selsdon and support sustainable growth of this, the following broad locations have been designated;

- a) An Area of focused Intensification is identified to the east of this (AFI6), within close proximity to Gravel Hill Tram Stop and the District Centre. High density residential and renewal will be supported within this.
- b) An Area of moderate intensification identified to north of this (close to Coombes Lane Tram Stop). The sustainable moderate, intensification and renewal of areas within this via proposals for new residential development will be supported that result in a reasonable increase in the density
- c) Development within these should: be well designed to protect, enhance the suburban character, setting of this settlement. The boundaries of these is shown on the map below.

Within Selsdon allocate sites for development as set out in Table 11.12.

### How the policy works

**11.189** The area in which Policy 0 applies is shown on the Policies Map.

#### Selsdon District Centre

**11.190** Selsdon District Centre has a strong 'Urban Shopping Area' character. Both ends of which are marked by retail outlets, creating a well-defined edge and a distinct start and finish to this character area.

**11.191** There are two intermingled and competing architectural styles of buildings. The mock Tudor facades pays reference to the residential surroundings, however these are of a low quality and have aged visibly. The second, modernist style buildings have red multi-stock brick facades. These are of a slightly higher quality and better express the distinctiveness of the District Centre and are therefore, more appropriate for this location. Detailed policy is required to strengthen the sense of place.

**11.192** In the western part of the centre the public realm is fragmented and dominated by the overwhelming scale of the Addington Road and Old Farleigh Road junction. There is an opportunity to improve the walking and cycling experience in this area.

#### Allocating land for development

**11.193** Table 11.12 below sets out the proposed use on specific sites in Selsdon. The location and boundary of each detailed proposal can be found on the Policies Map and further

details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.12 Proposals for uses of land of specific sites in Selsdon**

Ref no	Site name	Proposed use
85.	The Forestdale Centre	Residential development incorporating a new shopping parade with retail, finance, and food & drink
948.	230 Addington Road	Residential with retail on ground floor (up to 3 units).

## Shirley

**11.197A** Shirley is predominantly a suburban residential settlement surrounded by areas of open land, countryside and Green Belt, situated to the east of Croydon borough and bordering the London Borough of Bromley. This place is defined by the tree lined streets, the regular rhythm of well-spaced buildings with well-kept landscaped areas to the front, that allow oblique long range views beyond the rear gardens.

**11.197B** Shirley's built environment creates an open varied and interesting skyline and roofscape. The character varies to the north and south of Shirley Church Road, with the southern part dominated by detached homes including Bishops Walk Local Heritage Area and surrounded by expansive areas of greenery, including woodland of Addington Hills and Addington Palace Registered Historic Park and Garden.

**11.197C** Shirley has many heritage assets including three Local Heritage Areas; the Upper Shirley Road Area represents a range of styles and architectural forms dating from the 18th century, with well-preserved original features; the Stuart Crescent Area lies in the heart of the Spring Farm area with the layout arranged around the remnants of a circular historic copse; and the Bishops Walk Area represents a distinctive high quality historic landscape and townscape with the southern section's mature landscaping revealing the historic design of Addington Park which allows for scenic views within and outside of the area.

**11.197D** Connectivity is generally low in Shirley with high car dependency, which also can result in congestion at peak times on main roads such as Wickham Road. There is a tram stop at Coombe Lane however it is not conveniently close to the main

residential area and bus services are predominantly found on main roads.

### **Vision, opportunities, constraints and change up to 2036**

#### Vision

**11.194** Shirley will continue to be a suburb surrounded by substantial green space with improved cycle and pedestrian links. The vibrant Local Centre, with a range of retailing and independent shops will continue to serve the local community. A mature and rejuvenated Shrublands will be served by both local shops as well as those on Wickham Road. Shirley Road and Spring Park/Bridle Road Neighbourhood Centres will be supporting the existing and future community with services and facilities beyond a retail function.

#### Homes

**11.195** An area of sustainable growth of the suburbs with ~~some opportunity for windfall sites will see growth mainly confined to infilling with dispersed integration of new homes respecting existing~~ **through infilling respecting existing and evolving** residential character and local distinctiveness.

#### Employment, Skills and Community Facilities

**11.196** Some small scale employment will be provided in the Local Centre with predominantly independent shops supporting the local community.

#### Character, Heritage and Design

**11.197** New development will be sensitive to the existing residential character and the wooded hillsides of the Place referring to the Borough Character Appraisal to inform design

quality. Public realm improvements will focus on the Local Centre. Any building and conversions should be of a high standard of design to ensure the character of the Centre is respected. **The grade II listed Shirley Windmill is one of only four windmills open to the public in Greater London, and is a key landmark and key contributor to Shirley's special character**

the Local Centres by encouraging walking, cycling or public transport especially for school journeys.

#### Environment and Climate Change

**11.198** ~~Development in the flood zones will be guided by the policies of the Plan to reduce flood risk.~~ **The risk of surface water flooding is prevalent throughout Shirley and Spring Park, predominantly on or near main roads. A number of recorded surface water flooding events have occurred along Shirley Road and in Spring Park. Therefore measures to reduce food risk through sustainable drainage measures should be implemented.**

#### Green Grid and Open Space

**11.199** Shirley will continue to be well served by open space with improved connections to the Green Grid, along with way finding, enabling increased walking and cycling. ~~The Registered Historic and Local Historic Parks and Gardens in the area will be retained and new links provided where possible to incorporate them into the Green Grid network.~~ **New links will be provided to Addington Palace Registered Historic Park and Local Historic Parks and Gardens in the area including Millers Pond and the grounds of Hall Grange. These will be incorporated into the Green Grid network, where possible.**

#### Transport

**11.200** With improved access and links where possible, the existing connectivity and good public transport of Shirley will be maintained. The community will enjoy better quality, more frequent and reliable bus services connecting with Croydon Metropolitan Centre. Travel plans will look to ease congestion at peak times in

Figure 11.13 Shirley **graphic updated**



**General character**

**11.201** Shirley is predominantly a suburban residential settlement surrounded by natural areas of Green Belt. This place is defined by the tree lined streets, the regular rhythm of well-spaced buildings with well-kept landscaped areas to the front, that allow oblique long range views beyond the rear gardens. Paragraph deleted

**11.202** Shirley's residential character predominantly consists of 'Planned Estates Of Semi-Detached Houses' with garages and 'Compact Houses On Relatively Small Plots' set in large green spaces. This combination creates an open varied and interesting skyline and roofscape. The southern part is dominated by 'Scattered Houses On Large Plots' surrounded by expansive areas of greenery, including woodland of Addington Hills. Paragraph deleted

**11.203** Shirley has three urban and one suburban shopping area characters along Wickham and Shirley Roads. The suburban feel of these shopping areas are strengthened by tree lined streets, green verges with planting and small green spaces and parking accommodated in slip roads. These features play a vital role in creating Shirley's sense of place. Paragraph deleted

**11.204** The Upper Shirley Road Local Heritage Area predominantly consists of the 'Terraced Houses And Cottages' character type. Buildings represent a range of styles and architectural forms dating from the 18<sup>th</sup> century, with well-preserved original features. The grouping, its design and layout are a record of the local history of building design and development in this area. Paragraph deleted

**11.205** The Stuart Crescent Local Heritage Area lies in the heart of the Spring Farm area which has a consistent character of 'Planned Estates Of Semi-Detached Houses'. The layout is arranged around the remnants of a circular historic copse. The mature landscaping reveals the historic character of the landscape which pre-dates development. Paragraph deleted

**11.206** The Bishops Walk Local Heritage Area represents a distinctive high quality historic landscape and townscape with a 'Scattered Houses On Large Plots' residential character. The southern section of Bishops Walk's mature landscaping reveals the historic design of Addington Park which pre-dated and allows for scenic views within and outside of the area. The distinctive design of the northern section creates a well-integrated topography, planting and built environment. Paragraph deleted

**Policy DM45: Shirley**

**DM45.2** Within Shirley Local Centre, to retain the unique qualities development should:

- a) Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;
- b) Reference, respect and enhance architectural features such as the consistent rhythm and articulation of fenestration and retain features such as the triangular bay windows;
- c) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and

- d) Incorporate or retain traditional shop front elements such as fascias, pilasters and stall risers. **and**
- e) **Respect the setting of locally listed buildings within the area.**

**DM45.3** In the area between 518 and 568 Wickham Road, to improve the character proposals should reference the 'Suburban Shopping Area' character type.

**DM45.4** In the area of the Wickham Road Shopping Parade, to retain the distinctive character of the 794-850 Wickham Road proposals should:

- a) Complement the existing predominant building heights up to a maximum of 2 storeys; and
- b) Retain the 'Suburban Shopping Area' character.

**DM45.4A** **To retain the distinctive character of this part of Shirley Road Shopping Parade, proposals should:**

- a) **Complement the existing predominant building heights of 2 storeys up to a maximum of 3 storeys along Shirley Road, and a height of 2 storeys up to a maximum of 4 storeys directly behind the parade; and**
- b) **Reference, respect and enhance architectural features such as the consistent rhythm and articulation of windows and doors.**

**DM45.4** Within Shirley allocate sites for development as set out in Table 11.13.

## How the policy works

**11.207** The areas in which Policies DM45.2 to DM45.4 apply are shown on the Policies Map.

### Shirley Local Centre

**11.208** Shirley Local Centre consists of the combination of three different character types an 'Urban Shopping Area', 'Scattered Houses On Large Plots' and a 'Suburban Shopping Area'. The northern side of the Local Centre is more tightly built-up, while the southern more is spacious with green verges, tree lined streets and parking within slip roads. In this area the potential for growth is limited. **The area includes a number of**

**locally listed buildings. The setting, heights and other characteristics of these buildings should be respected.**

### Shirley Road and Wickham Road

**11.209** Each of Shirley's shopping areas has a distinct character which should be enhanced and strengthened. This character is informed by the layout, scale, urban grain and, architectural features such as the brick work, fascias and stall risers. In order to ensure that the distinctive elements that contribute to Shirley's sense of place are not lost, these features have been included in the detailed policies.

Allocating land for development

**11.210** Table 11.13 below sets out the proposed use on specific sites in Shirley. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.13 Proposals for uses of land of specific sites in Shirley**

Ref no	Site name	Proposed use
87.	Shirley Community Centre	Mixed use development with residential and replacement community facility that provides at least equivalent functionality to the existing centre
128.	Land at Poppy Lane	Residential development
502.	Coombe Farm, Oaks Road	Residential development so long as the development has no greater footprint, volume or impact on openness on the Metropolitan Green Belt than the existing buildings on the site

Ref no	Site name	Proposed use
504.	Stroud Green Pumping Station, 140 Primrose Lane	Residential development (including the conversion of the Locally Listed pumping station) if the site is no longer required for its current use in the future. It should be noted that ordinary watercourses have not have been included in the fluvial modelling of the River Wandle and therefore a fluvial flood risk from this watercourse may be present.

## South Croydon

**11.214A** South Croydon lies immediately south of Croydon Metropolitan Centre and is organised in a south to north alignment along the Brighton Road. Its fragmented character can be attributed to the Brighton Road and railway infrastructure. The areas to the east are rich in green open spaces including areas of Green Belt such as Lloyd Park.

**11.214B** South Croydon has a rich heritage which is protected through the designation of a Conservation Area and three Local Heritage areas. Croham Manor Road Conservation Area is a notable collection of early 20th century Locally Listed houses with a wealth of well-preserved arts and crafts features. The South End Local Heritage Area represents an early vernacular architectural style from late 19th with a wide range of well-preserved highly decorative architectural features. Its historic townscape composition consists of the street frontage and a triangular square with the prominent locally listed Swan and Sugarloaf former public house terminating vistas along Brighton Road. St Peter's Road Local Heritage Area is focused around the Grade II Listed St Peter's Church with its high quality historic landscape that enables long vistas over South Croydon and reveals a panorama of the Croydon Opportunity Area and glimpses across the area. Birdhurst Road Local Heritage Area represents a collective value of high quality, well-designed and well-preserved Victorian Villas dating from before 1890. There is a distinctive relationship between the mature landscape of the street scene, the design of the buildings and the plan layout.

**11.214C** South Croydon due to its proximity is well-connected to Croydon Metropolitan Centre and the wider area through rail and bus links as well as cycling and walking routes. As a result of this, there is a relative deficiency in the range of community services

available. The area continues to have a high car dependency, but relatively less so than places further south, and congestion can occur at peak times on Brighton Road.

### Vision, opportunities, constraints and change up to 2036

#### Vision

**11.211** South Croydon will continue to be a highly accessible Place with good connections to open space providing an introduction to the suburban south. The character of the area will be improved through support for the wide range of independent shops and restaurants along South End and its two Local Centres. South End/Parker Road/St Peter's Church Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function.

#### Homes

**11.212** The main focus for sustainable growth of the suburbs will be in the Brighton Road area ~~with a mix of windfall and infill development that respects the existing residential character and local distinctiveness and includes flood mitigation measures.~~ through focussed intensification, with a mix of windfall and infill development in the wider Place. Areas of Focused Intensification have been designated at the Brighton Road Transport corridor (AFI7a) and Sanderstead Road (AFI7b) within close proximity to Purley Oaks and Sanderstead Railway Stations. These are considered sustainable locations, where high density residential and renewal will be encouraged due to their proximity to the stations, as well as services/facilities within the two Local Centres. Development will be well designed, to ensure that it respects and evolves the existing residential character and local distinctiveness and includes flood mitigation measures.

### Employment, Skills and Community Facilities

**11.213** Selsdon Road (including Carlton Road), will remain an important Separated Industrial Location for the borough and will continue to be protected. Elsewhere employment will be concentrated in the two Local Centres and along the Brighton Road.

### Character, Heritage and Design

**11.214** New development will be sensitive to the existing local character and the wooded hillsides of **South Croydon taking into consideration the Place referring to the Borough Character Appraisal and Croham Manor Road Conservation Area Appraisal and Management Plan** to inform design quality. Opportunities for public realm improvements will be primarily focused on the two Local Centres with any building and conversions of a high standard of design to ensure the character **of surrounding areas the Centres and Conservation Areas** are respected. **There are opportunities for new links to be provided to Croham Manor Road Conservation Area, the Local Historic Parks and Gardens- and Local Heritage Areas in the area including those around St Peter's Church, South End and the Birdhurst Estate, which will be incorporated into the Green Grid network** ~~The Local Historic Parks and Gardens in the area will be retained and new links provided where possible to incorporate them into the Green Grid network.~~

### Environment and Climate Change

**11.215** ~~Through enabling development, potential exists to implement flood mitigation and adaptation measures along the Brighton Road.~~ **Flood risk will be mitigated through naturally based sustainable drainage solutions (where necessary), particularly through enhancement measures along the Brighton Road that is susceptible to surface water flood risk**

### Green Grid and Open Space

**11.216** Improved connections to the Green Grid will be sought to increase opportunities for walking and cycling in the area. **St. Peter's Church, South Croydon – a key landmark, Local Heritage Area and Local Historic Park and Garden – will be integrated into this expanding network (where possible)**

### Transport

**11.217** The existing connectivity and good public transport of South Croydon will be maintained and enhanced where possible, with the quality, capacity and reliability of bus services improved. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys. The potential of Selsdon Road Industrial Location to act as a railhead to transfer freight to rail will be supported. **Along the Brighton Road Corridor, walking, cycling and public transport will be encouraged by creating safer and more attractive environments for these modes of transport including in road segregated cycle lanes. There will also be in road segregated cycle lanes on Coombe Road. The Council will work with TfL to explore the feasibility of public transport improvements (such as metroisation, a new tram line or bus rapid transit) from Croydon Metropolitan centre to this area Purley and Coulsdon. This will help to improve the reach and capacity of the tram network to support good growth.**

Figure 11.14 South Croydon **graphic updated**

## General character

**11.218** South Croydon is organised in a south to north alignment along the Brighton Road. Its fragmented character can be attributed to the Brighton Road and railway infrastructure. The areas to the east are rich in green open spaces including areas of Green Belt such as Lloyd Park. The 'Industrial Estates' are primarily concentrated along the railway. Small pockets of 'Industrial Estates' are also scattered amongst residential blocks. **Paragraph deleted**

**11.219** The predominant residential character consists of 'Terraced Houses And Cottages', located within the central strip, with the mix of 'Medium Rise Blocks With Associated Grounds and 'Compact Houses On Relatively Small Plots' to the west and north. The areas to the east contain 'Detached Houses On Relatively Large Plots' and 'Large Houses On Relatively Small Plots', a number of which have been Locally Listed. **Paragraph deleted**

**11.220** The Croham Manor Road Conservation Area represents the 'Detached Houses On Relatively Large Plots' character type. It is a notable collection of early 20<sup>th</sup> century Locally Listed houses with a wealth of well-preserved arts and crafts features. **Paragraph deleted**

**11.221** The South End Local Heritage Area has an 'Urban Shopping Area' character. It represents an early vernacular architectural style from late 19<sup>th</sup> with a wide range of well-preserved highly decorative architectural features. Its historic townscape composition consists of the street frontage and a triangular square with the prominent former Swan and Sugarloaf building terminating vistas along Brighton Road. **Paragraph deleted**

**11.222** The 'Urban Shopping Areas' of Ye Market Local Heritage Area is a distinctive early 20<sup>th</sup> century 'mock Tudor' style shopping parade with a range of preserved original decorative features and detailing. **Paragraph deleted**

**11.223** St Peter's Road Local Heritage Area is focused around the Grade II Listed St Peter's Church with its high quality historic landscape that enables long vistas over South Croydon and reveals a panorama of the Croydon Opportunity Area and glimpses across the area. The character consists of the 'Institutions With Associated Grounds' surrounded by 'Large Houses On Relatively Small Plots' of well-preserved Victorian villas set in the high quality townscape. **Paragraph deleted**

**11.224** The Birdhurst Road Local Heritage Area predominantly contains the 'Large Houses On Relatively Small Plots' residential character type. It represents a collective value of high quality, well-designed and well-preserved Victorian Villas dating from before 1890. There is a distinctive relationship between the mature landscape of the street scene, the design of the buildings and the plan layout. **Paragraph deleted**

Policy DM46: South Croydon

**DM46.1** Within the Brighton Road (Selsdon Road) Local Centre, to encourage a balance to be struck between strengthening and enhancing the character and facilitating growth, proposals should:

- a) Complement the existing predominant building heights up to a maximum of 3 storeys;
- b) Positively reinforce, strengthen and enhance characteristic features such as the articulation of corner buildings and continuous building line;
- c) Incorporate main entrances onto Brighton Road; and
- d) Positively reference, respect and enhance the articulation of shop fronts, including consistent rhythm and size of windows and doors.

**DM46.1A** To ensure a balance is struck between strengthening and enhancing the character and facilitating growth within the Brighton Road (Sanderstead Road) Local Centre, proposals should:

- a) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and
- a) Incorporate multi-stock brick as the predominant facing material, or a material which is complementary to multi-stock brick.

**DM46.1B** Areas of focused Intensification have been designated on Brighton Road (AFI7a) close to Purley Oaks Railway Station and Sanderstead Road (AFI7b), which are located within proximity to the above Local Centres. High density residential and renewal will be supported within these. The boundaries of these are shown on the map below. Development should:

- a) Be well designed to protect, enhance the suburban character, setting of this transport corridor into/out of the settlement
- b) Include adequate measures to demonstrate development; will minimise and mitigate any flood risk on Brighton Road (.i.e. within AFI7a), it will be safe for future residents and not increase risk elsewhere.
- c) Assess and mitigate any potential noise pollution impacts, near Sanderstead Station (AFI7b), to create a health environment for future residents.

**DM46.2** Within South Croydon allocate sites for development as set out in Table 11.14.



## How the policy works

**11.225** The area in which Policy DM46.1 and A and B applies is shown on the Policies Map.

### Brighton Road (Selsdon Road) Local Centre and Brighton Road (Sanderstead Road) Local Centre

**11.226** The two Local Centres along Brighton Road are dominated by the road infrastructure. The predominant character of 'Urban Shopping Areas' is characterised by the consistency of architecture and landmark buildings that serve as focal points and close the vistas at the apexes of Brighton Road and South End.

**11.227** The street frontages in the area are active and continuous. Ground floors are strongly articulated, have a consistent rhythm and size of ground floor doors and windows. The predominantly hard surfaced public realm has narrow footways that do not encourage walking.

**11.228** Place-specific development management policies are required to ensure a balance is struck between strengthening and enhancing the character of the Local Centres and facilitating growth.

### Allocating land for development

**11.229** Table 11.14 below sets out the proposed use on specific sites in South Croydon. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

Table 11.14 Proposals for uses of land of specific sites in South Croydon

Ref no	Site name	Proposed use
54.	BMW House, 375-401 Brighton Road	Mixed use residential and supermarket. The site is located within Flood Zone 3a associated with the culverted River Wandle. At this location, the culverted River Wandle has been incorporated into the surface water sewer system as it flows north below the A235 Brighton Road. A Flood Warning and Evacuation Management Plan must be prepared for the site.
101.	Toby Carvery, Brentwood Road	Residential development
114.	Garage courts at 18 Bramley Hill	Residential development
345	Normanton Park Hotel, 34-36 Normanton Road	<del>Residential development with primary school expansion if required (otherwise the whole site may be used for residential development).</del>
662	<del>Coombe Road Playing Fields, Coombe Road</del>	<del>Secondary school with retention of playing pitches</del>

## South Norwood and Woodside

### Vision, opportunities, constraints and change up to 2036

**14.234A** South Norwood lies to the north of Croydon borough between Upper Norwood and Addiscombe, and has retained its Victorian urban centre. Portland Road, one of the two historic high streets in South Norwood, links the District Centre with Woodside Green which contains some of the few remaining parts of the historic medieval village. The surrounding street pattern radiates from this open area. Larger green spaces such as South Norwood Country Park and South Norwood Lake are located along the northern edge and form a boundary between this Place and neighbouring boroughs. Small green open spaces are scattered throughout South Norwood and Woodside.

**14.234B** South Norwood and Woodside has a rich heritage and includes a Conservation Area and two Local Heritage Areas. Following the development of the railway station, the District centre grew quickly during Victorian times resulting in fine buildings on the High Street and grand residences at its perimeter, which form the South Norwood Conservation Area. The Grade II Listed Stanley Halls is one of the area's most significant historic assets. The South Norwood Clocktower continues to act as a key landmark for the Station approach and Clocktower Market area. The Portland Road Terraces, Portland Road Mission Hall and The Market Parade Local Heritage Areas contain distinctive collections of mid-19th to early 20th century shopping parades, with bespoke Arts and Crafts and gothic inspired features that record the gradual historic development of the area. Ingatestone Road Local Heritage Area represents a fine example of high density Edwardian development with unique features such as balconies with ornate ironwork, exposed red brick cladding with elaborate white stucco decorations.

**14.234C** South Norwood has relatively high public transport accessibility with tram stops at Woodside and Arena, as well as extensive bus routes north and south. Rail infrastructure prevents frequent east to west movement across the area, however a number of stations help residents move locally and further afield such as Central London.

The South Norwood Community Plan (2018) outlines the key economic, social and environmental issues facing the District Centre. Based on this, it sets out key priorities for investment in facilities, services and infrastructure identified by the local community, as this area is expected to change and growth in the future. A summary of the key issues identified by this are; need to reduce vacant commercial units, a need to improve the public realm, a need for more independent shops, a need for community space for all age groups and a need for space to support community projects/groups. The Community Plan is a key piece of evidence that has informed the content of the Local Plan.

#### Vision

**11.230** South Norwood and Woodside will be a revitalised residential neighbourhood, benefiting from London Overground services to Docklands, the City, and a good connection to Croydon Metropolitan Centre. A revived, enhanced District Centre will be enhanced through heritage-led enhancements, and will offer a mixture of homes, community and cultural facilities and a range of retailing, including many independent shops. South Norwood and Woodside, with their good transport connections will grow in popularity as a residential area and share in the borough's improving prosperity. Woodside Green and Portland Road (Watcombe Road/Woodside Avenue) Neighbourhood Centres will

be supporting the existing and future community with services and facilities beyond a retail function.

#### Homes, Employment, Skills and Community Facilities

**11.231** Sustainable growth of the suburbs with predominantly windfall sites and dispersed integration of new homes will respect existing residential character and local distinctiveness.

#### Employment, Skills and Community Facilities

14.236A Selhurst Park is currently the home of Crystal Palace Football Club. The District Centre, and Portland Road and Woodside Green Neighbourhood Centres will continue to provide employment and services for the local community. Other community facilities will be encouraged to locate in close proximity to the District Centre and opportunities to provide an Enterprise Centre, which could be creative industry based, will be sought in the vicinity of Portland Road. **Stanley Halls will become one of South London's premiere arts and performing centres, supporting creative enterprise, music, and art. An improved route connecting the Halls to Norwood Junction station, will be achieved through public realm and building enhancements. The new library will support a growing community, and alternative uses for the old library and other vacant assets will focus on building resilient businesses, local knowledge and cultural development. The Council will actively support meanwhile uses, where they enhance the character and vitality of the area.**

#### Character, Heritage and Design

**11.232** Heritage assets and landmarks will be protected, ensuring that new development respects **and enhances** the local character and distinctiveness of South Norwood and Woodside. It will need to take into consideration the **South Norwood Conservation Area Appraisal and Management Plan**, and Borough

Character Appraisal to inform design quality. Opportunities for public realm improvements will **focus** on the South Norwood District Centre, and South Norwood Conservation Area and Portland Road and Woodside Green neighbourhood centres any new-building and conversions will need to be completed to a high standard of design, to ensure the character of the Centres and the Conservation Area are respected. **Heritage-led enhancements will be a particular focus within the boundary area of the High Streets Heritage Action Zone. Public realm improvements will include improved wayfinding/legibility, restoring shopfronts and uppers, enhancing public realm and wayfinding for key community hubs and other local assets. Heritage at risk assets will be repaired and brought back into use. The Elmer's End Moated Site within South Norwood Country Park is a scheduled ancient monument and will continue to be protected. The provision of interpretation to raise awareness of the monument would assist in its protection.**

#### Environment, Climate Change

**14.237A** There are a number of areas in South Norwood and Woodside that are at risk of surface water flooding and a number of surface water flooding episodes have occurred in the vicinity of Norwood Junction station. **Development should incorporate sustainable drainage measures to help reduce this risk.**

#### Green Grid and Open Space

**11.233** The Place's diverse open spaces include South Norwood Lake and Country Park. Links will be provided, where possible to the Croydon Metropolitan Centre and Waterlink Way as part of the National Cycle Network. New Green Grid links will improve connectivity with the Local Historic Parks and Gardens and other green spaces to incorporate them into the Green Grid network. Development in the flood zones will be guided by the policies of the Plan to reduce flood risk.

## Transport

**11.234** As part of the wider Brighton Main Line rail improvement works, Norwood Junction Station will undergo improvements for access and capacity. Opportunities for walking and cycling improvements in South Norwood will be explored, including cycle connections from South Norwood to Crystal Palace, providing a connection with the proposed Green Grid through the creation of low traffic neighbourhoods. Cycle facilities

will be enhanced at Norwood Junction railway station, benefiting the local population who live within walking and cycling distance of this. The tram system in Croydon will be supported by promoting new ~~tram~~ extensions or other public transport improvements serving Crystal Palace and Bromley through South Norwood and Woodside. Measures to provide better quality, more frequent and reliable bus services along Whitehorse Road, Whitehorse Lane and Selhurst Road (A213) will be promoted.

Figure 11.15 South Norwood and Woodside **graphic updated**

## General character

**11.235** South Norwood has retained its Victorian urban centre, which has been recognised in its Conservation Area designation. It is predominantly a residential Place with a character of 'Terraced Houses And Cottages' with some patches of 'Medium Rise Blocks With Associated Grounds' and 'Compact Houses On Relatively Small Plots'. Some larger buildings including residential 'Tower Buildings' and 'Large Buildings With Spacing' are scattered in the District Centre, in the vicinity of the railway line. Larger 'Industrial Estates' are located along the railways and scattered within smaller residential blocks. The Place's only 'Retail Estate & Business & Leisure Park' lies on the western edge next to Selhurst Park football stadium. **Paragraph deleted**

**11.236** Portland Road, one of the two historic high streets in South Norwood, links the District Centre with Woodside Green. It has a predominant 'Urban Shopping Area' character interlaced with residential developments, predominantly 'Medium Rise Blocks With Associated Grounds' and 'Large Buildings With Continuous Frontage Line'. **Paragraph deleted**

**11.237** Woodside Green contains some of the few remaining parts of the historic medieval village. The surrounding street pattern radiates from this open area. Larger green spaces such as South Norwood Country Park and South Norwood Lake are located along the northern edge and form a boundary between this Place and neighbouring boroughs. The small green open spaces are scattered throughout South Norwood and Woodside. **Paragraph deleted**

**11.238** The South Norwood Conservation Area predominantly consists of an 'Urban Shopping Area' character mixed with 'Terraced Houses And Cottages'. Following the development of railway station, the district centre grew quickly

during Victorian times resulting in fine buildings on the High Street and grand residences at its perimeter. The Grade II Listed Stanley Halls is one of the area's most significant historic assets.

**Paragraph deleted**

**11.239** The Portland Road Terraces, Portland Road Mission Hall and The Market Parade Local Heritage Areas have an 'Urban Shopping Area' character. These areas contain distinctive collections of mid-19<sup>th</sup> to early 20<sup>th</sup> century shopping parades, with bespoke Arts and Crafts and gothic inspired features that record the gradual historic development of the area. **Paragraph deleted**

**11.240** Ingatestone Road Local Heritage Area has a 'Terraced Houses And Cottages' character. It represents a fine example of high density Edwardian development with unique features such as balconies with ornate ironwork, exposed red brick cladding with elaborate white stucco decorations. **Paragraph deleted**

## South Norwood and Woodside

Along the section of Portland Road between the South Norwood Conservation Area and Watcombe Road, to facilitate growth and strengthen the edge of the South Norwood District Centre proposals should:

Relate to the predominant character in adjacent residential areas;

Complement the existing predominant height up to a maximum height of 3 storeys with accommodation in roof space;

Incorporate main pedestrian entrances onto Portland Road; and

Maintain the rhythm and size of ground floor windows and doors.

Along the section of Portland Road between Watcombe Road and Woodside Avenue, to create a cohesive sense of place in this area, proposals should complement the existing predominant building heights of 2 storeys up to a maximum of 3 storeys.

Within South Norwood and Woodside allocate sites for development as set out in Table 11.15.

### How the policy works

**11.241** The areas in which Policies 0 and 0 apply are shown on the Policies Map.

#### Section of Portland Road between the South Norwood Conservation Area and Watcombe Road

**11.242** Portland Road links South Norwood District Centre with Woodside Green. This street has a predominant 'Urban Shopping Area' character that has recently seen significant change which has resulted in the number of unsympathetic conversions from shops to residential use and a reduction of commercial uses.

**11.243** To facilitate growth, strengthen definition of the edge of the District Centre and manage conversions a Place-specific development management policy is required.

#### Section of Portland Road between Watcombe Road and Woodside Avenue

**11.244** The character of the area consists of small 'Urban Shopping Areas' and 'Institutions With Associated Grounds' interlaced with 'Medium Rise Blocks With Associated Grounds'. These character areas are surrounded by 'Terraced Houses And Cottages'.

**11.245** A Place-specific development management policy is required to create a cohesive sense of place.

#### Allocating land for development

**11.246** Table 11.15 below sets out the proposed use on specific sites in South Norwood and Woodside. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.15 Proposals for uses of land of specific sites in South Norwood and Woodside**

<b>Ref no</b>	<b>Site name</b>	<b>Proposed use</b>
97	24 Station Road	Residential development with a retail unit
486	Land and car park at rear of The Beehive Public House, 45A Woodside Green	Residential development
51.	Land and car park between Belgrave Road and Grosvenor Road	Residential and community use



## Thornton Heath

### Vision, opportunities, constraints and change up to 2036

**11.251A** Thornton Heath is a densely built up settlement that is situated to the north of Croydon Metropolitan Centre and between Broad Green and Norbury. The area is focused along Brigstock Road and Thornton Heath High Street between London Road to the west and the slopes of the Upper Norwood to the north east. Thornton Heath is a predominantly residential area with small green open spaces scattered throughout.

**11.251B** Thornton Heath's history is recognised through the High Street Local Heritage Area which contains distinctive classical Georgian, perpendicular and Queen Anne architectural styles dating from late 19th to 20th century with a wide range of well-preserved highly decorative historic features. The District Centre also contains a number of distinctive taller buildings constructed in the 20th Century, of mixed design quality, which create a more urban character and skyline in places.

**11.251C** Thornton Heath is less car dependent than other areas of the borough and has a good level of access to public transportation, including a railway station in the District Centre. A number of small open spaces including Grangewood Park and recreation grounds help to break up the dominating terraced housing and road infrastructure of Thornton Heath.

### Vision

**11.247** Thornton Heath's District Centre will be a mix of homes, community and cultural facilities reflecting the local diversity of the population and a range of retailing including many independent shops. The Local Centres at Thornton Heath Pond

and Beulah Road will continue to have a strong evening economy. Brigstock Road Neighbourhood Centre will be supporting the existing and future community with services and facilities beyond a retail function. ~~The Thornton Heath~~ District Centre will be firmly connected with Green Grid links that follow the Norbury Brook through Thornton Heath Recreation Ground together with further green links to Grangewood Park and west onto Mitcham Common. The Place will share in the borough's improving prosperity.

**11.252A** The Council has produced a Thornton Heath Strategic Regeneration Framework which sets out how the regeneration of the District Centre and its environs could be achieved and this has informed this section of the Local Plan This consists of two documents called Shaping Thornton Heath: High Street Plan and A Manual for Shaping Thornton Heath. These set out the key social, physical and environmental issues facing the area and how the future development could help address these, as well as help the delivery of new, enhance social, physical infrastructure and public realm improvements to promote sustainable development. These documents will be a material consideration for assessing applications within this place.

### Homes

**11.248** Moderate residential growth with some opportunity for windfall sites, limited infilling, ~~and dispersed integration of new homes will respect existing residential character and local distinctiveness.~~ An Area of Focused Intensification (AFI) has been designated at the London Road Transport corridor. This largely covers the boundary of Thornton Heath Pond Local Centre and a larger area slightly to the south of it, the boundary of which partially crosses over into Broad Heath and Selhurst. This is located within a Local Centre and close proximity to Pollards Hill

Local Centre to the north. This is considered a relatively sustainable location, where high density development/renewal will be encouraged within these, comprising of mixed use residential and retail/town centre use (on ground floor) will be encouraged within Town centre and residential in areas outside of these.

Development will need to respect and evolve existing residential character and local distinctiveness. Where possible, existing homes (privately owned and council-owned homes) should be improved or retrofitted to create higher-quality and more energy efficient homes.

#### Employment, Skills and Community Facilities

**11.249** Croydon University Hospital will evolve and, as the borough's principal health centre, will remain Thornton Heath's largest employer. Thornton Heath District Centre, Thornton Heath Ponds and Beluah Road Local Centres will continue to support the community, providing employment and services. Community facilities will be encouraged to locate in close proximity the former Centres and light industrial sites are important to the local community and economy, supporting SMEs and providing key local services. Development should aim to continue to provide a mix of uses in well-designed spaces, which provide a range of local employment opportunities.

#### Character, Heritage and Design

**11.250** ~~Heritage assets and landmarks will be protected and enhanced and the Place will be improved with high quality new development that respects the local character and distinctiveness, referring to the Borough Character Appraisal to inform design quality. Public realm improvements will primarily be focussed on the District and Local Centres with any buildings and conversions of a high standard of design to ensure the character of the Centres are respected.~~ Public realm improvements will be primarily focussed on the District, Local Centres and Neighbourhood

Centres. The character of the Thornton Heath High Street Local Heritage Area will be protected. Developments in the Thornton Heath District Centre and within its setting will respond to this character. The landmark Clock Tower and its setting will be protected and it will continue to act as a key wayfinding element in the public realm. Local Historic Parks and Gardens such as Grangewood Park and Thornton Heath Recreation Ground will be enhanced, and linked in to the green grid network

#### Environment and Climate Change

**11.251** ~~Development will be directed away from the functional flood plain of the Norbury Brook. Development in flood zones will be guided by the policies of the Plan to reduce flood risk.~~ Norbury Brook runs through the area and whilst this is a natural asset, it is a source of flooding risk. Its de-culverting can help contribute to sustainable urban drainage and rainwater management. Episodes of surface water flooding have also been recorded historically in Thornton Heath. -As there are areas of flood risk and the water flows into an area of limited capacity, utilising natural sustainable drainage should be provided (where necessary, to reduce the risk of surface water flood risk. Existing mature planting, street trees should be protected (where possible).

#### Green Grid and Open Space

**11.252** Norbury Brook provides an opportunity to enhance the character of the Place, celebrate local topography, and create more biodiverse habitats. To improve access to nature and the quality of the local open spaces, opportunities to de-culvert Norbury Brook in Thornton Heath Recreation Ground will be considered as part of a parks improvement project, but will need to be assessed against the need to provide space for sport and recreation. A Green Grid link with green spaces along the Norbury Brook will be established where possible. Way finding and improvements to the Local Historic Grangewood Park and

Whitehorse Meadow will help to encourage more use of existing green spaces.

### Transport

**11.253** Cycling to Thornton Heath railway station will be more attractive with additional and better quality cycle facilities provided where possible. ~~The tram system in Croydon~~ Public Transport will be further supported by promoting a new tram line, bus rapid transit or other public transport improvements to Streatham, Brixton and Tooting following the London Road through the Thornton Heath Pond Local Centre. The community will enjoy better quality, more frequent and more reliable bus services connecting with Croydon Metropolitan Centre. A network of safe and marked cycle routes and junctions will be supported to connect to local areas and more distant destinations. ~~Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys.~~

Figure 11.16 Thornton Heath **graphic updated**

## General character

~~11.254 Thornton Heath is a densely built up settlement, with District and Local Centres that are spatially clearly defined.~~

~~Paragraph deleted~~

~~11.255 The Place has a predominantly residential character consisting of 'Terraced Houses And Cottages' with a number of~~

~~Edwardian and Victorian parks interlaced within the urban fabric.~~

~~Paragraph deleted~~

~~11.256 The Thornton Heath High Street Local Heritage Area has an 'Urban Shopping Area' character. It contains distinctive classical Georgian, perpendicular and Queen Anne architectural styles dating from late 19<sup>th</sup> to 20<sup>th</sup> century with a wide range of well-preserved highly decorative historic features.~~ Paragraph deleted

## Policy DM48: Thornton Heath

**DM48.1** Within the Thornton Heath District Centre and its environs, to ensure a balance is struck between strengthening and enhancing the character and enabling growth, proposals should:

- a) Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys except in the vicinity of Thornton Heath railway station where any tall or large buildings proposed should not exceed 9 storeys;
- b) Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;
- c) Promote the expansion and enhancement of the shared public realm within the curtilage of the development;
- d) Ensure that the setting of Thornton Heath's local landmark, the Clock Tower, is respected; and
- e) ~~Incorporate red multi-stock brick as the predominant facing material~~ Ensure development to the east of the Town Centre responds to the character of the Thornton Heath High Street Local Heritage Area.

**DM48.2** Within the Thornton Heath Pond Local Centre and its environs, to ensure a balance is struck between strengthening and enhancing the character and facilitating growth, proposals should:

- a) Ensure building lines and frontages positively reference and respond to the form of the Thornton Heath Pond junction;
- b) Incorporate red multi-stock brick as the predominant facing material;
- c) Retain the extent and enhance the quality of the existing public realm;
- d) Complement the existing predominant building heights of 3 storeys up to a maximum of 6 storeys; and

e) Ensure transitions between buildings of different sizes create sense of continuity at the street level.

**DM48.3** Within Thornton Heath allocate sites for development as set out in Table 11.16.

**DM48.4** An area of focused Intensification (AFIX) has been designated on London Road transport corridor, large comprising the same boundary of Thornton Heath Pond Local Centre. Proposals for high density schemes will be supported within this, comprising of mixed use residential and retail/other town centre uses (on ground floor) development, renewal will be supported within the town centre boundary. High density residential development will be supported in areas outside of the Town Centre. The boundaries of these are shown on the map below.

### How the policy works

**11.257** The areas in which these Policies DM48.1 and DM48.2 apply are shown on the Policies Map.

#### Thornton Heath District Centre and environs

**11.258** The character of Thornton High Street is defined by elements such as ~~red multi-stock brick with white detailing around windows~~, a consistent scale of three storey buildings with active frontages and strong tree lines and the local landmark clock tower.

**11.259** The character around the railway station is less consistent changing from smaller scale buildings (up to three storeys) with narrow footways to tall and large buildings (up to nine storeys) with wider footways. The building lines within this area step back and forward resulting in inconsistent street frontages.

**11.260** There are opportunities for growth within this area. To facilitate growth, manage spatial quality and enhance and strengthen the character of the District Centre a Place-specific development management policy is required.

#### Thornton Pond Local Centre and environs

**11.261** The edge of the Thornton Pond Local Centre is beginning to lose its separate identity and sense of place. This could result in the Local Centre being absorbed into the homogenous urban form of the London Road. ~~The Thornton Heath Pond has been covered over since the 1970's, but it should be celebrated as the heart of the area. This could be achieved by introducing a water feature and mitigating the negative impacts of traffic, helping to deliver outdoor community facilities for residents.~~

**11.262** Densities in areas around of Thornton Pond Local Centre are beginning to increase. A cohesive approach needs to be taken to ensure that edge of the Local Centre remains well defined and that the Local Centre has a distinct sense of place.

#### Allocating land for development

**11.263** Table 11.16 below sets out the proposed use on specific sites in Thornton Heath. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

Table 11.16 Proposals for uses of land of specific sites in Thornton Heath

Ref no	Site name	Proposed use
115	Cheriton House, 20 Chipstead Avenue	Residential redevelopment
129	843 London Road	Primary school
136.	Supermarket, car park, 54 Brigstock Road	Mixed use of residential, retail along Brigstock Road, and employment use
149	Tesco, 4-32 Brigstock Road, Thornton Heath	
248.	18-28 Thornton Road	Residential development
286	35-47 Osborne Road	Residential development
295	2 Zion Place	Residential development
326.	Ambassador House, 3-17 Brigstock Road	Mixed use conversion comprising residential, retail and community facilities
400	Day Lewis House, 324-338 Bensham Lane	Residential redevelopment
407	797 London Road	Conversion or redevelopment to residential use
468.	Grass area adjacent to, 55 Pawsons Road	Residential development
499	Croydon University Hospital Site, London Road	Consolidation of the hospital uses on a smaller area of the site with enabling residential development on remaining part subject to there being no loss of services provided by the hospital in terms of both quantity and quality
103.	585-603 London Road	Mixed use development for residential and hotel (up to existing floor space).

Ref no	Site name	Proposed use
105.	Strand House, Zion Road	Residential development

## Waddon

### Vision, opportunities, constraints and change up to 2036

**14.268A** Waddon is situated to the west of Croydon Metropolitan Centre and borders neighbouring London Borough of Sutton. It has a fragmented and inconsistent character, consisting of big box retailers and industrial premises along the Purley Way, residential areas such as the Waddon Estate and the large green open spaces of Duppas Hill, Wandle Park, Purley Way Playing Field, Roundshaw and the former international airport, WWI RFC and WWII RAF airfield.

**14.268B** Located on east edge of Waddon towards Central Croydon, The Waldrons Conservation Area, one of Croydon's first Conservation Areas, contains fine Victorian houses around the Waldons and a number of large high quality buildings on Bramley Hill and Bramley Close.

**14.268C** Waddon is relatively deficient in local facilities, with most being within the Purley Way Transformation Area. This includes the shops on Central Parade at the Fiveways junction. The large retail outlets along Purley Way serve a wide area, which leads to congestion on the main roads at and outside of peak times. There are two tram stops and a railway station in Waddon (all of which lie within the Purley Way Transformation Area) linking residents to the Metropolitan Centre and beyond.

### Vision

**11.264** Waddon will comprise both a growing residential community and a principle industrial location. In addition to Waddon Road/Abbey Road Neighbourhood Centre new Local Centres at Waddon Marsh and Fiveways and a new

Neighbourhood Centre at Waddon Way; will be supporting the existing and future community with services and facilities beyond a retail function. It will, therefore, remain central to the borough's economic prosperity including continuing employment, inward investment, training and innovation. Waddon will share in the borough's improving prosperity and retain its high levels of accessibility, both for the residents and industrial and commercial traffic. Simultaneously the area will benefit from improved community provision for walking and cycling routes with an expanded Green Grid network connecting the Wandle Valley Regional Park with Croydon Metropolitan Centre. The Transforming the Purley Way chapter outlines how the retail areas along Purley Way, A23, will evolve into ~~a series of interconnected mixed-use developments well-integrated~~ sustainable mixed-use neighbourhoods, the nature of which will be determined by a masterplan and delivery strategy.

### Homes

**11.265** As set out in the transforming the Purley Way Area chapter ~~an area of major new high quality residential development based on available land~~ will be concentrated around two new Local Centres at Waddon Marsh and Fiveways and a new Neighbourhood Centre at Waddon Way, as part of new mixed-use neighbourhoods along the Purley Way. ~~on Purley Way, and a possible Local Centre at Five Ways. Residential development will respect the existing residential character and local distinctiveness.~~ Further an Area of Moderate Intensification has been designated to the south of Waddon, This is currently a low density residential area, which is considered to have good access to Waddon and South Croydon Railway Stations, as well as local services within Brighton Road (Selsdon Road) Local Centre and the future new



Five ways Local Centre. Due to this, it is considered a sustainable location for moderate renewal, intensification via new residential development that results in a reasonable increase in the density of the area. Residential development will need to be well designed, respect, reflect, evolve the existing residential character and local distinctiveness Residential development will respect and evolve the existing residential character and local distinctiveness.

#### Employment, Skills and Community Facilities

**11.266** Purley Way, a Strategic Industrial Location, and the industrial heartland of the borough, will remain an important centre of employment activity. The borough will continue to invest in community facilities and education and training facilities, ~~within the new Local Centres and Neighbourhood Centre such as the Waylands Leisure Centre,~~ to meet the needs of the existing and new population.

#### Character, Heritage and Design

**11.267** New development will respect the existing local character and distinctiveness of Waddon referring to the Borough Character Appraisal to inform design quality. Opportunities for public realm improvements will focus on Five Ways, where a possible Local Centre could be located. Waddon's heritage assets, including Croydon Airport House and the classic view of Croydon from the Purley Way playing fields, will be protected. The Local Historic parks in the area will be retained with new links provided where possible to incorporate them into the Green Grid network.

#### Environment and Climate Change

**11.268** The River Wandle will continue to be de-culverted where possible to create a more natural environment whilst encouraging biodiversity. Development that does take place in the

flood zones will be guided by the policies of the Plan to reduce flood risk.

#### Green Grid and Open Space

**11.269** Improved connections to the Croydon Metropolitan Centre and Wandle Valley Regional Park via Wandle Park and Waddon Ponds will be sought, improving and expanding the Green Grid to promote strategic east/west and north/south links.

#### Transport

Opportunities to improve the functioning of the A23 and junction improvements at Five Ways will be taken. To encourage walking and cycling, high quality connections within an attractive environment will be sought to reduce the severance effect of the Purley Way road, railway and tram lines. ~~There is a particular need to improve walking and cycling connections between Purley Way and Croydon Metropolitan Centre and reduce the severance caused by road flyover infrastructure such as Roman Way and Old Town roundabout.~~ Waddon will benefit from improved rail and tram services with investment in tram stock and more frequent services ~~once infrastructure improvements to overcome bottlenecks such as Wandle Flyover and the Brighton Mainline upgrade works have been delivered. As the attraction of the Croydon Metropolitan Centre increases, the quality, capacity and reliability of bus services connecting to it will be improved. Travel plans will look to ease congestion at peak times by encouraging walking, cycling or public transport especially for school journeys.~~ Waddon will also benefit from new and improved bus services to Croydon Metropolitan Town Centre, Purley, and Kenley and further afield supported by dedicated bus priority facilities on Purley Way. Demand management tools and behaviour change measures including new parking controls will aim to ease traffic congestion by encouraging walking, cycling or use of public transport especially for school and work journeys.

**14.275A** The industrial and commercial areas of Waddon are becoming an increasingly popular base for freight distribution, warehouses and delivery centres. Whilst there may be benefits in terms of new employment, there are potentially very significant cumulative impacts on the local road networks.

**14.275B** The council will work with Transport for London to explore the feasibility of a tram extension to this area (and related facilities) to improve the reach and capacity of the tram network to support good growth.

**14.275C** The Transforming the Purley Way chapter sets out the priorities for creating safe and attractive green links across the Purley Way area along with, upgrades to transport infrastructure required to support new development.

Figure 11.17 Waddon **graphic updated**

**General character**

**11.270** Waddon has a fragmented character which consists of Retail Estates and Business and Leisure Parks and Industrial Estates along Purley Way, Local Authority Built Housing with Public Realm' on the Waddon Estate, the large green open spaces of Duppas Hill, Wandle Park, Purley Way Playing Field, Roundshaw and the former international airport, WWI RFC and WWII RAF airfield. The local character is most consistent within

the centre and becomes more inconsistent towards the northern and eastern edges of Waddon. Paragraph deleted

**11.271** Located on east edge of Waddon, The Waldrons Conservation Area, one of Croydon's first Conservation Areas, has a residential character of 'Large Houses On Relatively Small Plots'. The central focus of the area are the fine Victorian houses around the Waldons and a number of large high quality buildings on Bramley Hill and Bramley Close. Paragraph deleted

**Policy DM49: Waddon**

**DM49.1** To enable development opportunities including public realm improvements to be undertaken in a cohesive and coordinated manner, a masterplan with elements of design code will be considered for the area within Waddon's potential new Local Centre. An Area of moderate intensification has been designated to the south of Waddon. The sustainable moderate, intensification and renewal of areas within this via proposals for new residential development will be supported that results in a reasonable increase in the density. Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of these are shown on the map below.

**DM49.2** Within Waddon allocate sites for development as set out in Table 11.17.

**How the policy works**

Waddon's potential new Local Centre

**11.272** The area in which DM49.1 applies is shown on the Policies Map.

**11.273** The proposed new Local Centre and environs has a mix of conflicting uses. This has resulted in insensitive transitions between character areas. Additionally the area lacks a sense of place and does not function as a destination for residents, despite being well served by public transport, therefore a Place-specific development management policy is required.

**11.274** Waddon's potential to accommodate significant growth may lead to the designation of a new Local Centre. This opportunity provides additional impetus to ensure a balance is struck between retaining Waddon's sense of place while strengthening and enhancing the positive elements of Waddon's character. Additionally there is a need to create opportunities to reduce the dominant effect of the Purley Way and Fiveways road infrastructure and use the full potential of Waddon station as a catalyst for growth.

**11.275** Due to the complexity of these issues and the number of development opportunities in Waddon's potential Local Centre, a detailed masterplan would help coordinate

development within this area is undertaken in a coordinated and cohesive way while retaining Waddon's sense of place.

Allocating land for development

**11.276** Table 11.17 below sets out the proposed use on specific sites in Waddon. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7.

**Table 11.17 Proposals for uses of land of specific sites in Waddon**

Ref no	Site name	Proposed use
44	<del>Croydon Garden Centre, 89 Waddon Way</del>	<del>Residential development</del>
16	Heath Clark, Stafford Road	Secondary School and residential development subject to access from Stafford Road
25	<del>Morrisons Supermarket, 500 Purley Way</del>	<del>Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community. It is recommended that basements are not considered at this site. Further ground investigations would be required at this site to confirm the the likelihood of groundwater occurrence.</del>
48	<del>294-330 Purley Way</del>	<del>Mixed use development comprising retail store, commercial space and residential units</del>

Ref no	Site name	Proposed use
304	<del>Sea Cadet Training Centre, 34 The Waldrons</del>	<del>Residential use</del>
316	<del>PG World, 2 Trojan Way</del>	<del>Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community</del>
332	<del>Superstores, Drury Crescent</del>	<del>Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community</del>
349	<del>Harveys Furnishing Group Ltd, 230-250 Purley Way</del>	<del>Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community. As the site is partly within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment.</del>
350	<del>Wing Yip, 544 Purley Way</del>	<del>Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community</del>

Ref no	Site name	Proposed use
354	Furniture Village, 222 Purley Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by NHS) and community uses to form the basis of a new residential community
355	Decathlon, 2 Trafalgar Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community
430	Grafton Quarter, Grafton Road	Creative and Cultural Industries Enterprise Centre and residential development
946	Stubbs Mead depot, Factory Lane	Mixed residential and employment (industry and warehousing)

## 12. The Brighton Main Line and East Croydon Transformation Corridor

### Transforming East Croydon Station and corridor through the Brighton Main Line Upgrade Programme

#### Where we are now

- Prior to the COVID-19 Pandemic more than 300,000 passengers and 1,700 trains pass through the Croydon area each weekday, making it the busiest part of the country's rail network.
- The complex railway through the area means the Croydon bottleneck is widely considered to be one of the most operationally challenging railway junctions in the UK, regularly causing delays on the Brighton Main Line, its branches and the wider network.
- Until the outbreak of COVID-19 passenger numbers at stations in Croydon had been rising, from 42.4m in 2010/11 to 52.9m in 2018/19<sup>113</sup>.

- Overall there are now twice as many journeys made to or from stations in Croydon compared to 2000-2001.
- East Croydon station is the 17<sup>th</sup> busiest station in the UK in terms of passenger numbers.
- Govia Thameslink (and its predecessors), the principal operator of passenger trains through East and West Croydon stations saw a 41% increase in passenger numbers from April 2011 to December 2019<sup>114</sup>.
- The London Plan 2021 states the importance of the Brighton Main Line by referencing the project in the title of Croydon's Opportunity Area and identified in the Plan as a Strategic Infrastructure Priority.

#### Vision - Croydon Area Remodelling Scheme (CARS)

The step-change transport improvements that could be brought about through the Croydon Area Remodelling Scheme (CARS) as part of the Brighton Main Line Upgrade Programme, should it be funded, could be a once in a generation opportunity for Croydon, London and the wider South East. They would establish the East Croydon station area as a destination and transport hub of regional connectivity, and a civic place of exemplar design quality and sustainability, one that can service a diverse and growing population (residents, visitors and workers) for generations to come. This would be facilitated by significant and sensitive infrastructure delivery at Selhurst Triangle to address rail operations constraints and enable metroisation of the borough's suburban rail network.

The transformation brought about by the Croydon Area Remodelling Scheme would bring significant opportunities for Croydon's residents, its existing and future communities, businesses, visitors, developers and investors. This would be achieved through co-ordinated development planning, attracting substantial inward investment, a high quality and inclusive station, Station Square and wider public realm, which enhances East Croydon's heritage and character, an integrated and intuitive transport interchange and significant new green infrastructure to enhance the borough's Green Grid. It would encompass substantial enhancement in the rail infrastructure and surrounding environment at East

<sup>113</sup> Office of Rail and Road estimates of station usage

<sup>114</sup> Office of Rail and Road passenger journeys by operator

Croydon, Selhurst Triangle and Windmill Bridge. It would strengthen, celebrate and enhance Croydon's unique heritage – physical, social and cultural, whilst improving the amenity of the town centre and wider catchment. It would significantly improve one of London's key stations through a high quality and intuitive transport interchange at East Croydon and investment in an exemplary public realm will deliver a more attractive, destination experience that connects into the wider Opportunity Area and complement the core functions of these locations. The Croydon Area Remodelling Scheme would be an exemplar of sustainability, enhance and promote health and wellbeing for passengers, residents and visitors and integrate and encourage active travel.

The further development of CARS has been affected by issues such as the significant uncertainty about future passenger behaviour and demand following the COVID-19 pandemic and funding constraints following the Government's 2020 spending review.

Given the significant investment required to deliver this scheme, Network Rail will now need to take the time to consider how the pandemic may affect passenger behaviour and travel patterns in the future, and how any such changes should be reflected in infrastructure investments such as this.

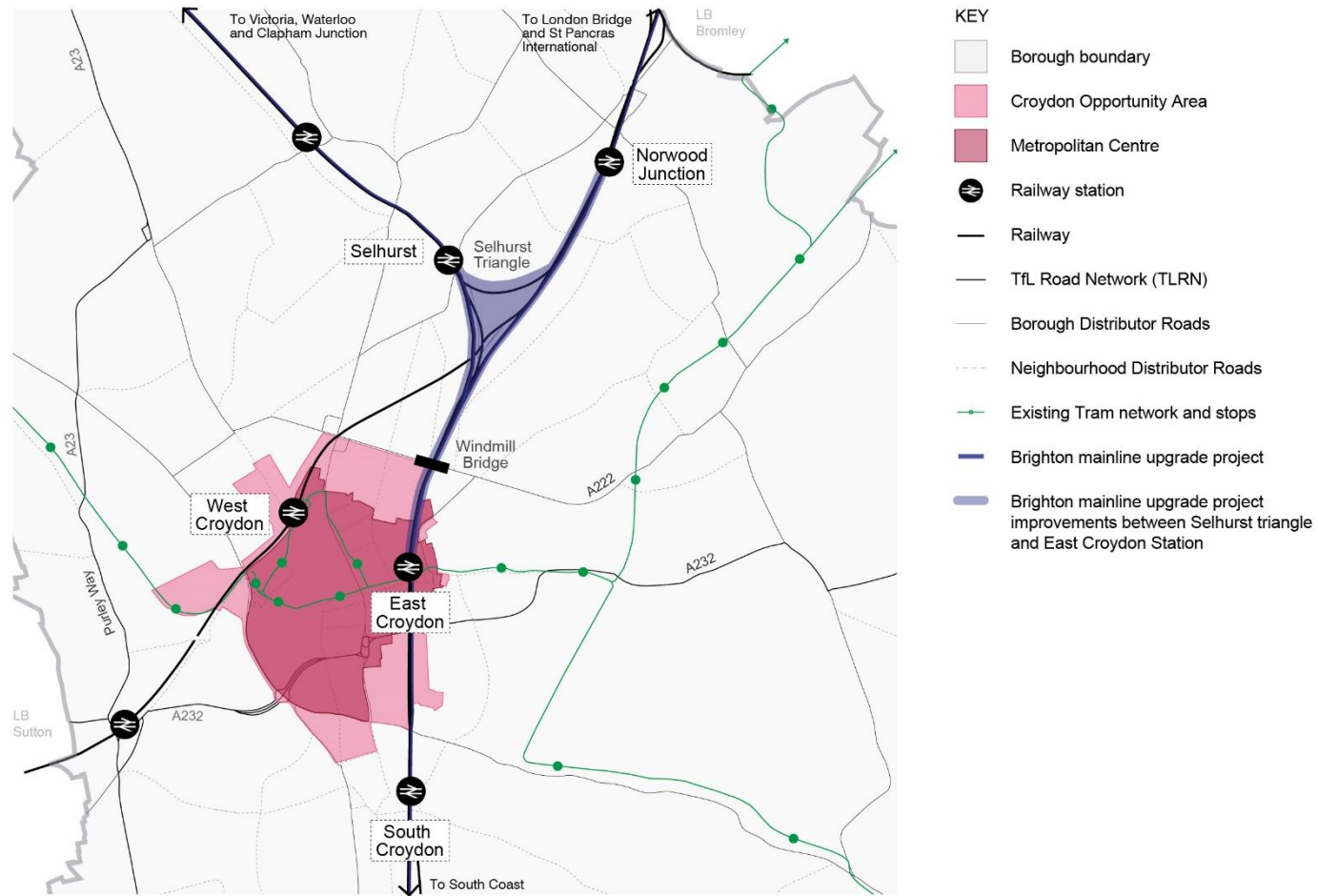
At this time, it is not known when CARS may proceed. However, it is appropriate to set the planning framework for the Brighton Main Line and East Corridor Transformation Corridor to provide development plan clarity given the uncertainties outlined.

Network Rail recognises the significant positive changes that CARS could bring to a heavily used and constrained route and will continue to develop the case for CARS in a way that responds to the wider uncertainties. This will help build a stronger business case and ultimately improve the chances of securing a positive decision and move the project to the next stage of the Government's investment pipeline.

The following detailed sections of this chapter are reflective of Network Rail's existing scheme designs and seek to support delivery of CARS. However, given the current uncertainty over the final scheme and the constrained funding environment, in the future the chapter may need to be, as appropriate, applied to a future scheme. It could be supplementary guidance might be required to respond to a future scheme.



Figure 1 - East Croydon Transformation Corridor (Indicative Figure)



Where we want to be

**Strategic Objective 1:** Establish Croydon as the premier business location in South London and the Gatwick Diamond.

**Strategic Objective 2:** Foster an environment where both existing, and new, innovative, cultural and creative enterprises can prosper.

**Strategic Objective 4:** Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

**Strategic Objective 7:** Conserve, enhance and create spaces and buildings that foster safe, healthy and cohesive communities.

**Strategic Objective 8:** Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

### Why this area will be transformed

**12.2** The opportunity to create a vibrant and exemplary front door to the town centre will bring significant opportunities for Croydon's existing and future communities, businesses, visitors, developers and investors. It represents the key physical piece of infrastructure which will bring people to the business heart of the borough including the transformed destination of the North End Quarter.

**12.3** Prior to the Covid-19 pandemic more than 300,000 passengers and 1,700 trains typically pass through the Croydon area each weekday, making it the busiest part of the country's rail network. The complexity of the track layouts and railway junctions directly to the north of East Croydon Station mean that Network Rail consider it to be one of the most operationally challenging railway junctions in the UK.

**12.4** East Croydon station and the immediate surrounding area has been a focus for development since the East Croydon Masterplan of 2011, the principles and objectives of which remain valid. This has seen notable developments reach consent, commencement and completion adjacent to East Croydon Station. The allocations and policies of this plan for the sites adjacent to the Brighton Main Line will continue to facilitate these growth and development opportunities. The area also remains Croydon's core office location and the office retention area remains part of the development plan. East Croydon, for many, is the gateway for those that live, work and visit the borough.

**12.5** Alongside the rail infrastructure CARS presents an opportunity to strengthen biodiversity along the corridor, particularly through the new public realm and a station square, enhancing the Croydon Green Grid.

**12.6** The final form of the station square, particularly whether the station square includes a void or not, should be determined prior to submission of the Transport and Works Act Order application after a joint Council / Network Rail assessment of the options. A robust assessment process means that reasonable options have been considered using agreed evaluation criteria to select the preferred option. The policies of this plan relating to the station square and public realm are to be applied to the station square whether a void exists or not.

#### What is the Croydon Area Remodelling Scheme?

**12.7** The Croydon Area Remodelling Scheme (CARS) encompasses the range of interventions that are being taken forward by Network Rail, sponsored by the Department for Transport, to address the current issues in this area. CARS forms part of Network Rail's extensive Brighton Main Line Upgrade Programme providing significant capacity and reliability improvements to this important railway corridor.

**12.8** The benefits of CARS go beyond technical improvements to the tracks, stations and operational arrangements. From the passenger experience and for the people of Croydon this promises to be an exciting and refreshing improvement to a busy place which many residents pass through regularly. It is also a major gateway to the borough and is many people's first experience of Croydon as a place. Once CARS is completed anyone travelling to, through or from East Croydon station will have a better experience through technical improvements that make their journey more reliable and physical improvements to the station's architecture, facilities and surroundings.

**12.9** The full transformation of East Croydon station, including relocating the main station building approximately 150m to the north

of its current location, an increase in the number of platforms from 6 to 8, and the creation of a new station square are integral components of CARS.

**12.10** Network Rail will seek approval for the CARS main interventions through the Transport and Works Act Order process. This includes approval for the infrastructure, deemed planning permission for the elements requiring planning consent and land acquisition powers for the physical and construction land requirement. As a consequence, this chapter of the Local Plan will be the council's development plan position to the Transport and Works Act Order process, particularly any Public Inquiry. At the Public Inquiry the Local Plan will be material to the consideration and determination of Network Rail's proposals. Network Rail will also be engaging their permitted development rights to support delivery of CARS.

**How we are going to get there**

Transforming East Croydon Station and corridor through the Brighton Main Line Upgrade Programme

**BML SP1** The Brighton Main Line and East Croydon Transformation Corridor will provide a high quality station and transport interchange enabling the increased use of public transport to, from and through East Croydon station, and via Windmill Junction and the Selhurst Triangle. To ensure this development proposals in the Brighton Main Line and East Croydon Transformation Corridor area will be expected to:

- a) Enable the delivery of the Brighton Main Line Upgrade Project;
- b) Provide for efficient and effective transport interchange which facilitates transfers between different modes of transport;
- c) Include innovative measures to improve passenger transfer and integrate digital and smart city infrastructure;
- d) Enable the ongoing effectiveness of the existing transport network during the Brighton Main Line Upgrade delivery;
- e) Outside of the remit of the TWAO, but within the Brighton Main Line and East Croydon Transformation Corridor area, deliver a mix of uses, which contribute to the development of the borough as a significant commercial centre alongside associated services and facilities and residential development.

**BML SP2** to deliver an effective transport hub integrating all modes of transport the redevelopment must:

- a) Provide for an effective accessible, inclusive and legible network integrating all modes of transport focussed on East Croydon Station;
- b) Establish new or integrated connections to the wider transport network through the borough and to the south east; and
- c) Connect and enhance the accessibility of to the Croydon Metropolitan centre including the retail core.

**BML SP3** Enhancements to public transport facilities should incorporate:

- a) Significant improvements to East Croydon Station for rail and tram passengers;
- b) Improvements to the bus infrastructure and network to enable full integration with the new station location;
- c) Taxi and private hire provision that meets the needs of station users.

**BML SP4** To deliver a high quality transport interchange in the new location, development will be required to manage the impacts of increased passenger numbers, the change in geographical location of the station and support growth and development in the Brighton Main Line and East Croydon Transformation Corridor area by:

- a) Providing for the effective onward distribution of passengers in an integrated format to all modes of transport;
- b) Providing new east-west connections across the station;
- c) Providing new, direct connections to the station from the east and west, together with direct, legible connections via George Street to the south.
- d) Providing a new public station square adjacent to George Street and the relocated station entrances.

**BML SP5** Key measures to manage the impact of the new station and support growth and development in the area will include measures to promote walking and cycling, including new routes and facilities, enhanced signage and significant public realm improvements, in order to reduce pressure on the public transport network.

**BML SP6** To reduce the impact of construction works associated with CARS and make provision for sustainable freight routes, phasing and modes, which minimise the impact of freight and construction traffic.

**BML SP7** Redevelopment in the Brighton Main Line and East Croydon Transformation Corridor Area will be phased to support its transformation to ensure that:

- a) The effective and efficient health and viability of local businesses is protected so that the local economy of Croydon continues alongside the transformation; and
- b) The phasing of development ensures that the strategic transport network is effective and operates in support of local business, Croydon's function as a strategic outer London centre

The allocations that fall directly under consideration of East Croydon Chapter are as follows:

Local Plan Allocation No.	Local Plan Allocation Address
138	Land adjacent to East Croydon Station and land at Cherry Orchard Road, Cherry Orchard Gardens
172	North site, Ruskin Square
175	Stephenson House, Cherry Orchard Road and Knolly House, Addiscombe Road
50	44-60 Cherry Orchard Road
200	Multi-storey car park, Lansdowne Road
199	20 - 22 Lansdowne Road
45	East Croydon Station
37	45 Lansdowne Road
21	Former Royal Mail site, 1-5 Addiscombe Road

What indicatively it could look like

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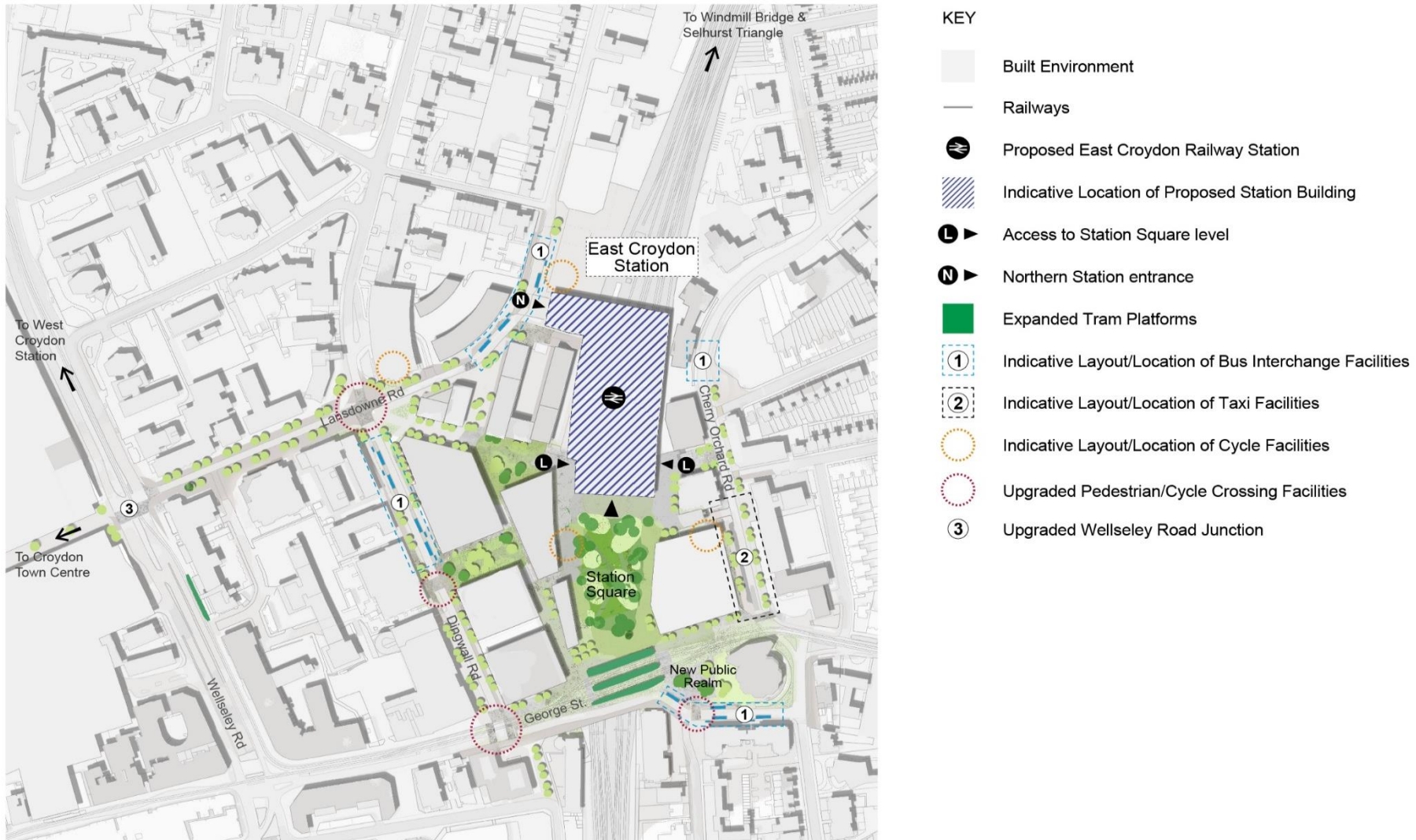


Figure 2 Indicative London Borough of Croydon Strategic Regeneration Framework (2020) East Croydon station and the new station square



## Why we have taken this approach

**12.11** The station building, station square, rail systems, highways, bridges and construction planning associated with CARS will form part of a Transport and Works Act Order (TWAO) application to secure the parliamentary powers required for the scheme's development.

**12.12** It will encompass substantial enhancement in the rail infrastructure and surrounding environment at East Croydon, Selhurst Triangle, Windmill Bridge and all other works within the TWAO boundary. CARS will build on strengthen, celebrate and enhance Croydon's unique heritage – physical, social and cultural, whilst improving the amenity of the town centre and wider catchment. It will significantly improve one of London's key stations through a high quality and user centred transport interchange at East Croydon and investment in a high-quality public realm will deliver a more attractive, destination experience that connects into the wider Opportunity Area and complement the core functions of these locations. The CARS scheme will meet the highest possible standards of holistic sustainability and seek to enhance Croydon's Green Grid, walking a cycling connections and biodiversity.

**12.13** Given the considerable change CARS brings to Croydon it is critical the council has a development plan framework for the project. This is to guide and influence the development management and Transport and Works Act Order process. Should the Brighton Main Line Upgrade Programme be delayed, the policies and allocations will still be engaged to determine proposals in the Brighton Main Line and East Croydon Transformation Corridor area, unless directly related to the CARS end state, such as the Station Building and Station Square.

**12.14** Notwithstanding the anticipated change, the project also presents significant growth and development opportunities for the London Borough of Croydon (LBC), which the Local Plan is looking to capture through the vision, policies and allocations of the Local Plan.

**12.15** The ambition is to create a high quality station and transport interchange at East Croydon, which responds to its new geographical context, general development in the area and passenger growth. To achieve this the new station will be expected to be a high quality civic hub and transport interchange and have a spacious and inclusive design.

**12.16** Central to the urban design objectives for a relocated East Croydon Station is the opportunity to realise a high quality transport interchange, enabling easy, intuitive and efficient transfer between modes of transport integrated within the local context and routes.

**12.17** The character of the east Croydon area will evolve in the coming years. A busier town centre with more residents, people coming to Croydon for work and leisure, a future station and adjoining public realm will need to serve a multitude of new residents and continue to improve perceptions. The station re-location presents the opportunity to create a user centred transport environment that celebrates and enhances Croydon's diverse heritage, character and communities, integrates public facilities, social infrastructure and activities. To do so, the streets and spaces connecting the station to its surrounding environment will need to enable an uplift in the levels of walking and cycling and provide the opportunity for seamless interchange with other modes of transport. Significant opportunity exists to set this interchange function within an exemplary station environment, with an exceptional public realm integrated with its surrounding street and open space network.

**12.18** An overarching urban design ambition for East Croydon is to deliver an environment where pedestrians do not feel secondary or negatively impacted by their environment. This means re-prioritising space for people within the urban realm and ensuring that this space is attractive, safe and welcoming. This also means that facilitating sustainable modes of transport should be prioritised over private transport, with through-traffic on the streets around the station removed and rat-running deterred. Additionally, it means that where buildings and new developments meet the public realm, care should be taken to improve the experience of being in the street.

**12.19** A successful Brighton Main Line Upgrade Programme and development around the new East Croydon Station and station square will be of exemplary quality, well integrated in placemaking terms with the surrounding streets and contribute to sustainable transport and a transport interchange. To guide the project and development a Strategic Regeneration Framework has been prepared. The Framework expresses how the new East Croydon Station and associated public realm can best integrate and link with the wider Croydon Opportunity Area and Addiscombe through the street network.

**12.20** An upgraded pedestrian environment around the station will include require the creation of a legible street network, wider footways, together with safe and conveniently located crossing facilities and new direct east-west walking and cycling routes across the rail corridor. New pedestrian and cycle routes should be facilitated by new development in the streets around the station.

**12.21** As part of the Station Square proposals and the reconfiguration of bus stopping arrangements around the station,

there is an opportunity to create a high quality Tram Station interchange at East Croydon.

**12.22** To enable increased capacity within the wider Tram network, in order to meet the service level increases set out in the Mayor's Transport Strategy, an additional platform has been proposed at East Croydon Station. The removal of the existing Train Station building fronting George Street enables a fourth Tram platform to be located adjacent to existing platforms. This proposal will require further technical feasibility studies to ensure the bridge structure can support an additional platform and Trams. However, it is expected the TWAO submission will provide provision for this additional platform opportunity.

**12.23** The provision of bus facilities, including a relocation of services to fully integrate the bus network with the new station, new bus stops, high quality passenger waiting facilities, along with standing and turning space for terminating services, will be required in order to meet increased future passenger demand and operational requirements. The design of the bus facilities needs careful consideration, in order to ensure that passengers benefit from safe, welcoming and direct interchange between modes, they enhance the public realm environment, and contribute positively to the image and attractiveness of East Croydon.

**12.24** Options for bus stopping and standing will be subject to further testing through RailPlan with Transport for London ahead of the TWAO submission to determine the end state bus stopping and standing arrangements within the Croydon Area Remodelling Scheme area.

**12.25** The new provision for buses should meet the requirements of bus passengers whilst also providing a permeable, safe and

attractive environment for pedestrians and cyclists. The new bus network arrangements will be designed to be of similar scale to the surrounding street network, and to feel like a part of an attractive London streetscape.

**12.26** Taxis play an important role at the station, being the first or final component of many journeys via East Croydon station. It is, therefore, important to make provision of taxis. At the same time taxis can have an impact on neighbouring areas through queuing and the often impenetrable public realm around taxi ranks. To mitigate these issues whilst still meeting the needs of users of East Croydon station consideration will be given to promoting alternative modes such as walking and cycling. Provision will ensure that ranking and pick up/drop off areas are carefully managed, making the most efficient use of space, enhancing the public realm and paying due regard to access arrangement for those within mobility issues. Opportunities will be explored for a larger feeder rank that could be located outside of the immediate station area, with use of apps / cameras to indicate available space at the pick-up location.

**12.27** These proposals are subject to TWAO approval and scheme funding being secured from the Department of Transport. A key component of the TWAO application stage will be the full consideration by the Department for Transport of the Outline Business Case for the scheme.

**12.28** The transformation provides a huge opportunity, but will cause significant disruption to existing residents, businesses and development proposals. This is needed to cement the borough's position as an outer London strategic economic location to the benefit of Croydon, London and wider south east. Disruption caused by the transformation includes:

- a) Network Rail taking control of land that is not currently railway land in order to carry out the works – some land will need to be taken over permanently and other areas can be returned to non-rail use when the project is completed;
- b) Delaying the development of some existing Local Plan allocations, which will need to be implemented later than originally planned in order to allow the upgrade works to take place; and
- c) The loss of some commercial and industrial area

**12.29** Network Rail will be acquiring land to facilitate the physical delivery and construction of CARS. Post construction, the land that was required for construction will become available for development. Any proposals will be assessed on their merits against the development plan policies and development need in place at the time of pre application engagement and planning application determination. However, if the land to be acquired and made available post construction is currently either a Tier 1, 2 or 3 employment site, as defined in Policy SP3.2 Employment, this will be the land use designation at the point the land becomes available post CARS construction.

## Key Supporting Documents

- East Croydon Strategic Regeneration Framework (2020)
- Croydon Opportunity Area Planning Framework (2013)
- East Croydon Masterplan (2011)
- Public Realm Design Guide (2019)

## Detailed policies

### BML DM1 Station building and Square

**BML DM1.1** The Station and Station Square will serve as a key gateway to the town centre for the millions of travellers using the rail, bus, tram and taxi that pass through. To enable this both the new station building and the square should:

- Integrate built in digital infrastructure in the design and as a means to enable passengers of all mobility capabilities to efficiently move around the different transport modes;
- Provide enhanced provision for cyclists and pedestrians in order to support an increase in the mode share of cycling and walking to and from East Croydon Station;
- Meet an Urban Greening Factor threshold of 0.3;
- Use the opportunity to create increased green infrastructure that is lacking in the area;
- Integrate significant biodiversity measures to achieve Biodiversity Net Gain; and
- Land uses proposals that are outside of the remit of the TWAO, but within the Station and Station Square area, should be commensurate to the function of the station and complement the core function of other areas within the Croydon Opportunity Area.

**BML DM1.2** Development proposals for the new station building should:

- Be high quality place specific, with a strong identity fitting of being the borough's gateway and reflective of Croydon's unique heritage, local character and diverse communities and users;

- b) Frame views towards and enhance the setting of the NLA Tower as well as compliment other unique architectural assets in the area, existing and emerging;
- c) Respond to new geographical location by respecting sensitive boundaries with adjacent developments and respond to the emerging scale of the surrounding developments;
- d) Be clearly identifiable through its architectural forms, materials and details. In particular, all entrances should be clearly articulated and visible through their placement and design;
- e) Have a clear physical connection to George Street and its approaches to aide wayfinding and interchange with trams and buses;
- f) Be visually and physically permeable;
- g) Sensitively integrate security measures into the design of the station and associated public realm; and,
- h) Ensure arrangements for delivery & servicing are accommodated in off-street locations or away from the key streets and movement corridors where with minimal disruption to public realm.

**BML DM1.3** As a consequence of the station building shifting north there is the opportunity to create a high quality public space between the new station site and George Street, acting as a catalyst and point of orientation for wider regeneration and development for the benefit of residents and visitors. A new Station Square and associated public realm should:

- a) Establish a new vibrant space and focal point for the east Croydon area enhancing its sense of place and identity;
- b) Frame and enhance the setting of the NLA Tower;
- c) Accommodate the demands of a diverse communities and users through being a welcoming, safe, accessible and inclusive environment for all including provision for the needs of young people, older residents and visitors and those with mobility challenges;
- d) Given the size and significance to Croydon should include integrated public art;
- e) Be integrated with the station building itself;
- f) Integrate active frontages facing onto the square from adjacent developments.

- g) Provide a programme of a variety of activation throughout the week which complement the daytime and evening economy uses within Croydon Town Centre.
- h) Create a micro-climate environment that allows for short and long stays.
- i) Outside of the remit of the TWAO, but with the Station and Station Square area, include a provision of non-rail ancillary land uses that are commensurate to the function of the station and complement the core function of other areas within the Croydon Opportunity Area.

**BML DM1.4** A significant enhancement within the streets, public realm network and frontages around the new East Croydon station is vitally important to ensure the station integrates with the wider Opportunity Area and will greatly improve the quality of experience for all users, particularly pedestrians. These improvements should:

- a) Integrate significant green infrastructure increases;
- b) Widen footways at locations of high footfall to accommodate expected increase in footfall;
- c) Locate crossing points intuitively along anticipated desire lines;
- d) Development should actively address the street and contribute to a high quality arrival experience;
- e) Enhance the setting of heritage assets and their role as wayfinding markers within the street network; and
- f) Streamline street furniture to make sure key views and routes are not obstructed.

### How the policy works

**12.30** The station re-location presents the opportunity to create a high quality transport interchange that is uniquely 'Croydon' in character and that creates strong connections to surrounding areas and local communities. To do so, the streets and spaces connecting the station to its surrounding environment will need to

encourage more people walking and cycling and provide the opportunity for seamless interchange with other modes of transport. Significant opportunity exists to set this interchange function within an exemplary station environment, with a high quality public realm integrated with its surrounding street and open space network.

**12.31** The Station and Station Square will serve as a key gateway to the town centre for the millions of travellers using the rail, bus, tram, taxi and bicycle services that pass through.

**12.32** The station site should provide enhanced provision for cyclists in order to support an increase in the mode share of cycling to and from East Croydon Station. Cycle parking will be expected to integrate well with the new cycle routes and desire lines around the station, to help encourage cycling as a convenient way to travel to and from the station. All cycle parking would be expected to include a multiple of services to support the cyclist, including cycle parking, bike repair facilities, electric charging points and cycling information.

**12.33** The station building will shift approximately 150 metres north along the rail tracks north and will be located north of George Street. It is necessary for way finding and to serve as a gateway to Croydon Town Centre for the building as seen from George Street and beyond to be able to have a clear physical presence.

**12.34** There will be a secondary entrance onto Lansdowne Road (north of Caithness Walk) which will unlock the development potential in this area. The creation of a new station in a different location will enable the existing station to continue to function and eventually to be decommissioned without disruption to services. It should be a high quality, sustainable and place specific destination, with a strong identity which is contextual and celebrates central Croydon's unique heritage, local character, and diversity.

**12.35** The Station and square will integrate with the surrounding public realm to create a civilised transport interchange uniting different forms of mobility and be focused on passengers through excellent connectivity and legible routes. The policies seek to

ensure that the square is a new vibrant space and focal point for the east Croydon area enhancing its sense of place and identity and which compliments local community facilities. Through careful design using innovative new integrated technologies the space will serve to help passengers move smoothly and efficiently between trains, busses, trams and other sustainable forms of transport.

**12.36** The station square would be created above the existing train lines on an elevated deck at the existing level of George Street and would be defined by the proposed East Croydon station to the north, proposed developments along Cherry Orchard Road, including a redeveloped Royal Mail site to the east, tram interchange and George street to the south and the existing HMRC building and Ruskin Square proposed developments to the west.

**12.37** The final form of the station square, particularly whether the station square includes a void or not, should be determined prior to submission of the Transport and Works Act Order application after a joint Council / Network Rail assessment of the options. A robust assessment process means that reasonable options have been considered using agreed evaluation criteria to select the preferred option. The policies of this plan relating to the station square and public realm are to be applied to the station square whether a void exists or not.

**12.38** Station Square will cohesively integrate with the wider network of public spaces and walking and cycling routes both existing and proposed across the Opportunity Area, both existing and proposed, that would begin to set a new development context for East Croydon, re-prioritising pedestrians and cyclists and providing a spatial anchor for this part of Croydon.

**12.39** In addition to being an area for passenger transport movements the square will act as a notable gateway to the metropolitan centre. It will provide an immediately recognisable signature view for passengers arriving in Croydon. However, recognising the large numbers of people living nearby it will need to function as a local meeting and recreation space. There should be generous green infrastructure as there is a lack of natural landscapes in the metropolitan centre. The square should meet the Urban Greening Factor threshold of 0.3.

**12.40** The character of the area and sense of identity can be created in the square through integrated public art. To be most effective this should be collaboratively designed delivered with the community.

**12.41** The station square should offer a rich variety of activity throughout the week providing amenity opportunities and social infrastructure for all diverse communities and users of the square. It is envisaged this will require activation strategies to be put in place, which address ongoing management and maintenance, varied programming, and interim use strategies to test.



## Policy BML DM 2 Other improvement Areas along the Brighton Main Line

### Selhurst Triangle

**BML DM 2.1** The Selhurst triangle rail improvements, whilst recognising that this is an engineering improvement, to ensure that impacts benefit and not to the detriment of neighbours must:

- a) Be led by a comprehensive design which through the layout, location and form of development addresses the impact on the surrounding community;
- b) The layout and landscaping should be used to complement and add biodiversity value to the Selhurst Triangle site of Nature Conservation Importance incorporating biodiversity corridors that the area to the wider Green Grid;

### Windmill Bridge

**BML DM 2.2** The Windmill Bridge will be fully rebuilt at Lower Addiscombe Road and St James's Road to accommodate the increase in railway tracks from 5 to 8. The new bridge must incorporate:

- a) Sufficient width to accommodate walking and cycling
- b) Significant urban greening around the abutments and their surrounds;
- c) A high-quality, sustainable design that responds to local character, enhances the setting of the immediate area and provides a useful wayfinding function;
- d) Improved north-south pedestrian and cycle connections beneath the Bridge on the west side of the railway line; and
- j) Improvements and uplift in quality of playground provision at Little Road playground.

**BML DM 2.3** Prior to works on Windmill Bridge taking place a construction methodology must be agreed that ensures:

- a) Walking and cycling connections across the railway line in this location are generally retained during the construction phase;
- b) Any road closures to traffic are minimised via the use of innovative construction methods;
- c) Minimises and mitigates any adverse impacts on Little Road playground.

Loss of surrounding industrial and commercial area.

**BML DM 2.4** Land acquired under the Brighton Main Line Upgrade TWAO for construction and is currently (2021) either a Tier 1, 2 or 3 employment land, as defined in Policy SP3.2 Employment, will be considered this land use designation for the purposes of assessing any planning applications post CARS construction.

**How the policy works**

**12.42** Beyond the improvements around East Croydon station there are other improvements which contribute to the improvement project. Some of these improvements are unseen engineering improvements that may be carried out as part of the permitted development enjoyed by the rail infrastructure providers. However, where the project leads to development covered by the local plan these policies seek to ensure that the project adds benefit to the residents and the environment.

The Selhurst Triangle

**12.43** The Selhurst Triangle is the heart of the rail infrastructure requirements of the Brighton Main Line project where the core causes of the Croydon Bottleneck will be addressed in rail operation and infrastructure terms. Network Rail's current proposals outline a complex arrangement of rail infrastructure including rail realignment, grade separation and a series of under passes and flyovers. The Council acknowledge the infrastructure importance of the Selhurst Triangle. However, there are measures that can mitigate any impact where they take place outside the railway.

**12.44** The policies seek to mitigate the impact of the infrastructure on surrounding properties, especially neighbouring residential areas, and is a key policy requirement.

**12.45** Given part of the Selhurst Triangle is a Site of Nature Conservation Importance, the approach to the landscape has to be holistic to work alongside the necessary physical infrastructure. The Brighton Main Line Project presents a unique opportunity to produce an innovative and unique landscape intervention that works with the proposed structures to produce a unique natural and man-made urban intervention. A high quality landscape solution will contribute to an enhanced first impression to rail users arriving or passing through Croydon.

Windmill Bridge

**12.46** The Windmill Bridge improvements should ensure that walking and cycling connections across the railway line in this location are retained when reasonable during the construction phase, and any road closures to traffic are minimised via the use of innovative construction methods.

Norwood Junction station

**12.47** Norwood Junction Station is proposed to be improved but fall outside the TWAO boundary. They would provide significant track and internal station improvements which should lead to improved capacity and a better experience for passengers including Installation of two new footbridges and step-free access to all platforms.

**12.48** These proposals for Norwood Junction currently fall outside of the TWAO process and are anticipated to require planning consent and/or delivery via permitted development rights conferred by Schedule 2 of the General Permitted Development Order. These proposals will be considered against wider development plan policy.



## 13. Transformation Area - The North End Quarter

### Introduction

The North End Quarter includes the land bound by Wellesley Road, George Street, Frith Street, Tamworth Road and Poplar Walk, and it includes North End running along its central spine and the largest retail centre in the borough (see fig 5.1. Site Plan).

It sits within the Croydon Opportunity Area and is surrounded by five town centre masterplan areas including the adjacent Old Town masterplan, West Croydon masterplan, Mid Croydon masterplan, Fairfield masterplan and East Croydon masterplan. Part of it also sits within the Central Croydon Conservation Area and has an array of listed and locally listed buildings.

### Transforming the North End Quarter

#### Where we are now

**13.1** The key issues that the borough faces in terms of the North End Quarter are as follows;

- Croydon Town Centre, and the North End Quarter in particular (see fig 5.1 site plan), has an ambitious development and vibrant retail history. It rose fast and successfully in a period of post war boom and 550,000m<sup>2</sup> of commercial floor space was built between 1963 and 1973. The Whitgift Centre opened in this period. It was originally based around a network of streets and public spaces, and became one of the most well-known attractions of Croydon town centre. This shopping focussed area, like many others, has been undergoing a period of decline over recent decades.
- Altogether Croydon town centre has more retail floor space than any other Metropolitan Centre in London, with 30,000m<sup>2</sup> more floor space

than Stratford. However it also has the highest vacancy rate among London's Metropolitan Centres (at 27%)<sup>115</sup>. And whilst Croydon town centre has the 5th highest rate of spending on comparison goods amongst Metropolitan Centres in London, when this is converted to how much is spent per square metre of floor space, Croydon falls to the lowest rate of spend in London.

- Neighbouring competition from other outer London retail centres along with Bluewater and Lakeside in the 1990's, led to a period of sustained challenges for this previously thriving centre. Investment has previously been proposed by large scale redevelopment proposals which have not been realised and in the meantime a number of its department stores have now closed and the quality of the public realm has declined. These challenges have continued to the present day.
- The once iconic department store buildings of Grants and Allders are now gone.

<sup>115</sup> Croydon Future Destination of Retail Study

- The other major shopping centre in central Croydon is Centrale on the western side of North End, which opened in 2004. Although relatively modern in its quality of offer, the draw of Croydon shopping is no longer strong enough and even this centre is now challenged like many centres.
- Developers continue to be interested in taking on the challenge of the redevelopment evidenced by planning permission being granted three times over recent decades for new shopping centres in the town centre (including the associated Compulsory Purchase Orders being approved) but no permission has been implemented.
- Whilst High Streets have declined greatly over the past 20 years, with the increase in online shopping and changing trends in the retail industry; COVID-19 has accelerated these pre-existing challenges. Today, primary retail zone (Zone A) rents are now half of what they were in 2018<sup>116</sup> and in Croydon they are still declining.
- Today North End remains Croydon's principal shopping street. However, much of the retail offer – including the types of businesses and quality of space - is tired and does not live up to its potential or have the ability to respond to future trends and demand. It offers neither occupiers nor shoppers the type of quality retail experience or accommodation that is required or expected. Further, there has been a reliance on retail as the primary town centre land use, but this is no longer sustainable or resilient.
- Alongside the post war boom as a retail centre, Croydon was also a planned 'out of centre' area for offices including some large organisational headquarters that moved from central London. Between 1963 and 1973, 20% of offices and 30% of jobs moved out of Central London to Croydon. Until recently, Croydon was experiencing 30 years of continued decline as a location for offices, however recently the demand for new offices has begun to increase again and there is a need for follow on space for SMEs<sup>117</sup>. Some of this can be well integrated in the North End Quarter.
- North End and George Street retain many 19th century buildings reflecting Croydon's past commercial prosperity. Several frontages are of high quality and protected as part of Central Croydon Conservation Area.

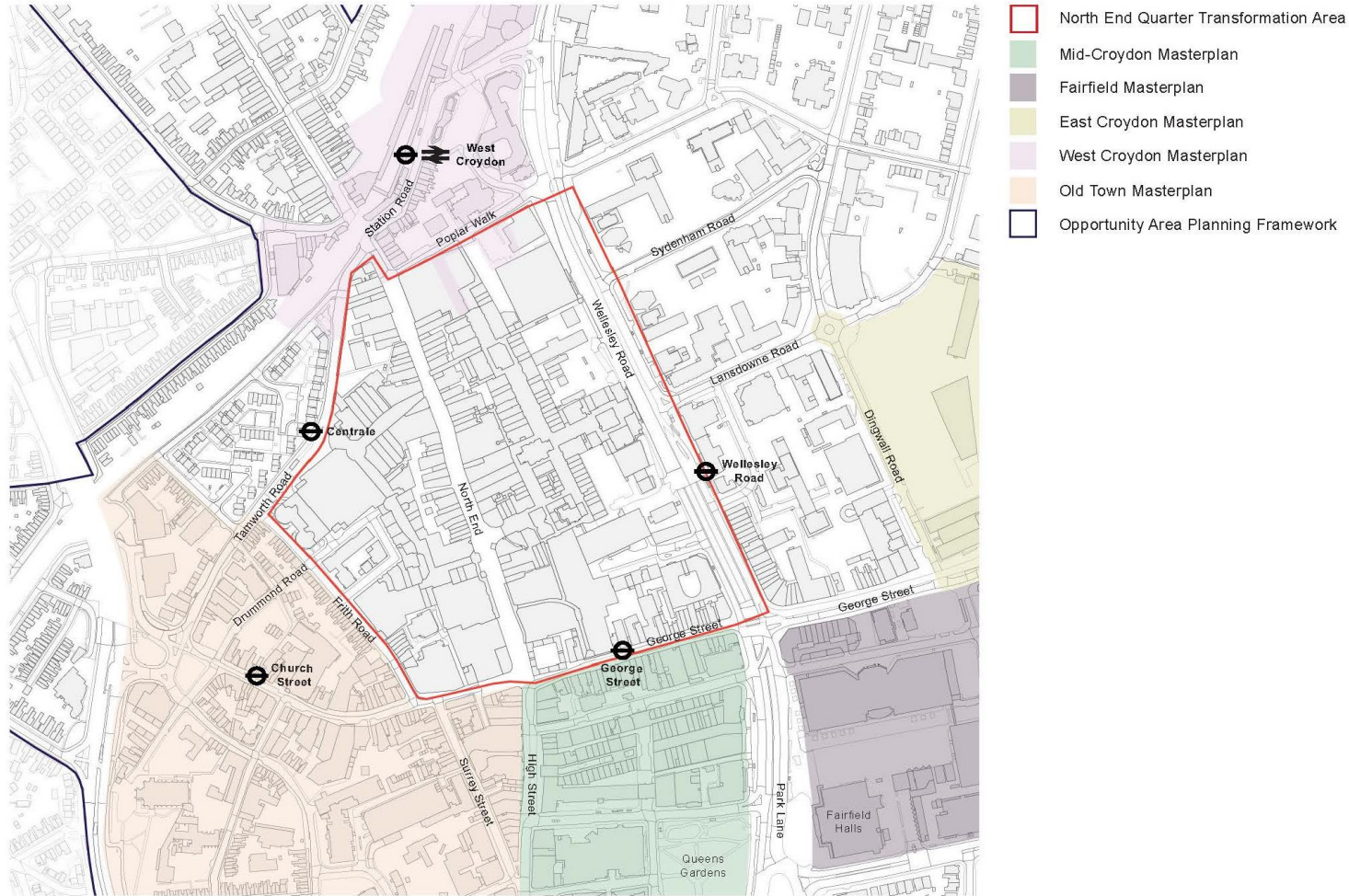
<sup>116</sup> Croydon Future Destination of Retail Study

A number are also listed and locally listed with significant heritage value such as the Grade I listed Whitgift Almshouses (over 400 years old) and the Grade II listed Electric House. The relationship between the Victorian shopping streets and post-war modernist development is important to its character and new development will need to build on and enhance this.

- The issues that the North End Quarter faces need to be addressed, and an updated overarching spatial planning strategy and guidance is required for the area – one that is sustainable, flexible and responds to the local context of Croydon as well as broader consumer trends. This will ensure the North End Quarter is a vibrant and resilient metropolitan centre for those who live, work and visit Croydon. This transformation chapter sets out an overarching framework for how it should be shaped to address the challenges it faces and to ensure its vitality for years to come.

<sup>117</sup> Croydon Future of Destination Retail + Employment Land Review

Figure 0.1. North End Quarter Transformation Area Boundary (w/ surrounding masterplan areas + OAPF boundary)



## Vision for the North End Quarter

- The North End Quarter will be a sustainable, resilient and safe 24 hour destination for all. It will revive central Croydon's bold and visionary heritage with innovation, social value and wellbeing at its heart. It will be a vibrant biodiverse, high quality neighbourhood that complements and supports the surrounding masterplan areas in the town centre, and includes retail as a balanced part of a more diverse mix of uses that safeguard its future vitality and viability.
- The North End Quarter will build on its history as an education, commercial and social hub, to be an attractive visitor destination with a vibrant public and cultural offer alongside retail. The anticipated growth will be sustainable, design led and guided by good growth principles. It will be an inclusive destination for all, including an exemplary physical network of streets, public spaces and facilities that improves connectivity, celebrates its heritage and a unique local character with a strong green infrastructure that connects to the wider green and blue grid, digital infrastructure and sustainable transport embedded throughout. This will attract new audiences with diverse new activities and uses.
- The area will support lifelong learning and celebrate local knowledge, services and production. It will provide opportunities and infrastructure for all local communities and include a minimum of 600 new homes and many new residents. Given the expanded area, it is expected to accommodate a greater number of homes than previously envisaged and enable a thriving neighbourhood.
- Complemented by the other transformation areas of Purley Way and Brighton Main Line Corridor and East Croydon Transformation Corridor, North End Quarter will be a highly productive area that helps tackle climate change, improves public health and wellbeing, celebrates diversity and fosters social and community cohesion

through all stages and parts of its development. It will continue to be an integral part of the metropolitan centre for the borough and an area for public and social life, retail, office/workspace, arts and creative industries (including a diverse evening/night-time economy), leisure and sports, entertainment, learning and innovation activity alongside residential. It will also be a strategic commercial centre in South London.

- The North End Quarter will function as a cultural, social, economic and ecological connector for all that live, work and visit the borough.<sup>118</sup>

<sup>118</sup> See the section 3.1.1 (including the 8 Emerging Principles diagram) of the Croydon Future of Destination Retail Study, This sets out the key challenges the

quarter faces alongside the values and principles to guide its future vision, development and delivery



**Where we want to be**

<b>Strategic Objective 1:</b> Establish Croydon as the premier business location in South London and the Gatwick Diamond.
<b>Strategic Objective 2:</b> Foster an environment where both existing, and new, innovative, cultural and creative enterprises can prosper.
<b>Strategic Objective 3:</b> Provide a choice of housing for people at all stages of life.
<b>Strategic Objective 4:</b> Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.

<b>Strategic Objective 5:</b> Ensure that high quality new development both integrates, respects and enhances the borough’s natural environment and built heritage.
<b>Strategic Objective 6:</b> Provide and promote well designed emergency services, community, education, health and leisure facilities to meet the aspirations and needs of a diverse community.
<b>Strategic Objective 7:</b> Conserve, enhance and create spaces and buildings that foster safe, healthy and cohesive communities.
<b>Strategic Objective 8:</b> Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
<b>Strategic Objective 9:</b> Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.

**Why this area will be transformed**

**13.2** The heart of Croydon’s town centre was most recently developed in the 1960s when urban theory favoured the segregation of different uses and this has resulted in the provision of an area containing predominantly retail uses. This is still mirrored on both sides of North End.

**13.3** The pedestrianised North End has the appearance of a traditional high street occupied with a value offer and retail chains whilst the two large shopping centres are composed of mainly comparison retail with significant voids, particularly at the upper floors. The town’s department stores have been badly affected by changing trends in the last two decades. The effects of the Covid-19 pandemic have accelerated and exacerbated these challenges. There is very little in the way of other uses or social infrastructure in the North End area, with most of these activities taking place to the south of the retail core. The Quarter also lacks quality open and green public space and suffers from poor connectivity and

permeability. This segregation of uses, whilst typical of many town centres in the UK, has not aided their future resilience.

**13.4** Town centres are increasingly becoming places where people live as well as work, shop, visit and socialise. The Croydon Opportunity Area will accommodate approximately one quarter of new homes needed by 2039. Surveys have shown that access to public transport and being close to where you work, cafes and restaurants, local services, leisure, public space and cultural facilities are more important to those who choose to live in town centres than being close to shops<sup>119</sup>. There is a projected rise in need for ‘15 minute’, 24 hour and circular economies as well as green infrastructure<sup>120</sup>. Furthermore, those town centres that have invested in attracting a balanced diversity of uses, residents and high skilled jobs have been more resilient over the last ten years through the changing retail market. The diversification of the North End Quarter with a mix of residential, retail, knowledge & innovation, arts & culture, food & drink, leisure & entertainment, offices and homes alongside high quality streets and public spaces and community and social infrastructure will enable it to develop with resilience over the lifetime of this Local Plan. This change will generate greater levels of footfall and spending power,

<sup>119</sup> Croydon Future Destination of Retail Study

<sup>120</sup> See case studies in Croydon Future of Destination Retail Study

supporting the town centre economy. The redevelopment of the area with a new mix of uses that complements a renewed retail offer along with public open space will encourage multi-purpose trips, in the heart of the town centre.

**13.5** With the proportion of retailing conducted online likely to continue to increase, Croydon's town centre will need to provide a unique experience and a more diverse offer if it is to maintain its position as a major destination and centre in south London. Creative, cultural, evening and night time uses, and spaces for making and production to facilitate a circular ecosystem will be needed to achieve a sustainable 'destination.'

**13.6** Bricks and mortar retail will still remain an important component. Towns and cities grew up around the activities of 'exchange', with a shop's physical presence being an important attractor for consumers, but their role is changing. On average, retailers record a 12% increase in online sales in the catchment area after opening a store<sup>121</sup>. Shops will become less about in store sales and more about building their brand and connecting with their customers; a focus on experience, a curated offer and service rather than actually buying a product. This, in turn, will drive demand for higher quality, and in some cases, larger, shop units, as well as the need for higher quality public realm with green spaces in Croydon's town centre. This will create a much more pleasant environment in which to shop, a generous and attractive destination to socialise and enhance the area to support its economy while having environmental benefits.<sup>122</sup> A more diverse mix of uses and infrastructure will also be needed to support a growing residential community in the town centre.

**13.7** Croydon's history of innovation will be a useful starting point to promote local businesses, and take advantage of and support the creativity of the borough. Transformation will not be effective if it is not uniquely Croydon grounded in Croydon's heritage. Any future development, whether short, medium or long term, must build on and

celebrate the unique heritage and character of the area, meaningfully benefitting the borough's diverse communities and needs. Furthermore, transformation will need to be sustainable, and be neighbourhood based; with the town centre's role for public good at its core. Rich biodiverse and productive landscapes within a strong green grid and social infrastructure that replace the dominance of cars will be the new draw for this part of the town centre. This in turn will lead to an attractive destination and drive up footfall.

**13.8** The urban form of Croydon town centre, and in particular the Whitgift Centre, has poor permeability and accessibility issues. East to west routes across the heart of the town centre and through the North End Quarter are limited, poor quality and difficult to navigate during the day. At night it is impossible to travel east to west through the shopping centres, and North End becomes one, long north to south canyon across the town centre. Wellesley Road is a dual carriageway with tram lines and with no surface crossing points for pedestrians. Redevelopment will need to ensure that the existing significant barriers for pedestrians are addressed. It should be possible to easily and safely travel north to south and east to west 24 hours a day in the future. The poor relationship that the shopping centres have with the surrounding townscape, with the inactive back entrance to the Whitgift Centre, servicing for redundant office space, and entrances to the centre's car parks will be improved. Wellesley Road will need to function as more than just as a car dominated route cutting through the metropolitan heart of the borough.

**13.9** The significant heritage value of the area in particular within the Central Croydon Conservation Area, the corner of North End and George Street with the Grade I listed Whitgift Almshouses, the Grade I listed St Michael and All Angels Church and a number of other listed and locally listed buildings lie in the area will inform development proposals that will need to enhance their settings. The current refurbishment of the Grade II listed Electric House to house an educational use is a welcome step forward in improving the townscape and providing an exciting reuse that

<sup>121</sup> Croydon Future Destination of Retail Study

<sup>122</sup> See case studies in the Croydon Future Destination of Retail Study

will attract new footfall to the area. Future development will use the area's rich heritage and evolving surrounding townscape as a positive foundation to build on and further enhance its special history and character, while improving the setting of these heritage assets with high quality public realm.

**13.10** Post war development was predicated on car use and has been a root cause of the poor pedestrian connectivity, accessibility and inclusivity in the public realm and built environment. Surrounding recent town centre masterplans have set out objectives and guidelines to transform and improve connectivity in the wider town centre and these principles will also be placed at the heart of the revival of the North End Quarter.

**13.11** This transformation of the North End Quarter will need to be different to what has taken place before, and been attempted so far this century. Previous approaches and proposals have not worked due to factors including the dominance of retail, and not being built on the

positive assets and heritage of the area. Future development will likely be phased over time, part of a flexible yet coordinated spatial framework, and involve the re-use of existing spaces and buildings as well as the construction of new relatively denser and more robust development, which can be reused and adapted over time.<sup>123</sup>

**13.12** It will be a diverse and resilient central neighbourhood with the area providing for a mix of commercial uses, social infrastructure and supporting a new residential community. This will include affordable commercial and community spaces that help celebrate and showcase local organisations whilst supporting Croydon's diverse demographics. It will complement the rich and distinctive character of the adjacent Old Town and West Croydon areas;

## How we are going to get there

### Strategic Policy NEQ SP1 Transforming the North End Quarter

**NEQ SP1** The North End Quarter forming part of the Croydon Metropolitan Centre and Croydon Opportunity Area, will be an important public destination in the borough, with a productive and diverse range of uses within a green and sustainable framework, where revitalisation and development will include a resilient and diverse mix of uses, including a renewed retail offer alongside a new residential community and supported by a programme of infrastructure investment maintaining its status as the commercial heart of the borough. Development proposals will be expected to reflect and be delivered through a collection of strategic principles for change :

- a) the North End street frontage between George Street and Poplar Walk will serve as the main retail and commercial frontage for the town centre;

<sup>123</sup> See Croydon Future of Destination Retail Study for examples

- b) Sustainable development which is adaptable and future-proofed including provision of retail spaces according to identified and evidenced need, where evidence responds to emerging consumer behaviour trends, environmental benefits, hyper-local and circular economy principles;
- c) Provide a diverse and balanced mix of uses alongside renewed retail, new homes, local services and social infrastructure. This can include offices and workspaces, arts and creative industries, a diverse evening/night-time economy, leisure, sports and play, entertainment, learning and innovation activity, and promote new forms of innovative ventures that provide public benefit and support local organisations. Retail is to be focused along North End with the wider Quarter including a balanced and complementary mix of uses;
- d) An integrated Northern area that supports and complements West Croydon becoming a civilised transport interchange and celebrating diverse local businesses and convenience shops of London Road;
- e) Wellesley Road will become more welcoming approach to the North End Quarter with enhanced public realm, green infrastructure and become a healthy street;
- f) A green network - an inclusive quarter for public life stitched together through a generous high quality accessible public realm, a strong green grid and new network of streets and public spaces; it will improve permeability, connectivity and include a central anchor space and a series of pocket parks throughout<sup>124</sup>;
- g) Our heritage will be revealed, conserved and enhanced alongside complementary and respectful new development. Development proposals should seek to celebrate and enhance the area's distinct existing local character and heritage. They will be expected to have regard to historical assets alongside surrounding public realm improvements to elevate their setting and provide complementary new adjacent developments;

**NEQ SP2** The Council will work with landowners and stakeholders to bring forward and facilitate a spatial framework and guidance that further enables the execution of core principles and objectives set out in this chapter. To ensure redevelopment within the North End Quarter is coordinated, sustainable and resilient to changing trends, redevelopment proposals will be expected to:

- a) Demonstrate how they contribute towards achieving a joined up spatial vision that builds on the overarching principles of this chapter;
- b) Where possible, bring forward public realm improvements, to improve activity, perception, footfall and begin reviving the Quarter;

<sup>124</sup> See Spatial Vision diagram below + figure 5.3

- c) Demonstrate that they contribute toward the creation of an accessible, inclusive and legible network of high quality streets and public spaces (including a new anchor public space, pocket parks, squares and roof gardens) across the Quarter, which shall include safe 24 hour public spaces, new 24 hour east-west and north-south routes to improve permeability and connectivity including a key east – west route connecting Wellesley Road to North End and beyond;
- d) Contribute to a balanced mix of town centre uses including residential, commercial, and community uses including affordable commercial and community spaces alongside wider social infrastructure.
- e) Proposals for higher education uses (along with identified necessary supporting facilities) within the North End Quarter will be supported where they are of high quality sustainable design and complement surrounding uses and institutions;
- f) Support the creation of a residential community with a minimum of 600 new homes, including a mix of tenures and types of housing. There is an expectation that where robustly justified, a greater number of homes will be accommodated across the Quarter;
- g) Make the best use of land through a sustainable design led approach that optimises site capacity and promotes appropriate density, sustainable development that benefits from proximity to jobs, services and public transport facilities while contributing to the vitality and resilience of the town centre.

**NEQ SP3** Development shall improve the public realm within Croydon Metropolitan Centre and to reduce barriers to pedestrian movement across the town centre by:

- a) Contributing to the delivery of an accessible, inclusive and legible network of high quality streets and public spaces incorporating a new safe linked network of 24 hour east-west routes
  - i. from Wellesley Road through North End,
  - ii. North End to Tamworth Road/Frith Road
  - iii. a new north-south route between Poplar Walk and George Street, and
  - iv. Other secondary streets to improve permeability and connectivity through the Quarter;
- b) Contribute toward the establishment of a new anchor public space and a network of pocket parks, squares and roof gardens, and part of the wider green grid;
- c) Embed public art within the public realm including interventions that showcase and celebrate the heritage and diversity of the area;

- d) Create a high quality, safe, accessible and inclusive environment for all including step free access across the Quarter which resolves any issues caused by land level changes, servicing and car parking;
- e) Following a hierarchy of street networks<sup>125</sup>, where North End is the main town centre retail frontage, with other active frontages on Wellesley Road, George Street and Poplar Walk. These will include a mix of sustainable town centre uses that complement a renewed retail offer that is focused along North End. Other streets will include a combination of active and positive frontages to ensure vitality and safety;
- f) All frontages are to be developed as a holistic part of the public realm that promote permeability and vibrancy, passive surveillance, safety and sustainable service arrangements.

**NEQ SP4** To ensure the North End Quarter positively contributes to Croydon's environmental improvements and a more sustainable centre, development should integrate urban greening, sustainable transport and public realm improvements through the following:

- a) An inclusive, high quality public realm that enhances the area's civic function and attractiveness, and improves connectivity for pedestrians and cyclists to locations beyond the North End Quarter including West Croydon and East Croydon stations, Fairfield Cultural Quarter, Mid Croydon, Old Town, Park Hill recreation park and Wandle Park, and the Purley Way area;
- b) Encouraging sustainable transport routes and landscaping through the integration of green and blue infrastructure within streets and open spaces;
- c) Improved biodiversity such as ecological corridors;
- d) Social spaces and play spaces that welcome and support the borough's diverse communities;
- e) Improved walking and cycling connections towards existing green and blue spaces;
- f) Joined up servicing and delivery access; and
- g) Significantly reduced provision of car parking within the North End Quarter;
- h) Contributing towards making land uses in the quarter car-free.

<sup>125</sup> See figure 5.2; 'Spatial Vision Diagrams'

**NEQ SP5** Restoration, and re-use of existing buildings will be supported where:

- a) An existing building, its retention, restoration and re-use makes a positive contribution to the Central Croydon Conservation Area as set out in the Appraisal and Management Plan;
- b) the existing building is a statutorily Listed Building or a Locally Listed Building; and
- c) It is supporting interim uses of buildings and land to avoid long periods of inactivity in the town centre, and seeks to address the vision and objectives for the North End Quarter.

## What it will look like – Spatial Vision

**13.13** The following diagrams illustrate the five overarching spatial approaches and principles for delivering the vision for North End Quarter: connectivity, public realm, mix of uses, frontages and phasing.

**Figure 0.1 Illustrative spatial vision diagrams<sup>126</sup>**

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<sup>126</sup> See section 3.1.3 of Croydon Future of Destination Retail Study

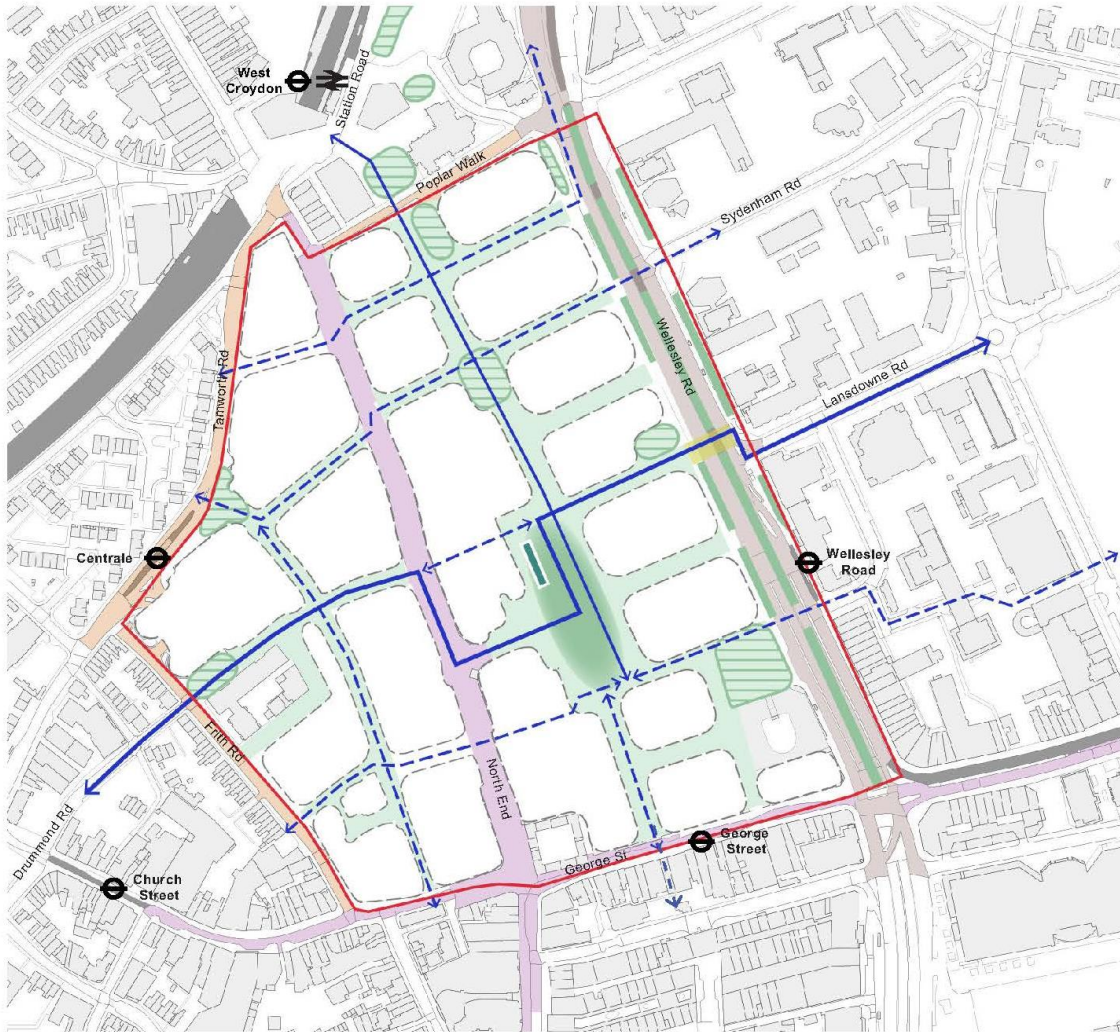


<ul style="list-style-type: none"> <li>• Break up an impermeable urban block</li> <li>• New 24 hour accessible and inclusive routes across the North East Quarter, improving north –south and east-west connectivity. This includes contributing to connections from: <ul style="list-style-type: none"> <li>(a) West Croydon to George Street</li> <li>(b) East Croydon and New Town to Old Town</li> </ul> </li> <li>• Make Wellesley Road less of a barrier to pedestrian and cycle movement</li> </ul>	<ul style="list-style-type: none"> <li>• Provide a safe, inclusive, active and well-lit public realm</li> <li>• Early interventions in the public realm along with precursors and interim uses would be welcomed supported</li> <li>• Key to unlocking the revival, development and investment in the area</li> <li>• A new anchor public space and a network of pocket parks and squares</li> <li>• Provide a network of accessible and inclusive streets, public spaces and joined up public realm</li> <li>• Open up parts of the large roofed areas to create high quality open spaces and improve air quality</li> <li>• Improve green grid, including ecological corridors across and beyond the Quarter</li> </ul>	<ul style="list-style-type: none"> <li>• Uses that attract people 24 hours a day</li> <li>• Taller forms to be sensitively located through testing for townscape and heritage impacts</li> <li>• Retail to be focused along North End with the wider Quarter including a complementary mix of leisure, residential, office, education, innovation and, creative and cultural uses</li> <li>• Support the social, arts and music heritage of the area to enable the Quarter to thrive</li> <li>• Integrate productive landscapes into the North East Quarter with proposed centres to improve legibility</li> <li>• Integrate affordable spaces for local organisations through the Quarter</li> </ul>	<ul style="list-style-type: none"> <li>• Ground floor uses to be active where appropriate and an integrated part of the public realm. This is to ensure it complements and supports existing and forthcoming facilities and activities; creates active frontages and attracts people 24 hours a day</li> <li>• Legible and safe residential entrances to welcome new residents into their homes. Residential accommodation to the focussed above ground floor.</li> <li>• Innovative servicing and delivery and logistics plans that minimise need for vehicles will be embedded</li> <li>• Exemplary design and quality preserving and enhancing the setting of the Central Croydon Conservation Area</li> </ul>	<ul style="list-style-type: none"> <li>• Phasing of transformation based around a coordinated spatial framework</li> <li>• Where possible, early wins / phases including public realm improvements, interim uses and precursor interventions brought forward early to improve activity, perception, footfall and begin reviving the North End Quarter would be welcomed</li> </ul>
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The five spatial principles come together in the below indicative and illustrative diagram. (Fig 5.3). <sup>127</sup> Note these are illustrative and diagrammatic graphics to help visualise how the key spatial principles could come together, and alternative approaches that meet the principles and objectives of the chapter well may be deemed appropriate.

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<sup>127</sup> The Croydon Future of Destination Retail Study includes a number of additional illustrative diagrams that help communicate the objectives of a spatially driven, joined up mixed use programme



- ← Main new public access east/west route (24 hr)
- ← New and improved secondary routes
- ← Potential new routes to improve permeability
- Key open space
- Pocket parks
- Public space improvements - inner paths
- Potential pedestrian crossings/subways improvements
- New local feature
- Frith Road, Tamworth Road and Poplar Walk improvements
- High Street enhancements inc. primary retail frontage
- Wellesley Road improvements
- Indicative building locations
- Study area boundary

Fig 5.3

## Why we have taken this approach

### A resilient town centre

**13.14** Since 1945 Croydon has relied heavily on large scale, comprehensive developments within the town centre to deliver change. These schemes are massively challenging and expensive to deliver so the policies enable development to be delivered in a phased, flexible and simpler form, allowing for viable developments to evolve.

**13.15** The world of retail has changed substantially since Centrale opened in 2004. Online retailing was in its infancy then. ONS statistics show that in 2008 online retailing accounted for just 5% of all sales. Ten years later (in 2017) it had risen to 16% of all sales. In the same period in-store sales rose in total by 13% compared to a 326% rise in online sales<sup>128</sup>. For comparison the total UK economy grew by just over 10% in the same time frame<sup>129</sup> meaning that in-store sales barely kept up with general economic growth whereas growth in online sales outstripped overall growth by a factor of over 30.

**13.16** Retailing has declined and less floor space is required and is used differently to this end, proposals which propose a net loss of retail floor space (particularly comparison goods) will be considered. Should a proposal seek an increase in retail floor space that would result in a significant increase overall across the district centre the council would need evidence to be satisfied that the proposal is both resilient to future changes in retailing, is sustainable and deliverable, will enable a circular economy with substantial public benefits and will not cause substantial harm to competing town centres (which include other Metropolitan and Major Centres in neighbouring boroughs, and designated principal Town Centres in Tandridge and Reigate & Banstead). Where focused on one

<sup>128</sup> Comparing “bricks and mortar” store sales with online retail sales: August 2018 (ONS)

part of the area, proposals must also demonstrate cumulative impact to ensure it does not harm viability and potential of the wider Quarter.

**13.17** Further, new macro challenges have arisen that any future development of the area will need to positively address – this includes the environmental challenges and the climate emergency; public health and quality of life (exacerbated by the Covid-19 crisis), systemic social and cultural inequality, economic uncertainty and the housing crisis. Development should work to address issues such as community safety, diversity and inclusion arising from and exacerbated by rising inequalities and economic uncertainty, as well as the delivery of the Mayor’s Transport Strategy.

**13.18** A new approach to transforming and future proofing North End Quarter and making it a resilient Metropolitan Centre serving Croydon and south London is required. The transformation will need to address the challenge left by the decline of large scale retail led development which is no longer commercially, economically or socially viable.

**13.19** Research into the impacts of the 2008 economic crisis has shown that the town centres that were more likely to have sustained their economic vitality and viability were those that were more orientated towards local services than traditional destination retail, and those with a more diversified portfolio of high quality retail units and higher proportion of smaller independent specialist stores showcasing local products and organisations. Within Croydon itself this is best exemplified by a number of the district centres which exhibit these features, notably Crystal Palace. Therefore, proposals for development in the North End Quarter will need to plan for a more resilient mix of uses that creates a new neighbourhood. It should not be focussed on being led by large scale retail floors that have not proven viable, and instead be guided by 15 minute and circular economy principles that encourage local production and services. Part of this may include some smaller retail development in appropriate locations

<sup>129</sup> Gross Domestic Product: chained volume measures: Seasonally adjusted £m (2008Q1 – 2017Q4) (ONS)

and guided by the principles in this chapter. This is of particular importance given the rapidly growing residential community throughout the town centre.

**13.20** Experiential and specialist local products and services will be important to a local placemaking response. The North End Quarter along with the Purley Way area will need to evolve and adapt in a manner that can be responsive to future changes in market demand, as well as also complementing other town centre masterplan areas. Diversification of uses and how they are designed in will need to ensure that the heritage and character of the local area and that of the conservation area is preserved and enhanced

**13.21** A resilient town centre will also be a place that caters for a range of users from families with young children, through to younger people, and the borough's older residents. It will be an inclusive centre with facilities that cater for the borough's diverse communities; and be accessible to users with a variety of mobility needs.

**13.22** Providing a range of sizes of public spaces is proven to support a diversity of uses<sup>130</sup>. A central anchor space in the North End Quarter can function as a natural meeting place, large enough for events and activities, whilst networked smaller areas can accommodate more intimate occupations such as contemplation, reflection and play and support active travel connections to and through the North End Quarter. A variety of generous and adaptable public spaces within a sustainable, biodiverse green and blue framework will serve the diverse communities and needs of the borough; improving public health, climate change and inequalities. Development will contribute to this provision either by delivering it through the development where appropriate or through financial contribution towards shared spaces. The green and blue framework will connect to the wider green and blue grid in the borough to help facilitate a positive response to climate challenges, improving biodiversity and greening throughout the borough along with wider

benefits captured in the Green Grid chapter. Blue infrastructure in this case refers to integrated interventions such as Sustainable Urban Drainage systems (SUDs), sustainable urban irrigation systems, rain gardens amongst others that enable a thriving green and blue grid with circular benefits to the public realm and environmental qualities; however, if proposed and appropriate it does not preclude decorative or play based water features such as water fountains

#### Phasing of development

**13.23** The Croydon Opportunity Area Planning Framework, adopted as a Supplementary Planning Document to the Croydon Local Plan: Strategic Policies in April 2013, set out that the preferred approach to redevelopment of the Whitgift and Centrale areas of Croydon town centre, was through a comprehensive approach as part of a large redevelopment and renewal approach. This would preferably be carried out as part of a single, or complementary phased programme of redevelopment proposals and works.

**13.24** In the changing landscape of retail that Croydon town centre now faces in the 2020s, it is unlikely that such a single phase comprehensive approach would either be placed before the council to consider, or be delivered if it were required by the council, nor would it be a sustainable approach. However, it is still critical to the success and transformation of the town centre for there to be a joined up, coordinated spatial framework that guides the coordinated redevelopment and revival of the North End Quarter across multiple phases. Without a strategic overview there is always a risk that the transformation would be piecemeal and/or include large periods of vacancy. Any individual smaller development proposals that come forward would therefore need to reflect and support the principles and objectives of this chapter and contribute to achieving its vision.

<sup>130</sup> See findings and case studies in Croydon Future of Destination Retail Study

**13.25** There are a number of acceptable routes to achieving a strategic overview and coordinated transformation of the North End Quarter. The first is for the council to agree a phased programme of works and interventions with stakeholders within a joined up spatial framework. Alongside meaningful public engagement, the council will work with landowners and stakeholders to bring forward and facilitate a spatial framework that sees the execution of the principles and objectives set out in this chapter<sup>131</sup>. This will create a foundation for the North End Quarter to continue to provide the town centre with resilient retail and other destination services commensurate with its status as part of a Metropolitan Centre and new residential neighbourhood. This phased programme would where appropriate set out interim uses of existing spaces as well as precursors and early wins which may also retrofit and reuse existing buildings during the transformation period, and beyond. To secure this phased programme of works, a Hybrid Planning Consent could also be an appropriate route covering the whole area of potential works and renewal (including reuse of existing buildings), and a more detailed early phase and interim use plan.

**13.26** The second approach to securing a strategic overview is to prepare a high level masterplan setting out the parameters for any redevelopment or re-use of different elements of the North End Quarter. Any masterplan should ensure the execution of the principles set out in this chapter, and focus on deliverability, design principles and phasing with guidance on uses based on the vision for the area. Any masterplan for the area will need to be inherently flexible in regards to building uses, phasing, and include a robust public realm strategy. This can be council led where funding can be secured and developed in close collaboration with key stakeholders; or stakeholder / lead developer led with close collaboration with the council, both with in- depth public engagement. The latter could also be developed as the first part of an extended pre-app process or through coordination between multiple applicants.

**13.27** Whichever approach is taken it will need to consider all stages of phasing including short term, interim and precursors uses, infrastructure capacity and dependencies with other development schemes to ensure deliverability and the cumulative impact is understood. Interim uses will be encouraged and welcomed for individual sites that are unlikely to be developed in the short term. The phasing will need to be agile and responsive to changing consumer and public needs, behaviours, technological advances, and other macro issues set out in the vision and kept under regular review. In the case of a masterplan this can be through monitoring of the masterplan phases and reviewing and refreshing any detailed guidance that may form part of it. Any masterplan approach will need to ensure longevity and avoid being an elongated process to ensure it catalyses rejuvenation of the area. The preferred approach would be a phased, flexible masterplan, however this does not preclude other approaches being acceptable where justified such as a high level spatial framework alongside a phased programme of works including (including short, medium and long term phases); or a hybrid planning application. All approaches will need to demonstrate they can successfully execute the objectives and principles of the North End Quarter chapter. In a scenario where phasing is secured through an Outline or Hybrid Planning Consent, the regular review of phasing plans, design guidelines and codes would be recommended to ensure it is suitably adapting to changing policy or market conditions.

#### Re-use of existing buildings

**13.28** A large proportion of the North End Quarter is located in the Central Croydon Conservation Area and retains significant heritage assets and a distinct local character. The transformation of the North End Quarter therefore does not mean the complete demolition of rebuilding of the area. Many buildings can and should be retained and revived to a high standard, particularly considering the heritage context and contribution to that area's particular sense of place. Furthermore, in the

<sup>131</sup> See figure 5.2; 'Spatial Vision Diagrams'

context of tackling the causes of climate change, and the carbon emissions of construction materials, in some cases re-use of existing buildings can be more sustainable, producing less carbon than demolishing and rebuilding. They can also be equally transformative<sup>132</sup>. To enable this the re-use of existing buildings will be supported where the existing buildings (of any size) are to be retrofitted to achieve a minimum of BREEAM Very Good standard or equivalent. In all cases where buildings are to be re-used, the highest standards of design, quality, sustainability and carbon reduction will be sought.

**13.29** Other buildings within the North End Quarter will make a positive contribution to the Central Croydon Conservation Area. Where a building does make a positive contribution the council will favour its retention and high quality restoration. If an alternative development approach is proposed, it will need to be justified through the pre-application process in order to assess if it an appropriate approach and ensure it enhances the setting of the conservation area and surrounding heritage assets. As with other buildings of that meet the area threshold, if it involves over 500m<sup>2</sup> in floor space then Policy SP6.3 of the Croydon Local Plan will apply and the works will need to achieve a minimum of BREEAM Very Good standard or equivalent.

**13.30** Reuse and retrofit of buildings with possible impact on heritage assets or where it falls within the conservation area, will be of the highest quality and enhance the setting of the heritage asset(s) and provide wider public benefits such as new public spaces and social and community facilities.

**13.31** Interim uses and precursors uses where sites of various scales are unlikely to be redeveloped in the short term will be welcomed and encouraged whilst following the principles and objectives of this chapter. Short term phases of development will also play an important role in the revival of North End Quarter as it undergoes transformation. They will ensure that the town centre does not suffer from decline as elements of

the North End Quarter undergo redevelopment or renewal by helping to attract residents and visitors to the town centre at all times. Building and maintaining footfall, public life and supporting existing businesses in the town centre will be critical for ensuring the long term success and resilience of transformation as those businesses will be the bedrock of the development of North End Quarter. Early public realm improvements as a precursor to long term development and delivery of high quality public spaces as part of development proposals will play an equally important role. Therefore, the council will support the improvement and re-use of existing buildings, spaces and land where they support the creation and operation of a viable interim/meanwhile uses or early phase/early win transformations as part of the holistic phased framework including precursor and long term phases will also encourage and support early public realm improvements where both help to prevent decline occurring in Croydon town centre and improve vitality.

#### Homes

**13.32** The North End Quarter will include a rich tapestry of uses within a green, civic framework to ensure its resilience and vitality as a town centre destination. Integrating a minimum of 600 new homes, including affordable homes and a balanced range of housing typologies will be an important part of developing a thriving new neighbourhood. New homes will be an important part of the mixed use quarter and will be maximised alongside provision of town centre retail, however in a sustainable, balanced and appropriate manner. The North End Quarter has potential to accommodate a significant number of homes. There is also opportunity for the area bound by Frith Road, North End, Tamworth Road/Poplar Walk and George Street/Church Street to provide further new homes in the future. Any proposal will also need to incorporate suitable and quality infrastructure (physical, social and cultural) and inclusive of public facilities.

#### Education

<sup>132</sup> Croydon Future of Destination Retail Study

**13.33** It is a long standing objective to create a new university campus in Croydon. Electric House, a Grade II listed building on Wellesley Road, will be used as a new university centre in Croydon. Further, additional learning, creative industries and innovation uses with related services and infrastructure within the North End Quarter would complement this anchor use.

#### East-West routes and the Wellesley Road frontage

**13.34** It is an objective to secure a 24-hour east-west route across the North End Quarter as part of any redevelopment proposals. This is set out in the Croydon Opportunity Area Planning Framework and was included as part of the two outline planning permissions for redevelopment of the Whitgift Centre. It is critical to the success of the Quarter's transformation that longstanding barriers to pedestrian and cycle movement are removed and replaced with a new legible pattern of streets and public spaces across the area. The east-west route will need to connect the Old Town area of the town centre with the New Town area and on towards East Croydon station.

**13.35** Pedestrian safety on these routes will be of paramount concern so it is important that they benefit from active frontages during the day and evening, and passive surveillance at night from overlooking residential properties.

#### Local character, townscape and public realm

**13.36** New development proposals should seek to celebrate the history and heritage of the North End Quarter. The North End Quarter features a rich history of social and commercial innovation and high-quality buildings of diverse architectural styles that can contribute to its distinct destination offer. North End itself is Croydon's principal shopping street; formed as a result of the late Victorian commercial expansion of the Town Centre. It is

part of the historic north-south route that connects through to central London and south to Brighton.

**13.37** Building heights on North End range from the modest domestic scale of two-three storeys in some of the oldest buildings, including the Grade I listed Whitgift Almshouses, to a maximum of four storeys in the later 19th century commercial buildings. Many buildings have pitched roofs and gable fronts.

**13.38** Two large shopping centres, the Whitgift Centre and Centrale, occupy most of the built-up area behind the older buildings on North End. The Centrale shopping centre has a modern frontage on North End.

**13.39** The Alders Department Store, on North End and George Street, was the flagship store for Croydon entrepreneur Joshua Alder in 1862 and grew over time to be the third largest retail unit in the UK in early 2000's. Apart from the Alders building itself, buildings on George Street are at a consistent height of three to four storeys, with four storey buildings concentrated at the north-east corner with Wellesley Road.

**13.40** Building heights and density across North End Quarter will need to be carefully designed to preserve or where possible enhance the setting of Central Croydon Conservation Area, surrounding heritage assets and other sensitive locations. Proposals for taller forms will need to be robustly tested for their townscape and heritage impacts and sustainability, whilst also helping determine the suitability of locations. They will also need to ensure a positive and welcoming microclimate is created throughout the Quarter, wind tunnels prevented and air quality improved.

**13.41** Improving the public realm, permeability and connectivity of the North End Quarter is critical to its successful transformation. An active and inclusive high quality public realm with exemplary public spaces at all levels of development will contribute to the usability and appeal of the destination offer. It should accommodate active lifestyles (walking and cycling in particular), and the demands of the borough's diverse



communities from play space for children, the needs of young people and elderly residents; and be a safe, accessible and inclusive environment for all.

**13.42** Enhancing and increasing green infrastructure connected to Croydon's green grid and integrating blue infrastructure where appropriate will also contribute to the sustainability, biodiversity, usability and appeal of the destination offer of the North End Quarter. Incorporating productive landscapes (e.g. indoor and outdoor urban farming where appropriate will be welcomed), green spaces and landscaping, sustainable urban drainage systems, sustainable urban irrigation systems, active travel networks into the transformation of the Quarter will help to reduce carbon emissions from the area, improve air quality, help to create a net biodiversity gain and help facilitate a circular ecosystem in the area. It will in turn improve the appeal and long term vitality of the area.

#### Transport and servicing

**13.43** The North End Quarter lies in the heart of Croydon town centre between East and West Croydon stations. Bus routes surround the Quarter serving Tamworth Road, West Croydon Bus Station, Poplar Walk and Wellesley Road. There are also tram stops serving the Quarter on Tamworth Road, at West Croydon station, on Wellesley Road and on George Street. Together these combine to give the entire Quarter a Public Transport Accessibility Level of 6b, the highest possible level. To take advantage of this, accessibility objectives for the North End focus on creating permeability on the street for safe and effective active travel connection.

**13.44** As the Quarter lies in the most accessible location in the borough any transformation should be based around maximising car-free destination retailing and leisure to reduce the carbon footprint of development, and to improve air quality in the town centre. Guided by the

Mayor's Transport Strategy, part of this will include significantly reducing the provision of car parking in the Quarter. Currently Croydon town centre has in excess of 8,500 car parking spaces which is more than 2,000 spaces more than any other Metropolitan Centre in London<sup>133</sup>.

**13.45** Limited shared coach parking may be supported depending on the mix of destination uses that would attract large group visits – the need for this will need to be demonstrated through robust evidence.

**13.46** Innovative servicing and delivery and logistics plans that minimise the need for vehicles will be embedded. For example the use of sustainable methods such as cargo bikes alongside centralised distribution centres in locations away from the town centre will be encouraged for appropriate uses e.g. residential deliveries.

**13.47** Generous and robust civic infrastructure including public spaces, social and community infrastructure and inclusive public and cultural facilities will need to be integrated throughout the Quarter to improve quality and attractiveness of the environment, improve wellbeing, increase footfall and draw in new audiences to the neighbourhood. This in turn will increase the value and opportunities in the area.

**13.48** Provision will need to be made for uses facilitating and supporting a knowledge economy, education uses and an innovation hub within the North End Quarter. This will include enhancing training infrastructure and career pathways for young people and for life-long learning.

**13.49** Given the potential for considerable residential development in the Quarter, any redevelopment within the area bounded by North End, Poplar Walk, Wellesley Road and George Street should provide a minimum of 600 new homes to support the creation of a resilient and vibrant town centre. This will contribute to significant placemaking benefits and will require high quality public facilities and social infrastructure to

<sup>133</sup> Croydon Future Destination of Retail Study

support it. In addition to this, there is potential opportunity for some student accommodation to support the educational uses in the Quarter.

Designations shown on the Policies Map

The designations used to address the policies are shown on the Policies Map. The designations are summarised in Table 0.1 below:

**Table 0.1 Designations in this section as shown on the Policies Map**

Designation
North End Quarter
North End
Centrale
Land bounded by North End, Poplar Walk, Wellesley Road and George Street
Poplar Walk and Station Road

Designation
Wellesley Road
George Street (to the west of Wellesley Road)

**Key Supporting Documents**

- Croydon Opportunity Area Planning Framework (2013)
- Central Croydon Conservation Area Appraisal and Management Plan (2014)
- Town Centre Masterplans (various)
- Future of Destination Retail Research Study (2020)
- Public Realm Design Guide (2012)
- Meanwhile Croydon booklet

**Detailed policies**

**Policy NEQDM1 North End - town centre retail focal point**

**NEQ DM1.1** Serving as the central ‘civic’ spine of the area, and key pedestrian thoroughfare from West Croydon Station to the Mid-Croydon quarter, area development should:

- a) Be designed with active frontages at ground floor level;
- b) Be designed to create a vibrant social space with a safe, high quality public realm;
- c) Where appropriate be designed to integrate provision for larger markets, temporary activities, spill out space and events;
- d) Provide for evening business presence; including outside food and beverage spaces, restaurants and cafes; experiential retail; civic, creative and cultural uses; and

e) Integrate a well-designed cycle route and walking routes.

**NEQ DM1.2** Along North End, to facilitate growth and to enhance the distinctive character, development should:

- a) Be designed and laid out in response to the constraints and opportunities of the distinctive heritage of the area;
- b) Seek to address the need to contribute positively to street frontages to ensure a high quality and coherent streetscape, whilst preserving and enhancing the setting of heritage assets;
- c) Complement the existing predominant building heights of 3 storeys along the North End frontage, respecting and responding appropriately to sensitive locations;
- d) Celebrate the designated view of the Town Hall Complex and Clocktower from North End, and respect the setting of St Michael and All Angels Church whilst improving connectivity to these key assets;

### How the policy works

**13.50** North End is a key pedestrianised artery and civic centre in this Quarter and broader town centre. Provision of high quality public realm along North End complemented by a key public space in the wider quarter and connected pocket parks will encourage varieties of informal and formal activities that complement other parts of the town centre

**13.51** The provision of programmable spaces for markets, activities, spill out space and events, alongside provision for evening as well as daytime activity will attract audiences over the 24 hour life of the area. Families with young children will be encouraged to visit with the provision of integrated internal and external play space. Evening activity will help to increase passive surveillance and the safety of the space at night.

**13.52** Providing a cycle route and cycle parking along North End will encourage active travel and its associate health and economic benefits,

increasing car-free access along North End, and through to West Croydon Station.

**13.53** North End is lined by many high quality buildings, the majority relating to the area's prosperity in the late 19th century and early 20th century and displaying well-detailed frontages (surviving to the upper floors in particular). In addition to the predominant Victorian architecture, particularly notable buildings include the former Allders store and medieval Whitgift Almshouses (Grade I listed). The buildings are largely individually-designed but their height, quality and overall character provide a cohesive streetscape which underpins the area's distinctive character<sup>134</sup>. The view south towards Croydon Clocktower (grade II listed, designated landmark) further enhances the distinctiveness of the area and contributes to wayfinding through the area. Ensuring growth in the area responds to this distinctive character, preserves and enhances heritage assets and their settings and ensures that they remain the dominant feature, will provide a unique identity to the destination,

<sup>134</sup> See Central Croydon Conservation Area Appraisal and Management Plan

contributing greatly to the attractiveness of the North End Quarter as a place to spend time.

## Policy NEQDM 2 Central Neighbourhood -

**NEQDM2.1** To ensure that development is designed and laid out in the area bounded by North End, Poplar Walk, Wellesley Road and George Street to enable the development of a diverse central neighbourhood with public life at its heart it, it should; :

- a) Seek to improved safety, access, inclusivity and legibility;
- b) Be laid out to improve north – south and east – west permeability and connectivity throughout the quarter, including a key 24 hour east-west route
- c) Provide for a vibrant mixture of uses along the route within a public and sustainable green framework including comparison and convenience retail and local services. As part of a mixed use development; office and affordable work space, food and drink, finance and commercial, education and knowledge economies, leisure and entertainment, community uses and social infrastructure, creative industries including a variety of affordable creative production spaces; arts & cultural uses, and wider civic functions could be provided with residential use being focused above ground floor level;
- d) Deliver future proofed retail development on the ground floor with complementary active uses such that there is a balanced mix that ensures resilience and vitality;
- e) Incorporate public open spaces and pocket parks, including an anchor public space;
- f) Maximise amenity spaces for residents and visitors at all levels including upper levels and roof tops;
- g) Complement the existing predominant building heights of 3 storeys along the western (Centrale) part of the quarter; and
- h) Focus taller buildings towards the eastern side of the block to protect the setting of the Central Croydon Conservation Area and to protect the most sensitive locations in terms of privacy, heritage assets, security, overshadowing and wind.

## How the policy works

**13.54** This is the relatively new and functioning retail area which will transition to include a more resilient mix of units. It will benefit from including a variety of types of units that are adaptable, including for smaller, independent organisations at rents affordable to local businesses, and public uses whilst complementing the offer within other parts of the town centre. They will also make provision for a move towards an experiential and curated town centre offer where a mix of scale of spaces including larger spaces are needed for larger businesses and organisations.

**13.55** The rental levels for affordable rented units will be benchmarked against the prevailing rents for independent stores and other appropriate uses outlined previously elsewhere in Croydon Metropolitan Centre (along designated Main Frontages on George Street, Church Street, Surrey Street, High Street and food & beverage businesses and other local services along streets such as South End) exclusive of service charges.

The proportion of affordable rented units should be maximised and will be secured in perpetuity through planning obligations. Further guidance is provided in the Employment section.

**13.56** To further enhance the resilience of the North End Quarter, where appropriate development proposals will need to make provision for small and medium sized local Croydon businesses in the form of studio space, production spaces, innovation hubs and managed workspaces. All managed workspaces will need to be managed by vetted providers of managed workspaces and incubators.

**13.57** Provision will also need to be made for the arts, creative and cultural industries at affordable rents.

**13.58** Provision of public and community facilities at affordable rents should also be maximised, particularly in order to support a diverse demographic of visitors, a growing residential community and workers in the area.

## Policy NEQDM 3 Northern Boundary - Poplar Walk and Station Road

**NEQDM 3.1** Reflecting that this area acts as the northern boundary and northern entrance of the North End Quarter, featuring a diverse range of uses such as office, a grade I listed church, retail, a rationalised transport interchange with the West Croydon rail, bus stations and a new cycle hub, and an array of convenience shops serving Croydon's diverse communities that continues into London Road; development in this area should support and enhance current uses and be designed to reflect the distinctive character of the northern part of the quarter by.:

- a) Incorporating new active frontages that complement existing mixed use;
- b) work with land level changes in the area to ensure step free and active access through all parts of the public realm and into buildings;
- e) Complement the existing predominant building heights, ensuring the setting of heritage assets is respected and enhanced including, in particular St Michael and All Angels Church;
- f) Contribute to creating a safe, legible and welcoming forecourt to the North End Quarter with enhanced public realm that supports the delivery of a rationalised transport interchange and cycle hub facility at West Croydon;

- g) Integrating a strategic cycle route; and
- h) Building on the diverse and bustling character of the area at the edge of London Road.

## How the policy works

**13.59** Poplar Walk and Station Road are close to the West Croydon Station, the 'new doorway to Croydon'<sup>135</sup> and a primary arrival point into the North End Quarter for Croydon residents and visitors. Introducing active and positive frontages along Poplar Walk will help create a cohesive and legible northern entrance to the North End Quarter that is safe and welcoming to all users. As part of this, consideration will need to be given to reducing the impact of servicing and carpark access on the pedestrian environment and the road network. The impact of these access points will need to be addressed as part of the overall transformation of the North End Quarter. Consideration will also need to be given to improvements being provided through emerging developments in the area such as London Square development and its enhanced public realm.

**13.60** The area features a vibrant collection of uses and building scales which contributes to its distinctive character, varying from affordable fine grain shopfronts to large office buildings and carparks. Innovative new uses on Poplar Walk should be explored, building upon the existing range of uses and range of building sizes. Large existing buildings and carparks have the capacity for a diverse range of alternative uses including play space, street sports, growing and community gardens<sup>136</sup>. Smaller buildings should support finer grain local businesses and creative enterprises. The varied historic character includes Grade 1 Listed St Michael and All Angels Church, post war office blocks, and historic

shopfront at 10 Station Road. Development should respect and enhance this varied character.

**13.61** Views of St Michael and All Angels Church are long-standing landmarks and key to informal wayfinding into the North End Quarter, therefore the scale and massing of developments should respond to existing variation in heights to respect and maintain this. Other important views in and around the Quarter must be preserved and enhanced. Development proposals will need to be tested in views to assess the suitability of scale, massing and height.

**13.62** Public realm improvements such as the provision of green infrastructure including sustainable blue infrastructure where appropriate, improved wayfinding, lighting and seating will help support the existing and future access needs on Poplar Walk and help mediate between the different needs of service access vehicles, buses, cyclists and pedestrians.

**13.63** Contributing to and supporting improved permeability between Station Road and Poplar Walk, will help improve pedestrian accessibility and also support active travel into the Quarter. Existing pedestrian flows into North End Quarter from West Croydon Station are focussed on the busy junction of Station Road and North End where pedestrian space and crossings are severely restricted.

**13.64** As part of the public realm improvements there is potential to expand and further distribute existing pockets of green spaces adjacent

<sup>135</sup> West Croydon Masterplan

<sup>136</sup> Croydon Future Destination of Retail Study

and parallel to St Michael's Church. The existing car parking on the north side of Poplar Walk and hard-landscaped square on the south side, have the opportunity to provide generous and connected spill out space for local office workers, local businesses, temporary and long-term community use such as markets, play space and events. This can be done by producing a variety of spaces, some which are unfurnished providing space for programming and others that provide street furnishings that can be used for multiple purposes.

## NEQ DM 4 Wellesley Road – Croydon’s front path

**NEQDM 4** This is the main highly trafficked route into Croydon town centre through all modes of travel. Experienced as the “ front path” of the metropolitan centre, development should contribute to reducing the dominance of the road infrastructure by appropriate design facing the road and where appropriate providing for and integrating enhanced public realm that where appropriate will create pedestrian and cycle links, a green artery with enhanced biodiversity and a series of pocket parks;

- a) Address the deficiency in sustainable green infrastructure within the area by maximising tree planting, greening, SUDs, sustainable landscapes that create a thriving ecological corridor and improve the environmental qualities of the area, whilst integrating and connecting with the green grid network and balancing the impact of existing and proposed high density developments;
- b) Complement and build on the character of the historic modernist architecture of the area so that it feels like you are passing through a point in time in Croydon’s past;
- c) Ensure tall buildings complement the existing surrounding townscape, respect and enhance the setting of heritage assets through rigorous testing for impact and create a cohesive townscape; and
- d) Ensure buildings fronting the eastern and western sides of Wellesley Road enhance and connect to the public realm around them and appropriately announce themselves with active forecourts and ground floor frontages, integrated wayfinding and public access.



## How the policy works

**13.65** Passive surveillance, active frontages and widening of footways are critical to improving the public realm and pedestrian experience along the western side of Wellesley Road. As part of this, consideration will need to be given to reducing the impact of servicing of commercial developments on the pedestrian environment and the road network. Access to public car parking has the same detrimental impact, notably providing some difficult road crossings for the pedestrians walking along the western side of Wellesley Road. A reconnected urban realm will serve as a public backbone for future developments<sup>137</sup>.

**13.66** Generous green infrastructure that is informed and supported by Green Grid and Healthy Streets principles will be essential to reducing the severance caused by the road network, improving the environmental

quality of the area, and creating an attractive public welcome to the North End Quarter to draw in more visitors. Noise and air pollution, traffic dominance and poor accessibility create a confusing and hostile environment, which will need to be repaired as part of its transformation. Using existing infrastructures to support new forms of public life has been proven as a successful model<sup>138</sup>.

**13.67** Historic landmarks such as St Michaels & All Angels Church to the north, and Electric House to the south are important informal wayfinding signposts and contribute to the overarching destination offer of the North End Quarter. The landmarks can be part of a wider wayfinding strategy that connects through to Fairfield Halls, setting up a series of historic building signposts along Wellesley Road.

## Policy NEQDM5 George Street (to the west of Wellesley Road) – Historic Southern Edge

Development in this area should be informed by its rich heritage assets and how these form the southern boundary of the North End Quarter by:

- a) Creating for a distinctive historical entrance and forecourt on the southern edge of the quarter and along a key east-west route through the town centre, and creating a strong building line;
- b) Uplift and enhance the public realm and pedestrian environment around the tramline and Listed Whitgift Almshouses;
- c) Improve shopfronts and building facades along the George Street, ensuring attractive and active frontages are created;;
- d) Provide for interim and precursor use of the former Allders building and arcade where connected to a long term strategy and plan or where the activity compliments and doesn't compromise the delivery of the long term vision and objectives for the North End Quarter; and
- e) Retaining and enhancing the existing façade of the former Allders Department Store.

<sup>137</sup> As evidenced in Croydon Future Destination of Retail Study - Luchtsingel/Luchtpark.

<sup>138</sup> As evidenced in Croydon Future Destination of Retail Study - The Bentway in Toronto.

## How the policy works

**13.68** George Street is an important artery of the Central Croydon Conservation Area, and respecting and enhancing its historic character will contribute to the distinctive destination offer in the North End Quarter<sup>139</sup>. The medieval street pattern is distinct to the area and includes a series of high quality Victorian commercial buildings with prominent dormers and gables Grade I Listed Whitgift Almshouses sited on the corner of George St and North End. Design proposals that reflect and enhance this character with the aim of preserving and strengthening a clear building line and the streetscape will be supported

**13.69** Pedestrian routes lead to several major destinations in the Quarter through Fairfield Halls, the Clocktower and Town Hall complex, the Minster and Surrey Street Markets through to the tramline which connects beyond to East Croydon Station and Purley Way. Public realm improvements should seek to enable improved connection to the historic Thomas Turner Path and to enhance pedestrian access through to Park Street.

**13.70** The street is named after the ancient medieval inn, The George that stood on the south-west corner opposite the Whitgift Almshouses. Given its central location, improving active frontages to bring out this history will help attract pedestrians into the North End Quarter, and improve passive surveillance.

**13.71** The internal arcade in the former Allders building previously provided a pedestrian through-route to George Street proposals for interim or early phase use of the building that re-utilises it and/or improves permeability and connectivity from George Street – northwards in a different manner will be welcomed and encouraged.

**13.72** The provision of interim and short-term uses are proven to be successful ways to test new activities and uses for existing buildings<sup>140</sup>. The former Allders building has a rich history of incremental development and innovation which should be celebrated and enhanced as part of new phased development of the building. This can include a medium term precursor phase that in turn informs longer term use and development proposal for the building.

<sup>139</sup> As evidenced in Croydon Future Destination of Retail Study – Kings Cross London

<sup>140</sup> As evidenced in Croydon Future Destination of Retail Study – Renew Newcastle, Australia and The Department Store, Brixton, the Meanwhile Programme programme in Croydon Town Centre.

## Policy NEQDM6 Public realm in the North End Quarter

To improve the function of the North End Quarter as a shared social and cultural platform with healthy streets and public spaces, development should increase the extent and quality of public realm by:

- a) Delivering public value and facilities for the borough's diverse communities, demographics and needs, including but not limited to introducing play areas for families, public toilets and providing spaces and facilities for young people and the elderly;
- b) Include well designed streets, high quality and public spaces (indoor and outdoor) incorporating digital and smart city infrastructure that are inclusive; improve health and wellbeing; contribute public facilities for the borough's diverse communities, and provide opportunities for social and cultural life to thrive;
- c) Introduce a cohesive, welcoming and unique North End Quarter identity that responds to and enhances the heritage of the area through high quality hard and soft landscaping, green and blue grid infrastructure, street furniture, walking and cycling routes including cycle parking, lighting, seating and signage;
- d) Ensure ground floor uses are developed as an holistic part of the public realm that maximise active frontages, ensuring permeability and vibrancy, passive surveillance, safety and consolidated sustainable service arrangements;
- e) Deliver legible, safe and open east-west and north-south 24 hour public routes and connections through the North End Quarter; including new east-west routes (from Frith Road, North End through to Wellesley Road and beyond towards East Croydon to the east and Wandle Park and Purley Way to the west); new north-south routes from the West Croydon area and Poplar Walk to George Street; supporting further connectivity through the New Town Quarter to East Croydon Station and Fairfield Halls including safe 24 hour pedestrian routes linking the western side of Wellesley Road with Lansdowne Road and beyond; and
- f) Where possible, bringing forward public realm improvements in the short term to improve footfall and vitality.

### How the policy works

**13.73** The North End Quarter is the principal destination centre in Croydon, and its public realm needs to function as a shared social and cultural platform for all who work, visit and live in the borough and attract visitors from across Croydon and beyond. As such, the public realm of the

North End Quarter needs to be exemplary; improving health and wellbeing, addressing the climate change emergency, and accessible to all.

**13.74** Due to the increase of housing in the North End Quarter, the public realm must also accommodate the diverse needs of the growing

residential community with the provision of play areas for families with small children, spaces for neighbourly exchange and accessible outdoor space and seating for older populations.

**13.75** A generous and high quality public realm encourages people to stop, sit and socialise giving the space character and vibrancy. Providing a multi-layered public realm helps to create a space that supports diverse uses reflective of the culturally rich and varied population in Croydon.

**13.76** Early interventions and early delivery of public realm has proven to unlock opportunities for growth, development and further investments, building footfall and improving perception of an area. Further, it provides a mechanism and platform for meaningful public engagement which in turn leads to public buy in, sense of ownership and therefore the success and vibrancy of the area<sup>141</sup>. Public realm improvements can be considered as part of a new public-private partnership model. A high quality public realm supports active travel which is proven to be of health and economic benefit, increasing visitation and social exchange<sup>142</sup>. Understanding that both the public and private sector have much to gain from improved public realm with walkable sustainable places that add real value. There should be a compelling logic to pursue improvements through innovative public-private partnership routes to unlock the Quarter. Early improvements to the public realm can take place in phases as parts of the quarter come forward for development. It can also include interim and precursor interventions within the Whitgift Centre to open up the urban block and iteratively build up a network of streets and public spaces. Examples of interventions that can be tested and will create a positive impact include but are not limited to removal of parts of the retrofitted roof structure, ground level creative interventions to create new social spaces.<sup>i</sup>

**13.77** The provision of digital and smart city infrastructure will ensure the area is future proofed and resilient; improving connectivity and flexibility of the public realm, addressing climate change and increasing its destination

<sup>141</sup> There are good examples locally and from further afield that demonstrate these benefits and public value, e.g. Ruskin Square; Luchtsingel/Luchtpark in Rotterdam; Kings Cross; and more - Croydon Future Destination of Retail Study

appeal. It can also help to address existing digital inequality within the borough and will support a knowledge economy, education uses and an innovation hub within the North End Quarter.

**13.78** A cohesive public realm that stitches together the varied history of the North End Quarter will improve the general legibility and accessibility of the area for visitors. Historic buildings and sites of interest can be highlighted as unique landmarks through the area, through the introduction of signage and wayfinding, lighting, seating, public art, hard and soft-landscaping.

**13.79** A holistic ground floor strategy across internal and external spaces within the North End Quarter, will ensure the area is accessible and safe for all visitors, with an established front and back-of-house. 24-hour active frontages will support pedestrian use and create natural passive surveillance, whilst coordinated service arrangements will ensure service vehicles and delivery services are efficient and discreet.

**13.80** Improved public routes to and through the North End Quarter will increase the safety and usability of the area as a 24 hour destination. Night time uses are known to be diversifying, supporting the demand for a variety of night time uses such as sports and leisure facilities encourages active lifestyles while creating all hours activity that reinforces the areas role as the boroughs Metropolitan Centre.

**13.81** The North End Quarter has the best access to public transport links in the borough, and providing sustainable connections to transport links in the North End Quarter will improve car-free access across the borough. Enhancing the pedestrian link between the North End and the Eastern side of Wellesley Road will reconnect the areas severed by the road, connecting the Old Town and the New Town areas. Enhancing this connection to ensure the safe 24 hour movement between these areas

<sup>142</sup> <http://content.tfl.gov.uk/street-appeal.pdf>

will help to improve access and increase vibrancy in the North End Quarter.

**13.82** The integration of materials and style that reflects the heritage of the area can be achieved through high quality hard and soft landscaping, street furniture, including lighting, seating and signage. Materials used should reflect the built environment as well as integrating native plantings.

### Policy NEQ DM7 Green and blue infrastructure

As the area is deficient in green and blue infrastructure development should::

- a) Through innovative green and blue landscapes and interventions at all levels of developments, including streets and public spaces, green roofs, green walls; productive landscapes and urban agriculture, deliver enhanced biodiversity;
- e) Integrate sustainable urban drainage and permeable paving throughout the North End Quarter;
- f) Include urban farming in external and internal spaces where appropriate;
- g) Mitigate the impact of development through the provision of tree planting and other green and blue infrastructure as part of an urban greening strategy and proportionate to its impact;
- h) Ensure maintenance of green and blue infrastructure is minimised in design;
- i) Ensure all walking and cycling interventions include accessible and inclusive public amenity and facilities to cater to the borough's diverse communities, demographics and needs; and
- j) Include walking and cycling links that connect people to the wider strategic routes, blue and green infrastructure through the town centre and beyond in a sustainable manner, improving health and wellbeing.

## How the policy works

**13.83** The North End Quarter is an urban setting currently characterised by large amount of concrete hardscaping and asphalt. Introducing green and blue infrastructure into the North End Quarter will provide multiple proven environmental benefits, reducing flood risk and improving storm water filtration as well as reducing the urban heat island effect, improving air quality and biodiversity. Measures like tree planting will reduce the ambient temperature at the ground level, improving thermal comfort.

**13.84** Green and blue infrastructure will enhance and connect to the wider green and blue grid in the borough to help facilitate a positive response to climate challenges, improving biodiversity and greening throughout the borough along with wider benefits captured in the Green Grid chapter. Blue infrastructure in this case refers to integrated interventions such as Sustainable Urban Drainage systems (SUDs), sustainable urban irrigation systems, rain gardens amongst others that enable a thriving sustainable green grid with circular benefits to the public realm and environmental qualities; however if proposed and appropriate it does not preclude decorative water features such as water fountains. Where interventions like decorative or play based water features are proposed as part of a high quality public realm design alongside a robust management and maintenance plan, these will considered and assessed on their own merit.

**13.85** Integrating sustainable green and blue infrastructure into the public realm will also have wider social and economic benefits, improving the attractiveness and amenity of active travel routes, shopfronts, restaurants and residential buildings. It is proven to have significant health and wellbeing benefits, increasing levels of physical activity and perceptions of safety. Additionally, this infrastructure will help support economic resilience and circular economy principles in the form of productive landscapes, efficient management of resources, reuse of buildings and supporting community-led initiatives.

**13.86** Green and blue infrastructure can be provided as part of existing building refurbishment as well as new development. It is proven to be an

effective tool in regenerating buildings and connecting and creating new communities.

**13.87** Sustainable urban drainage (SUDs) is proven to be an effective way of reducing surface flooding and should be incorporated into all area proposals. Proposals that integrate these and restorative redevelopment such as daylighting former historic ponds where appropriate for public amenity would be supported.

**13.88** Existing trees have significant value and should be maintained and relocated if required, alongside new planting. A tree plan will be used to ensure development does not result in a loss of green amenity space. A robust tree plan encourages urban greening to help offset the environmental and social impacts of development. To support and improve biodiversity, plants should include species that are native to the area and be chosen in relation wider ecological corridors that connect to nearby green grid assets such as Wandle Park, Queens Gardens and Park Hill Recreation Park.

**13.89** Maintenance of green grid infrastructure is essential to maximise its benefits. Overgrown green spaces, for example, can negatively contribute to perceptions of safety and sense of belonging. Consideration of ongoing upkeep costs should be included as part of the initial design process to ensure the sustainability and ongoing viability of the project.

## 14. Transforming the Purley Way

### Where we are now

- With a long industrial heritage Purley Way remains the industrial and warehousing heartland of the borough and is strategically important for London as a whole. The area is home to around 600 businesses and 115 artists, occupying nearly 706,000m<sup>2</sup> of employment floor space and providing approx. 10, 000 jobs.
- The majority of businesses are Small and Medium Enterprises (SMEs) comprising 0-9 employees. There is also an emerging cluster of creative industries and, given its strategic location relative to central London and Gatwick Airport and road connections, a growing number of logistics, storage and distribution businesses.
- The area is a significant out-of-town shopping and leisure destination and includes a large number of 'big box' low-rise retail buildings. Shopping habits and how people consume leisure and cultural experiences is changing rapidly, accelerated by the COVID-19 pandemic in 2020, and this is likely to affect demand for the mainly 'big box' shops, leisure and cultural infrastructure in the Area in the future.
- The area includes established residential communities which has increased by about 7% over the last five years, more than double the rate of the borough as a whole.
- There has been limited commercial development in recent years, yet demand for space was outstripping supply. Demand is also changing, as witnessed by the proposed Amazon distribution centre on a non-SIL designated site at Trojan Way.

- The Purley Way (A23) corridor itself currently dominates and divides the area. It consistently has heavy traffic and relatively poor public transport along the corridor. It also has an unpleasant street environment, is noisy and suffers from poor air quality. This means walking and cycling are not attractive options at present.
- The area has little tree cover, and the quality of buildings is generally poor. However, there are pleasant green oases and hidden gems including Wandle Park, Waddon Ponds and the River Wandle.
- The area's important industrial and social heritage is revealed through several listed and locally listed buildings. Buildings such as the locally listed power station chimneys and the Grade II listed Water Palace diving boards were operational in their original uses within living memory and as such hold particular local significance amongst older people.
- Local engagement has revealed that the retail and leisure offer of areas such as Valley Park and the Colonnades have specific resonance for local young people, who enjoy socialising in these areas.

**Vision for the Purley Way**

The Purley Way (A23) will be transformed from a hostile and divisive road in to a green city street. It will integrate new development with important retail and industrial areas and existing communities in Broad Green & Selhurst and Waddon.

Transformation will be organised around a cluster of three, new district centres and one neighbourhood centre, each with a clear purpose and character which responds and enhances positive elements of local character and the setting of heritage assets, and complements Croydon Metropolitan Centre, Purley Town Centre, the Beddington Lane industrial area and other places in Croydon and Sutton.

Enhanced public transport links and services, including an improved Waddon Station and enhanced tram services, and additional health, child care, education and other community facilities will support new homes in these centres. The important

**Where we want to be**

- Strategic Objective 1:** Establish Croydon as the premier business location in South London and the Gatwick Diamond.
- Strategic Objective 2:** Foster an environment where existing, new, innovative, cultural and creative enterprises, civic uses, knowledge economies and learning & development can prosper, and create a new vibrant place for all.
- Strategic Objective 3:** Provide a choice of housing for people at all stages of life, from all socio-economic and cultural backgrounds and for a variety of mobility needs
- Strategic Objective 4:** Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment,

economic role of the area and its thriving business community will be further strengthened and celebrated as an integral part of these mixed-use neighbourhoods.

The road environment will be enhanced to encompass welcoming, high-quality public spaces, stitched together by a network of green and blue walking and cycling routes and opened-up sections of the River Wandle these will connect existing green spaces, central Croydon and the wider Wandle Valley. Together, these interventions will reinvent the area as a desirable, sustainable, healthy and attractive place to work, live and play and one which rises to the challenge of climate change and incorporating the highest environmental standards.

- improve skills and education and renew housing, community and environmental conditions.
- Strategic Objective 5:** Ensure that well designed, high quality new development both integrates, respects and enhances the borough’s natural environment, unique character and built heritage
- Strategic Objective 6:** Provide and promote well designed emergency services, civic and community, arts & culture, education, health & wellbeing, hospitality, leisure and entertainment facilities to meet the aspirations and needs of diverse and growing communities
- Strategic Objective 7:** Conserve, enhance and create spaces and buildings that foster safe, healthy and cohesive communities.
- Strategic Objective 8:** Improve the public realm, smart city and social infrastructure including accessibility, inclusivity, permeability, connectivity, sustainability and ease of movement to, from and



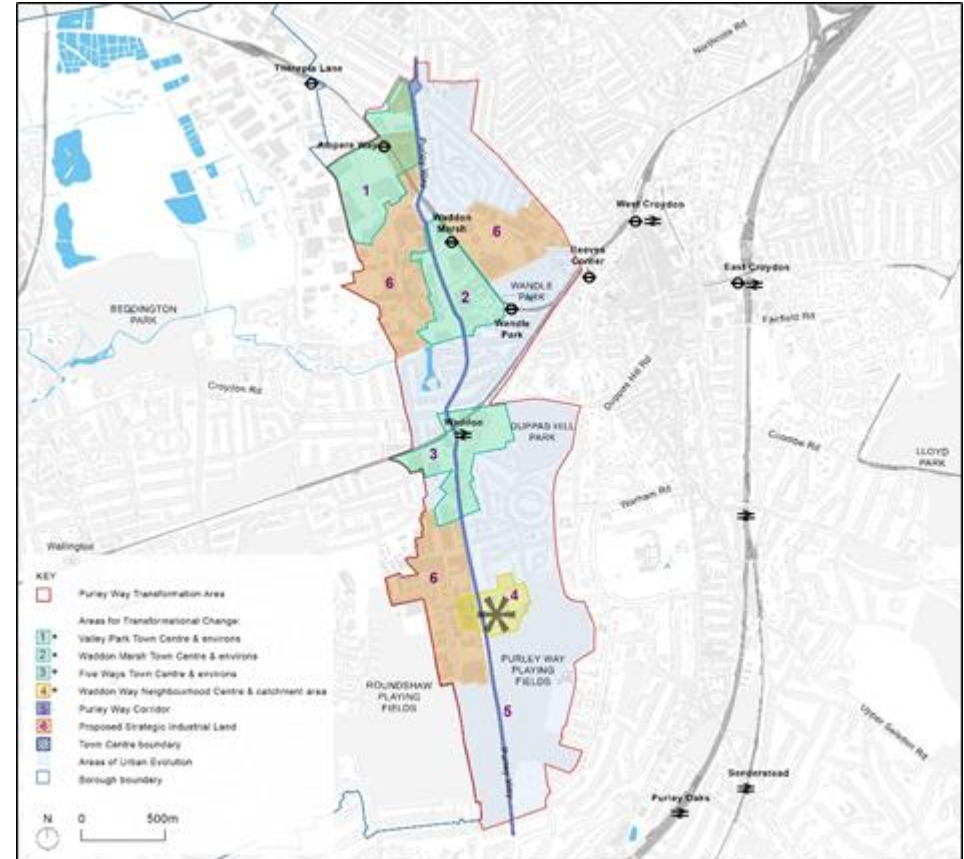
within the borough; Ensuring this enhances and integrates the borough's green and blue grid, and in turn public health and wellbeing.

**Strategic Objective 9:** Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.

## Why this area will be transformed

**14.1** The potential to strengthen Purley Way transformation area's role as a strategically important industrial location between central London and Gatwick, consolidate and reshape its retail offer and provide additional high-quality homes makes it a key component of the overall borough-wide spatial strategy. There is the opportunity to transform the area by giving it a coherent structure by breaking down the traffic corridor into a series distinctive centres which accommodate a range of uses to complement and better integrate existing residential and businesses areas.

**14.2** In terms of planning policy, the area has been divided in to 'areas for transformational change' and 'areas of urban evolution'.



**Figure 14.1** Areas for transformational change and areas of urban evolution

### 'Areas for transformational change'

**14.3** The following six areas will be the focus of growth and intensification where wholesale changes will take place in terms of land use mix, density and character.

Table X.X: Areas for transformational change

Area of transformation	Strategic opportunities
<p>1. Valley Park Local Centre and environs</p>	<p>Valley Park is a gateway into Beddington industrial zone, and currently accommodates a hub for leisure and big box retail. There is potential to consolidate these uses and mitigate large areas of car parking which currently make this area less pedestrian and cycle friendly. The area benefits from existing connectivity with Croydon Town Centre via tram links and has capacity to accommodate a variety of innovative housing models including self-build, custom-build, intergenerational, and community-led housing, along with intensification of industrial sites. The area’s industrial heritage, including the Ikea chimneys (Local Designated Landmarks) are key contributors to its sense of place.</p>

Area of transformation	Strategic opportunities
<p>2. Waddon Marsh Local Centre and environs</p>	<p>Waddon Marsh is primarily characterised by big box retail plots with large car parks which flank both sides of the Purley Way (A23). The area benefits from existing connectivity with Croydon Town Centre via tram links as well as proximity to two historically rich and high quality green spaces – Wandle Park and Waddon Ponds. There is opportunity to strengthen the retail and employment offer by consolidating into a local centre which replaces car parking with active frontages, and accommodates new community uses, high quality public realm, and a variety of innovative housing models, co-located with retail, leisure and industrial uses.</p>

Area of transformation	Strategic opportunities
3. Fiveways Local Centre and environs	Fiveways is currently dominated by a convergence of main vehicle routes which has resulted in insensitive transitions between character areas, and a lack of sense of place. The area does benefit from its proximity to Waddon Station which gives opportunity for increased density, as part of a new local centre for both existing and new residential communities. The centre could include the co-location of a variety of innovative housing models with re-provided retail, community and leisure uses, whilst celebrating the Waddon Hotel and Old Tithe Barn heritage assets.
4. Waddon Way Neighbourhood Centre	Waddon Way is the southern gateway into Purley Way transformation area which accommodates a range industrial, residential, leisure and recreational uses, including key local assets such as Croydon Airport and Purley Way Playing Fields. The convergence of multiple uses within the area presents a prime opportunity to provide a retail/leisure destination, co-located with family housing. The existing historical landmarks in this area should be celebrated and enhanced.

Area of transformation	Strategic opportunities
5. Purley Way Corridor	The main road is currently noisy, dirty and harsh – with parts of it being identified as an Air Quality Focus Area. There is the opportunity to transform the quality of this space by turning the road in to a sustainable green urban street that unites rather than divides the Purley Way transformation area and encourages walking and cycling by reducing the impacts of traffic.
6. Strategic Industrial Land	The Purley Way transformation area contains three distinct sub-areas of SIL which provide vital employment space for the borough and the wider region. There is an opportunity to deliver intensification of employment uses in these areas and better integrate them with other uses, whilst ensuring new adjacent uses do not prejudice the functionality of the SIL.

‘Areas of urban evolution’

**14.4** The areas of urban evolution are the established mainly residential neighbourhoods around Euston Road, Waddon Road and Denning Avenue. The emphasis here will be on making sure that existing communities are integrated with and benefit from growth in the transformation area. Any change here will comprise relatively small-scale development and interventions that respond positively to and help evolve the existing character of these areas.

## How we are going to get there

### Policy PWSP1 Transforming the Purley Way

**PWSP 1.1** The Purley Way transformation area will be transformed through development opportunities, as well as, and including, public realm improvements, to be undertaken in a cohesive and coordinated manner, in accordance with the design principles set out in the Purley Way Masterplan and Delivery Strategy SPD.

#### Homes

The Purley Way transformation area forms a significant part of the strategy to meet the housing needs of the borough so the Areas for Transformational Change should deliver up to 7,515 homes. This will be achieved by:

- a) Co-locating housing with other uses to make the best use of land, create vibrant mixed-use developments, improve personal safety, reduce the need to travel and help vitality and delivery;
- b) Ensuring that new housing is located and designed in ways which responds positively to existing and expected future environmental qualities of the area; and
- c) Ensuring that new housing does not compromise the integrity, operation, economic viability and effectiveness of industrial and waste uses by requiring new housing to adopt the Agent of Change principles when designing new developments.

**PW SP 1.2** To ensure that public transport capacity in the area is sufficient to accommodate growth:

- a) From 2019 no more than 4,000 additional homes shall be consented in the Purley Way Transformation area in advance of detailed transport modelling being completed to objectively assess the highway and sustainable transport measures needed to accommodate more than 4,000 homes and the implementation of associated further improvements to highway and sustainable transport capacity.

#### Employment

**PWSP1.3** Development should strengthen the important role that the area plays in terms of business and enterprise, support Croydon Metropolitan Town Centre and other town centres in Croydon and Sutton and ensure no net loss of industrial and warehousing/distribution floorspace (B2/B8) and non-Town Centre Class employment generating E uses (light industrial, R&D within Strategic Industrial Land (SIL) over the plan period. This will be achieved by:

- a) Consolidating and safeguarding Strategic Industrial Land (SIL) for industrial, warehousing/distribution and non – Town Centre employment generating E Class uses(i.e. light industrial, R & D)uses as part of the 4 tier approach;

- b) Protecting existing industrial and warehousing/distribution floorspace and facilities, ensuring that businesses can operate on a 24-hour basis and ensuring that on land adjacent to SIL any permitted non industrial and warehousing/distribution uses/buildings are located and designed accordingly to ensure industrial floorspace is not compromised;
- c) Encouraging the intensification of all industrial stock and poor-quality industrial and warehousing/distribution floorspace and facilities;
- d) Supporting the retention, intensification and re-provision of cultural production space' (industrial, warehousing, small-scale office use occupied by Creative Industries) in the streets around Wandle Park;
- e) Proposals will improve the environmental quality and safety of streets and public spaces within SIL, bringing forward public realm enhancements, improved streets and introducing more street trees and better lighting to connect the areas of SIL with the proposed Local and Neighbourhood Centres;
- f) Ensuring that there is a better range of small-scale 'walk to' services for industrial occupiers that support enterprise, such as workplace crèches and cafés;
- g) Encouraging the consolidation of retail and leisure uses at Valley Park, Waddon Marsh and Fiveways through permitting new Local Centres, convenience shopping, services and leisure that are small in scale and which focus on supporting businesses, workers, and residents. These may have the potential to form new Local Centres during the life of the Local Plan in line with Policy DM22.
- h) Adopting a 'town centre first' approach to all other town centre uses, encouraging comparison shopping, large-scale commercial, leisure floorspace and offices to re-locate to Croydon Metropolitan Town Centre and District Centres;
- i) Creating a Waddon Way Neighbourhood Centre and allowing new small-scale convenience shopping and community uses to support nearby business and residential communities.

#### Urban design and local character

**PWSP1.4** The creation of distinctive Local and Neighbourhood Centres will help provide a stronger structure and sense of place for the area. This will be achieved by:

- a) Focusing development and taller buildings in proposed Local and Neighbourhood Centres;
- b) Integrating these Centres with their environs, including existing industrial/warehousing, open spaces and residential areas, by new attractive green streets and routes that will enable the creation of more viable frontages;
- c) Transforming Purley Way (A23) into a pleasant, new city street which balances its important movement function with a sense of place in the Local and Neighbourhood Centres it passes through and is fronted by high-quality buildings, spaces and trees which create attractive places and help improve air quality;
- d) Safeguarding and revealing the significance of existing landmarks, views and heritage assets (and their settings) and drawing upon these assets to develop attractive new development that responds to and is fully integrated with the character of Broad Green & Selhurst and Waddon Places to enhance the identity of places along Purley Way (A23);
- e) Ensuring that new development has a positive relationship with and provides natural surveillance of streets, routes and spaces and that high-quality tree planting and landscaping helps ensure an attractive walking and cycling environment along heavily trafficked routes.

**PWSP1.4** To create a stronger structure and sense of place along the Purley Way (A23) corridor (as defined within the masterplan) the following six design principles will be applied:

- a) Provide a street-based frontage for new buildings;
- b) Frame the street with buildings that establish a rhythm of rising and falling height along its length and avoid creating canyons where poor air quality could get trapped;
- c) Create separate perpendicular streets for residential access and service for employment areas either side;
- d) Establish parallel 'quietways' that provide priority for pedestrians and cyclists, stitch together new development with existing neighbourhoods and provide high-quality amenity space; and
- e) Respond positively to adjacent development by ensuring back-to-back, scale-to-scale and use-to-use relationships that support the successful integration of uses and built form;
- f) Ensure new development has a positive relationship with, and provides natural surveillance of, streets, routes and spaces

#### Community facilities

**PWSP1.5** The council will ensure that additional homes and new businesses and the good growth of the area incorporates sufficient additional social infrastructure to meet additional demands and integrate existing and new communities, especially earlier in the plan period. This will be achieved by:

- a) Identifying the current need and likely need for additional childcare, school places, community spaces, health and sports facilities for the Purley Way transformation area and borough wide, and allocating land accordingly and establishing appropriate monitoring and delivery mechanisms to ensure that provision keeps pace with population growth; and
- b) Locating additional facilities in Local and Neighbourhood Centres and improving connections so that they can be used by existing as well as future residents, businesses and visitors, whilst complementing and integrating with existing facilities and networks.

#### Environment and Climate Change

**PWSP1.6** Growth within the transformation area will be expected to take advantage of the area's proximity to the Beddington Energy Recovery Facility to allow the use of a low carbon heat source to its future residents and commercial users. To maximise opportunities to make a positive contribution to tackling climate change and to improve air quality, new major development will be required to :

- a) Incorporate a communal heating system powered by an appropriately located energy centre with sufficient space for a district heat substation

- b) Explore opportunities to include an appropriately sited soft wall to allow a connection to a future Beddington -Central Croydon District Energy Network (DEN).
- c) Ensure any green renewable energy technologies incorporated in new development are compatible with a future connection to the DEN

#### Green and Blue Grid & Open Space

**PWSP1.7** Transform the area into a much greener, more attractive and better-connected place to support the expected levels of growth by requiring new development to provide or otherwise contribute towards:

- a) The development of the Wandle Valley Regional Park;
- b) De-culverting the River Wandle and integrating the open river with new development, routes and spaces;
- c) Improving the attractiveness of green spaces and their ability to accommodate increased levels of activity;
- d) The provision of additional green space and public realm, particularly in that part of the area to the north of Mill Lane/Waddon Road, including pocket parks and squares;
- e) Tree planting along Purley Way (A23) and other public highways, Innovative and generous landscaping and other green and blue features including rain gardens, living roofs, green walls and productive landscapes that results in a net gain in biodiversity;
- f) .

#### Transport and Communication

**PWSP1.8** Working with landowners, developers, Transport for London, Network Rail and other stakeholders and securing provision and/or financial contributions towards improving the area's walking and cycling, public transport, highway and parking infrastructure to ensure that the Purley Way transformation area has sufficient capacity to support the level of proposed growth and that it maximises the use of sustainable modes of transport. This will be achieved by:

- a) Creating a network of attractive and safe walking and cycling routes that safely and conveniently connect new development with shops, services and open spaces and reduce the severance effect of Purley Way (A23), the tramline, the railway and other roads;
- b) Enhancing public transport nodes (bus stops, tram stops and Waddon Station);
- c) Facilitating enhanced rail services and metroisation at an improved Waddon Station;
- d) Facilitating additional tram capacity on the Wimbledon branch;
- e) Establishing Purley Way (A23) as a sustainable transport corridor by reducing 'pinch points' to secure wider footways, better cycle lanes and better bus priority measures and enabling a potential extension of the tram network.
- f) Facilitating enhanced and/or new bus services along the Purley Way (A23) corridor;

- g) Supporting TfL with implementing improvements to the Fiveways junction and other improvements to other priority road junctions;
- h) Requiring development sites to make use of existing junctions to avoid adding additional turning movements and increasing congestion on the network;
- i) Improving and reducing the impact of deliveries and servicing by using Delivery and Servicing Plans to designate traffic routes for new industrial, warehousing/distribution and retail developments;
- j) Incorporating Smart City and digital infrastructure to make networks and services as efficient as possible;
- k) Manage construction activities to minimise adverse impacts on traffic, business operations and residential amenity.

#### Car parking standards

**PWSP1.9** In order to promote lower carbon forms of transport, decrease congestion on the borough's highways and reduce the impact and level of car parking in new developments, the following will be implemented:

- a) Existing and proposed new (subject to consultation) Controlled Parking Zones (CPZs) across the whole Purley Way transformation area;
- b) All new development on sites marked as 'Short-term' in Table 4.5 will be required to comply with the borough-wide car parking standards;
- c) All new development on sites marked as 'Medium-term' in Table 4.5 will be required to comply with Purley Way Car Parking Standards 1, as set out in table 4.1, subject to CPZ's are existing or being implemented; and
- d) All new development on sites marked as 'Long-term' in Table 4.5 will be required to comply with Purley Way Car Parking Standards 2, as set out in table 4.2 , subject to CPZ's are existing or being implemented.

#### Areas of urban evolution

**PWSP1.10** Growth in the 'areas for transformational change' will be well integrated (physically, socially and economically) with existing residential and business communities in 'areas of urban evolution' by ensuring that:

- a) New employment space provides additional high-quality job and training opportunities for local people and helps support the sustainability of the local centres;
- b) New community facilities are in locations that are convenient for existing communities;



- c) Improved and new walking and cycling routes connect neighbourhoods with improved public transport nodes and Local and Neighbourhood Centres;
- d) Proactive measures are taken to prevent additional traffic and overspill car parking;
- e) A secondary school on the Heath Clarke site is provided; and
- f) Improvements to Canterbury Road Recreation Ground, Wandle Park, Duppas Hill Park, Waddon Ponds, Purley Playing Fields and Purley Way West are supported.

**Table 4.1 Purley Way Car Parking Standards 1 (medium term)**

Land use	Proposed PTAL of 4+	Proposed PTAL of 3 or less
Residential (C3 and C4) <sup>[1]</sup>	Aim for car free (except disabled parking in line with borough/London Plan standards)	Max 0.5 parking space per dwelling
Residential (C2)	As per borough/London Plan standards	
Business (B2)	Car-free except for disabled and operational parking	
Warehousing & Distribution (B8)	Case by case basis, but in line with borough/London Plan standards for Outer London: Up to 1 space per 100m <sup>2</sup> GIA, plus disabled and operational parking	
Hotel (C1)	Car-free except disabled parking, operational parking and coaches where appropriate	Minimal parking provision, except for coaches and disabled parking
Commercial, Business and Service (E)	As per borough/London Plan standards – up to 1 space per 75m <sup>2</sup> GIA	
Learning and non-residential institutions (F1)	As per borough/London Plan standards	
Local Community (Class F.2)	As per borough/London Plan standards	
Sui generis	Case by case basis, minimum operational parking and disabled parking	

**Table 4.2 Purley Way Car Parking Standards 2 (long term)**

Land use	Proposed PTAL of 4+	Proposed PTAL of 3 or less
Residential (C3 and C4) <sup>[2]</sup>	Aim for car free (except disabled parking in line with borough/London Plan standards)	Max 0.3 parking space per dwelling
Residential (C2)	As per borough/London Plan standards	
Business (B2)	Car-free except for disabled and operational parking	
Warehousing & Distribution (B8)	Case by case basis, but in line with borough/London Plan standards for Outer London: Up to 1 space per 100m <sup>2</sup> GIA, plus disabled and operational parking	

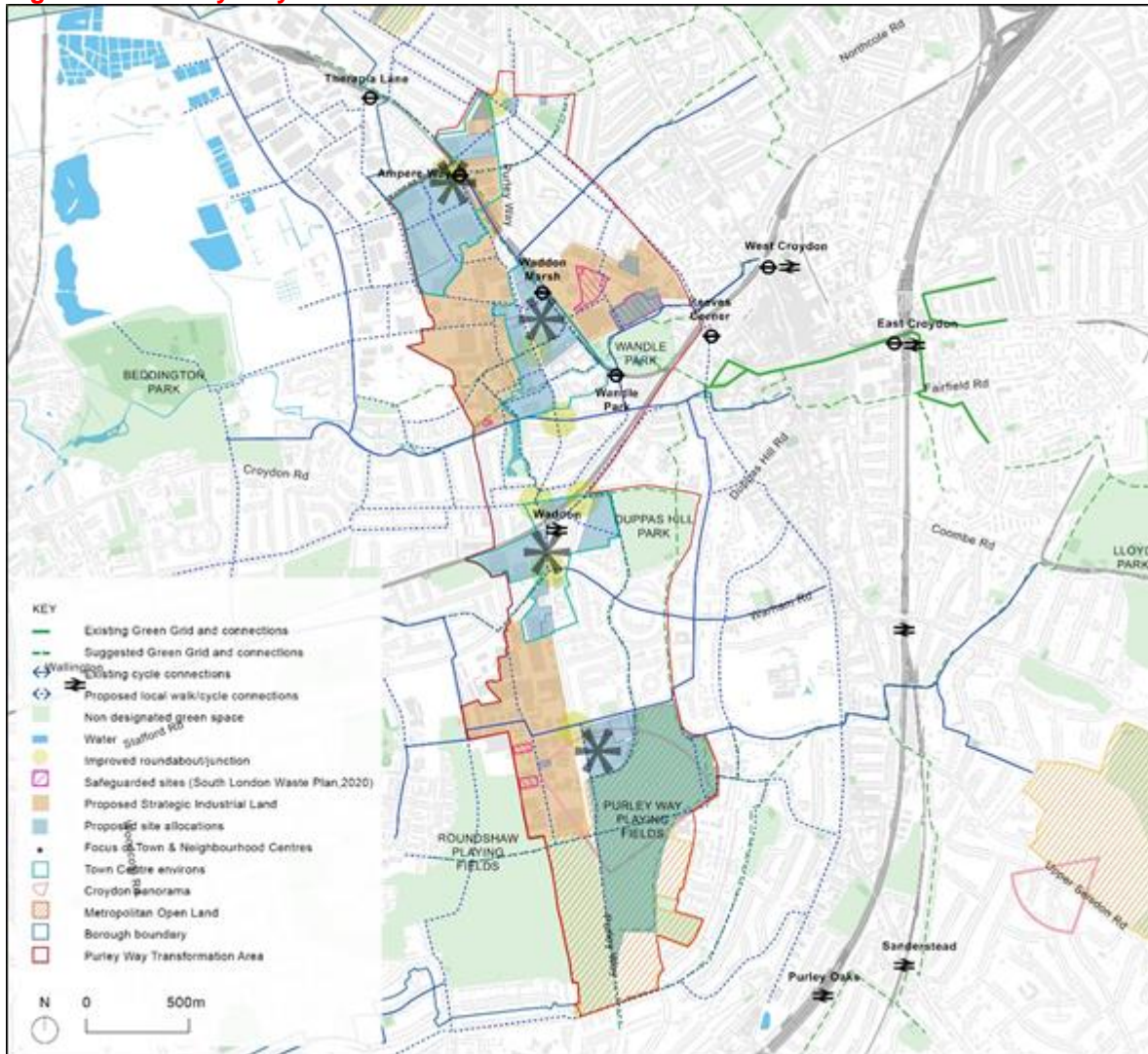
Land use	Proposed PTAL of 4+	Proposed PTAL of 3 or less
Hotel (C1)	Car-free except disabled parking, operational parking and coaches where appropriate	Minimal parking provision, except for coaches and disabled parking
Commercial, Business and Service (E)	As per borough/London Plan standards – up to 1 space per 75m <sup>2</sup> GIA	
Learning and non-residential institutions (F1)	As per borough/London Plan standards	
Local Community (Class F.2)	As per borough/London Plan standards	
Sui generis	Case by case basis, minimum operational parking and disabled parking	

<sup>[1]</sup> Including large scale purpose-built shared living, student accommodation and other sui generis residential uses

<sup>[2]</sup> Including large scale purpose-built shared living, student accommodation and other sui generis residential uses

## What it will look like

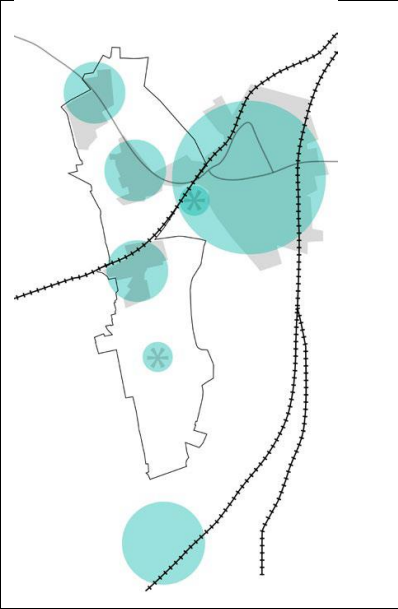
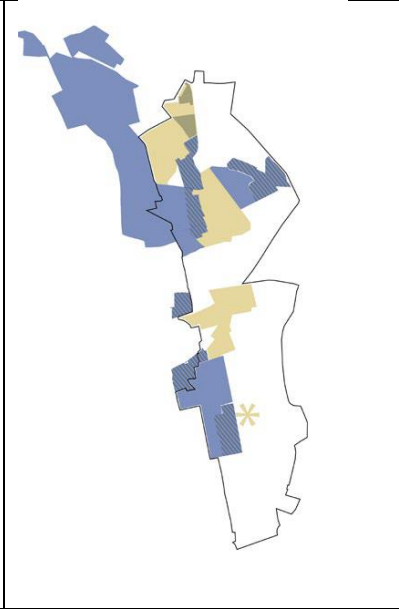

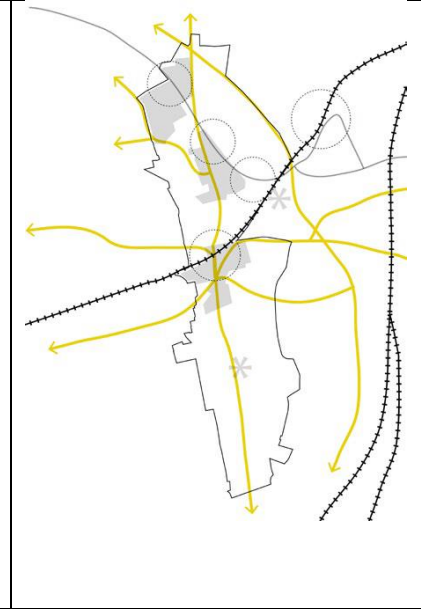
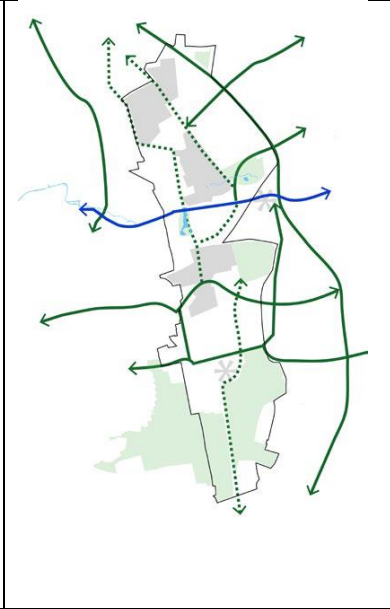
Figure 14.2 Purley Way transformation area



## Spatial Vision

14.5 The Purley Way Masterplan SPD identifies the following five overarching spatial approaches for delivering the vision: character, use, form, connectivity and environment.

Figure 14.3 Spatial vision diagrams

				
<p><b>1. Character: A clear hierarchy of centres</b></p> <ul style="list-style-type: none"> <li>• Create new Local Centres and a Neighbourhood Centre to define new 'places'</li> <li>• Define a distinctive hierarchy between the proposed Local and Neighbourhood Centres and the wider area</li> </ul>	<p><b>2. Use: Transitioning between uses</b></p> <ul style="list-style-type: none"> <li>• Gradual transition between uses</li> <li>• Introduce new mixed residential and employment buildings into the area</li> <li>• Use new mixed-use developments to ensure new residential</li> </ul>	<p><b>3. Form: Shaping the transformation area</b></p> <ul style="list-style-type: none"> <li>• Subdivide the area into a series of segments, rather than one homogenous transport corridor</li> <li>• Distribute building heights avoiding canyon-like streetscape</li> </ul>	<p><b>4. Connectivity: A connective tissue</b></p> <ul style="list-style-type: none"> <li>• Focus on public transport nodes</li> <li>• Connect east-west to reduce severance caused by the Purley Way (A23)</li> <li>• Provide alternative north-south routes running in parallel to Purley Way (A23) that create</li> </ul>	<p><b>5. Environment: Green &amp; Blue grid</b></p> <ul style="list-style-type: none"> <li>• Expand and improve the green and blue grid network and reinforce sustainable connections, linking key open spaces and centres</li> <li>• Increase biodiversity and create habitat corridors</li> </ul>

<ul style="list-style-type: none"> <li>• Embed new centres into existing communities</li> <li>• Enhance and draw upon positive elements of local character and heritage to define character of new centres</li> <li>• Ensure that the area is well connected with Croydon and Purley Town Centres and that new development supports them as 'higher order' centres.</li> </ul>	<p>communities can co-exist with existing industry and businesses</p> <ul style="list-style-type: none"> <li>• Introduce new social infrastructure to support the local areas</li> <li>• Improve the environment for all users by improving the Purley Way (A23) as it passes through the new centres</li> </ul>	<ul style="list-style-type: none"> <li>• Cluster taller landmark buildings around the proposed centres to improve legibility</li> <li>• Lower buildings in sensitive locations, including existing residential areas, heritage assets and protected views</li> <li>• Establish active frontages where buildings face streets and public spaces and help animate them.</li> </ul>	<p>quietways, linking centres with existing neighbourhoods and green spaces</p> <ul style="list-style-type: none"> <li>• Reduce perceived and physical severance between industrial areas, existing neighbourhoods and centres</li> <li>• Link fragmented pedestrian and cycle routes to improve connectivity with surrounding areas</li> <li>• Improve and expand the existing pedestrian &amp; cycling network.</li> </ul>	<ul style="list-style-type: none"> <li>• Improve existing green spaces, increase green space provision and high quality public open spaces</li> <li>• Introduce planting and trees along streets and boundaries to industrial areas.</li> </ul>
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### Why we have taken this approach

#### Homes

**14.6** Based on a number of assumptions, capacity testing work carried out as part of preparing the Purley Way Masterplan SPD identified the potential to successfully accommodate up to 7,515 homes over the plan period. This housing is expected to be delivered over time and phased as follows:

- Short-term – 1,288
- Medium-term – 2,653
- Long-term – 3,574

**14.7** The above expected level of growth is likely to increase the number of people living in the area over the plan period by between about 11,640 and 17,420. The need to make additional provision of physical, social, cultural, and green infrastructure to serve this bigger population and integrate with existing residential and business communities is addressed under a number of headings below.

**14.8** The co-location of housing with other uses will be required to make the best use of land, incorporate necessary additional social infrastructure, create vibrant mixed-use developments, improve personal safety, reduce the need to travel and help financial viability and delivery.

**14.9** The Agent of Change principle, as set out in London Plan Policy D13, will be applied to SIL and waste sites safeguarded in the South London Waste Plan (including those that are in Sutton) and ensure that new housing does not compromise the integrity and effectiveness of industrial and waste uses.

**14.10** The detailed location and design of new housing will have to respond positively to the existing poor conditions. For example, housing at ground floor next to Purley Way (A23) itself is very unlikely to be acceptable and single-aspect homes facing Purley Way or other noisy streets with poor air quality will be resisted and communal open space and play space will be expected to be carefully located in sheltered areas of new developments.

**14.11** New development will consider the existing Gypsy and Traveller site at Latham's Way to ensure that the site integrates with the area as it changes and that residents living on the site feel part of and benefit from growth and investment.

**14.12** The Purley Way Masterplan SPD found that most residents travelling in the peak hour for work head towards central Croydon (either to destinations within central Croydon or travelling onward to central London)<sup>143</sup>. A smaller proportion travel west towards Wimbledon. Given this, TfL has estimated that there is sufficient capacity on the Wimbledon branch of the existing tram network to support 2,000 additional homes in the area<sup>144</sup>.

**14.13** Beyond this number, capacity on the existing tram network would need to be increased, either by longer trams or greater frequency, or both.

**14.14** Growth beyond 4,000 homes may require a range of additional improvements to highway and sustainable transport capacity, subject to modelling. Based on current housing delivery assumptions, the above infrastructure/frequency improvements would be needed in about 2032 (two years in to the long term). Whilst a specific package of measures to support the additional homes has not been identified, there is sufficient time for the council to work with developers, TfL, Network Rail and other partners to identify what is needed, how much it would cost and how this would be funded. To address these issues, the council, GLA and TfL are underway with the following during the short term (2022-2027):

Undertake detailed transport modelling (LBC/TfL/GLA and development partners) to objectively assess the highway and sustainable transport measures needed to accommodate more than 4,000 homes and taking account of delivery and viability, alongside the delivery of development across the borough, especially the Opportunity Area, and alongside the tram corridor and bus network across boroughs.

**14.15** Table 4.3 under the Delivery Strategy sets out an approach to prioritising the transport measures outlined above over the plan period.

#### Employment

**14.16** There are three distinct sub-areas of SIL in the Purley Way transformation area:

The Beddington Farm / Commerce Way SIL area currently accommodates around 115 businesses in around 160,000m<sup>2</sup> of

<sup>143</sup> Analysis of Census 2011 journey to work data

<sup>2</sup> 22<sup>nd</sup> November 2021

employment space. There is a greater proportion of manufacturing businesses in this sub-area, and a notable concentration of pharmaceutical activity. Sites are typically larger, and suited to stand alone warehouses and larger scale operators of logistics and distribution.

The Factory Lane/ Whitestone Way SIL area includes the former gas works and Stubbs Mead Depot. Once the gasholders have been demolished, both of these areas have potential for intensification of employment floorspace to significantly increase employment and economic activity supported on the sites. The area also accommodates smaller-scale construction retail and over 100 'artists' studios in the Grafton Quarter development. The Imperial Way sub-area includes particularly dense employment, accommodating 41% of all businesses in the transformation area, including 72% of all creative businesses. There is a higher proportion of small and light industrial floorspace here, which may be suited to multi-level and stacked industrial provision. Existing businesses and new arrivals will benefit from the amenity of the Waddon Way Neighbourhood Centre.

**14.17** It should be noted that the existing SGN gasholders site on Factory Lane (approx. 1.45ha) is designated as SIL, although the

land is not currently used for industrial or warehousing/ distribution purposes. The planned demolition of the gasholders and levelling of the site will increase the amount of developable SIL. Assuming a plot ratio of between 50 and 65%, this site could accommodate between 7,250 and 9,430m<sup>2</sup> of Business floorspace.

**14.18** The Purley Way Masterplan SPD estimates that potential intensification of SIL and new mixed-use development focused on Local and Neighbourhood Centres could result in around 1,750 additional Full Time Equivalent (FTE) jobs over the plan period. Construction work will also generate additional temporary employment opportunities. The land use policies set out in this chapter should ensure that there is a diverse range of job opportunities, including jobs that drive up skills. The council will secure in-kind and financial contributions from developers in accordance with Local Plan policies SP3 to help maximise training and job opportunities for local people.

**14.19** The Purley Way Masterplan SPD sets out how potential changes to the SIL boundaries within the Purley Way can take place, in order to efficiently consolidate land uses, and increase opportunity for industrial intensification.

**14.20** The proposed changes in the Purley Way Masterplan SPD are in accordance with London Plan Policies E5 and E7 and the Mayor of London's guidance 'Industrial intensification and co-location through plan-led and masterplan approaches (November 2018)'. Capacity testing undertaken through the Purley Way Masterplan SPD was based on an assumed no net loss of industrial, warehousing and distribution floorspace across the area based on a combination of the compensatory SIL intensification and co-location.

**14.21** The council will develop further evidence to support any release or designation of SIL, including viability testing and landowner engagement, at the next review of the Local Plan.

**14.22** The area currently provides relatively affordable rents for workspace and part of the Area is within Croydon's Creative Enterprise Zone (CEZ) and there is a developing cluster of 'cultural production space' (industrial, warehousing, small-scale office use occupied by Creative Industries) in the streets around Wandle Park. In order to increase variety and economic resilience, the retention, intensification and re-provision of these uses will be supported.

**14.23** In order for the area to be successful and sustainable a series of New Local Centres in the area will be a focus for 'main town centre uses'<sup>145</sup> as part of consolidating and focusing high-quality mixed-use development that ensures that the area is supported by Centres which are vibrant and attractive hubs for people to shop, socialise, work, live, go to school and access services. As the new Local Centres are not yet defined on the

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<sup>145</sup> NPPF 'main town centre' uses definition: Retail development (including warehouse clubs and factory outlet centres), Leisure, entertainment facilities and the more intensive sport and recreation uses (including cinemas, restaurants,

Policies Map (as their extent cannot be determined before they are built) a material consideration needs to be made to the Plan's policies on out of centre development to allow the new Local Centres to develop. As the Local Centres are intended to provide essential services to new residents it is necessary to remove the restrictions on out of centre development for convenience retailing, services and leisure that is small in scale and commensurate to local needs when it is proposed in the broad area of one of the new Local Centres. For other town centre uses including larger scale convenience and comparison retailing Town centre first principles will be applied to the New Local Centres to prevent direct competition with Croydon Metropolitan Town Centre. The wider 'environs' of these Centres will successfully link with their residential and industrial hinterlands. Here, appropriate and diverse business and residential uses will be the primary uses and attractive streets will help integrate existing and new residential and business communities.

**14.24** The new Neighbourhood Centre at Waddon Way will provide small-scale (less than 280m<sup>2</sup>) day-to-day shopping and services for the localised business and residential communities. This could include small-scale 24-hour shops and cafes to support shift workers and users of the Purley Way Playing Fields.

**14.25** The Policies Map identifies the wider 'environs' for the proposed Local and Neighbourhood Centres. The proposed Centres themselves will be defined in the next Local Plan, following discussions with land owners and prospective developers at pre-application stage, as part of shaping specific proposals. As such,

drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); Arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).



the policy shall not apply until detailed boundaries have been confirmed as part of a Local Plan review process.

**14.26** SIL and the new Local and Neighbourhood Centres will be well connected to support industrial intensification and ensure that people working in and visiting the area for business purposes have sufficient access to cafes, restaurants and other day-to-day services.

#### Urban Design and Local Character

**14.27** New development will safeguard the setting of designated and non-designated heritage assets in the area and in neighbouring areas of Croydon and Sutton including Croydon Airport, River Wandle and the IKEA Towers Local Designated Landmark. It will also frame and make a positive contribution to the designated Croydon Panorama from Purley Way Playing Field to Croydon Metropolitan Centre (landmarks NTL mast, the Town Hall Clock Tower in Katharine Street, No.1 Croydon and the Park Hill Water Tower).

**14.28** New buildings and open and public realm spaces will draw on the positive characteristics of Broad Green & Selhurst and Waddon Places and transform the quality of the built environment by adopting the five principles included in Policy SP2.6. Guidance for implementing this is set out in the Purley Way Masterplan SPD.

**14.29** In areas for transformational change, new buildings are expected to make the best use of urban land and optimise density. The four Local and Neighbourhood Centres will accommodate the taller buildings in the area, to reinforce and mark their role as the focus of use and activity and to aid wayfinding. Buildings that are adjacent to, and are in 'areas of urban evolution' should respect and respond positively to the height of existing buildings, ensuring development positively mediates transitions with lower density

areas and responds to predominant height, in line with relevant borough-wide policies.

#### Community facilities

**14.30** The Purley Way transformation area includes Kingsley Primary and Harris Primary Academy Schools and the Haling Manor High School and (just outside the area) the former St Andrew's Secondary School. Planning permission has been granted for an additional 3-FE primary school at 91-93 Canterbury Road (18/03408/FUL, February 2019). The area also has a number of children nurseries and play groups. It is also home to Broad Green Library, Waddon Leisure Centre and commercial leisure and entertainment uses at the Colonnades, Valley Park (including VUE Cinema) and other locations. However, there are relatively few community, youth, and sports facilities and places of worship.

**14.31** The additional housing and population growth outlined under Homes above is predicted to result in between 730 and 1,090\* additional Primary-aged children over the plan period (0 in the short-term, 170-260 in the medium-term and a further 540-830 in the long-term). In the medium-term, any projected increase in demand for primary school places is likely to be absorbed using the existing capacity within local schools. In the long-term, depending on actual levels of growth, there may be the need for additional primary school places in the area. This will be monitored by the proposed Growth Delivery Updates identified in the Infrastructure Delivery Strategy below. If additional provision does prove necessary, a new 2FE primary school could form part of a new mixed-use development in the Waddon Marsh centre and environs, as identified in Site Allocation 332 (Superstores, Drury Crescent).

**14.32** The expected level of demand for secondary school places should be capable of being absorbed by the existing secondary schools, including the possible re-use of the site where St Andrews CE School that's is located just outside the area (subject to agreement from the Southwark Diocesan Board of Education), and the proposed additional secondary school on Heath Clark Duppas Hill (Site Allocation 16).

**14.33** Based on the Council's adopted benchmark ratio of 1GP per 1,800 people, the expected growth is likely to generate the need for an additional 6.5-9.7 Full Time Equivalent GPs. Given this, it is proposed to make provision for two health hubs of about 1,200m<sup>2</sup> each to cater for around 12 FTE GPs in total and associated services. The proposed mixed-use development in the new Local Centres and environs and Waddon Way Neighbourhood Centre provide a number of opportunities to incorporate health facilities and are detailed in specific site allocations (25, 125, 314, 316, 332, 334, 349, 351 and 355).

**14.34** Additional facilities will generally be directed to the new Local and Neighbourhood Centres, where existing and new residents can best access them to help foster a united local community based on shared local facilities and experiences.

#### Environment and Climate Change

**14.35** The orientation, layout and design of new development, particularly housing, should take account of the existing environmental constraints of the area, including noise and poor air quality. The Purley Way Masterplan SPD includes guidance on how new development could respond to and improve existing air quality conditions.

**14.36** The Council is investigating bringing forward a District Energy Network (DEN) to supply heating and hot water to the Croydon Growth Zone and the Purley Way transformation area. This would connect Purley Way and the Growth Zone with the Beddington Energy Recovery Facility (ERF) in nearby Beddington Lane, via a central energy centre in the Wandle Road car park site.

**14.37** Once established, a connection route for the supply and return pipes would provide opportunities for new development in Purley Way transformation area to connect with the DEN, either directly from one of the primary routes or via a secondary network, and to access low-carbon heat. To keep this option open, the Council will require all 'major' development in the area to incorporate a communal heating system powered by an appropriately located energy centre, with sufficient space for a district heat substation (heat exchanger), with the energy centre incorporating an appropriately located 'soft' wall to allow for a connection to a future DEN.

**14.38** In addition to making provision for 'clean' energy in this way, new development will be expected to incorporate appropriate 'low carbon communal or ditrict heating systems which are compatible with future connection to the proposed DEN. The River Wandle provides particular opportunities for developments that are near to it to use Water Source Heat Pumps.

#### Green and Blue Grid & Open Space

**14.39** The area is particularly harsh, with very little tree cover or greenery. If its full potential is to be realised, it needs to be transformed into a more attractive, greener, more biodiverse place.

**14.40** The council supports the continued development of the Regional Park concept and will work with the Trust, the Environment Agency and other stakeholders to play its part in delivering the Wandle Valley Area Green Grid Framework developing a connected, cross-borough network of green spaces. As part of this commitment, the council will manage Wandle Park and Waddon Ponds and look for opportunities to connect these with other open spaces and de-culvert stretches of the River Wandle as and when development opportunities arise to secure connectivity, flood risk and biodiversity enhancements.

**14.41** Canterbury Recreation Ground, Duppas Hill Park and Purley Way Playing Fields provide much needed open space within the Purley Way transformation area, and are all in need of enhancement to increase their attractiveness and ability to accommodate increased levels of activity associated with the expected increase in residential population. The council will seek to improve these spaces, including incorporating additional habitats, and implement the Parklife project so that the Playing Fields become a high-quality sports-hub (Site Allocation152).

**14.42** The council will seek to secure additional high-quality publicly accessible green open spaces and areas of public realm as part of development schemes wherever possible, particularly in that part of the area to the north of Mill Lane/Waddon Road where there is a current lack of open space.

**14.43** In accordance with London Plan Policy G5 (Urban Greening Factor) and borough-wide policies, the Council will ensure that new development maximises opportunities to include green infrastructure to help reduce water run-off and the heat island effect, improve air quality, deliver a net gain in biodiversity, offer opportunities to grow food, improve the attractiveness of the area

and contribute to the health and well-being of people living, working and visiting the area.

**14.44** The Council will invest in public realm and lighting improvements across the Purley Way Transformation Area potentially through planning obligation receipts and beyond site specific requirements of schemes to create attractive and safe green links. These may include:

- a) Providing additional local connections to support Areas for Transformational Change and linking these with existing and proposed community facilities and green spaces.
- b) Providing a network of high-quality pedestrian routes connecting Local and Neighbourhood Centres and their environs to public transport nodes and destinations in neighbouring areas.
- c) Using de-culverted and naturalised sections of the River Wandle to provide walking and cycling routes.

**14.45** Key priorities for the green links will include:

- a) Additional north-south connections to provide alternative routes to Purley Way (A23) and east-west connections in the northern part of the area to provide quieter walking/cycle routes.
- b) Improved pedestrian infrastructure along strategic east-west connections with Stafford Road/Denning Avenue, Mill Lane/Waddon Road to provide better connections with Croydon Local Centre.
- c) Additional and improved crossings on Purley Way (A23) at key locations, located and designed to reduce severance and support public transport nodes and cycling connections.

- d) Improved, signed local links to promote active travel choices to access health, education, green spaces etc.
- e) Site specific routes in collaboration with landowners and developers to include new /improved footways and

footpaths through development sites, plus upgraded areas of public realm on Purley Way and other key roads around development sites and more broadly within Local/Neighbourhood Centres.

## Transport and communication

**14.46** The Purley Way Masterplan SPD includes detailed strategies and guidance for improving walking and cycling infrastructure in the area. The Council will use the Development Management process to ensure that new development has a positive relationship with and provides natural surveillance of streets, routes and spaces and that high-quality tree planting and landscaping helps ensure an attractive walking and cycling environment along heavily trafficked routes.

**14.47** A series of interventions will be made to make public transport the easy choice for getting to, from and around the area, including a combination of the following:

- a) Creating a sustainable transport corridor, with a spine formed of a major new high-quality public transport route,
- b) Promoting the role of public transport nodes (bus stops, tram stops and Waddon Station) as mobility hubs and special places, located to support efforts to create or strengthen Local/Neighbourhood Centres
- c) Reducing walking times from across the area to public transport nodes

**14.48** The above measures coupled with improvements to enhance walking catchments for rail, tram and bus aim to ensure that all 'areas for transformation' are within a maximum five-minute walk to a bus and/or a ten-minute walk from a tram stop or Waddon Station.

**14.49** At Waddon station the existing poor-quality station building is set back from Purley Way (A23), accessed by poor quality public realm and only provides step-free access for the westbound platform. The council will work with Network Rail/TfL and landowners to improve accessibility with a strong presence on the

Purley Way (A23) either in advance of or as part of redeveloping the low-density retail/restaurant uses around it. This is addressed further in Site Allocation 110 (Old Waddon Goods Yard).

**14.50** The Brighton Main Line and East Croydon Transformation Corridor chapter explains the current context regarding the Croydon Area Remodelling Scheme (CARS). The Council will also work with TfL to support bringing forward the proposed 'metroisation' of rail services in South and South East London.

**14.51** The Council will work with TfL and landowners/developers to turn Waddon Marsh in to a key public transport hub, including improving the link from Purley Way and interchange with buses, creating a sense of entrance and arrival at the tram stop with a public space, integrating micro mobility and drop-off space into the area so that it becomes a mobility hub and redesigning the forecourt area as a distinctive and welcoming station plaza.

**14.52** As a first step to creating a high-quality public transport corridor – and as an alternative should a tram extension not come forward in the foreseeable future, the Council could support the creation of a rapid bus corridor subject to modelling, with a series of bus 'superstops' at the same locations as the tram stops. The Council supports the provision of demand responsive bus services.

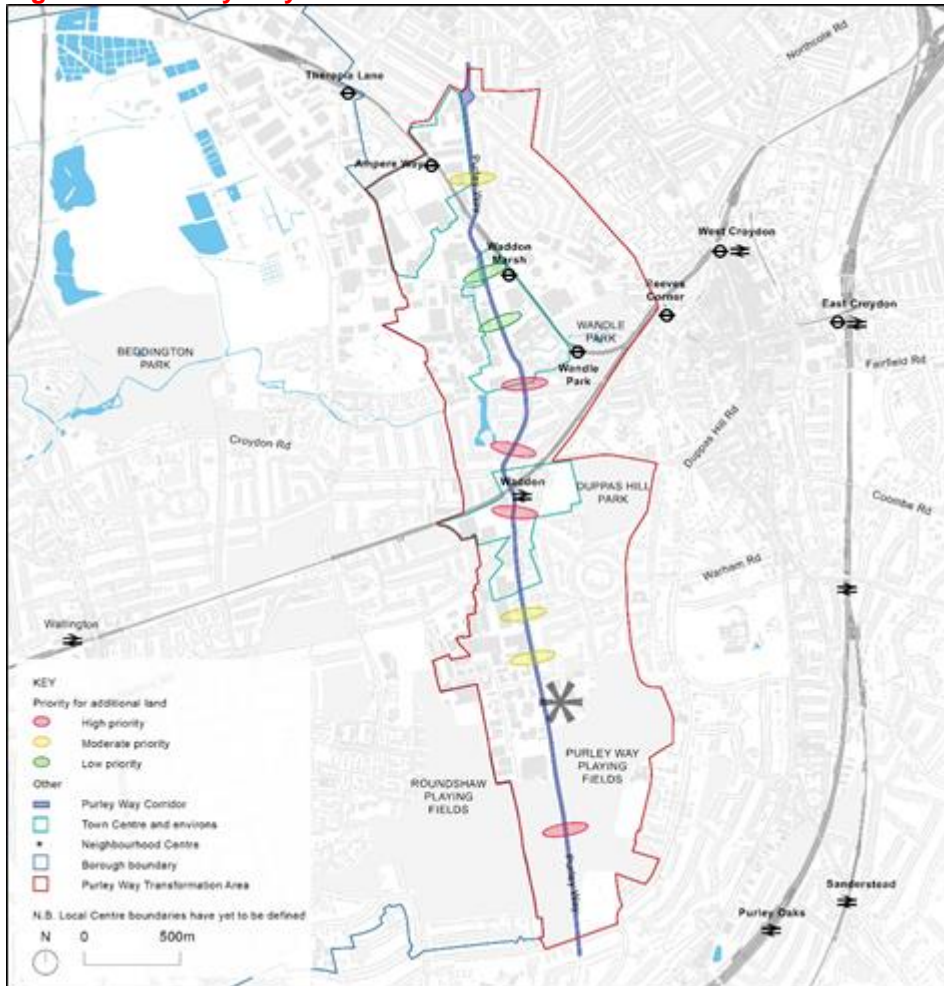
**14.53** There are a number of relatively narrow sections of Purley Way (A23) which act as 'pinch points' that create congestion for traffic and poor-quality conditions for pedestrians, cyclists and buses. These are identified in Figure 4.4 below.

**14.54** The council will seek to explore possible widening of the carriageway and/or footway of Purley Way (A23) to secure improvements for sustainable modes of transport – including wider footways/shared walking/cycling routes, designated cycle lanes for cycling, bus lanes and/or space for a future a possible tram

extension. The council will proactively work to identify and secure opportunities to remove these pinch points and widening the corridor whilst maintaining strategic traffic movement. These

include entering in in to Section 106 and/or Highway Agreements to secure additional land and financial contributions towards the costs of implementing schemes.

Figure 14.4 Purley Way Pinch Points



**14.55** The council will continue to work with TfL and other stakeholders to explore the aspiration and need for a new tram extension along Purley Way (A23) to Purley and Coulsdon, with a series of stops located to support the proposed Local and

Neighbourhood Centres in the area linked to the level of Croydon is expected by the Mayor to accommodate.

**14.56** Traffic congestion and capacity is a key issue in the area. The strategic nature of the Purley Way (A23) means that the vast

majority of trips are longer distance<sup>[1]</sup>, and the road is vital for serving the many industrial and retail businesses in the area. The potential on-street public transport improvement and better pedestrian and cycle crossing facilities called for above are likely to introduce additional capacity constraints.

**14.57** Whilst the land use strategy outlined above and implementation of borough-wide transport and Purley Way transformation area parking policies and standards will help reduce additional car trips, the transformational change called for in the vision for the area will, unavoidably, create some additional highways trips. Focussed highways improvements, subject to modelling, on the following key junctions and links where capacity is most constrained, while integrating healthy streets measures to better accommodate walking and cycling, as well as urban realm that supports enhanced place amenity and character:

- (a) Fiveways area improvements (including the junctions of Croydon Road/Purley Way and Epsom Road/Duppas Hill Road/Stafford Road)
- (b) Duppas Hill and Croydon Way junction
- (c) Mill Lane/Waddon Road/Purley Way
- (d) Drury Crescent/Commerce Way

**14.58** The council could also bring forward traffic management and calming measures to reduce any displacement of traffic from Purley Way (A23) on to other streets in the area, surrounding Places and neighbouring Sutton. These include investigating the potential to reducing some or all of the area to 20mph, and designing the local road network in accordance with the aim to create low-speed, safer and more attractive streets that support the Mayor's Vision Zero goal which aims to eliminate all deaths and serious injuries on London's transport network by 2041.

**14.59** There are already many LGV/HGV trips along the Purley Way Corridor (A23) due to existing uses, and these will only increase with the anticipated growth and committed development in the adjoining Beddington Lane Industrial Area. An area-wide strategy for servicing will be developed and implemented by Delivery and Service Plans secured as part of granting planning permissions for new 'major' development.

Car parking standards

**14.60** In order to promote lower carbon forms of transport, not increase congestion on the borough's highways and reduce the impact of car parking in new developments, the council could, subject to consultation, implement Controlled Parking Zones (CPZs) across the whole area. When a Controlled Parking Zone is in place s.106 Agreements will be used to prevent residents/business in new development from parking on nearby streets, the council intends to carry out consultation and design work in the short term and implement approved CPZs in the short and medium terms, prioritising those areas.

**14.61** In tandem with implementation of improvements to the walking and cycling network and public transport capacity, set out under Transport Infrastructure below, on-site car parking standards will need to become increasingly restrictive over time. They will reduce relative to the implementation of associated improvements to public transport capacity, the proposed PTAL of different parts of the area and the implementation of on street car parking controls. This will help to reduce the impact of car trips in the area.

**14.62** The council will apply borough-wide cycle parking standards to new development in the area and ensure that short and long-term cycle parking is located in convenient locations and that other facilities (including lockers and showers) are provided as part of new major employment/mixed-use developments.

**14.63** In line with government policy and practice guidance, the Purley Way Transformation Area provides an opportunity to identify



the short, medium and long-term transport proposals across all modes that are needed to ensure sustainable travel behaviour. It is important that walking and cycling infrastructure, public transport and highway capacity serving the area is sufficient to accommodate the proposed level of growth and that it is available when it is expected to be needed. This is to ensure that growth is carried out in a sustainable way and does not lead to the existing public transport and/or highway networks being overwhelmed and unable to cope.

**14.64** The council will work with developers, TfL and other partners to secure funding to implement the walking and cycle route priorities identified in Figure 4.2 above, focusing in the short and medium term on improving connections to and from existing trams stops.

**14.65** The Council will work with land owners, developers and other stakeholders to seize the opportunity to integrate smart city technology, where digital communication is maximised to make networks and services more efficient. This includes:

- Shared mobility – the Council working with car club providers and others to include provision Car Club spaces and facilities for bike and scooter sharing, taxi and private hire services and micro-transit services;
- Electrification of vehicles - the Council requiring the provision of Electric Vehicle Charging Points in all 'major' developments, in accordance with the policy and also making provision for on-street charging for car club cars, taxis etc.;
- Mobility hubs – the Council working with TfL and others to enhance existing and proposed public transport nodes so that they become hubs, with enhanced facilities and information;

- Connected and autonomous vehicles – build flexibility in to the design of parking and public spaces so that they are able to accommodate these vehicles in the future
- Cycle freight – make provision for storage of e-cargo bikes in developments and at mobility hubs;
- Encouragement of Drop-off Boxes for internet deliveries and allowing for future drone and autonomous deliveries; and
- Integrating Smart City and digital infrastructure within the wider public realm.

### Infrastructure Delivery Strategy

**14.66** The anticipated level of growth in the Purley Way transformation area over the plan period is indicative only. The degree of certainty over the level of growth diminishes over the short, medium and long-terms. Growth in the first five-years is 'deliverable' as defined by the NPPF. However, growth in the following years is 'developable' as defined by the NPPF. In addition, whilst all of the identified transport and open space and green grid measures are needed for the expected indicative growth scenario of up to 4,000 homes in the short to medium term, and further 3,515 homes in the long term (a total of 7,515 homes over Local Plan period), social infrastructure and local services will respond to demand thresholds in the population growth.

**14.67** In addition, public sector delivery agencies (including the council, TfL, Network Rail and NHS) operate on three to five-year planning cycles and it would be misleading to pretend that infrastructure can be mapped out over a 20-year period with any degree of certainty.

**14.68** Such updates can feed in to the council's Infrastructure Delivery Plan and Local Plan reviews, to inform future policy

development. Table 4.3 seeks to summarise the proposed approach.

**Table 14.3 Phasing and review of infrastructure provision**

	Short-term	Medium-term	Long-term
<b>Transport and parking measures</b>			
CPZ study & consultation	✓		
Transport modelling	✓		
CPZ implementation		✓	
Walking & cycling routes	✓		
Borough wide car parking standards	✓		
Purley Way Car Parking Standards 1		✓	
Purley Way Car Parking Standards 2			✓
Bus service improvements		✓	
New limited-stop bus service and super stops (subject to modelling)		✓	
Rapid bus priority measures (subject to modelling)		✓	
Other junction upgrades (subject to modelling)			✓
Capacity increases on existing tram network (subject to modelling)		✓	
Waddon Station upgrade & enhanced services			✓
Tram extension (subject to modelling)			✓
Borough-wide behavioural change measures	✓	✓	✓

	Short-term	Medium-term	Long-term
<b>Social Infrastructure</b>			
Early Years (commercial opportunities throughout)	✓	✓	✓
Primary school places		tbc	tbc
Secondary school places (beyond existing capacity and allocations)		tbc	tbc
Health care facilities		tbc	tbc
<b>Open space &amp; green grid</b>			
Improvements to other existing spaces	✓	✓	✓
New spaces as part of development		✓	✓
<b>Utilities</b>			
Develop & implement utilities plan	✓	✓	✓
<b>Monitoring</b>			
Growth Delivery Update		✓	✓

### Designations shown on the Policies Map

Each of the designations set by 0 and Policies PW DM1 to PW DM7 are shown on the Policies Map. The designations are summarised in Table 4.4 below:

**Table 14.4 Designations set by Policy SP2 and Policies DM1 to DM7 shown on the Policies Map**

<b>Designation</b>	<b>Policy it relates to</b>	<b>Location</b>
Area for Transformational Change	SP2	Parts of the Places of Broad Green & Selhurst, and Waddon
Areas for managed change	SP2	Parts of the Places of Broad Green & Selhurst, and Waddon
Future local centre	SP2	Valley Park Waddon Marsh Fiveways
Neighbourhood Centre	SP2 DM22	Waddon Way
Area around Lombard Roundabout	DM1	Area around Lombard Roundabout
Valley Park Local Centre and environs	DM2	Future Valley Park Local Centre and environs
Waddon Marsh Local Centre and environs	DM3	Future Waddon Marsh Local Centre and environs

<b>Designation</b>	<b>Policy it relates to</b>	<b>Location</b>
Fiveways Local Centre and environs	DM4	Future Fiveways Local Centre and environs
Purley Way corridor	SP2 DM6	Along the Purley Way

**Key Supporting Documents**

- Purley Way Masterplan Supplementary Planning Document

## Detailed policies

### Policy PW DM 1 Area around Lombard Roundabout

In the area of the Lombard Roundabout, to facilitate growth and to enhance the distinctive character of the Lombard Roundabout area proposals should:

- a) Complement the existing predominant building heights of 3 storeys up to a maximum of 6 storeys;
- b) Create a sense of continuity by setting back buildings from the street and create building lines and frontages which positively reference and respond to the junction;
- c) Address the deficiency in green infrastructure within the area by incorporating tree planting and greenery within the development; and
- d) Retain the extent and enhance the quality of the existing public realm within the development, including introducing large trees and other vegetation to balance the impact of large or tall buildings.

#### How the policy works

**1.3.** This is an area at the edge of two character types that contrast in scale. These are 'Terraced Houses and Cottages' and 'Large Buildings with Continuous Frontage Line'. The area has potential for growth. The Place-specific development management policy is required to facilitate growth that enhances the distinctive character of the Lombard Roundabout Area.

**1.4.** These policies will encourage new developments to establish a transitional zone between the existing uniform low-rise residential areas and the larger scale structures around the Lombard Roundabout.

### Policy PW DM 2 Potential new Local Centre at Valley Park

Proposals that promote the potential creation of a new Local Centre at Valley Park will be supported during the life of the Plan in line with the Purley Way Master Plan, if the following requirements are met:

- a) The new centre should straddle Ampere Road and provide a focus around Ampere Road tram stop (precise boundaries to be determined);
- b) The new centre explores opportunities to consolidate, enhance existing retail and leisure uses with additional housing and the wider environs should provide scope for and intensification of industrial, warehousing and distribution uses;
- c) Building heights of development within the Centre and environs should generally be in the order of 3-8 storeys, with focal point accents of up to 10 storeys at gateway locations;
- d) Proposal should enhance the setting of the IKEA chimneys by delivering high quality development and public realm interventions; and
- e) Development opportunities including public realm improvements should be undertaken in a cohesive and coordinated manner and create a new Local Centre with a sense of place and distinct character. The Purley Way Masterplan SPD provides guidance on the creation of a new Centre and a wider area of focused change (its environs).

### How the policy works

- 1.5. The mix of uses in the Valley Park area presents an opportunity to improve public realm connections, densify uses, and encourage a 24/7 economy inviting a mix of participants. The popularity of Ikea/Valley Park as a retail and leisure heart of the wider region should be preserved, albeit with a radical re-thinking of the car-centric land use pattern.
- 1.6. Attractive public realm and densified retail/leisure uses with active frontages will create a walkable retail centre and encourage use of sustainable modes of transport. Connectivity to Ampere Way tram station on both sides will be seamless, safe and clearly signposted to also encourage use.
- 1.7. The area has been identified as having capacity for new housing, which would intensify use across the site and mitigate the negative impact of large areas of car parking. To ensure co-location of other uses with residential is successful, privacy and well-designed amenity for residents in the area, notably the northern neighbourhood, is a priority. The twin IKEA chimneys, as important markers of character for Croydon, must be retained and celebrated to enhance sense of place.
- 1.8. Towards the south of this area, larger sites offer the opportunity to accommodate industrial employment uses adjacent to the SIL in Beddington, and to offset de-designation SIL elsewhere in the wider Purley Way transformation area. This is essential to improving cohesion between uses and character across the Purley Way transformation area, whilst also strengthening the attractiveness of the area for businesses to locate there.

## PW DM3 Potential new Local Centre at Waddon Marsh

Proposals that promote the potential creation of a new Local Centre at Waddon Marsh will be supported during the life of the Plan in line with the Purley Way Master Plan, if the following requirements are met:

- a) Excellent transit connectivity and proximity to amenity and industry locations are opportunities to create an attractive locality to live, work, shop and socialise;
- b) The new centre should be located on the east side of Purley Way and be focussed around Purley Way itself and the Waddon Marsh tram stop (precise boundaries to be determined);
- c) The new centre should consolidate and enhance existing retail uses and include new housing, social infrastructure and green open space; and
- d) Buildings heights of development in the Centre and environs should generally be in the order of 3-8 storeys, with focal point accents of up to 15-storeys at gateway locations.

### How the policy works

**1.9.** A new local centre around Waddon Marsh tram station, with high quality public realm interventions, will create an attractive locality to live, work and shop. This opportunity arises from excellent transit connectivity, emerging local centre characteristics surrounding the Sainsbury's store, and proximity to amenity and industry.

**1.10.** In tandem with envisioned reduced car use and increased density, there is an opportunity to replace large tracts of parking with active retail frontage and public amenity which will improve the environment for both pedestrians and cyclists. Mid- to high-rise residential uses,

co-located with retail, industry and leisure, especially in the immediate vicinity of Waddon Marsh station, will help to establish the character of the local centre.

**1.11.** High-quality industrial zones with well-utilised land area and sensible servicing routes will strengthen the area as an attractive destination for businesses to locate. Green spaces are to be enhanced through interventions such as the deculverting of Wandle River and the creation of pocket

### PW DM4 Potential new Local Centre at Fiveways

parks. Interventions to enhance the network of green spaces, will be needed to accommodate increased activity in the area, and improve connectivity as part of the wider Green Grid.

Proposals that promote the potential creation of a new Local Centre at Fiveways will be supported during the life of the Plan in line with the Purley Way Master Plan, if the following requirements are met:

- a) The convergence of multiple uses within the area presents a prime opportunity to provide a retail/leisure destination, with a substantial user catchment at all times of the day;
- b) The new centre should be focused around the Fiveways junction and include the existing Waddon Leisure Centre and Waddon Station (precise boundaries to be determined);
- c) The new centre could consolidate and enhance existing retail and leisure uses and include new housing, social infrastructure and green open space;
- d) Building heights of new development in the Centre and environs should generally be in the order of 3-8 storeys, with focal point accents of up to 12-storeys at gateway locations; and
- e) Proposals should seek to enhance the setting of the Grade II listed Old Tithe Barn by delivering high quality development and public realm interventions adjacent to it.

### How the policy works

**1.12.** Fiveways junction is crucial to characterise the local centre. The high transport connectivity gives the opportunity for an increased density, specifically by co-locating mixed-use buildings with mid-to high-rise residential elements with re-provided retail, community and leisure uses. In tandem with improvements to the road layout, which will alleviate

congestion and encourage walking, public realm improvements to the area has the potential to create a bustling local centre. Attractive public realm, such as public furniture and an unobstructed station forecourt would form the basis for street activity.

**1.13.** Given the high transport connectivity, there is latent potential to increase density of development, specifically by

co-locating mid- to high-rise residential uses with reprovided retail, community and leisure functions.

**1.14.** New development must be stitched in with the public realm and existing green amenity, with attention to fostering community, forming a network of active and green spaces surrounding Fiveways.

**1.15.** Due to the complexity of these issues and the number of development opportunities the Purley Way Masterplan SPD helps to coordinate development within this area to ensure it is undertaken in a coordinated and cohesive way while retaining Waddon's sense of place.

## Policy PW DM 5 Potential new Neighbourhood Centre at Waddon Way

Proposals that promote the potential creation of a new Neighbourhood Centre at Waddon Way will be supported during the life of the Plan in line with the Purley Way Master Plan, if the following requirements are met:

- a) The new centre should be on both sides of Purley Way;
- b) A Development should seek to consolidate and enhance the existing retail and leisure uses within this centre, with particular emphasis on serving the business community, and include new housing and green open space;
- c) The building heights of new development in the Centre and environs should generally be in the order of 3-8 storeys, with focal point accents of up to 10-storeys at gateway locations; and
- d) Proposals should seek to enhance the setting of heritage assets including Croydon Airport and the former lido diving board by delivering high quality development and public realm interventions



## How the policy works

- 1.16.** The convergence of multiple uses in the Waddon Way area presents a ripe opportunity to provide a congregation of live, play and work functions on both sides of the Purley Way, with a substantial user catchment at all times of day.
- 1.17.** Improvements to the Imperial Way business district and re-provision of existing hotels will cement Waddon Way as a centre for business and gateway into industries along Purley Way. Due to the smaller size of the plots the area is considered suitable for SMEs, innovation clusters and creative industries.

- 1.18.** Public transport improvements and increasing density are expected to be mutually supportive moving forward, freeing up car parking space and consolidation of retail and leisure uses, enabling increased density.
- 1.19.** The concentration of historical landmarks in the area including Croydon Airport significantly contribute to its character. Therefore, it is vital that high quality development and public realm interventions celebrate and enhance these local heritage assets.

## Policy PW DM 6 Purley Way Corridor

The existing harsh and unattractive road corridor will be transformed by:

- a) Taking opportunities to remove pinch points (identified in Figure 4.4) to provide space for sustainable modes of travel – walking, cycling, buses and a possible tram;
- b) Incorporating high-quality pedestrian and cycle crossing points at key locations to reduce severance and increase connectivity;
- c) locating and designing buildings and spaces in ways which provide active frontages to the street;
- d) locating and designing buildings and spaces that include measures to improve air quality, reduce creation of wind corridors and rough urban surfaces, break down any street canyon, orientate street canyons parallel to wind, promote air circulation around base buildings, prevent local inversions and locate sensitive uses away and upwind from emissions and away from the pollution source; and
- e) Building heights along the corridor, outside of Town and Neighbourhood Centres and their environs, should be 3 to 8 storeys.

**How the policy works**

**1.20.** There is a great opportunity to transform the Purley Way into a green, pleasant city street and sustainable transport corridor. The street should mark a positive relationship with the Local and Neighbourhood Centres that it passes through, making sure it is fronted by high-quality buildings, spaces and trees which create attractive places and help improve air quality.

**1.21.** New pedestrian connections and public space improvements will reduce the severance between both sides

**Policy PW DM 7 Strategic Industrial Locations**

of the Purley Way. The new city street will accommodate enhanced bus services, pedestrian and cycle routes and potentially a future tram route, all of which will encourage the use of more sustainable modes of transport and alleviate pressure from the road network.

**1.22.** The retention of Purley Way as a strategic transport and servicing route is vital for serving the many industrial, warehousing and distribution and retail businesses in the area.

The areas of SIL are strategically important industrial, warehousing and distribution areas which must be used and developed in the most efficient way. New development should:

- f) Support the intensification of industrial, warehousing and distribution floorspace to maximise the economic contribution to the area, safeguard these functions by taking account of new housing being introduced in to the wider area and mitigate adverse impacts on the area’s road network from additional traffic;
- g) Deliver active frontages on to routes, to make active travel and use of public transport as attractive as possible for employees;
- h) If creating internal routes these should facilitate good connections with Town and Neighbourhood Centres and their environs, in order to integrate industrial, warehousing and distribution uses with the uses and services that these areas provide; and
- i) Facilitate a step-change in quality of public spaces and street frontages throughout the SIL by following urban design principles outlined in the Purley Way Masterplan.

**How the policy works**

**1.23.** The SIL along Purley Way must be supported and nurtured so that they can thrive as dynamic business locations. Key physical measures will include making streets safer and more attractive to use, so that more people working in and visiting business settings choose to walk, cycle and use public transport. It is also important that these

business areas are integrated with nearby Local and Neighbourhood Centres, so that employees and visitors can take advantage of services that they offer.

**1.24.** Opportunities to intensify use of the SIL areas by increasing industrial floorspace and potentially introducing multi-level accommodation will allow the area to support new jobs as the town centres and their environs evolve.

## Policy PW DM 8 Site allocations

**PW DM 8.1** Within the Purley Way transformation area allocate sites for development as set out in Table 4.5.

**PW DM 8.2** To ensure that public transport capacity in the area is sufficient to accommodate growth:

- a) Only sites marked as ‘Short-term’ or ‘Medium-term’ in Table 4.5 shall be built and occupied in the area in advance of detailed transport modelling to objectively assess the highway and sustainable transport measures needed to accommodate more than 4,000 homes and the implementation of associated further improvements to public transport capacity

### How the policy works

**1.25.** Table 14.5 below sets out the proposed use on specific sites in Purley Way transformation area. The location and boundary of each detailed proposal can be found on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) can be found in Appendix 7. These site allocations sit alongside those for the wider Broad Green & Selhurst and Waddon Places and the safeguarded waste sites in the South London Waste Plan (September 2020).

**1.26.** Table 14.5 also sets out the phasing for each sites. It is common ground with TfL that there is sufficient overall sustainable transport capacity to support 4,000 additional homes in the area. These sites are marked as short-term in Table 4.5.

**1.27.** Growth beyond 4,000 homes could require a range of additional improvements to highway and public transport capacity. Any site marked as long-term in Table 14.5 is

dependent, subject to modelling, on these additional improvements taking place before it can be developed.

**1.28.** The phasing of sites has been determined having regard to their capacity, and the need to create the new Local and Neighbourhood Centres in order to enable to creation of new communities in the area.

**Table 14.5 Proposals for uses of land of specific sites in Purley Way Transformation area**

Ref no	Site name	Proposed use	Phasing
8	Motor Village Croydon, 121 Canterbury Road.	Residential development (possibly with replacement car showroom)	Short-term
11	Croydon Garden Centre, 89 Waddon Way.	Residential development linked to a potential Waddon Way Neighbourhood Centre.	Short-term
16	Heath Clark, Stafford Road.	Provision of a Secondary School.	Short-term

Ref no	Site name	Proposed use	Phasing
16A	Stafford Road	Residential development	Short-term
25 a,b, & c	a)Morrisons Supermarket, 500 Purley Way b)Porcelenosa, 468-472 Purley Way c) Fiveways Retail Park, 500 Purley Way	Redevelopment of a mix of residential, retail, commercial and community uses, new green open space and health facility (if required by the NHS) to form the basis of a new residential community and part of the potential Fiveways Town Centre and environs.	Long-term
48	294-330 Purley Way.	Mixed use development comprising retail store, commercial space and residential units.	Medium-term
110	Old Waddon Goods Yard, Purley Way.	Mixed use development incorporating residential, retail and food & drink (with the retail and food & drink elements limited to the current amount of floor space) around a greatly improved or new Waddon Station.	Long-term

Ref no	Site name	Proposed use	Phasing
125	Sainsburys, Trafalgar Way.	Mixed use residential and retail development (with retail floor space limited to no more than currently exists on the site), including new green open space and health facility (if required by the NHS) to form the basis of a new residential community and part of the potential Waddon Marsh Town Centre and environs.	Medium-term
314	Valley Park (B&Q and Units A-G Daniell Way), Hesterman Way.	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and town centre, with scope to include industrial, warehousing and distribution uses	Long-term

Ref no	Site name	Proposed use	Phasing
316	Fabb Sofas, 2 Trojan Way.	Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community and part of the potential Waddon Marsh Town Centre and environs.	Medium-term
332	Superstores, Drury Crescent.	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) including a primary school and community uses to form the basis of a new residential community and part of the potential Waddon Marsh Town Centre environs.	Medium-term

Ref no	Site name	Proposed use	Phasing
334	Valley Leisure Park, Hesterman Way	Redevelopment of this area to provide a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre	Long-term
348	Homebase & Matalan stores, 60-66 Purley Way.	Mixed use residential and retail development within the potential Valley Park Town Centre and environs	Short-term

Ref no	Site name	Proposed use	Phasing
349	Harveys Furnishing Group Ltd, 230-250 Purley Way.	Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community and part of a Waddon Marsh Town Centre environs. As the site is partly within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment.	Medium-term
351	Furniture Village, 222 Purley Way.	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by NHS) and community uses to form the basis of a new residential community.	Medium-term

Ref no	Site name	Proposed use	Phasing
355	Decathlon, 2 Trafalgar Way.	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community and part of the potential Waddon Marsh Town Centre and environs.	Short-term
946	Stubbs Mead Depot, Factory Lane.	Mixed residential and employment (industry and warehousing) and housing	Long-term
132	550-550a Purley Way	Redevelopment of the site to provide a mixture of residential, retail business uses.	Short-term
135	Hilton Hotel, 101 Waddon Way	Redevelopment for residential development and retention of hotel to form part of a Waddon Way Neighbourhood Centre	Long-term

Ref no	Site name	Proposed use	Phasing
137	The Colonnades	Redevelopment of this area to provide a mixture of residential, retail, leisure and community uses to form the basis of a new residential community and part of a Waddon Way Neighbourhood Centre.	Long-term
143	South Croydon Ambulance Station and Waddon Youth & Community Centre, 619 Purley Way.	Redevelopment to provide residential development and replacement community floorspace (no net loss) and a replacement ambulance station (if required by the NHS).	Long-term
144	Sofology, 226 Purley Way	Redevelopment for mixed use residential and retail.	Medium-term
146	PC World, Trojan Way Retail Park	Redevelopment for mixed use residential and retail.	Medium-term
147	IKEA, Valley Park, Purley Way	Redevelopment of car park areas for residential development and existing store for mixed use retail, residential and community uses.	Long-term

Ref no	Site name	Proposed use	Phasing
153	Fiveways Triangle (516-540 Purley Way & 107-113 Stafford Road)	Redevelopment for mixed use residential and retail	Long-term





## 15. Delivering and Monitoring the Croydon Local Plan ~~2018~~

How we are going to deliver the Croydon Local Plan ~~2018~~

**15.1** The Croydon Local Plan ~~2018~~ has four main strands for its delivery:

- Policy – national, regional and local planning policy
- Legal – section 106 agreements, Compulsory Purchase Orders etc.
- Partners – delivery via partnership projects
- Resources – Council staff resources, capital spending by the Council or its partners, lottery funding etc.

**15.2** An Infrastructure Delivery Plan (IDP) setting out the key locations, sites and infrastructure, which are essential for the successful implementation of the Strategic Policies forms part of the supporting evidence.

**15.3** The Infrastructure Delivery Plan is not repeated as a document in the Croydon Local Plan. The full infrastructure schedule within the Infrastructure Delivery Plan is part and parcel of the Local Plan's delivery and is a critical supporting document.

**15.4** Appendix 8 to this Plan sets out the full delivery matrix showing how each of the Strategic Policies will be delivered. The infrastructure required for the delivery matrix is set out in the full Infrastructure Delivery Plan report.

How we will know if the Croydon Local Plan ~~2018~~ is being delivered

**15.5** It is important to know if and when any policy of the Plan is not being delivered as anticipated. Each Strategic Policy has a set of monitoring indicators setting out what the expected outcomes of the policy are.

**15.6** The indicators will be monitored on an annual basis and included in a Monitoring Report looking at the implementation of the Strategic Policies. Each indicator is set out in Appendix 9 to this Plan.

**15.7** A further series of indicators are contained within the Sustainability Appraisal report which accompanies the Strategic Policies. These indicators do not monitor specific policies but instead monitor the Plan as a whole by outlining areas in which it is expected to have an effect.

## Former Saved Unitary Development Plan policies

~~15.8 Appendix 10 to this Croydon Local Plan 2018 sets out the policies in the former Unitary Development Plan (UDP) that were replaced by the Croydon Local Plan 2018.~~

Table deleted

# Appendices

Picture break

# Appendix 1 – Glossary

## **Accessibility**

How easy it is to enter or reach physically, including ease of use for disabled persons. See also Public Transport Accessibility Level.

## **Affordable Housing**

Affordable housing is housing that is provided to meet the housing needs of households whose needs are not met by the private market. It can either be social rented housing, affordable rented housing or intermediate affordable housing.

Social rented housing is rented housing owned and managed by local authorities and registered providers of social housing, for which guideline target rents are determined through the national rent regime, and which is made available to eligible households nominated by the Council.

Affordable rented housing is rented housing provided by registered providers of social housing which is similar to social rented housing except that it is outside the national rent regime, but is subject to other rent controls that require it to be offered to eligible households at a rent of up to 80 per cent of local market rents.

Intermediate affordable housing is housing at prices and rents above those of social rent but below market price or rents, and which meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices and include provisions for the home to be retained for future eligible households or for any subsidy to be recycled for alternative affordable housing provision. These can include shared equity and shared ownership homes for sale, and intermediate rent, but does not include affordable rented housing.

Starter homes are homes for which 100% of the equity is sold at first point of sale but which are discounted so that the maximum price is the lower of 80% of the market value of the property or £450,000. They are not affordable in perpetuity and after a number of years may be sold at full market value. Potential purchasers must be first time buyers and meet other pre-defined criteria.

## **Affordable Workspace**

Is workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose.

## **Airport City**

~~This seeks to promote businesses and employment opportunities which capitalise on Croydon's proximity to Gatwick, Heathrow, London City and Biggin Hill Airports and central London.~~

**Amenity**

The experience of a place as pleasant or attractive, which contributes to its overall character and to the enjoyment of residents or visitors; or something that contributes to an area's environmental, social, economic or cultural needs.

**Archaeological Priority Areas**

Areas that are known to be of archaeological importance because of past finds, excavations or historical evidence.

**Biodiversity**

The variety of species of flora and fauna.

### **Biodiversity Action Plan**

A plan of action for protecting, conserving and enhancing wildlife at a local level. The UK signed up to the Biodiversity Convention at the 1992 Rio 'Earth Summit'. This confirms the UK's commitment to protecting and enhancing wildlife. The UK Biodiversity Steering Group has emphasised the importance of Local Biodiversity Action plans. In 2013 Croydon's Biodiversity Action Plan consisted of four Habitat Action Plans.

### **Borough Character Appraisal**

An analysis and assessment of every residential neighbourhood in the borough to determine the predominant type of housing and architectural form, together with other physical and natural features that give each area its distinct character.

### **Brownfield**

Land that has been previously developed (excluding agricultural land or buildings, gardens, mineral works and temporary uses).

### **Car Club**

An organisation that owns cars that are available for use by its members. People arrange to use the car in advance and pay according to how much they use it. The advantage is that people have cars available for use, but avoid many of the costs of running a car as they only pay when they need to use it.

### **Climate Change**

Long term alterations in weather patterns, in particular to temperature and precipitation. Anthropogenic climate change refers to a warming climate across the globe caused by the increase of levels of greenhouse gases in the atmosphere as a result of human activities.

## **BREEAM**

Building Research Establishment's Environmental Assessment Methodology (BREEAM) is used to measure the sustainability performance of commercial buildings.

## **Cohesive Communities**

A society in which there is a common vision and sense of belonging by all communities.

## **Combined Heat and Power system**

The generation of electricity by burning fossil or renewable fuels is relatively inefficient and produces a large amount of heat as a by-product. Combined heat and power (or CHP) makes much better use of the original energy source (gas, diesel, coal, biomass, waste) as it captures the heat produced during electricity generation and supplies it via small or large networks for commercial or domestic recipients. This is because CHP generation makes efficient use of the original energy source by utilising two forms of energy output, therefore its product is considered low in carbon dioxide.

## **Compulsory Purchase Order**

An order issued by the government of a local authority to acquire land or buildings for public interest purposes. For example, for the construction of a major road or the redevelopment of certain brownfield sites.

## **Community Infrastructure Levy**

The Community Infrastructure Levy is a levy that local authorities can choose to charge on new developments in their area. The money can be used to support development by funding infrastructure that the Council, local community and neighbourhoods need to enable growth.

## **Community Facilities**

Facilities providing for the health and wellbeing (excluding care homes, residential homes and nursing homes), social, educational, spiritual, recreational, leisure and cultural needs of the community, including public houses and post offices.

## **Connectivity**

The degree to which a place is connected by routes to other places and its own parts are connected with each other.

## **Conservation Area**

Areas designated by the Council under Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest, the character of which it is desirable to preserve or enhance. Conservation Area Consent is required for the demolition of unlisted buildings in Conservation Areas.

### **Creative and Cultural Industries**

A sector of the economy characterised by businesses and organisations associated with higher levels of creativity and cultural activity, such as designers, artists, theatres and architects.

### **Detailed Policies and Proposals**

The Detailed Policies and Proposals contribute towards delivering the Croydon Local Plan 2018's Strategic Policies and its objectives by setting out detailed planning policies that the Council will use when determining applications for planning permission in the borough. They also allocate land for future development to help deliver the development requirements of the Plan and set out proposals for major development sites in the borough and other site-specific/designation policies as appropriate.

### **Croydon Metropolitan Centre (CMC)**

A metropolitan centre serves a wide catchment which can extend over several boroughs and into parts of the wider south east region. Typically they contain at least 100,000m<sup>2</sup> of retail floor space with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions.

### **Croydon Monitoring Report**

The Croydon Monitoring Report (formerly the Annual Monitoring Report), assesses the implementation of the Local Development Scheme (LDS – essentially the timetable for the production of the Local Development Framework), the extent to which policies in the Local Development Framework are being successfully implemented, and the need for possible changes to policy.

### **Croydon Opportunity Area**

Opportunity Areas are designated by the London Plan and are London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing with a mixed and intensive use of land and assisted by good public transport accessibility. The Mayor has designated an Opportunity Area in central Croydon known as Croydon Opportunity Area.



## **Croydon Panoramas**

The criteria applied for identification includes the following:

- The viewpoint must be in a publicly accessible location in a major public area or the viewpoint is located in an area or on routes identified in Figure 6.1;
- The viewpoint selected is where the widest panorama can be viewed;
- The viewpoint selected is also the one that gives the clearest view, has the least obstructions of the subject matter; and
- The view is of substantial parts of the borough of Croydon (views looking outside of Croydon are not included as the subject matter is outside the remit of the Council).

## **Cycle Hub**

A point for collecting or returning bicycles available for hire.

## **Department for Environment, Food and Rural Affairs (DEFRA)**

The UK government department responsible for policy and regulations on the environment, food and rural affairs.

## **Development Management**

The process of managing development from design through applying for planning permission to implementation whilst ensuring that it achieves planning objectives.

## **Development Plan**

This contains the policies and guidance which manage development in a Local Authority area. Under the present planning system the Development Plan comprises the London Plan, the Local Development Framework and saved policies in the existing Unitary Development Plan.

## **Development Plan Document (DPD)**

A policy document in the Local Development Framework, which is subject to public consultation and an independent examination.

## **District Energy Networks**

The connection of a series of buildings via a pipe network in order to receive heat and potentially other energy services including cooling and electricity. The network incorporates a single or multiple energy centres usually based on combined heat and power generation plant. District energy networks are most suitable for areas of high urban density like Croydon Opportunity Area because of the demand and relatively short distances for the heat or energy to be distributed.

**District Centre**

Distributed more widely than the metropolitan centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000 – 50,000m<sup>2</sup> of retail floor space. Some District centres have developed specialist shopping functions.

**Enterprise Centre**

This refers to a facility which promotes the start up and development of small and medium sized businesses in the area through the provision of business information and support services.

**Equalities Analysis**

Equalities Analysis has been developed as a tool for ensuring that equality, social inclusion and community cohesion issues can be considered when drawing up policies or proposals which affect the delivery of services, the carrying out of the Council's functions and the employment practice of the authority.

**Evidence Base**

The NPPF paragraph 158 states each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.

**Flood Risk Zone**

These zones comprise land assessed as having vulnerability to flooding from river, sea and other sources and the potential to increase flood risk elsewhere through the addition of hard surfaces and the effect of the new development on surface water run-off.

**Fluvial Flooding**

Flooding resulting from water levels exceeding the bank level of a main river or watercourse.

**Grade A Office floor space**

Grade A Office floor space is the most sought after space on the market. It will usually contain a number of the following features:

- Be a new, redeveloped, or totally refurbished property.
- Be in a prime, prestigious location.
- Have been furnished to an extremely high specification.

- Have state-of-the-art facilities.
- Have excellent accessibility.
- Have quality building management and maintenance arrangement.

### **Green Belt**

Green Belt is a national policy designation that helps to contain development, protect the countryside and promote brownfield development, and assists in urban regeneration. There is a general presumption against inappropriate development in the Green Belt.

### **Green Grid**

This is a network which will link open spaces with a network of walking and cycling routes and is being planned alongside the development of other infrastructure.

### **Green Infrastructure**

The open environment within urban areas, the urban fringe and the countryside, which forms a network of connected, high quality, multi-functional open spaces, corridors and the links in between that provide multiple benefits for people and wildlife.

### **Green Arc Vision**

Bringing the Big Outdoors closer to people through the creation of an extensive and attractive and valued recreational landscape of well-connected and accessible countryside around London, for people and wildlife.

### **Groundwater Flooding**

Flooding that occurs when water levels in the ground rise above surface elevations.

### **Heat Island Effect**

Refers to the tendency for a city or town to remain warmer than its surroundings, by as much as 5.5°C or more. This effect is caused mostly by the lack of vegetation and soil moisture, which would normally use the absorbed sunlight to evaporate water as part of photosynthesis.

### **Heritage Assets**

A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions.

### **Housing Supplementary Planning Guidance**

The Mayor of London's Housing Supplementary Planning Guidance incorporates the standards previously set out in the London Housing Design Guide. This sets a new benchmark for housing in the capital and aims to provide consistency and clarity about what is expected in London from the outset of a development. The standards are anticipated to be taken forward across all tenures.

### **Housing Typologies Study**

A piece of evidence base which tested how different types and sizes of dwellings might be accommodated within Croydon Opportunity Area and how such development might be phased.

### **Imagine Croydon**

A project which sought to define a long term vision for Croydon; the vision seeks to explain how Croydon may be shaped, how it will function and what it will look like in 2040, based on local community needs and the aspirations and views of local residents, businesses and organisations.

### **Inclusive Communities**

A community, whereby each person is respected as a citizen who can fully exercise his or her rights and responsibilities.

### **Infrastructure Delivery Plan (IDP)**

The delivery of a sound Local Development Framework, including the Croydon Local Plan 2018, and other development plan documents, will depend on an IDP. An IDP usually consists of a delivery strategy, an infrastructure delivery schedule of projects likely to be funded and a schedule of required infrastructure.

### **Innovation**

Whilst there are many forms of innovation, references in this document relate to the practice where academic specialists work closely with businesses to cultivate ideas, identify and transform important technological discoveries into commercial ventures.

### **Legibility**

Legibility describes how easily people can find their way around a place.

### **Local Centre**

Typically serves a localised catchment often mostly accessible by walking and cycling and may comprise a local parade and small clusters of shops, mostly for convenience goods and other services. This may include a small supermarket (less than 2,000m<sup>2</sup>), sub-post office, pharmacy, launderette and other useful local services. Together with District Centres they can play a key role in addressing areas deficient in local retail and other services.

### **Local Designated Landmark**

The criteria used to identify landmarks are:

- It is a prominent building/structure
- It is easily recognisable close up
- It is easily recognisable from a distance and in a Local Designated View and
- It positively contributes to the built environment of Croydon, and local distinctiveness and may provide an orientation point/way finding.

### **Local Designated Views**

The criteria applied for identification includes the following:

- The viewpoint must be in a publicly accessible location in a major public area or the viewpoint is located in an area or on routes identified in Figure 6.1;
- It must contribute positively to the local character;
- Key landmarks (Local Designated Landmarks) are seen or it is a unique view; and
- It must be substantially of a part of the borough.

### **Local Development Framework (LDF)**

The LDF is a suite of planning policy documents consisting of Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). DPDs and SPDs must conform to the Strategic Policies of the Croydon Local Plan 2018. Once adopted, LDF documents will replace the saved policies contained within the old style Unitary Development Plan (The Croydon Plan, July 2006).

### **Local Enterprise Partnership (LEP)**

A partnership, that brings together businesses, Councils and universities to develop a growth strategy and bid for funding.

### **Local Green Space**

Open space that is demonstrably special to the local community and holds a particular local significance because of its beauty, historic importance, recreational value, tranquillity or richness of its wildlife. It does not include Green Belt and must be local in character and not cover extensive tracts of land.

### **Local Heritage Areas**

Local Heritage Areas (LHAs) are distinctive locally significant heritage assets that have been designated as a result of their heritage and architectural or townscape or landscape value. LHAs are characterised by their locally recognised, distinctive and particularly high quality

examples of more familiar types of local historic development. They are areas of a recognised local heritage significance which additionally meets one or more of the following three criteria:

- **Architecture:** The architecture in the area must be of a high quality, distinctive and well preserved. The collective value of a group of historic buildings has a consistent architectural form, style, features, detailing or materials; and the group will often, but not always, have been built as a single development over a short period of time.
- **Townscape:** The townscape of the area must be of a high quality, distinctive and well preserved. This is because of the attractive and historic composition of the urban form; and the area will often, but not always, have been planned.
- **Landscape:** The landscape of the area must be of a high quality, distinctive and well preserved. This is because of the distinguishing quality, extent or features of its historic landscape; and it will often, but not always, have been planned.

### **Localism Act 2011**

The Localism Act 2011 was given Royal Assent on 15 November 2011. This Act shifts power from central government back into the hands of individuals, communities and Councils and includes five key measures that underpin the Government's approach to decentralisation; Community rights, Neighbourhood planning, Housing, General power of competence and Empowering cities and other local areas.

### **Local Listed Buildings**

The locally listed buildings and structures within Croydon are considered by the public and the Council as having special local architectural or historic interest, to be of significance to the local community and to contribute to the environmental and cultural heritage of the borough. All locally listed buildings should satisfy at least two of the following criteria:

- **Authenticity:** Buildings and groups selected for the local list should be substantially unaltered and retain the majority of their original features;
- **Architectural significance:** Buildings which are of good architectural quality or are good examples of a particular building type;
- **Historical significance:** Buildings which represent specific architectural and social building periods or which are associated with, local historical events, the development of Croydon, well known people or noted designers;
- **Technical significance:** Buildings that display exceptional innovation and craftsmanship;
- **Townscape Value:** Buildings and/or groups of buildings which due to their form, massing, appearance and positive role in the streetscene, such as key corner buildings, local landmarks, uniformly designed terraces.

### **Locally Listed Historic Parks and Gardens**

The criteria for the local list of historic parks and gardens are set by Historic England along with the London Parks and Gardens Trust. This stipulates that the site have at least one of the following:

- evident historic features or design

- buried archaeology
- connections with famous designers or nurserymen
- connections with nationally or locally famous individuals
- a design typical of a landscape style.

### **Local Strategic Partnership (LSP)**

An LSP is a non-statutory body that brings together the different parts of the public, private, voluntary and community sectors, working at a local level. The lead player in the LSP is the local Council. Other players will include the police and NHS Croydon.

### **Masterplan**

This term is used here to describe a 'spatial masterplan', which sets out proposals for buildings, spaces, movement strategy and land use in three dimensions and matches these proposals to a delivery strategy.

### **Mayor's Supplementary Planning Guidance**

The Mayor of London produces Supplementary Planning Guidance to provide further detail on particular policies in the London Plan. Supplementary guidance is used to support statutory development plans.

### **Metropolitan Green Belt (MGB)**

See Green Belt

### **Metropolitan Open Land (MOL)**

Areas of predominantly open land within the built- up area with significance beyond one borough.

### **Mixed-use development**

Development for a variety of activities on single sites or across wider areas, such as town centres.

### **Multiversity**

A university-level organisation with many constituent and affiliated institutions and campuses.

### **National Planning Policy Framework (NPPF)**

Published in March 2012, the National Planning Policy Framework is a key part of Government reforms to make the planning system less complex and more accessible, and to promote sustainable growth. The NPPF replaces all existing Planning Policy Statements and Planning Policy Guidance.

### **Natural Signatures**

Guidance produced by Natural England to re-establish the relationship between the built and natural aspects of London.

### **National Technical Standards (2015)**

The Department for Communities and Local Government (DCLG) has enacted a [package of deregulatory changes](#) (announced March 2015) to the building regulations in 2012.

### **Natural Surveillance**

Informal or natural surveillance aims limit the opportunity for crime by increasing the perception that people can be seen by those living, working or passing through an area. Natural surveillance can be achieved by ensuring doors and windows look onto public spaces, parking areas and streets, encouraging a diversity of uses, encouraging pedestrian use, incorporating low landscaping, street lights and removing hiding and lurking places.

### **Neighbourhood Centres**

These offer the opportunity for clusters of uses, in particular community uses, to emerge with support through planning policy. The identification of Neighbourhood Centres recognises the wider role the centres play in supporting the local community as well as their retail function.

### **Neighbourhood Forum**

An organisation established for the express purpose of furthering the social, economic and environmental well-being of individuals living, or wanting to live, in an area that consist of or includes the neighbourhood area concerned. There are other criteria the organisation has to meet, and if met/recognised by the local planning authority, the designation lasts for five years.

### **Neighbourhood Planning**

The government is creating a new Neighbourhood Planning tier that will be led by the community rather than the Council. The Localism Bill, which recently became an Act, embeds Neighbourhood Planning in the formal planning system. The purpose of the legislation is to allow community groups to become involved in enabling and shaping and promoting growth and development that takes place in their local area.



### **Neighbourhood Development Plan**

Neighbourhood Forums will be able to write a Neighbourhood Development Plan (NDP) to set out policies and plans for their area. They should only cover land use planning issues, and not broader local concerns. Nor will an NDP cover strategic issues such as major development or major public transport infrastructure, but it will be able to guide local issues. The NDP will form part of the Development Plan which comprises the London-wide policy in the London Plan, the Council's planning policies and any other adopted NDPs. The NDP will need to conform with the Development Plan and the relevant national policies. The NDP will be able to be adopted as a formal part of the Development Plan (thereby gaining the status of a 'Development Plan Document'). This means that planning decisions will have to be made in accordance with the Neighbourhood Plan, (and other parts of the overall Development Plan), unless there are good planning reasons not to.

### **Night-Time Economy**

The provision of a range of leisure and cultural facilities which provide jobs and entertainment for visitors and residents, including bars, clubs, music venues, restaurants, cinema, and theatres. Together these support and strengthen the town centre's economic standing and attraction beyond its function as a day-time workplace and shopping centre.

### **Opportunity Area Planning Framework (OAPF)**

A non-statutory planning document issued by the Mayor of London. It is consistent with and is derived from the London Plan and other Mayoral strategies. Its purpose is to assist with the delivery of cross-borough projects, provide clarity to developers and investors, and guide borough planning decisions and policies.

### **Partners**

Partners are any organisation that the Council works with to deliver a service or achieve an objective. A list of partner organisations can be found in the Infrastructure Delivery Plan.

### **Permeability**

Permeability is about movement and connection and the ease with which people are able to get to and move through places. A permeable place avoids severance by providing a clear choice of routes connecting to existing roads and facilities.

### **Planning Obligations**

New development often creates a need for additional infrastructure or improved community services and facilities, without which there could be a detrimental effect on local amenity and the quality of the environment. Planning Obligations are the mechanism used to secure these measures. Planning obligations are intended to make acceptable development which would otherwise be unacceptable in planning terms. Planning Obligations are secured pursuant to Section 106 of the 1990 Town and Country Planning Act (as amended) and the Planning & Compulsory Purchase Act 2004 and are often private agreements negotiated, usually in the context of planning applications, between the Council and persons with an interest in the land (Section 106 Agreement). Planning Obligations can also be given unilaterally to the Council by

the persons with an interest in the land (Unilateral Undertaking). Planning obligations secured by way of a Section 106 agreement or Unilateral Undertaking (also called a Unilateral Obligation), are binding on the land and are therefore enforceable against all successors in title.

### **Pluvial Flooding**

Flooding from water flowing over the surface of the ground; often occurs when the soil is saturated and natural drainage channels or artificial drainage systems have insufficient capacity to cope with additional flow.

### **Public Realm**

The parts of a village, town or city (whether publicly or privately owned) that are available, without charge, for everyone to see, use and enjoy, including streets, squares and parks; all land to which everyone has ready, free and legal access 24 hours a day.

### **Public Transport Accessibility Level (PTAL)**

A measure of the extent and ease of access by public transport, or the degree of access to the public transport network.

### **Registered Provider**

All providers of social housing are listed on a register as a "Registered Provider" (RP).

### **Renewable energy**

Energy derived from a source that is continually replenished, such as wind, waves, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

### **Sewer Flooding**

Flooding caused by a blockage or overflowing in a sewer or urban drainage system.

### **Soundness**

Soundness is the essential measure of a Development Plan Document, especially a Local Plan, which is tested at a public examination. For a DPD to be "sound", it must be positively prepared, justified, effective and consistent with national policy. "Positively prepared" means the strategy meets objectively assessed development requirements. "Justified" means that a document must be founded on a robust and credible evidence base and the most appropriate strategy when considered against the reasonable alternatives. "Effective" means that it must be deliverable, flexible and able to be monitored.

### **Source Protection Zone**

These zones show the risk of contamination to groundwater, which supplies up to 80% of the drinking water in some parts of the South East, from any activities that might cause pollution in the area. The closer the activity, the greater the risk. There are three main zones (inner, outer

and total catchment). In some instances nationwide there is a fourth zone of special interest. The Environment Agency use the zones in conjunction with their Groundwater Protection Policy to set up pollution prevention measures in areas which are at a higher risk, and to monitor the activities of potential polluters nearby.

### **Source Protection Zone 1 – Inner protection zone**

Defined as the 50 day travel time from any point below the water table to the source. This zone has a minimum radius of 50 metres.

### **Source Protection Zone 2 – Outer protection zone**

Defined by a 400 day travel time from a point below the water table. This zone has a minimum radius of 250 or 500 metres around the source, depending on the size of the abstraction.

### **Source Protection Zone 3 – Source catchment protection zone**

Defined as the area around a source within which all groundwater recharge is presumed to be discharged at the source. In confined aquifers, the source catchment may be displaced some distance from the source. For heavily exploited aquifers, the final Source Catchment Protection Zone can be defined as the whole aquifer recharge area where the ratio of groundwater abstraction to aquifer recharge (average recharge multiplied by outcrop area) is  $>0.75$ . There is still the need to define individual source protection areas to assist operators in catchment management.

### **Stakeholder**

A person or organisation with an interest in or concern for a particular place; one who affects or is affected by the processes of urban change.

### **Statement of Community Involvement (SCI)**

Sets out when, with whom and how consultation will be undertaken in connection with all documents to be prepared by the Council as part of the LDF and in the consideration of planning applications.

### **Statutory Listed Building**

The national list of buildings of special architectural or historic interest maintained by Historic England on behalf of the government.

### **Supplementary Planning Documents (SPD)**

Documents produced by the Council as part of its LDF. These are not subject to independent examination but provide further explanation of policies or proposals in a DPD.

### **Sustainable Communities**

Places where people want to live and work, now and in the future; that meet the diverse needs of existing and future residents, are sensitive to their environment and contribute to a high quality life. They are safe and inclusive, well planned, built, or modified to promote sustainable living.

### **Sustainability/Sustainable Development**

Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. Sustainable development has three elements: environmental, economic and social sustainability. More generally, it is used as a benchmark for a range of economic, social, political, and environmental initiatives that contribute to the quality of life.

### **Sustainability Appraisal (SA)**

The SA is a process of appraising DPD and SPD policies to ensure that an LDF is economically, socially and environmentally sustainable. The Council must carry out an SA process that runs alongside the formulation of all its planning documents.

### **Sustainable Community Strategy (SCS)**

The Local Strategic Partnership creates a long-term vision for the area to tackle local needs. The vision is set out in the SCS. The Local Area Agreement is the mechanism for making the vision a reality. All the SCS outcomes and targets are designed to deliver the vision set out in the SCS. The SCS is the 'plan of plans' in the area. It sits above all the other plans and should be based on evidence and consultation. The SCS should also set out the key tasks that the partners in the area need to achieve to improve its wellbeing. The Local Development Framework, particularly the Croydon Local Plan 2018 needs to demonstrate how it is delivering the SCS.

### **Sustainable Drainage Systems (SuDS)**

Drainage systems that seek to control and treat surface water run-off from a site to reduce risk of flooding and pollution by mimicking the processes performed by natural drainage systems such as wetlands

### **Strategic Housing Land Availability Assessment**

The primary role of the SHLAA is to identify sites with potential for housing development, assess their housing potential and estimate when they are likely to be developed. Although the Assessment is an important evidence source to inform plan-making, it does not, in itself, determine whether a site should be allocated for housing development.

### **Transport for London (TfL)**

Transport for London (TfL) is the organisation responsible for London's transport system. Its role is to implement the Mayor's Transport Strategy and manage transport services in London, for which the Mayor has ultimate responsibility.

### **Transport Assessments**

An impartial assessment of the transport impacts of a proposed development

**Travel Plan**

A general term for a package of travel measures tailored to suit the needs of a business, school or other organisation at a given location or site. The aim is to promote greener, cleaner travel choices and reduced reliance on the car.

**Urban Blue Corridors**

A network of multifunctional spaces and corridors that provide safe routes and storage for flood water within the urban environment.

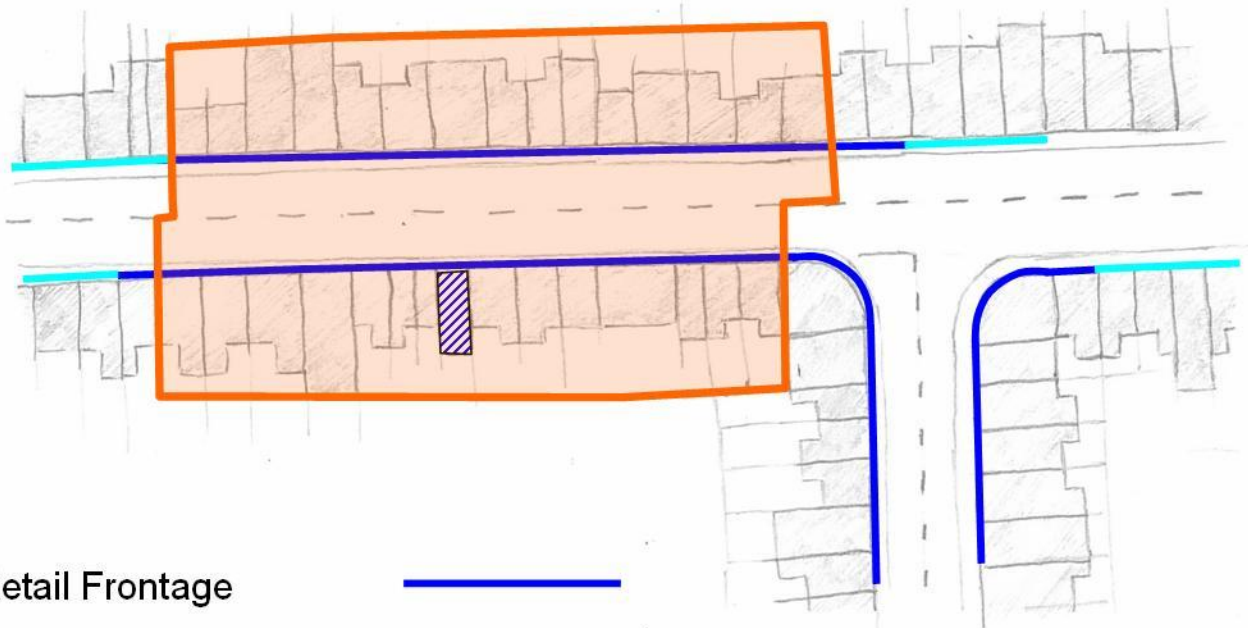
~~**We are Croydon**~~


~~This is the title given to the vision for Croydon contained in the Sustainable Community Strategy.~~

**Windfall sites**

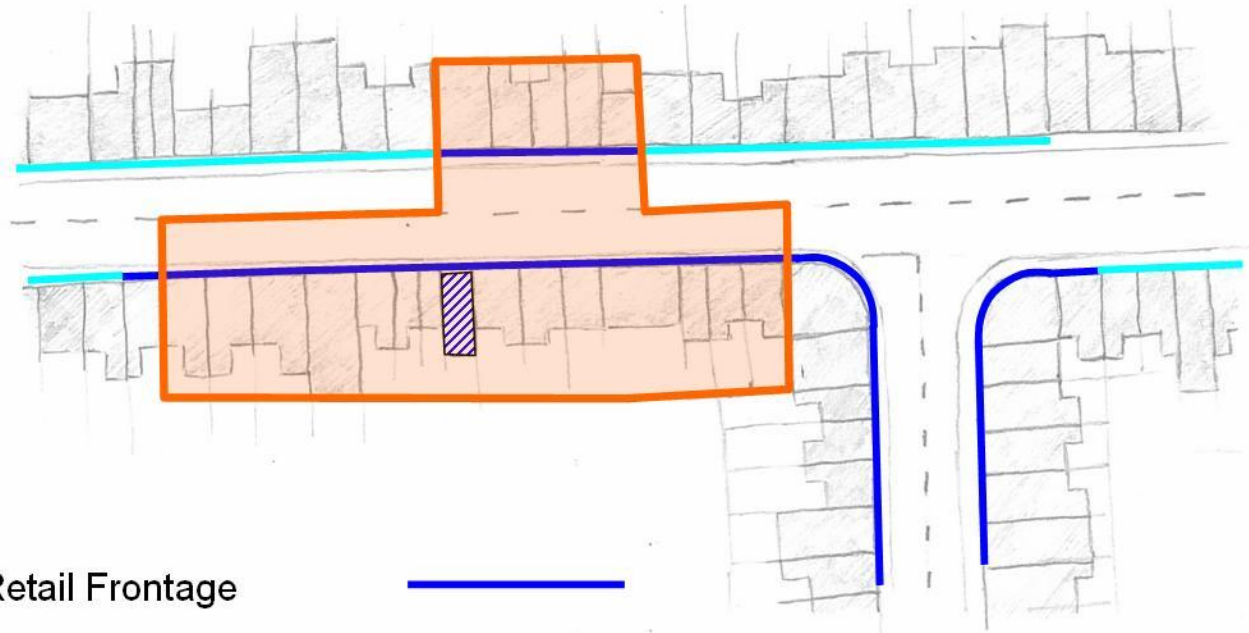
These are sites which are developed for housing or another use, which were not known to be development sites at the time the development plan was prepared and therefore were not included as allocations in a development plan.

## Appendix 2 – Calculating the percentage of units within a ~~Main or Secondary~~ Retail Frontage



- Main Retail Frontage 
- Secondary Retail Frontage 
- Application Premises 
- Extent of Main Retail Frontage for the purposes of calculating percentages 

**Example 1**  
7 units either side of the application premises are included alongside 15 on the opposite side of the road.







- Main Retail Frontage
- Secondary Retail Frontage
- Application Premises
- Extent of Main Retail Frontage for the purposes of calculating percentages

**Example 2**  
7 units either side of the application premises are included. However as the Main Retail Frontage on the opposite side of the road is smaller, only 5 units are included.





- Main Retail Frontage 
- Secondary Retail Frontage 
- Application Premises 
- Extent of Main Retail Frontage for the purposes of calculating percentages 

**Example 3**  
7 units on one side of the application premises and 3 on the other are included alongside the 7 on the opposite side of the road.



# Appendix 3 – Designated Shopping Frontages

## Croydon Metropolitan Centre

<b>Croydon Metropolitan Centre: Main Retail Frontage</b>	
Whitgift Centre	Ground and first floor units, units 96 and 97, Chapel Walk
Centrale	Internal units
North End	1-151(odd); 2-142 (even)

<b>Croydon Metropolitan Centre: Secondary Retail Frontage</b>	
Station Road	2-12 (even)
Crown Hill	Crown House; 1-17 (odd); 2-18 (even)
Church Street	19-105 (odd); 26-100 (even)
Reeves Corner	1-5 (odd)
Surrey Street	Surrey House; 5-54 (cons)
High Street	1-117 (odd); 4-114 (even); Arcade adjacent to no.34
St George's House	1-51 (odd); 2-44 (even); St George's Walk frontage of 22 Park Lane
Park Street	2-24 (even)
George Street	3-45 & 67-95 (odd); 2-68 (even)
Norfolk House	1-28 (cons)
Park Lane	2

## District Centres

<b>Addiscombe: Main Retail Frontage</b>	
Lower Addiscombe Road	237-295 (odd)

<b>Addiscombe: Secondary Retail Frontage</b>	
Lower Addiscombe Road	185-205 & 207-227 & 229-231 (odd); 1-9 Bingham Corner (cons) 297-331 (odd); 272-284 & 286-308 (even);

<b>Coulsdon: Main Retail Frontage</b>	
Brighton Road	110-148 (even)
Chipstead Valley Road	2-40 (even); 3-39 (odd)

<b>Coulsdon: Secondary Retail Frontage</b>	
Brighton Road	96-108 & 150-234 (even); 129-159 & 165-185 (odd)
Chipstead Valley Road	41-55 (odd); 42-48 (even)

<b>Crystal Palace: Main Retail Frontage</b>	
Hollybush Terrace	1-4 (cons)
Westow Street	1-23 (odd); 2-64 (even)
Westow Hill	2-24 (even)

<b>Crystal Palace: Secondary Retail Frontage</b>	
Central Hill	1-19 (odd)
Church Road	6-48 & 52-96 (even); 99-113 (odd)
Westow Hill	26-88 (even)
Westow Street	25-71 (odd); 74-78 (even)

<b>New Addington: Main Retail Frontage</b>	
Central Parade	7-50 (cons)

<b>New Addington: Secondary Retail Frontage</b>	
Central Parade	51-54 (cons)

<b>Norbury: Main Retail Frontage</b>	
London Road	1384-1434 (even)

<b>Norbury: Secondary Retail Frontage</b>	
London Road	1327-1423 & 1433-1493 & 1495-1533 (odd); 1350-1374 & 1448-1468 (even)

<b>Purley: Main Retail Frontage</b>	
Brighton Road (A235)	908-934 (even); 909-921 (odd)
High Street	44-48 (even); 15-31 (odd)
Purley Parade	1-11 (cons)

<b>Purley: Secondary Retail Frontage</b>	
Brighton Road	923b-959 (odd); 936-960 (even)
High Street	2-42 (even); 1-13 (odd) (excl. 1c and 1d)
Purley Road	1-7 (odd)
Russell Hill Parade	1-5 (cons)
Russell Parade	1-13 (cons)
The Exchange	1-5 (cons)
Tudor Court	4-18 (evens)

<b>Selsdon: Main Retail Frontage</b>	
Addington Road	182-228 (even)

<b>Selsdon: Secondary Retail Frontage</b>	
Addington Road	119-137 (odd); 150-180 & 230-234 (even)

<b>South Norwood: Main Retail Frontage</b>	
High Street	1a-10(cons); 77-91(cons)
Selhurst Road	208-218 (even)
Station Road	2-22(even);1-9(odd)

<b>South Norwood: Secondary Retail Frontage</b>	
High Street	11-25 & 64-76 (cons)
Station Road	11-21 (odd)
Portland Road	1-47 (odd); 2-38 (even)

<b>Thornton Heath: Main Retail Frontage</b>	
High Street	2-46 (even); 97-123 (odd)

<b>Thornton Heath: Main Retail Frontage</b>	
Brigstock Road	32-54 (even); 3-17 (odd)
Ambassador House	1-7 (cons)
Cotford Parade	1-6 (cons)

<b>Thornton Heath: Secondary Retail Frontage</b>	
Brigstock Road	23-33 (odd); 66-98 (even) (excl. Nicholas House)
High Street	80-86 (even); 21-96 (odd)

Local Centres

<b>Beulah Road: Main Retail Frontage</b>	
Beulah Road	52-76 (even); 82-100 (even)

<b>Beulah Road: Secondary Retail Frontage</b>	
Beulah Road	55b-57 (odd)
Parchmore Road	105-117 (odd)

<b>Brighton Road (Sanderstead Road) : Main Retail Frontage</b>	
Brighton Road	244-292 (even); 285-333 (odd)

<b>Brighton Road (Sanderstead Road): Secondary Retail Frontage</b>	
Brighton Road	261-277 (odd)

<b>Brighton Road (Selsdon Road): Main Retail Frontage</b>	
Ruskin Parade	1-8 (cons)
Selsdon Road	2a-18c (even)

<b>Brighton Road (Selsdon Road): Secondary Retail Frontage</b>	
Brighton Road	2-40 (even)
South End	79-131 (odd)
Selsdon Road	20-20e (even); 1-15 (odd)

<b>Broad Green: <del>Main</del> Retail Frontage</b>	
London Road	282-332 (even); 227-271 (odd)
St James's Road	1-9 (odd)

<b>Broad Green: <del>Secondary</del> Retail Frontage</b>	
London Road	248-272 (even)

<b>Hamsey Green: <del>Main</del> Retail Frontage</b>	
Limpsfield Road	324-340 (even); 335-351 (odd)

<b>Hamsey Green: <del>Secondary</del> Retail Frontage</b>	
Limpsfield Road	316-322 & 342-350 (even); 333a-333d (odd)

<b>Pollards Hill: <del>Main</del> Retail Frontage</b>	
London Road	1050-1100 (even); 1023-1107 (odd)

<b>Sanderstead: <del>Main</del> Retail Frontage</b>	
Limpsfield Road	25-47 (odd)

<b>Sanderstead: <del>Secondary</del> Retail Frontage</b>	
Limpsfield Road	1-23 & 49-59 (odd)

<b>Shirley: <del>Main</del> Retail Frontage</b>	
Wickham Road	134-188 & 242-254 (even); 129-151 & 211-227 (odd)

<b>Thornton Heath Pond: <del>Main</del> Retail Frontage</b>	
London Road	778-840 (even)

<b>Thornton Heath Pond: <del>Secondary</del> Retail Frontage</b>	
London Road	722-728 & 842-892 (even)
Brigstock Parade, Brigstock Road	1-8 (cons)

## Shopping Parades

<b>Bensham Lane</b>	
Bensham Lane	101-117 (odd); 102-128 (even)
<b>Brighton Road/Biddulph Road</b>	
Brighton Road	560-572 (even)
<b>Brighton Road/Kingsdown Avenue</b>	
Brighton Road	406-418 & 420-454 (even)
<b>Brighton Road/Newark Road</b>	
Brighton Road	171-201 (odd)
<b>Brigstock Road</b>	
Brigstock Road	216-246 (even)
<b>Bywood Avenue</b>	
Bywood Avenue	4-24 (even); 13-19 (odd)
<b>Calley Down Crescent</b>	
Calley Down Crescent	95-105 (odd)
<b>Chapel View</b>	
Chapel View	44-60 (even)
<b>Cherry Orchard Road</b>	
Cherry Orchard Road	140-168 (even)
<b>Chipstead Valley Road</b>	
Chipstead Valley Road	209-227 (odd); 318-330 (even)



<b>Crossways Parade</b>	
Crossways Parade	1-5 (cons)
Selsdon Park Road	169-179 (odd)

<b>Crown Parade</b>	
Crown Parade	1-16 (cons)
Beulah Hill	413-421 (odd)

<b>Elmfield Way</b>	
Elmfield Way	31-49 (odd)

<b>Fiveways Corner</b>	
Purley Way	443-449 (odd)
Central Parade, Denning Avenue	8-10 (cons)

<b>Forestdale Centre</b>	
Forestdale Centre	1-11 (cons)

<b>Godstone Road, Kenley</b>	
Godstone Road	8-30 (even)

<b>Green Lane</b>	
Green Lane	2A-42 (even)

<b>Grovelands</b>	
Brighton Road	102-122 (even))

<b>Headley Drive</b>	
Headley Drive	112-122 (even)

<b>Kenley Station</b>	
Godstone Road	64-84 (even)

<b>Lacey Green</b>	
Lacey Green Parade	1 and 2
Coulsdon Road	217-231 (odd)
<b>London Road/Fairholme Road</b>	
London Road	331-375 (odd)
<b>London Road/Mead Place</b>	
London Road	51-87 (odd)
Mead Place	1-6 (cons)
<b>London Road/Nova Road</b>	
London Road	222-238 (even)
<b>Lower Addiscombe Road</b>	
Lower Addiscombe Road	36-48 (even); 19-53 (odd)
<b>Lower Addiscombe Road/Davidson Road</b>	
Lower Addiscombe Road	7-17 (odd)
<b>Lower Addiscombe Road/Warren Road</b>	
Lower Addiscombe Road	85-99 (odd)
<b>Lower Barn Road</b>	
Lower Barn Road	100-108 (even)
<b>Mayday</b>	
London Road	474-514 (even)
<b>Milne Park East</b>	
Milne Park East	133-145 (odd)

<b>Mitcham Road/Aurelia Road</b>	
Mitcham Road	550-560 (even)
The Parade	1-6 (cons)
<b>Mitcham Road/Wentworth Road</b>	
Mitcham Road	216-244 (even)
Mitchley Avenue	71-79 (odd)
<b>Monks Orchard</b>	
Orchard Way	118-126 (even)
<b>Norbury Road</b>	
Norbury Road	39a-45 (odd)
<b>Portland Road</b>	
Market Parade, Portland Road	1-12 (cons)
Portland Road	149- 165 (odd)
<b>Portland Road/Sandown Road</b>	
Portland Road	245-293 (odd)
<b>Purley Oaks</b>	
Station Approach, Purley Oaks	1-6 (cons)
<b>Purley Way</b>	
Purley Way	335-347 (odd); 352-358 (even)
<b>St James's Road</b>	
St James's Road	185-197 (odd)
<b>Sanderstead Station</b>	
Station Parade, Sanderstead Road	1-12 (cons)
Station Approach	1-7 (cons)

<b>Selhurst Road</b>	
Northcote Road	76 and 78
Selhurst Road	Adj 2-22 (even); 11-17 (odd)
Sydenham Road	403-413 (odd)

<b>Selsdon Road</b>	
Selsdon Road	106-122 (even)

<b>Shirley Poppy</b>	
Wickham Road	572- 582 (even)

<b>Shirley Road</b>	
Shirley Road	151-177 (odd)

<b>Shirley Road/Bingham Road</b>	
Shirley Road	54-74 (odd)

<b>Shrublands</b>	
Broom Road	5-19b (odd)

<b>Southbridge Road</b>	
Southbridge Road	60-76 (even)

<b>South Norwood Hill</b>	
South Norwood Hill	261-285 (odd)

<b>Stoats Nest Road</b>	
Stoats Nest Road	73-85 (odd)

<b>Taunton Lane</b>	
Taunton Lane	13-25 (odd)

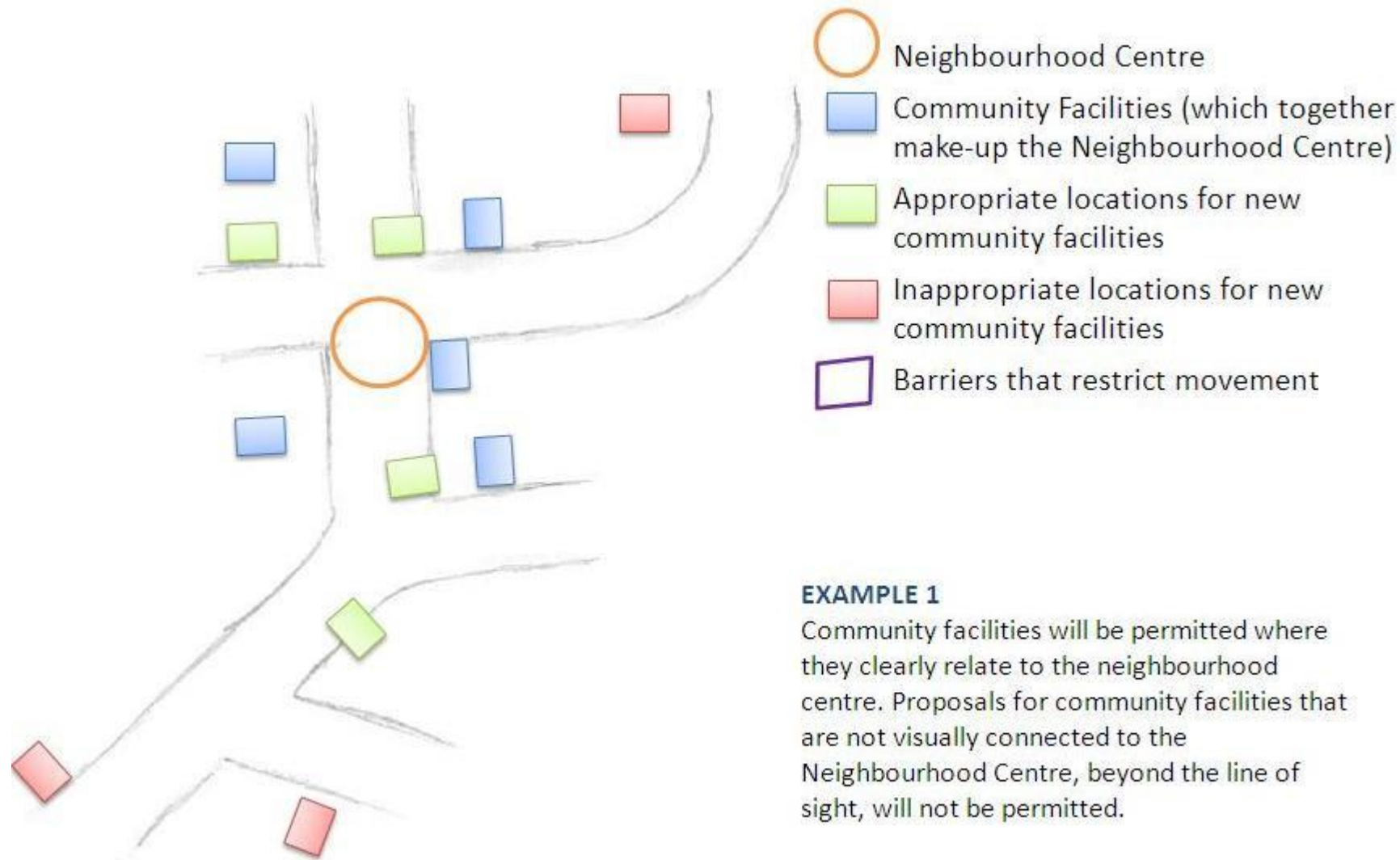
<b>The Parade, Old Coulsdon</b>	
The Parade, Coulsdon Road	1-12 (cons)
Placehouse Lane	1-1a (cons)
<b>Thornton Road</b>	
Thornton Road	42-54 (even)
<b>Waddon Road</b>	
Waddon Road	33-53 (odd)
<b>Wayside, Fieldway</b>	
Wayside	1-9 (cons)
<b>West Croydon</b>	
London Road	1-37 (odd); 12-42 (even)
<b>Whitehorse Lane</b>	
Whitehorse Lane	15-29 (odd)
<b>Whitehorse Road</b>	
Whitehorse Road	35-81A (odd)
<b>Whitehorse Road/Pawsons Road</b>	
Whitehorse Road	295-321 (odd); 322-346 (even)
<b>Wickham Road</b>	
Wickham Road	798-826 (even)
<b>Windmill Road/St Saviour's Road</b>	
Windmill Road	61a-73 (odd)
<b>Windmill Road/Union Road</b>	
Windmill Road	135-145 (odd)

<b>Woodside Green</b>	
Woodside Green	49-59 (odd)

Restaurant Quarter Parades

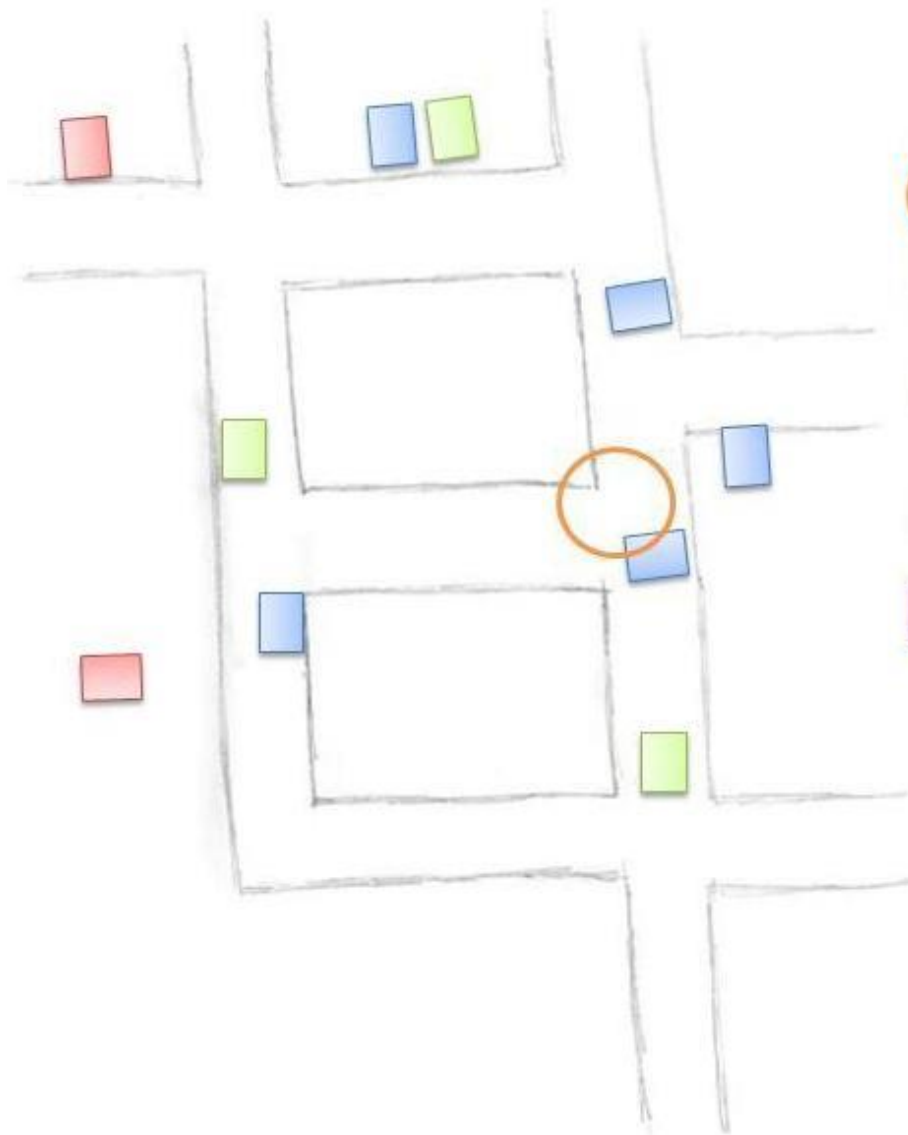
<b>Restaurant Quarter Parade</b>	
South End	1-73 (odd); 6-78 (even)

## Appendix 4 – How to assess whether proposals demonstrably relate to a Neighbourhood Centre





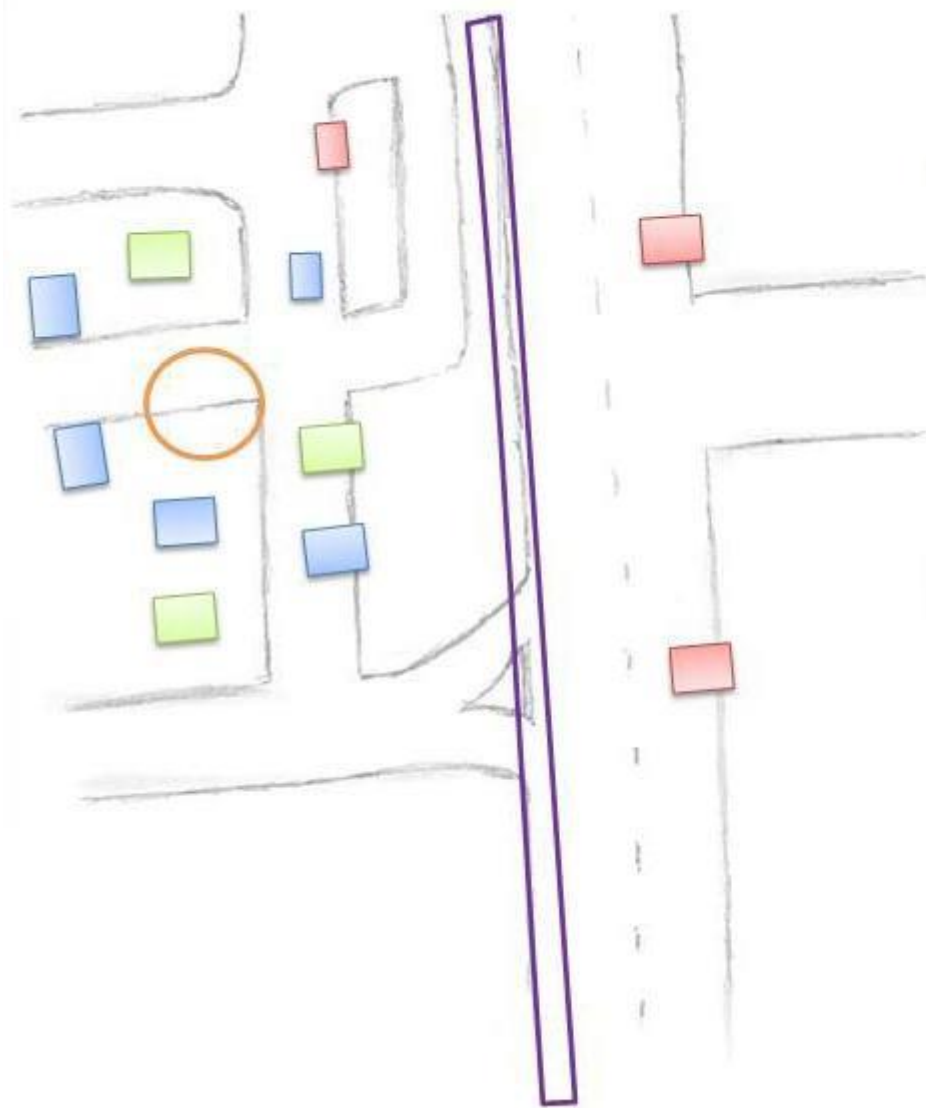




-  Neighbourhood Centre
-  Community Facilities (which together make-up the Neighbourhood Centre)
-  Appropriate locations for new community facilities
-  Inappropriate locations for new community facilities
-  Barriers that restrict movement

**EXAMPLE 3**

Community facilities will be permitted where they clearly relate to the neighbourhood centre. Proposals for community facilities that are not visually connected to the Neighbourhood Centre, beyond the line of sight, will not be permitted.



-  Neighbourhood Centre
-  Community Facilities (which together make-up the Neighbourhood Centre)
-  Appropriate locations for new community facilities
-  Inappropriate locations for new community facilities
-  Barriers that restrict movement

**EXAMPLE 4**

Community facilities will be permitted where they clearly relate to the neighbourhood centre. Proposals for community facilities that are not visually connected to the Neighbourhood Centre, beyond the line of sight, will not be permitted. A clear relationship cannot be demonstrated if there are barriers that restrict movement to the Neighbourhood Centre.

## Appendix 5 – Heritage assets in Croydon

It should be noted that statutory designations are subject to change at any point. Conservation areas, listed buildings and scheduled monuments can be designated at any time and any new designations would be subject to the same policies as those included here.

### Conservation Areas

- Addington Village
- Beulah Hill
- Bradmore Green
- Central Croydon
- Croham Manor Road
- Croydon Minster
- Chatsworth Road
- Church Road, Upper Norwood
- Church Street, Croydon
- East India Estate
- Harold Road
- Kenley Aerodrome
- Norbury Estate
- Norwood Grove
- South Norwood
- St Bernard's
- The Waldrons
- The Webb Estate
- Upper Woodcote Village
- Upper Norwood Triangle
- Wellesley Road (North)

### **Local Heritage Areas**

- 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
- St Peter's Road
- South End with Ye Market
- Station Approach (Coulsdon)
- Stoats Nest Village
- Stuart Crescent
- The Dutch Village
- Thornton Heath High Street
- Upper Shirley Road

### **Historic Parks and Gardens (Statutory List)**

- Addington Palace
- Norwood Grove
- Promenade de Verdun Memorial Landscape

## Historic Parks and Gardens (Local List)

The exact boundaries of these areas were approved by the Local Development Framework and Planning Policy Cabinet Committee on 10th December 2008 and adopted by the Council in the Croydon Local Plan: Strategic Policies in April 2013.

- Addiscombe Recreation Ground
- All Saints Churchyard, Sanderstead
- All Saints with St Margaret's, Upper Norwood
- Ashburton Park
- Beaulieu Heights
- Beulah Hill Pond
- Bradmore Green
- Chaldon Way Gardens
- Coombe Wood
- Coulsdon Manor (Coulsdon Court)
- Coulsdon Memorial Ground
- Croham Hurst
- Croydon Airport, Purley Way West
- Duppas Hill
- Geoffrey Harris House
- Grangewood Park
- Haling Grove
- Hall Grange
- Heathfield
- Kenley Airfield
- Kings Wood
- Lloyd Park
- Millers Pond
- Mitcham Road Cemetery
- Norbury Hall
- Park Hill Recreation Ground
- Pollards Hill

- Queen's Gardens
- Queen's Road Cemetery
- Royal Russell School
- St John the Evangelist, Old Coulsdon
- St John's Churchyard, Shirley
- St John's Memorial Garden, Church Street
- St Mary's Churchyard, Addington Village
- St Peter's Churchyard, South Croydon
- Sanderstead Pond (And Green)
- Selsdon Park Hotel (and golf club)
- South Norwood Lake & Gardens
- South Norwood Recreation Ground
- The Lawns
- Thornton Heath Recreation Ground
- Thomas Moore School- (frontage)
- Upper Norwood Recreation Ground
- Virgo Fidelis School inc St. Joseph's RC Infant and Junior Schools
- Waddon Ponds
- Wandle Park
- Wettern Tree Garden
- Whitehorse Road Recreation Ground
- Whitgift Almshouses
- Woodcote Village Green
- Woodside Green

### **Scheduled Monuments**

- Croham Hurst round barrow
- Elmers End moated site, South Norwood
- Group of four WWII fighter pens at the former airfield of RAF Kenley
- Group of seven WWII fighter pens at the former airfield of RAF Kenley
- Newe (or Wide) Ditch, Riddlesdown

- Regular aggregate field system, associated trackway and Anglo-Saxon barrowfield on Farthing Down, 490m east of Hooley Farm, Coulsdon
- St John the Baptist's Church gateway, Howley Road
- Surrey Iron Railway embankment, approx. 130m south west of Lion Green Road, Coulsdon

### **Statutory Listed Buildings**

See <https://www.croydon.gov.uk/planningandregeneration/framework/conservation/buildings>

### **Locally Listed Buildings**

See <https://www.croydon.gov.uk/planningandregeneration/framework/conservation/buildings>

### **Archaeological Priority Areas**

- Addington and Addington Park
- Addington Hills
- Ampere Way
- Ashburton Park
- Cane Hill
- Central Croydon
- Croham Hurst
- Croham Hurst Round Barrow
- Croydon 19<sup>th</sup> Century Cemeteries
- Croydon Downs
- Deepfield Way
- Elmers End
- Farthing Down
- Haling Grove
- Hook Hill
- Lion Green Road

- London to Brighton Roman Road
- London to Lewes Roman Road
- Mere Bank
- Norwood Grove
- Old Coulsdon
- Pampisford Road
- Park Lane Anglo-Saxon Cemetery
- Pollards Hill
- RAF Kenley
- Riddlesdown Road
- Russell Hill
- Sanderstead
- Waddon
- Watendone



## Local Designated Landmarks

- Addington Palace
- All Saints Church, Sanderstead
- 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
- Park Hill Water Tower
- Shirley Windmill
- St. Andrew's Church, Woodmansterne Road, Coulsdon
- St. Peter's Church, South Croydon
- The Town Hall Clock Tower, Croydon
- Whitgift Almshouses, North End

## Views – Croydon Panoramas with the description of what is considered valuable and protectable in the panorama

- From Addington Hills of Croydon Metropolitan Centre (landmarks NTL Mast, Shirley Windmill, and No.1 Croydon)
- From Biggin Hill of Croydon Metropolitan Centre (landmarks No.1 Croydon and Ikea Towers)
- From Croham Hurst looking south west of Purley and the Downs
- From Farthing Downs of Coulsdon (landmark No.1 Croydon)
- From Kenley Common of Riddlesdown (A good viewpoint to see a unique view of Riddlesdown, and the quarry on the hillside)
- From land adjacent to Parkway and North Downs Crescent of Addington Palace and Shirley Hills (landmark Addington Palace)
- From Norwood Grove of Croydon Metropolitan Centre (landmark No.1 Croydon)
- From Pollards Hill of Croydon Metropolitan Centre (landmarks No.1 Croydon, George Street and Ikea Towers)
- From Purley Way Playing Field of Croydon Metropolitan Centre (landmarks NTL mast, the Town Hall Clock Tower in Katharine Street, No.1 Croydon and the Park Hill Water Tower)
- From Riddlesdown of Kenley (A good viewpoint to see a unique view of Kenley)
- From Ross Road of Ikea Towers (landmark Ikea Towers)

## Local Designated Views with the description of what is considered valuable and protectable in the view

- From Addiscombe Road by Sandilands Tramstop of No.1 Croydon
- From Church Street of Whitgift Almshouses and No.1 Croydon
- From Crown Hill of Croydon Minster
- From Farthing Downs of Cane Hill Water Tower
- From George Street of No.1 Croydon, George Street
- From Heathfield of Selsdon and New Addington (unique view of the collection of buildings of New Addington)
- From High Street north east, of the Clock Tower, South Norwood
- From High Street of the Clock Tower, Thornton Heath
- From High Street south west, of the Clock Tower, South Norwood
- From Limpsfield Road, near Wentworth Way of All Saints' Church
- From North End of the Town Hall Clock Tower
- From Oliver Grove of the Clock Tower, South Norwood
- From Park Hill of Croydon Metropolitan Centre (unique collection of buildings, no landmarks)
- From Roman Way north of Croydon Minster
- From Roman Way south of Croydon Minster
- From Selsdon Road of St Peter's Church
- From South Norwood Hill of the Shirley Windmill
- From Woodcote Grove Road of Cane Hill and St. Andrews Church ( St Andrews In the foreground and land mark of Cane Hill Water Tower in the distance)

## Appendix 6 – About the proposal sites

The Croydon Local Plan ~~2018~~ sets out Croydon Council's proposed sites for new homes, new primary and secondary schools, new healthcare facilities, new Gypsy and Traveller pitches and Creative and Cultural Industries Enterprise Centres and also land to be safeguarded for transport improvements in the borough.

This appendix explains the factors that were taken into consideration when assessing possible proposal sites in the borough. The proposal sites were identified from the following sources:

- The Call for Sites ~~that took place in February 2012 and February 2014~~;
- The Strategic Housing Land Availability Assessment prepared by the Mayor of London ~~in 2013~~;
- Planning permissions and records of pre-application advice; and
- Sites identified by Council officers as having potential for development.

Each site was considered for different uses. As each different land use has different needs the factors that were taken into consideration are looked at in turn starting below with housing.

### **New homes**

In assessing each site the basic criteria that were considered were as follows:

- a) Is the site big enough for 10 or more new homes;
- b) Are there any existing or proposed policy constraints that would prevent the development of the site altogether;
- c) Is the existing land use protected from development unless certain criteria are met (such as demonstrating lack of demand for an industrial premises or community use);
- d) Are there any factors that would prevent the site being developed (such as legal covenants or viability issues); and
- e) Could better use be made of the site for another use such as a new school based on the criteria in the following paragraphs?

### **New primary schools**

There were five principal criteria when assessing whether or not a site was suitable for a new primary school. These were:

- a) The site must be big enough (with 0.25ha being the smallest site a new primary school could be built on);
- b) The site must be in an area with an identified need for new primary school classes;
- c) The existing land use is not protected;
- d) There are no policy constraints that would prevent the development of the site altogether; and

- e) There are no known factors that prevent the site being developed.

Not every area of the borough has a need for new primary school classes beyond 2017. Only the North West, Centre and South West have been identified as needing more classrooms that will require the construction of a new primary school. The remaining areas of the borough (the North East, the East and the South East), either do not have any need for new classrooms or the need is small enough to be accommodated through the expansion of existing primary schools.

### **New secondary schools**

The assessment criteria for secondary schools were similar to primary schools, the main differences being the size of the site required and that secondary school places are required across the borough. The minimum site size for a new secondary school is 1.1ha.

### **New healthcare facilities**

The Council has worked with NHS England, the Croydon Commissioning Group, the South London and Maudsley NHS Trust, the Croydon University Hospital NHS Trust, the London Healthy Urban Development Unit and NHS Property Services to identify sites that would be suitable for new healthcare facilities and are in areas of demand.

### **Sites for Gypsy and Traveller pitches**

Gypsy and Traveller pitches are initially considered in the same way as a site for housing as in planning terms it is the same use of land. However, new Gypsy and Traveller pitches have their own specific requirements as well which were:

- a) The site must be big enough for three pitches (with 0.15ha being the minimum site size required for three new pitches); and
- b) The site should have no existing buildings (on the grounds that it would not be viable to demolish existing buildings and replace them with Gypsy and Traveller pitches), or the existing building could be used to provide an amenity block for new pitches.

### **Creative and Cultural Industries Enterprise Centres**

The Croydon Local Plan 2018 sets out in Policy SP3.3 that it will create a network of Creative and Cultural Industries Enterprise Centres with one each in Croydon Metropolitan Centre, Crystal Palace, Purley and South Norwood/Portland Road. Sites in these locations have been considered as potential locations for a Creative and Cultural Industries Centre where there is an existing policy designation protecting the existing use, but where the site could be realistically used to support creative and cultural industries in the borough.

## Appendix 7 – Schedule of proposal sites

## Appendix 7 – Schedule of proposal sites

New text is red underlined

Deleted text is ~~crossed out~~

<b>Site 1: Land Fronting North Downs Road and &amp; Overbury Crescent</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
Addington	<u>CR0 0DD</u>	<u>0.38ha</u>	<u>Amenity land</u>	<u>Urban</u>	<u>High</u>	<u>Local Authority built housing with public realm, Mid-rise blocks with associated grounds, Compact houses on small plots</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development</u>		<u>Residential development will help to meet the need for new homes in the borough.</u>			<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>46</u>

Site 5: AIG Building, 2-8 Altyre Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Croydon Opportunity Area</u>	<u>CR9 2LG</u>	<u>0.23ha</u>	<u>0.23ha</u>	<u>Central</u>	<u>High</u>	<u>Large buildings in an urban setting</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment including residential and non-retail town centre uses</u>		<u>Residential development will help to meet the need for new homes in the borough. The site lies within Croydon Metropolitan Centre but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location.</u>			<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>76</u>

Site 8: Motor Village Croydon, 121 Canterbury Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way (Broad Green &amp; Selhurst)</u>	<u>CR0 3HF</u>	<u>0.36ha</u>	<u>Car showroom</u>	<u>Urban</u>	<u>Medium</u>	<u>Large buildings with well-defined building line and adjacent to other buildings</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development (possibly with replacement car showroom)</u>		<u>Residential development will help to meet the need for new homes in the borough. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>			<u>2022/23-2026</u>	<u>Site is subject to developer interest</u>	<u>65</u>

Site 11: Croydon Garden Centre, 89 Waddon Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<a href="#">Purley Way</a> (Waddon)	CR0 4HY	<del>0.994ha</del> <a href="#">1.03ha</a>	Garden centre and car park	Urban	Low	Compact houses on relatively small plots, Local authority built housing with public realm, Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development <a href="#">linked to a potential Waddon Way Neighbourhood Centre.</a>		The site is suitable for residential development as the garden centre is not a protected use. Residential development will help to meet the need for new homes in the borough. The Sustainability Appraisal recommends public transport improvements are made as part of the development to mitigate the site's low public transport accessibility rating. The Listed Building should be positively integrated into the development. <a href="#">The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</a>			2022/23-2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<del>35 to 94</del> <a href="#">152</a>



**Site 13: Boyden Tiles, Mayday Road**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Broad Green &amp; Selhurst</u>	<u>CR7 7GY</u>	<u>0.4ha</u>	<u>Vacant industrial site</u>	<u>Urban</u>	<u>Medium</u>	<u>Industrial estates</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed use residential and industrial/warehousing development</u>		<u>Residential development will help to meet the need for new homes in the borough. The employment use is a protected use and therefore need to be retained on the site.</u>			<u>2022/23-2026</u>	<u>Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed</u>	<u>Up to 39</u>

Site 16: Heath Clark, Stafford Road						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character
<u>Purley Way</u> (Waddon)	CR0 4NG	<u>3.56ha</u> 3.24	<u>Cleared site</u> Field	Urban	High	Compact houses on relatively small plots, Industrial Estates, Large buildings in an urban setting, Mixed type flats
Description of option		Justification for option		Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Secondary School and residential development subject to access from Stafford Road		<p>The site is of a suitable size for a secondary school, is in an area that has a high demand for school places and can make a significant contribution to meeting this demand. The site is also large enough to accommodate new homes as well as a secondary school. Residential development will help to meet the need for new homes in the borough. Access to this site is currently an issue and development is dependent upon the reconfiguration of the Fiveways junction as currently it is not possible to provide access on to Stafford Road or Duppas Hill Road because of the volume of traffic on these roads. The Sustainability Appraisal recommends the loss of open space is mitigated by the development. School buildings and residential development should be located away from areas at risk from surface water ponding. <u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p>		2022/23-2026	<p><u>The southern part of the site has planning permission for residential development. The northern part of the site forms part of Educational Estate Strategy and its delivery is anticipated to come forward in the medium to long term of the Plan period.</u></p> <p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	<p><u>126</u></p> <p><del>62 to 128</del></p>

<b>Site 20: 98 – 100 Lodge Road and 1 – 3 Frederick Gardens</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Broad Green &amp; Selhurst</u>	<u>CR0 2PF</u>	<u>0.13ha</u>	<u>Two HMO's for supported housing</u>	<u>Urban</u>	<u>Medium</u>	<u>Large houses on small plots, Compact houses on small plots</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development</u>		<u>Residential development will help to meet the need for new homes in the borough.</u>			<u>2027-2031</u>	<u>Site is subject to developer interest</u>	<u>Up to 16</u>

Site 21: Former Royal Mail site, 1-5 Addiscombe Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR9 6AB	0.43ha	Former Royal Mail Delivery Office	Central	High	Large buildings in an urban setting	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Residential led mixed use development incorporating either hotel, office, and leisure <u>and non-retail town centre uses and/or class A2-A5 uses</u></p> <p>Also retail so long as the current planning permission is extant.</p>		<p>Proximity to East Croydon station means the site is well suited to provide homes and could include either offices, hotel and leisure uses as part of a mixed scheme. The site lies within Croydon Metropolitan Centre but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location. The redevelopment of this site could help to meet the need for new homes in the borough. <u>The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</u></p> <p><del>The site has planning permission for a retail use having passed the sequential test. Should the planning permission expire retail use would cease to be an acceptable use on this site unless a new sequential test demonstrates that there are no sequentially preferable sites available that are suitable for the type of retail use proposed. A cycling hub is required to improve the sustainability of the site, the development of which has some negative environmental impacts, although partly mitigated by the provision of housing and employment.</del></p>			<p><u>Post 2032</u></p> <p><del>2016 - 2021</del></p>	<p>Site has planning permission <del>and there is nothing preventing the site from being developed</del></p> <p><u>but there are a number of issues that need to be overcome before the site can be developed including consideration of the Brighton Mainline and East Croydon station upgrade works</u></p>	<p><del>74 to</del></p> <p>201</p>

**Site 22: Whitehorse Road garages and parking area, Whitehorse Road estate (Johnson Road/Cromwell Road)**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Broad Green &amp; Selhurst</u>	<u>CR0 2JR</u>	<u>0.11ha</u>	<u>Garages and car park</u>	<u>Central</u>	<u>Medium</u>	<u>Medium rise blocks with associated grounds, Compact houses on small plots</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development</u>		<u>Residential development will help to meet the need for new homes in the borough.</u>			<u>2023-2024 onwards</u>	<u>Site is subject to developer interest</u>	<u>16</u>

Site 25a: Morrisons Supermarket, 500 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Waddon)	CR0 4NZ	<del>3.75ha</del> <u>2.74ha</u>	Retail warehouse site bordering Purley Way and Stafford Road	Urban	High	Detached houses on relatively large plots, Retail Estates & Business & Leisure Parks, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Redevelopment of a mix of residential, retail, commercial and community uses, <u>new green open space and health facility (if required by the NHS)</u> to form the basis of a new residential community <u>and part of the potential Fiveways Town Centre and environs.</u></p> <p><del>It is recommended that basements are not considered at this site. Further ground investigations would be required at this site to confirm the likelihood of groundwater occurrence.</del></p>		<p>Potential for a new Town Centre in the Fiveways area of <del>Waddon</del> is identified in the <u>Purley Way Transformation Area</u> and Croydon Local Plan's <del>Strategic Policies.</del></p> <p>. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, <u>community uses</u> and retail <del>alongside new community and leisure uses.</del></p> <p><del>Residential development will help to meet the need for new homes in the borough.</del></p> <p><u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p>			<p><del>Post 2026</del></p> <p><u>2023-2024 onwards</u></p>	<p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p> <p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p>	<p><del>251 to 1028</del></p> <p><u>529</u></p>

Site 25b: Porcelenosa, 468-472 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Waddon)	CR0 4NZ	<u>0.83h</u> <u>a</u>	Retail warehouse site bordering Purley Way	Urban	High	Detached houses on relatively large plots, Retail Estates & Business & Leisure Parks, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Redevelopment of a mix of residential, retail, commercial and community uses, <u>new green open space and health facility (if required by the NHS)</u> to form the basis of a new residential community <u>and part of the potential Fiveways Town Centre and environs.</u></p>		<p>Potential for a new Town Centre in the Fiveways area is identified in the <u>Purley Way Transformation Area</u> and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, <u>community uses</u> and retail. <u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p>			<p><u>Post 2032</u></p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>233</u></p>

Site 25c: Fiveways Retail Park, 500 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Waddon)	CR0 4NZ	<u>1.84h</u> <u>a</u>	Retail warehouse site bordering Stafford Way	Urban	High	Detached houses on relatively large plots, Retail Estates & Business & Leisure Parks, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Redevelopment of a mix of residential, retail, commercial and community uses, <u>new green open space and health facility (if required by the NHS)</u> to form the basis of a new residential community <u>and part of the potential Fiveways Town Centre and environs.</u></p>		<p>Potential for a new Town Centre in the Fiveways area is identified in the <u>Purley Way Transformation Area</u> and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, <u>community uses</u> and retail. <u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p>			<p><u>Post 2032</u></p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>338</u></p>



Site 28: Bowyers Yard, Bedwardine Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Crystal Palace & Upper Norwood	SE19 3AN	0.12ha 0.02ha	Studios and Workshop Space	Urban	High	Large houses on relatively small plots, Terraced houses and cottages, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Cultural and Creative Industries Enterprise Centre		<p>An existing recording studio that is seeking to expand their offer will provide greater support for the cultural creative sector. Accords with Croydon Local Plan Policy SP3.3 to deliver such a facility within Crystal Palace. <del>The Sustainability Appraisal highlights the context of the Conservation Area which development proposals will need to consider</del></p> <p><u>The site is within the Upper Norwood Triangle Conservation Area and should preserve or enhance the character of the area. The Council's relevant Conservation Area Guidance and Management Plans will need to be adhered to.</u></p>			Post 2032 2021 - 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	n/a

**Site 30: Purley Leisure Centre, car park and former Sainsbury's Supermarket, High Street**

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 2AA	0.66ha	Swimming pool, multi-storey car park and former supermarket	Urban	High	Large buildings in an urban setting, Mixed type flats, Terraced houses and cottages, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use redevelopment incorporating public car park, new leisure facilities, including a swimming pool, and other community facilities, healthcare facility <u>(if required by the NHS)</u> , creative and cultural industries enterprise centre, retail or residential accommodation.		The community use of the site is protected by Policy SP5 of the Croydon Local Plan . A commitment to deliver a creative and cultural industries enterprise centre in Purley District Centre is set out in Croydon Local Plan . As it is in the Primary Shopping Area retail is an acceptable use. Residential development will help to meet the need for new homes in the borough. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities.			<u>Post 2032</u> <del>2021-2026</del>	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>118</u> <del>30 to 171</del>

Site 31: Croydon College car park, College Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1PF	0.14ha	Eastern end of Croydon College over existing car park and access area	Central	High	Large buildings in an urban setting, Linear Infrastructure	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<u>Residential development</u> <del>Mixed use redevelopment comprising hotel &amp; residential</del>		<p>The site is to be used to fund improvements to the remaining parts of Croydon College, who do not need the car park. Residential development will help to meet the need for new homes in the borough.</p> <p><del>The site lies within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area so is suitable for all town centre uses except retail.</del></p>			2022/23-2026	<u>Site has planning permission comprising 120 C3 residential units and 817 co-living units (= 434 C3 units at a New London Plan ratio of 1.8 beds /1c3 unit)</u>  Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>573</u> <del>159</del>
Site 32: 4-20 Edridge Road							
<del>Place</del>	<del>Postcode</del>	<del>Size</del>	<del>Site description</del>	<del>Type of location</del>	<del>Public Transport Accessibility</del>	<del>Local character</del>	

**Site 31: Croydon College car park, College Road**

Croydon Opportunity Area	GRO-9WX	0.23ha	Car park	Central	High	Linear Infrastructure; Tower Buildings; Urban Shopping Areas	
<b>Description of option</b>		<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential development		Residential development will help to meet the need for new homes in the borough. It is a poor location for offices as it is too far from East Croydon station and outside of the Primary Shopping Area so retail use is not acceptable or suitable.			2021 – 2026	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	180-220

<b>Site 33: 26-28 Addiscombe Road (Go Ahead House)</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR9 5GA</u>	<u>0.13ha</u>	<u>Office building</u>	<u>Central</u>	<u>High</u>	<u>Large buildings with well-defined building line and adjacent to other buildings</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential, office and/or hotel</u>		<u>Residential development will help to meet the need for new homes in the borough. The site lies within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area is suitable for all town centre uses except retail.</u>			<u>2027-2032</u>	<u>Site is subject to developer interest</u>	<u>76</u>

<b>Site 34: Land Bounded By George St, Park Lane, Barclay Road, And Main London To Brighton Railway Line</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR0 1YL</u>	<u>1.61ha</u>	<u>Law court, cleared site and public realm</u>	<u>Central</u>	<u>High</u>	<u>Large buildings with surrounding space</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>

**Site 34: Land Bounded By George St, Park Lane, Barclay Road, And Main London To Brighton Railway Line**

<p><u>Mixed use development incorporating residential use on land behind the Fairfield Halls.</u></p>	<p><u>Residential development will help to meet the need for new homes in the borough. The site lies within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area so is suitable for all town centre uses except retail.</u></p>	<p><u>Post 2032</u></p>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p>	<p><u>626</u></p>
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**Site 35: Purley Baptist Church, 2-12 Banstead Road**

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 3EA	0.43ha	Purley Baptist Church, parking area and other various buildings	Urban	High	Large buildings in an urban setting, Planned estates of semi-detached houses, Terraced houses and cottages, Urban Shopping Areas	
Description of option			Justification for option		Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

**Site 34: Land Bounded By George St, Park Lane, Barclay Road, And Main London To Brighton Railway Line**

<p>Mixed use redevelopment comprising new church, community facility and residential with development located outside Flood Zone 2 and 3a.</p>	<p>The redevelopment of this site could help to meet the need for new homes in the borough. The church and community facility are protected by Croydon Local Plan Policy SP5. The provision of flood prevention measures is required to improve the sustainability of the development.</p>	<p>2022/23-2027</p>	<p>Site has planning permission  <del>Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission</del>                  there is nothing preventing the site from being developed</p>	<p><u>114</u>  <del>20 to 111</del></p>
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<b>Site 37: 45 Lansdowne Road</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR0 2BE</u>	<u>0.17ha</u>	<u>Car park</u>	<u>Central</u>	<u>High</u>	<u>Industrial estates, Large buildings with surrounding space</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development</u>		<u>Residential development will help to meet the need for new homes in the borough. The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</u>			<u>2027-2032</u>	<u>Site is subject to developer interest</u>	<u>33</u>

<b>Site 40: West Croydon Bus Station</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR0 2RD</u>	<u>0.32ha</u>	<u>Bus station</u>	<u>Central</u>	<u>High</u>	<u>Transport Nodes</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment over the bus station to incorporate residential uses and town centre uses (office, leisure, food &amp; drink or hotel). The bus station is to be retained as part of any redevelopment.</u>		<u>Redevelopment of the bus station, retaining this facility, will help to meet the need for homes in the borough in a sustainable location. The site lies within Croydon Metropolitan Centre close to West Croydon station but outside of the Primary Shopping Area so is suitable for all town centre uses except retail. Development should ensure the setting of St Michael's and All Angels Church is preserved and enhanced.</u>			<u>Post 2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>Up to 76</u>



<b>Site 40: West Croydon Bus Station</b>							
<b>Site 41: Direct Line House, 3 Edridge Road</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR9 1AG</u>	<u>0.27ha</u>	<u>Office building</u>	<u>Central</u>	<u>High</u>	<u>Large buildings with surrounding space</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential and/or office development</u>		<u>Residential development will help to meet the need for new homes in the borough. The site lies within Croydon Metropolitan Centre but outside of the Primary Shopping Area so is suitable for all town centre uses except retail. Development should ensure the settings of Croydon Quaker Meeting House and the Adult School Hall are preserved and enhanced.</u>			<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>Up to 158</u>

<b>Site 42: The Lansdowne, 2 Lansdowne Road</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR9 2ER</u>	<u>0.33ha</u>	<u>Office building</u>	<u>Central</u>	<u>High</u>	<u>Large buildings with surrounding space</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed use development of office and residential</u>		<u>Residential development will help to meet the need for new homes in the borough. The site lies within Croydon Metropolitan Centre but outside of the Primary Shopping Area so is suitable for all town centre uses except retail.</u>			<u>2027-2032</u>	<u>Site is subject to developer interest</u>	<u>Up to 158</u>

Site: 44: Central Parade West, Central Parade							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Addington	CR0 0JB	<u>1.74ha</u> <del>2.07ha</del>	Land and community buildings to the west side of Central Parade	Urban	Medium	Institutions with associated grounds, Local authority built housing with public realm, Mixed type flats, Suburban Shopping Area	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed development including residential, community, healthcare facility ( <u>if required by the NHS</u> ), leisure, retail and open space		Residential development would help meet the need for new homes in the borough. The site is in New Addington District Centre, within the Primary Shopping Area which would make all town centre uses acceptable in this location. Community facilities are protected by Policy SP5 of the Croydon Local Plan . Landscaping that includes species to assist biodiversity is required to assist sustainability. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.			<u>2022-2027</u> <del>2016-2024</del>	Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed	<u>376</u> <del>50 to 290</del>

**Site 45: East Croydon Station**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR0 1LF</u>	<u>2.82ha</u>	<u>Train station and associated infrastructure and platforms</u>	<u>Central</u>	<u>High</u>	<u>Transport Nodes</u>	
<u>Description of option</u>			<u>Justification for option</u>		<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment of the existing railway station including a square with associated public realm</u>			<u>Redevelopment of the train station to provide additional capacity and platforms. Provision of a square and public realm will help create a gateway to the town centre. The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</u>		<u>Post 2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed including consideration of the Brighton Mainline upgrade works</u>	<u>n/a</u>

**Site 47: 3-9 Park Street**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR0 1YD</u>	<u>0.07ha</u>	<u>Vacant building previously used as a nightclub</u>	<u>Central</u>	<u>High</u>	<u>Large buildings with well-defined building line and adjacent to other buildings</u>	
<u>Description of option</u>			<u>Justification for option</u>		<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed use residential and ground floor town centre use</u>			<u>Residential development will help to meet the need for new homes in the borough. Site lies within Croydon Town Centre and within the Primary Shopping Area which would make all town centre uses acceptable in this location. The site is within the Central Croydon Conservation Area and should preserve and enhance the character of the area. The Council's relevant Conservation Area Guidance and Management Plans will need to be adhered to.</u>		<u>2027-2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>Up to 18</u>

Site 48: 294-330 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Waddon)	CR0 4XJ	2.63ha 2.55ha	Retail warehouse and vacant employment land	Urban	Medium	Retail Estates & Business & Leisure Parks, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development comprising retail store, commercial space and residential units		<p><u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan.</u> Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, <u>community uses</u> and retail. <u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u> As the site is within Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment. It is recommended that basements are not considered at this site.</p>			<p><u>2027-2032</u> Post 2026</p>	<p>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</p>	<p>17 <u>331</u></p>

Site 50: 44-60 Cherry Orchard Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 6BA	0.3ha	Meat processing factory	Urban	High	Industrial Estates, Mixed type flats, Tower Buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development subject to the relocation of the existing business to another site in the borough		Residential development will help to meet the need for new homes in the borough. The site was included as an allocation in the Replacement Unitary Development Plan (2006) and as such is not protected as a Town Centre Industrial site as part of the Croydon Local Plan . The site forms part of the Brighton Mainline and East Croydon station Transformation Area.			2027-32	No known developer interest for this site	120 50 to 80

Site 51: Land and car park between Belgrave Road and Grosvenor Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
South Norwood & Woodside	SE25 5AW	0.71ha	Amenity land and car park	Urban	High	Tower buildings, Medium rise blocks with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

**Site 51: Land and car park between Belgrave Road and Grosvenor Road**

<p align="center"><u>Residential and community use</u></p>	<p><u>Residential development will help to meet the need for new homes in the borough. The community use of the site is protected by Policy SP5 of the Croydon Local Plan .The retention of a community facility will assist the sustainability of the site. The development should respond to the character of the South Norwood Conservation Area and enhance the public realm of the site.</u></p>	<p align="center"><u>2022-2027</u></p>	<p align="center"><u>Site has planning permission</u></p>	<p align="center"><u>102</u></p>
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**Site 54: BMW House, 375-401 Brighton Road**

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
South Croydon	CR2 6ES	<p align="center"><u>0.62ha</u> <del>0.584ha</del></p>	Site of former BMW showroom which has a multi-storey car park to the rear	Urban	Medium	Large houses on relatively small plots, Retail Estates & Business & Leisure Parks, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

Site 54: BMW House, 375-401 Brighton Road				
<p>Mixed use residential and supermarket  <del>The site is located within Flood Zone 3a associated with the culverted River Wandle. At this location, the culverted River Wandle has been incorporated into the surface water sewer system as it flows north below the A235 Brighton Road. A Flood Warning and Evacuation Management Plan must be prepared for the site.</del></p>	<p>There are no sequentially preferable sites within the Brighton Road (Sanderstead Road) Local Centre for a supermarket and a developer is interested in building one on this site. Residential development will help to meet the need for new homes in the borough.  <del>The development has some negative environmental impacts, although partly mitigated by the provision of housing and employment. As the site is within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment</del></p>	<p><u>2027-32</u>  <del>2016 - 2024</del></p>	<p><u>Site has a long history of unimplemented permissions for residential development. Site is It is</u> subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves            but there are a number of issues that need to be overcome before the site can be developed</p>	<p>42</p>



<b>Site 59: Garages at rear of 96 College Green and land at Westow Park, Upper Norwood</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Crystal Palace &amp; Upper Norwood</u>	<u>SE19 3PR</u>	<u>0.27ha</u>	<u>Garages and amenity land</u>	<u>Urban</u>	<u>Low</u>	<u>Tower buildings, Compact houses on relatively small plots, Local authority built housing with public realm</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development</u>		<u>Residential development will help to meet the need for new homes in the borough. The site is adjacent to three conservation areas and should ensure the settings of these areas is preserved. The Council's relevant Conservation Area Guidance and Management Plans must be adhered to.</u>			<u>Post 2032</u>	<u>Site is subject to developer interest</u>	<u>Up to 16</u>

<b>Site 60: Cane Hill Hospital Site, Farthing Way</b>							
<u>Place</u>	<u>Post</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Goulsdon</u>	<u>CR5 3YL</u>	<u>32.37ha</u>	<u>Former Hospital Site</u>	<u>Suburban</u>	<u>Low</u>	<u>Green Infrastructure; Planned estates of semi-detached houses; Scattered houses on large plots</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>

Site 60: Cane Hill Hospital Site, Farthing Way				
Residential development with new community, health and educational facilities	The development of this site will assist in meeting the need for housing in the borough. New community, health and educational facilities are required to improve the sustainability of the site. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities.	2016 – 2021	Site has planning permission and there is nothing preventing the site from being developed	650

Site 61: Purley Station car park and 54-58 26-52 Whytecliffe Road South							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 2AW	<u>0.61ha</u> <del>0.46ha</del>	Car Park and terraced residential homes	Urban	High	Institutions with associated grounds, Mixed type flats, Planned estates of semi-detached houses, Terraced houses and cottages, Transport Nodes	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential use with retention of car parking spaces		<p>The site will help to meet the need for homes and potential for public parking in the borough after 2026. A Transport Assessment will be required of redevelopment proposals for the site to consider possible impacts on local streets in the vicinity of Purley Railway station arising from any reduction in parking. <del>The site is located in close proximity to a safeguarded site under paragraph 204 of the National Planning Policy Framework therefore any proposals must be designed to ensure they do not prejudice its current or future operation.</del></p>			<u>2027-2032</u> Post 2026	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before it can be developed</u></p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>182</u></p> <p><del>21 to 119</del></p>



**Site 64: 112a and 112b Brighton Road**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley</u>	<u>CR8 4DB</u>	<u>0.28ha</u>	<u>Two vacant units at ground floor, previously used as a gym and bowling alley, with unit on first floor</u>	<u>Urban</u>	<u>Medium</u>	<u>Urban Shopping Areas</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential, with leisure uses (up to existing floor space)</u>		<u>Residential development will help to meet the need for new homes in the borough. Community facilities are protected by Policy SP5 of the Croydon Local Plan .</u>			<u>2027-2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>26</u>

Site 68: 130 Oval Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Addiscombe	CR0 6BL	0.22ha	Former warehouse/factory that has been vacant for more than five years. Hidden behind terraces of residential dwellings accessible through two alleyways.	Urban	High	Industrial Estates, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development		As part of the Croydon Local Plan any town centre or scattered employment site that has been vacant for more than 18 months is being proposed for redevelopment if it could accommodate 10 or more new homes. Policy SP3.2 of the Croydon Local Plan requires that evidence of lack of demand for the existing premises or site for an employment use be provided before other uses can be considered. However, the need for new homes in the borough is so great that, as a plan-making process, a plan-led release of vacant town centre and scattered employment sites is proposed to help meet the need for new homes.			<u>2027-2032</u> <del>2021 - 2026</del>	Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing	<u>12</u> <del>10 to 57</del>

Site 71: 2 Red Gables Beech Avenue							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
Sanderstead	CR2 0NL	0.63ha	Detached property and associated amenity land	Suburban	Low	Medium rise blocks with associated grounds	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
Residential development		Residential development will help to meet the need for new homes in the borough.			2022-2027	Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed	26

Site 78: 114-118 Whitehorse Road							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
Broad Green & Selhurst	CR0 2JF	0.04ha	Retail unit on ground floor & vacant offices set back from retail frontage over 2 floors	Urban	High	Urban Shopping Areas	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>

**Site 78: 114-118 Whitehorse Road**

Residential conversion and extension	Offices not in preferred location. Prior approval for office to residential for 8 units, there is potential for 10 units or more with potential to move the/extend the 1st storey and above to the building line of the ground floor. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.	2022-2027	Site is subject to developer interest	7 to 8
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Site 79: Waitrose, Sanderstead							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Sanderstead</u>	<u>CR2 9LE</u>	<u>0.74ha</u>	<u>Superstore and car park</u>	<u>Urban</u>	<u>Low</u>	<u>Retail estates, business, leisure parks</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed use residential and retail development</u>		<u>Residential development will help to meet the need for new homes in the borough. Site is located in Sanderstead Town Centre so all town centre uses including retail are suitable at this site</u>			<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>Up to 62</u>

Site 80: Victory Place							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Crystal Palace &amp; Upper Norwood</u>	<u>SE19 3BD</u>	<u>0.27ha</u>	<u>Warehouses and office buildings at rear of Victory Place and Carberry Road in the centre of the Crystal Palace Triangle</u>	<u>Urban</u>	<u>High</u>	<u>Compact houses on relatively small plots; Industrial Estates; Mixed type flats; Terraced houses and cottages; Urban Shopping Areas</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>



Site 80: Victory Place				
Ground floor retail, restaurant and studio space with hotel, office/ or and residential uses on other floors	Residential development will help to meet the need for new homes in the borough. The site lies within Crystal Palace District Centre and Primary Shopping Area so all town centre uses including retail are acceptable in this location. The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment.	2016–2024	Site has planning permission and there is nothing preventing the site from being developed	33 to 70

Site 85: The Forestdale Centre							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
Selsdon	CR0 9AS	0.94ha	Shopping parades with residential on first floor and car park	Urban	Medium	Retail estates, business, leisure parks	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
Residential development incorporating a new shopping parade with retail, finance, and food & drink		Comprehensive redevelopment of this site will regenerate the Centre at Forestdale with a mixture of appropriate town centre uses including retail on the Shopping Parades. Residential development will help meet the need for new homes in the borough.			Post 2032	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	86

Site 87: Shirley Community Centre						
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>
Shirley	CR0 8JA	0.1ha	Community centre	Suburban	Medium	Institutions with associated grounds

**Site 87: Shirley Community Centre**

<u>Description of option</u>	<u>Justification for option</u>	<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed use development with residential and replacement community facility that provides at least equivalent functionality to the existing centre</u>	<u>Residential development will help to meet the need for new homes in the borough. Community facilities are protected by Policy SP5 of the Croydon Local Plan .</u>	<u>2027-2032</u>	<u>Site is subject to developer interest</u>	<u>18</u>



Site 97: 24 Station Road							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
South Norwood & Woodside	SE25 5AG	0.05ha	Vacant plot adjacent to supermarket	Urban	High	Terraced houses and cottages; Urban Shopping Areas	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
Residential development with a retail unit		The redevelopment of this site could help to meet the need for new homes in the borough. The site lies within the Primary Shopping Area of South Norwood District Centre and so retail is an acceptable use. The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment.			2016 – 2021	Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves	12

Site 101: Toby Carvery, Brantwood Road							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
South Croydon	CR2 6ES	0.36ha	Restaurant & car park	Urban	High	Retail estates, business, leisure parks	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development</u>		Residential development will help to meet the need for new homes in the borough.			Post 2032	Site has no known developer interest and the Council will need to work with landowner to bring it forward	41

<b>Site 103: 585-603 London Road</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
Thornton Heath	CR7 6AY	0.81ha	Hotels and associated car parks	Urban	Medium	Large buildings with well-defined building line and adjacent to other buildings	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
Mixed use development for residential and hotel (up to existing floor space).		Residential development will help to meet the need for new homes in the borough.			2022-2027	Site is subject to developer interest	118

<b>Site 104: Former Taberner House site, Fell Road</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
Croydon Opportunity Area	CR9 3JS	0.36ha	Former Council offices currently being demolished	Central	High	Green Infrastructure; Large buildings in an urban setting; Tower Buildings	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
Residential development		Residential development will help to meet the need for new homes in the borough. It is a poor location for offices as it is too far from East Croydon station and outside of the Primary Shopping Area so retail use is not acceptable or suitable. The retention of public open space in the development is required to assist its sustainability.			2021 – 2026	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	440

<b>Site 105: Strand House, Zion Road</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Thornton Heath</u>	<u>CR7 8RG</u>	<u>0.25ha</u>	<u>Former Adult Learning and Training Centre</u>	<u>Urban</u>	<u>High</u>	<u>Large buildings with surrounding space</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development</u>		<u>Residential development will help to meet the need for new homes in the borough.</u>			<u>Post 2032</u>	<u>In Council ownership</u>	<u>Up to 22</u>

<b>Site 106: CACFO, 40 Northwood Road</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Norbury</u>	<u>CR7 8HU</u>	<u>0.15ha</u>	<u>Community centre</u>	<u>Urban</u>	<u>Medium</u>	<u>Cottages, terraced houses &amp; close knit semi-detached houses</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed use residential and community use (to retain equivalent floor space or functionality of the community use)</u>		<u>Residential development will help to meet the need for new homes in the borough. Community facilities are protected by Policy SP5 of the Croydon Local Plan .</u>			<u>2027-2032</u>	<u>Site is subject to developer interest</u>	<u>18</u>

<b>Site 110: Old Waddon Goods Yard, Purley Way</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Waddon)</u>	<u>CR0 4NX</u>	<u>0.74ha</u>	<u>Various large retail units</u>	<u>Urban</u>	<u>Medium</u>	<u>Retail estates, business, leisure parks</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed use development incorporating residential, retail and food &amp; drink (with the retail and food &amp; drink elements limited to the current amount of floor space) around a greatly improved or new Waddon Station.</u>		<u>Potential for a new Town Centre in the Fiveways area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>			<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>168</u>

<b>Site 114: Garage courts at 18 Bramley Hill</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>South Croydon</u>	<u>CR0 1AP</u>	<u>0.09ha</u>	<u>Garages and amenity land</u>	<u>Suburban</u>	<u>Medium</u>	<u>Medium rise blocks with associated grounds</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Residential development</u>		<u>Residential development will help to meet the need for new homes in the borough.</u>			<u>2027-2032</u>	<u>Site is subject to developer interest</u>	<u>8</u>

Site 123: Prospect West and car park to the rear of, 81-85 Station Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2RD	0.6ha	Car park at rear and office block	Central			
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential (with healthcare facility if required by NHS). It is recommended that basements are not considered at this site. Further ground investigations would be required at this site to confirm the likelihood of groundwater occurrence this site to confirm the likelihood of groundwater occurrence. There is one historic record of surface water flooding held by the Council in this location.		Existing office building is not protected from development. The site's location away from East Croydon station means it is less suited to hotel or office use and because it is outside of the Primary Shopping Area it is not suitable for retail use. Residential development will help to meet the need for new homes in the borough. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. Acoustic measures will need to be incorporated in the design to assist sustainability of the development. Development should ensure the setting of the Wellesley Road (North) Conservation Area and locally listed buildings is preserved and enhanced.			Post 2032	Site has no known developer interest and the Council will need to work with landowner to bring it forward	Up to 291

Site 115: Cheriton House, 20 Chipstead Avenue						
<del>Place</del>	<del>Postcode</del>	<del>Size</del>	<del>Site description</del>	<del>Type of location</del>	<del>Public Transport Accessibility</del>	<del>Local character</del>



Site 115: Cheriton House, 20 Chipstead Avenue							
Thornton Heath	CR7-7DG	0.17ha	Former care home and land	Urban	High	Institutions with associated grounds; Mixed type flats	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential redevelopment		No interest has been shown for a replacement community facility on this site so residential development is in principle acceptable and will help to meet the need for new homes in the borough. The design will need to address the environmental impacts of redevelopment. It is recommended that basements are not considered at this site.			2021–2026	Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed	15 to 20

Site 116: Rees House & Morland Lodge, Morland Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Addiscombe	CR0 6NA	0.46ha	Vacant office building and former care home	Urban	Medium	Compact houses on relatively small plots; Institutions with associated grounds; Large houses on relatively small plots; Mixed type flats; Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Secondary School		Needed to meet demand for school places			2016 – 2021	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	n/a

Site 120: Timebridge Community Centre, Field Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Addington	CR0 9DX	2.089ha	Former school and grounds currently in use as a community centre	Urban	Medium	Compact houses on relatively small plots; Institutions with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Secondary school buildings		The site is a suitable size for accommodating secondary school buildings and adjacent to existing playing fields which can be used by the school. The secondary school would make a significant contribution towards meeting the demand for secondary school places.			2016 - 2021	In-Council ownership	n/a

Site 123: Prospect West and car park to the rear of, 81-85 Station Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2RD	<del>0.88ha</del> 0.6ha	Car park at rear and office block	Central	High	Large buildings with surrounding space; Transport Nodes	
Description of option			Justification for option		Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential (with healthcare facility if required by NHS). It is recommended that basements are not considered at this site. Further ground investigations would be required at this site to confirm the likelihood of groundwater occurrence. There is one historic record of surface water flooding held by the Council in this location.			Existing office building is not protected from development. The site's location away from East Croydon station means it is less suited to hotel or office use and because it is outside of the Primary Shopping Area it is not suitable for retail use. Residential development will help to meet the need for new homes in the borough. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. Acoustic measures will need to be incorporated in the design to assist sustainability of the development. <u>Development should ensure the setting of the Wellesley Road (North) Conservation Area and locally listed buildings is preserved and enhanced.</u>		Post <del>2026</del> <u>2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u> <del>Site has planning permission and there is nothing preventing the site from being developed</del>	<u>Up to 291</u> <del>40 to 288</del>

**Site 125: Sainsburys, Trafalgar Way**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Waddon)</u>	<u>CR0 4XT</u>	<u>2.75ha</u>	<u>Large supermarket and car park</u>	<u>Urban</u>			
<u>Description of option</u>			<u>Justification for option</u>		<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<p><u>Mixed use residential and retail development (with retail floor space limited to no more than currently exists on the site), including new green open space and health facility (if required by the NHS) to form the basis of a new residential community and p</u></p>			<p><u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p>		<p><u>2027-2032</u></p>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p>	<p><u>632</u></p>

**Site 126: Spurgeons College, 189 S Norwood Hill, South Norwood**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Crystal Palace &amp; Upper Norwood</u>	<u>SE25 6DJ</u>	<u>2.4ha</u>	<u>Higher education facility and associated land</u>	<u>Urban</u>	<u>Medium</u>	<u>Institutions with associated grounds</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Higher education with residential</u>		<u>Community facilities are protected and higher education uses supported by Policy SP5 of the Croydon Local Plan . Residential development will help to meet the need for new homes in the borough.</u>			<u>2027-2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>Up to 72</u>

Site 128: Land at, Poppy Lane							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Shirley	CR0 8YT	1.43ha	Cleared site	Suburban	Low	Green Infrastructure; Institutions with associated grounds; Mixed type flats	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development		<p>This site does not meet the criteria for designation as Metropolitan Open Land as it does not contribute to the physical structure of London, it does not include open air facilities which serve whole or significant parts of London and it does not contain features or landscapes of national or metropolitan importance. For this reason it has been assessed by the same criteria as other non-Metropolitan Open Land sites and is considered acceptable for development. Residential development will help to meet the need for new homes in the borough.</p>			<p><u>2027-2032</u> Post 2026</p>	<p>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</p>	<p><u>91</u> <del>51 to 107</del></p>

Site 129: 843 London Road							
<del>Place</del>	<del>Postcode</del>	<del>Size</del>	<del>Site description</del>	<del>Type of location</del>	<del>Public Transport Accessibility</del>	<del>Local character</del>	
Thornton Heath	CR7 6AW	0.22ha	Site of former Oaks Hospital	Urban	Medium	Medium-rise blocks with associated grounds; Retail Estates & Business & Leisure Parks; Terraced houses and cottages; Urban Shopping Areas	
<del>Description of option</del>		<del>Justification for option</del>			<del>Anticipated phasing of development</del>	<del>Evidence of deliverability</del>	<del>Indicative number of homes</del>
Primary school		Site is a former community use and is protected for ongoing community activity by Policy SP5. There is a need for primary school places in this area of the borough and this site will help meet the need arising before 2017. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.			2016 – 2021	Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed	n/a



Site 130: 1-9 Banstead Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 3EB	<del>0.88ha</del> 0.42ha	Semi-detached houses including some used as offices	Urban	High	Planned estates of semi-detached houses	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development		Residential development will help to meet the need for new homes in the borough			2022-2027	<p><u>Site has planning permission</u></p> <p><del>Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed</del></p>	<p><u>106</u></p> <p>77 to 100</p>

<b>Site 132: 550 and 550A Purley Way</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Waddon)</u>	<u>CR0 4RF</u>	<u>0.3ha</u>	<u>Retail outlet and car park</u>	<u>Urban</u>	<u>Medium</u>	<u>Retail Estates &amp; Business &amp; Leisure Parks</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment of the site to provide a mixture of residential, retail and business uses</u>		<u>Potential for a new Town Centre in the Fiveways area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>			<u>2022-2027</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>111</u>

**Site 133: Woburn and Bedford Court**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR0 2AE</u>	<u>1.14ha</u>	<u>Various low rise residential blocks and associated parking and amenity land</u>	<u>Central</u>	<u>High</u>	<u>Medium rise blocks with associated grounds</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Additional residential development</u>		<u>Residential development will help to meet the need for new homes in the borough.</u>			<u>Post 2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>Up to 505</u>

<b>Site 135: Hilton Hotel car park, 101 Waddon Way</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Waddon)</u>	<u>CR9 4HH</u>	<u>0.36ha</u>	<u>Hotel car park</u>	<u>Urban</u>	<u>Low</u>	<u>Retail Estates &amp; Business &amp; Leisure Parks</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment for residential development and retention of hotel to form part of a potential Waddon Way Neighbourhood Centre</u>		<u>Potential for a new Town Centre in the Waddon Way area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>			<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>70</u>

Site 136: Supermarket, car park, 54 Brigstock Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR7 8RX	<del>0.44ha</del> 0.32ha	Iceland Freezer Centre store and car park.	Urban	High	Industrial Estates, Transport Nodes, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use of residential with retail along Brigstock Road and employment use		The site is in a very accessible location in Thornton Heath Town Centre next to the railway station. Currently it has a low density supermarket with car park and scaffolding yard to the rear. The preferred option retains some employment use (as this is protected by Policy SP3.2 of the Croydon Local Plan ) whilst making more efficient use of the site by providing homes that will help to meet the borough's need for housing and a replacement retail unit (as the site is in the Primary Shopping Area of the District Centre where retail is encouraged).			2027-32 <del>Post 2026</del>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>66 units</u> <u>(124 total for whole site)</u> <del>25 to 55</del>

<b>Site 137: Colonnades</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Waddon)</u>	<u>Purley Way</u> <u>CR0 4RS</u>	<u>3.51ha</u>	<u>Retail and leisure park with car park</u>	<u>Urban</u>	<u>Low</u>	<u>Retail Estates &amp; Business &amp; Leisure Parks</u>	
<u>Description of option</u>			<u>Justification for option</u>		<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment of this area to provide a mixture of residential, retail, leisure and community uses to form the basis of a new residential community and part of a Waddon Way Neighbourhood Centre.</u>			<u>Potential for a new Town Centre in the Waddon Way area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>		<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>659</u>

Site 138: <del>Land adjacent to East Croydon Station and land at Cherry Orchard Gardens and site between railway line Cherry Orchard Road, Cherry Orchard Gardens</del>							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 6BQ	0.8ha	Cleared site in two parts (1) between the railway line and Cherry Orchard Road and (2) on the corner of Cherry Orchard Road and Oval Road	Central	High	Industrial Estates, Mixed type flats	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development of residential with offices, restaurant/café, hotel and/or community facilities		Residential development will help to meet the need for new homes in the borough. The part of the site to west of Cherry Orchard Road lies within Croydon Metropolitan <u>Town</u> Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail are acceptable on this part of the site. Acoustic measures will need to be incorporated in the design to assist sustainability of the development. <u>The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</u>			2022-2027	Site has planning permission <del>but there are a number of issues that need to be overcome before the site can be developed</del> and landowner is <u>likely to develop the site themselves</u>	<del>220 to 492</del> <u>456</u>

Site 142: 1 Lansdowne Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2BX	0.48ha	<u>Voyager House</u> , Lansdowne Hotel, former YMCA Hostel and Marco Polo House	Central	High	Large buildings with surrounding space, Large buildings with well-defined building line and adjacent to other buildings, Linear Infrastructure	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development comprising residential, with offices, leisure and/or hotel		Residential development will help to meet the need for new homes in the borough. Site lies within Croydon Town Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail for which sequential testing would be required, are acceptable in this location.			2024-2027 - <u>2032</u>	<p>The Site (excluding Voyager House) has an implemented, deliverable planning permission. The developer remains in discussions with the Council with regard to a revised scheme incorporating Voyager House.</p> <p><u>Site has planning permission but there are a number of issues that need to be overcome before the site can be developed</u></p>	<p><u>794</u></p> <p>419 to 441</p>



<b>Site 143: South Croydon Ambulance Station and Youth Centre sites,</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Waddon)</u>	<u>CR0 4RQ</u>	<u>0.29ha</u>	<u>Ambulance station and youth centre with associated car park and amenity land</u>	<u>Urban</u>	<u>Low</u>	<u>Compact houses on small plots, Institutions with associated grounds</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment to provide residential development and replacement community floorspace (no net loss) and a replacement ambulance station (if required by</u>		<u>Potential for a new Town Centre in the Waddon Way area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>			<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>84</u>

<b>Site 144: Sofology, 226 Purley Way</b>						
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>

<b>Site 144: Sofology, 226 Purley Way</b>						
<u>Purley Way (Waddon)</u>	<u>CR0 4XG</u>	<u>0.35ha</u>	<u>Retail outlet and car park</u>	<u>Urban</u>	<u>Medium</u>	<u>Retail Estates &amp; Business &amp; Leisure Parks</u>
<u>Description of option</u>	<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment for mixed use residential and retail</u>	<u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>			<u>2027-2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>74</u>

<b>Site 146: Currys PC World (Carphone Warehouse), 12 Trojan Way</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Waddon)</u>	<u>CR0 4XL</u>	<u>0.96ha</u>	<u>Retail outlet and car park</u>	<u>Urban</u>	<u>Medium</u>	<u>Retail Estates &amp; Business &amp; Leisure Parks</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment for mixed use residential and retail</u>		<p><u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan. As the site is within Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment. It is recommended that basements are not considered at this site.</u></p>			<u>2027-2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>148</u>

Site 147: IKEA							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Broad Green &amp; Selhurst)</u>	<u>CR0 4UZ</u>	<u>6.56ha</u>	<u>Retail outlet and car park</u>	<u>Urban</u>	<u>Medium</u>	<u>Retail Estates &amp; Business &amp; Leisure Parks</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment of car park areas for residential development and existing store for mixed use retail, residential and community uses.</u>		<u>Residential development will help to meet the need for new homes in the borough. Potential for a new Town Centre in the Valley Park area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>			<u>Post 2032</u>	<u>Site has no known developer interest and the Council will need to work with landowner to bring it forward</u>	<u>590</u>

**Site 148: Canterbury House, Bedford Park**

<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Croydon Opportunity Area</u>	<u>CR0 9XE</u>	<u>0.38ha</u>	<u>Office building</u>	<u>Central</u>	<u>High</u>	<u>Large buildings with surrounding space</u>	
<u>Description of option</u>			<u>Justification for option</u>		<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed-use redevelopment including residential (but not including retail)</u>			<u>Residential development will help to meet the need for new homes in the borough. The site lies within Croydon Metropolitan Centre but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location.</u>		<u>2027-2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>266</u>

<b>Site 149: Tesco, 4-32 Brigstock Road, Thornton Heath</b>							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Thornton Heath</u>	<u>CR7 8RX</u>	<u>0.93ha</u>	<u>Supermarket and residential above</u>	<u>Urban</u>	<u>High</u>	<u>Urban Shopping Area</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Mixed-use development including retail and residential</u>		<u>This site is well situated in the Town Centre and opposite the train station to provide homes to meet the need in the borough, as well as retail uses within the Main Retail Frontage.</u>			<u>Post 2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>118</u>

Site 152: Parklife, Purley Way Playing Fields							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way (Waddon)</u>	<u>CR0 4HU</u>	<u>6.82ha</u>	<u>Recreation ground</u>	<u>Suburban</u>		<u>Green Infrastructure</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Multi-purpose leisure facilities</u>		<u>Multi-purpose leisure facilities at this site will help improve the playing fields offer and recreational value.</u>			<u>2022-2027</u>	<u>Site is subject to developer interest</u>	<u>n/a</u>

Site 153: Five Ways Triangle (516-540 Purley Way & 107-113 Stafford Road)							
<u>Place</u>	<u>Postcode</u>	<u>Size</u>	<u>Site description</u>	<u>Type of location</u>	<u>Public Transport Accessibility</u>	<u>Local character</u>	
<u>Purley Way</u>	<u>CR0 4RE</u>	<u>1.1ha</u>	<u>Petrol station and industrial units</u>	<u>Urban</u>	<u>High</u>	<u>Industrial estates</u>	
<u>Description of option</u>		<u>Justification for option</u>			<u>Anticipated phasing of development</u>	<u>Evidence of deliverability</u>	<u>Indicative number of homes</u>
<u>Redevelopment for mixed use residential and retail</u>		<u>Potential for a new Town Centre in the Fiveways area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan. The setting of the Listed Building should be positively integrated into the development.</u>			<u>Post 2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u>	<u>91</u>

Site 155: St Anne's House & Cambridge House, 20-26 Wellesley Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Groydon Opportunity Area	GR9 2UL	0.21ha	Two office buildings and car park	Central	High	Large buildings with well-defined building line and adjacent to other buildings; Linear Infrastructure	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Conversion of building to residential and hotel		<p>Planning permission has already been granted for this site. Residential development will help to meet the need for new homes in the borough. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development. Acoustic measures will need to be incorporated in the design to assist sustainability of the development.</p>			2021 – 2026	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	46 to 196



Site 157: Canterbury Mill, 103 Canterbury Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR0 3HA	0.10ha	Former factory building	Urban	Medium	Industrial Estates; Institutions with associated grounds; Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
New primary school		The site is of a suitable size for a primary school, is in an area that has a high demand for school places and can make a significant contribution to meeting this demand. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating			2016 - 2021	Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves	n/a

Site 162: St George's House, Park Lane							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1JA	0.07ha	High rise office building known as 'Nestle Tower'	Central	High	Large buildings in an urban setting	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

<b>Site 162: St George's House, Park Lane</b>				
Conversion and extension of existing building to provide retail and other Class A activities and leisure on the ground floor with residential accommodation on upper floors. There is one historic record of surface water flooding held by the Council in this location.	Existing office building is not protected from development. Site lies within the Primary Shopping Area so retail use is acceptable in this location. Planning permission has already been granted for this site. Residential development will help to meet the need for new homes in the borough. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.	2016 - 2021	Site has planning permission and there is nothing preventing the site from being developed	288

<b>Site 172: North site, Ruskin Square</b>							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2EW	0.43ha 2.7ha	<u>Northern section of</u> gateway site also known as Ruskin Square	Central	High	Industrial Estates, Large buildings with surrounding space, Large buildings with well-defined building line and adjacent to other buildings, Transport Nodes	
<b>Description of option</b>		<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>

Site 172: North site, Ruskin Square				
<p>Mixed use redevelopment with comprising residential <u>and</u> offices restaurant/café and fitness centre <u>and/or hotel and/or town centre uses except retail</u></p>	<p>Planning permission has already been granted for this site. Residential development will help to meet the need for new homes in the borough.</p> <p>Site lies within Croydon Metropolitan Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location and particularly suited to office use. To assist sustainability new development should have capacity to connect to a district energy facility. Acoustic measures will need to be incorporated in the design to assist sustainability of the development.</p> <p><u>Proximity to East Croydon station means the site is well suited to provide homes and could include either offices, hotel and leisure uses as part of a mixed scheme. The site lies within Croydon Metropolitan Centre but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location. The redevelopment of this site could help to meet the need for new homes in the borough. The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</u></p>	<p>Post 2031 2021 – 2026</p>	<p>Site has planning permission but there are a number of issues that need to be overcome before the site can be developed</p>	<p><u>158</u> 550 to 625</p>

Site 173: 28-30 Addiscombe Grove						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character
Croydon Opportunity Area	GR0 5LP	0.08ha	2 Edwardian houses	Central	High	Large buildings in an urban setting

<b>Site 173: 28-30 Addiscombe Grove</b>				
<b>Description of option</b>	<b>Justification for option</b>	<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Redevelopment to provide more homes	Residential development will help to meet the need for new homes in the borough.	2021 - 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	12 to 32

<b>Site 174: 30-38 Addiscombe Road</b>							
<b>Place</b>	<b>Postcode</b>	<b>Size</b>	<b>Site description</b>	<b>Type of location</b>	<b>Public Transport Accessibility</b>	<b>Local character</b>	
Croydon Opportunity Area	CR0 5PE	0.35ha	Vacant site	Central	High	Large buildings with well-defined building line and adjacent to other buildings, Large houses on relatively small plots, Medium rise blocks with associated grounds	
<b>Description of option</b>		<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>

Site 174: 30-38 Addiscombe Road							
<p>Residential development It should be noted that ordinary watercourses have not have been included in the fluvial modelling of the River Wandle and therefore a fluvial flood risk from this watercourse may be present. As set out in Section 11.3.2 of the Level 1 SFRA, applicants considering development of this site may need to prepare a simple hydraulic model to enable a more accurate assessment of the probability of flooding associated with this ordinary watercourse to inform the site specific FRA. This should be carried out in line with industry standards and in agreement with the LLFA</p>		<p>Residential development will help to meet the need for new homes in the borough</p>			<p><del>2021-2026</del> <u>2027-2032</u></p>	<p>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</p>	<p><del>49 to 144</del> <u>57</u></p>
Site 175: Stephenson House, Cherry Orchard Road and Knolly House, Addiscombe Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 6BA	0.69ha	Office building and car park	Central	High	Large buildings in an urban setting	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

Site 174: 30-38 Addiscombe Road				
Residential and/or office	<p>The existing office building is not protected from development. Site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre, close to East Croydon station but outside of the Primary Shopping Area making it particularly suited to office use. Residential development will help to meet the need for new homes in the borough. Acoustic measures will need to be incorporated in the design to assist sustainability of the development. The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</p>	<p>Post <del>2026</del> <u>2032</u></p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>195</u> <del>97 to 279</del></p>

Site <del>178</del> : Arcadia House, 5 Cairo New Road						
<del>Place</del>	<del>Postcode</del>	<del>Size</del>	<del>Site description</del>	<del>Type of location</del>	<del>Public Transport Accessibility</del>	<del>Local character</del>
Croydon Opportunity Area	CR0 1XP	0.36ha	Existing church in Factory building, and two other buildings (46 and 47 Tamworth Road)	Central	High	<p>Institutions with associated grounds; Linear Infrastructure; Terraced houses and cottages</p>
<del>Description of option</del>	<del>Justification for option</del>			<del>Anticipated phasing of development</del>	<del>Evidence of deliverability</del>	<del>Indicative number of homes</del>

Site 178: Arcadia House, 5 Cairo New Road				
Residential development	<p>Residential development will help to meet the need for new homes in the borough. It is a poor location for offices as it is too far from East Croydon station and outside of the Primary Shopping Area so retail use is not acceptable or suitable. The previous employment use of the site is protected by Policy SP3 of the Croydon Local Plan 2018 and the current community use is temporary so not protected. The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment</p>	2016-2021	Site has planning permission and there is nothing preventing the site from being developed	41 to 117

Site 182: Norwich Union House and St Matthew's House, 96 - 98 George Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1PJ	0.18ha 0.05ha	Residential Office building and 2/3 storey brick built residential block	Central	High	Large buildings with surrounding space, Urban Shopping Areas	
<b>Description of option</b>		<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>

Site 182: Norwich Union House and St Matthew's House, 96 - 98 George Street				
<p>Redevelopment for residential and/or offices and/or retail (on George Street frontage) <u>with active frontage at the ground floor level</u></p>	<p>Residential development will help to meet the need for new homes in the borough. Site lies within Croydon Metropolitan Town Centre-close to East Croydon station making it particularly suited to office use and the site lies within a proposed extension of the Primary Shopping Area which would make all town centre uses acceptable in this location. <u>To assist sustainability the development must incorporate acoustic measures to reduce impact of noise on the development.</u></p>	<p><u>2027-2032</u> Post 2026</p>	<p><u>Site is subject to developer interest</u> <del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	<p><u>Up to 33</u> <del>7 to 20</del></p>

Site 184: 1-19 Derby Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 3SE	<u>0.31ha</u> <del>0.34ha</del>	Shops and Garage on triangular site beside railway line close to West Croydon station	Central	High	Terraced houses and cottages, Transport Nodes, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes



**Site 184: 1-19 Derby Road**

<p>Residential development above, community uses on lower floors</p>	<p>The site lies outside Croydon Town Centre on a side street so town centre uses are not desirable in or suited to this location. Residential development will help to meet the need for new homes in the borough. New community facilities are required to improve the sustainability of the site. Acoustic measures will need to be incorporated in the design to assist sustainability of the development.</p>	<p><u>2027-2032</u> <del>2021-2026</del></p>	<p>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</p>	<p><u>66</u> <del>48 to 137</del></p>
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Site 186: Jobcentre, 17-21 Dingwall Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 9XF	0.35ha	A two storey brick built building	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Offices and/or residential and/or hotel and/or replacement Class A2 (Finance) premises (with healthcare facility if required by the NHS)		<p>The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area making it particularly suited to office use. Residential development will help to meet the need for new homes in the borough. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. Acoustic measures will need to be incorporated in the design to assist sustainability of the development.</p>			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	49 to 141

Site 187: 28 Dingwall Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2NE	0.13ha 0.11ha	Office building	Central	High	Large buildings with well-defined building line and adjacent to other buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Offices and residential and/or hotel (with healthcare facility if required by the NHS)		In accordance with Policy SP3 of Croydon Local Plan , office refurbishment/redevelopment and mixed use should be explored fully. The site lies within Croydon Metropolitan Town Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location. <del>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place.</del>			<u>Post 2032</u>  <del>Post 2026</del>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>133</u>  <del>16 to 44</del>

<b>Site 189: Car parks, Drummond Road</b>							
<b>Place</b>	<b>Postcode</b>	<b>Size</b>	<b>Site description</b>	<b>Type of location</b>	<b>Public Transport Accessibility</b>	<b>Local character</b>	
Groydon Opportunity Area	GR0 1TX	0.11ha	Surface car parks on Drummond Road including St Anne's Place	Central	High	Industrial Estates; Terraced houses and cottages; Urban Shopping Areas	
<b>Description of option</b>		<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential development		Subject to the Old Town Masterplan which states parking is required here for the period of the masterplan, but that residential redevelopment could be considered later. The redevelopment of this site could help to meet the need for new homes in the borough. The Sustainability Appraisal highlights the context of the Conservation Area which development proposals will need to consider.			Post 2026	In Council ownership	12 to 32

Site 190: Car park to the rear of Leon House, 22-24 Edridge Road Leon Quarter							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 9XT	0.66ha 0.40ha	Existing retail and office units and 2 storey parking area serving Leon House	Urban	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p><u>Mixed use redevelopment with residential, retail and other professional services and food and drink uses</u>  <del>Residential development. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface' (BGS Susceptibility to Groundwater Flooding.)</del></p>		<p>Residential development will help to meet the need for new homes in the borough. <u>The site lies within Croydon Town Centre but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location.</u></p>			<p>2022-2027 Post 2026</p>	<p><u>Site has planning permission and landowner is likely to develop the site themselves</u>  <del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	<p><u>357</u></p>

Site 192: Suffolk House, George Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1PE	<u>0.28ha</u> 0.25ha	Office building with retail units at ground level	Central	High	Large buildings with surrounding space, Linear Infrastructure, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use redevelopment with offices or residential dwellings above retail units at ground level		Site lies within a proposed extension of the Primary Shopping Area which would make all town centre uses acceptable in this location. The redevelopment of this site could help to meet the need for new homes in the borough.			<u>Post 2032</u> <u>Post 2026</u>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>66</u> <del>35 to 101</del>

Site 193: 100 George Street						
<del>Place</del>	<del>Postcode</del>	<del>Size</del>	<del>Site description</del>	<del>Type of location</del>	<del>Public Transport Accessibility</del>	<del>Local character</del>

Site 193: 100 George Street							
Croydon Opportunity Area	CR0 1PJ	0.21ha	The site of Essex House, a demolished office building, last used as a temporary public car park	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development with offices or residential dwellings above retail units at ground level		Site lies within a proposed extension of the Primary Shopping Area close to East Croydon station which would make all town centre uses acceptable in this location and making it particularly suited to office use. The development of this site could help to meet the need for new homes in the borough.			2021 – 2026	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	30 to 85

**Site 194: St George's Walk, Katharine House, Park House. See also allocation 231 Segas House, Park Street**

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1YE	<u>2.03ha</u> <del>4.94ha</del>	<u>Cleared site with previous use of office &amp; retail (including financial and food &amp; drink) buildings between Katharine Street and Park Street, and listed office building</u>	Central	High	Large buildings with well-defined building line and adjacent to other buildings, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes



Site 194: St George's Walk, Katharine House, Park House. See also allocation 231 Segas House, Park Street

<p>Residential with new civic space and a combination of retail, other Class A uses, leisure and office use. Alongside <u>residential conversion of Segas House with cultural uses if required (with town centres uses considered if there is no interest in delivery of culture facility)</u></p>	<p><del>Existing office building is not protected from development</del> <u>The site lies within the Primary Shopping Area of Croydon Town Centre so it is suited to retail but is situated</u> at a distance from East Croydon station so it less suitable for office use. Residential development will help to meet the need for new homes in the borough. The Civic Space is a requirement of the Mid Croydon Masterplan. Many of the retail/catering units in St Georges Walk house independent businesses that provide low cost options and measures should be taken to enable these to continue in Croydon either within the development or elsewhere. As The site is <u>partly</u> within the Central Croydon Conservation Area <u>and the setting of listed buildings including the Town Hall and Whitgift Almshouses. The development should respond to the character of the area, to preserve or enhance the significance of heritage assets.</u> The Council's <u>relevant</u> Conservation Area Guidance and Management Plans will need to be adhered to. <u>The conversion of the existing Listed Building (Segas House) on this site could help to meet the need for new homes in the borough. The existing office use is not protected. Delivery of a cultural facility on the ground floor in this location would be appropriate to meet demand with residential or office uses on upper floors. The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment.</u></p>	<p><u>2027-32</u> 2021 - 2026</p>	<p>Site is subject to developer interest <del>with a planning application likely soon and subject to granting of planning permission</del> <u>but there are a number of issues that need to be overcome before the site can be developed</u></p>	<p><u>874</u> 88 to 504</p>
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Site 195: Leon House, 233 High Street						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character
Croydon Opportunity Area	CR0 9XT	0.56ha	High rise office building	Urban	High	Large buildings with surrounding space; Urban Shopping Areas
Description of option	Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Conversion to residential or mixed use residential/ office with retention of retail on the ground floor. It should be noted that ordinary watercourses have not been included in the fluvial modelling of the River Wandle and therefore a fluvial flood risk from this watercourse may be present.</p> <p>Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface' (BGS Susceptibility to Groundwater Flooding).</p>	<p>Existing office building is not protected from development. Site is too far from East Croydon station to be suited to continued use as an office building in its entirety so conversion to residential or residential and office is preferred option for this site. The area is not suited to more tall buildings or buildings taller than Leon House which means that redevelopment of the site is unlikely as a redevelopment would not be viable because of restrictions on height and the cost of demolishing Leon House. Site is outside of the Primary Shopping Area so is not suitable for retail use although the existing retail floor space can be retained or replaced. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.</p>			Post 2026	<p>Site has planning permission but there are a number of issues that need to be overcome before the site can be developed</p>	26 to 145

Site 196: Stonewest House, 1 Lamberts Place							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Groydon Opportunity Area	CR0 2BR	0.13ha	Office building with stores	Urban	Medium	Industrial Estates; Linear Infrastructure; Mixed type flats; Terraced houses and cottages; Tower Buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development		Residential development will help meet the need for housing in the borough. The existing office use is not protected.			2016 - 2021	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	9 to 31

Site 197: Emerald House, 7-15 Lansdowne Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2BX	0.39ha	Office building	Central	High	Large buildings with surrounding space; Large buildings with well-defined building line and adjacent to other buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Office and residential and/or hotel (with healthcare facility if required by the NHS)		In accordance with Policy SP3 of the Croydon Local Plan 2018, office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place.			Post 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	55 to 157

Site 199: 20 - 22 Lansdowne Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2BX	<u>1.56ha</u> <del>0.775ha</del>	Builders yard between Lansdowne Road and the railway line into East Croydon	Central	High	Industrial Estates, Large houses on relatively small plots	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development with light industrial workshops and studio spaces		Site is a town centre employment site. Policy SP3.2 of the Croydon Local Plan requires that evidence of lack of demand for the existing premises or site for an employment use be provided before other uses can be considered. <u>The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</u>			Post 2026 <u>2032</u>	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed including <u>consideration of the Brighton Mainline and East Croydon station</u>	<u>107</u> <del>409 to 313</del>

Site 200: Multi-storey car park, Lansdowne Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2BX	0.44ha 0.95ha	Multi storey car park	Central	High	Large buildings with surrounding space, Large buildings with well-defined building line and adjacent to other buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use, public car park and residential.		The Croydon Opportunity Area Framework (2013) allows for the loss of 200 car parking spaces in the New Town and East Croydon Area. In light of this, the preferred option includes for an element of car parking to remain alongside residential and mixed use development. <u>The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</u>			Post  <u>2022-2027</u>	<u>Site is subject to developer interest</u> <del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del>	<u>Up to 66</u>  133 to 384

Site 201: Lidl, Easy Gym and car park, 99-101 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2RF	<del>1.16ha</del> 1.13ha	Supermarket, gym and car park	Urban	High	Retail Estates & Business & Leisure Parks, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Primary school with residential development on upper floors		The site is of a suitable size for a primary school, is in an area that has a high demand for school places and can make a significant contribution to meeting this demand. The site is in a dense urban area and is suited to a mixed use development with the residential element helping to meet the need for new homes in the borough.			Post 2026 <u>2032</u>	<u>Site is subject to developer interest</u> <del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del>	216 <del>51-293</del>



Site 203: West Croydon station and shops, 176 North End							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1UF	<u>1.86ha</u> <del>4.75ha</del>	West Croydon railway station, retail units on Station Road, London Road and North End, station car park and Network Rail yard	Central	High	Transport Nodes, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Remodelling of station and redevelopment to provide an improved transport interchange, cycle hub, retail & office units with residential development above. In the surrounding area, surface water flood risk is generally low. However, Station Road and the A212 have areas shown to be at high risk from surface water flooding. There are two historic records of surface water flooding held by Croydon Council in this location.		Existing station building is a low density development and use of the site (as identified in the West Croydon Masterplan) could be increased to include residential use. Improvements to the station as a transport interchange including a cycle hub is a policy aspiration of the Croydon Local Plan Policy SP8 and will assist in the sustainability of the development. Acoustic measures will need to be incorporated in the design to assist sustainability of the development and measures to alleviate surface water flooding taken, especially if current areas along train tracks are developed, reducing natural drainage capacity.			Post <del>2026</del> <u>2032</u>	<p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p> <p>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</p>	<p><u>Up to 109</u></p> <p><del>79 to 455</del></p>

Site 211: Poplar Walk car park and, 16-44 Station Road						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character

Site 211: Poplar Walk car park and, 16-44 Station Road							
Croydon Opportunity Area	CR0 2RB	<u>0.27ha</u> <del>0.35ha</del>	Car park & Buildings with ground floor retail units with residential accommodation on upper floors	Central	High	Large buildings with surrounding space, Shopping centres, precincts, Transport Nodes, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p><del>A more intensive use of the site with 232 residential units as part of an overall</del></p> <p>Redevelopment of the site which includes <u>residential</u>, re-provision of retail uses, car and cycle parking and a public square.</p>		<p>The site's location away from East Croydon station means it is less suited to hotel or office use and because it is outside of the Primary Shopping Area it is not suitable for retail use although the existing retail floor space can be re-provided as part of the redevelopment of this site. Residential development will help meet the need for new homes in the borough. <u>Development should ensure the setting of St Michael's and All Angels Church is preserved and enhanced.</u></p>			<p><u>2022-2027</u></p> <p><del>2016-2024</del></p>	<p><u>Site has planning permission</u></p> <p><del>Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves</del></p>	<p><del>Up 50 to 232</del></p> <p>240</p>

Site 218: Lunar House, Wellesley Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 9YD	1.334ha	Office Block	Central	High	Large buildings with surrounding space, Linear Infrastructure	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Office and residential and/or hotel (with healthcare facility if required by the NHS) if the site is no longer required by the Home Office.		In accordance with Policy SP3 of Croydon Local Plan , office refurbishment/redevelopment and mixed use should be explored fully. The site lies within Croydon Metropolitan Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location. Residential development will help to meet the need for new homes in the borough. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. Conversion should be considered in the redevelopment to increase sustainability of the site and due to the notable architecture of the building.			Post <del>2026</del> <u>2032</u>	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>418</u>

Site 220: 9-11 Wellesley Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 0XD	0.16ha	Offices and bank	Central	High	Large buildings with surrounding space, Large buildings with well-defined building line and adjacent to other buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential and/or hotel and/or retail and/or finance		Existing office building is not protected from development. Site lies within a proposed extension of the Primary Shopping Area which would make all town centre uses acceptable in this location. The redevelopment of this site could help to meet the need for new homes in the borough. <u>The massing should be tested to ensure the settings of the Whiltgift Almshouses and Electric House and the Central Croydon Conservation Area are preserved or enhanced.</u>			Post <del>2026</del> <u>2032</u>	<u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed.</u> Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>Up to 76</u>  21 to 60

Site 222: Multi-storey car park, 1 Whitgift Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1DH	0.56ha	Multi-storey car park and gymnasium	Central	High	Large buildings with well-defined building line and adjacent to other buildings, Terraced houses and cottages, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential with community facilities commensurate in size and functionality to that currently on the site		The redevelopment of this site could help to meet the need for new homes in the borough. It is a poor location for offices as it is too far from East Croydon station and outside of the Primary Shopping Area so retail use is not acceptable or suitable. The Opportunity Area Planning Framework identifies surplus car parking spaces in this part of Croydon Metropolitan Centre. The retention of community facilities are required to improve the sustainability of the site, development of which has substantial environmental impacts.			Post <del>2026</del> <u>2032</u>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>158</u> 95 to 193

**Site 231: Segas House, Park Lane**

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<b>Croydon Opportunity Area</b>	CR0 1NX	0.2 ha	Listed Office Building	Central	High	Large buildings with well-defined building line and adjacent to other buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential conversion with cultural uses if required (with town centres uses considered if there is no interest in delivery of cultural uses).		The conversion of the existing Listed Building on this site could help to meet the need for new homes in the borough. Existing office building is not protected from development. Delivery of a cultural facility on the ground floor in this location would be appropriate to meet demand with residential or office uses on upper floors.			<u>2027-2032</u> <del>2016-2024</del>	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>38</u> 40

Site 234: Southern House, Wellesley Grove							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR9 1TR	0.87ha 0.58ha	24-storey office building with undercroft straddling Wellesley Grove and a two-storey period property converted to an office	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Offices and residential and/or hotel (with healthcare facility if required by the NHS)		In accordance with Policy SP3 of Croydon Local Plan , office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area making it particularly suited to office use. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. The public realm is required to encourage connectivity with surrounding			Post 2032 2021 - 2026	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	342 82 to 234

Site 236: Apollo House, Wellesley Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 9YA	0.58ha	Office Building	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Offices and residential and/or hotel (with healthcare facility if required by the NHS) if the site is no longer required by the Home Office. There is one record of sewer flooding.		In accordance with Policy SP3 of Croydon Local Plan , office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area making it particularly suited to office use. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. To assist sustainability the development must incorporate acoustic measures to reduce noise impact on the development. <u>Conversion should be considered in the redevelopment to increase sustainability of the site and due to the notable architecture of the building</u>			<u>2027-2032</u> Post 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>145</u> <del>82 to 234</del>



Site 242: Davis House, Robert Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1QQ	0.13ha	Office building and shops	Central	High	Large buildings with well-defined building line and adjacent to other buildings; Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Offices and residential and/ or hotel (with healthcare facility if required by the NHS)		<p>In accordance with Policy SP3 of the Croydon Local Plan 2018, office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area making it particularly suited to office use. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. The public realm is required to encourage connectivity with surrounding areas to make the site more sustainable.</p>			2021-2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	82 to 234

Site 245: Mondial House, 102 George Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1PJ	0.22ha	9-storey office building	Central	High	Large buildings with surrounding space, Transport Nodes	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Office and/or residential development or offices or hotel and/or retail (on George Street frontage)		The site lies within a proposed extension of the Primary Shopping Area close to East Croydon station which would make all town centre uses acceptable in this location and making it particularly suited to office use. To assist sustainability the development must incorporate acoustic measures to reduce noise impact on the development.			<u>2027-2032</u> <del>2021 - 2026</del>	Site is subject to developer interest. but there are a number of issues that need to be overcome before the site can be developed	<u>133</u> <del>30 to 85</del>

<b>Site 247: Norwich Union House, 96 George Street</b>							
<b>-Place</b>	<b>-Postcode</b>	<b>Size</b>	<b>-Site description</b>	<b>Type of location</b>	<b>-Public Transport Accessibility</b>	<b>-Local character</b>	
Croydon Opportunity Area	CR0 1PJ	0.13ha	Office Building	Central	High	Large buildings with surrounding space	
<b>-Description of option</b>		<b>-Justification for option</b>			<b>Anticipated phasing of development</b>	<b>-Evidence of deliverability</b>	<b>Indicative number of homes</b>
Offices with residential development or hotel and/ or retail (on George Street frontage)		<p>In accordance with Policy SP3 of the Croydon Local Plan 2018, office refurbishment/redevelopment and mixed use should be explored fully. Site lies within a proposed extension of the Primary Shopping Area which would make all town centre uses acceptable in this location. The redevelopment of this site could help to meet the need for new homes in the borough. To assist sustainability the development must incorporate acoustic measures to reduce impact of noise on the development.</p>			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	19 to 52

Site 248: 18-28 Thornton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR7 6BA	<u>0.13ha</u> <del>0.20ha</del>	Car sales site	Urban	Medium	Industrial Estates, Medium rise blocks with associated grounds, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development		Residential development will help to meet the need for new homes in the borough.			Post 2026 <u>2032</u>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>11</u> <del>9 to 34</del>

Site 284: Asharia House, 50 Northwood Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Norbury	CR7 8HQ	0.20ha	Offices, gymnasium and car park	Urban	Medium	Industrial Estates, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development including replacement community facility		Residential development will help to meet the need for new homes in the borough. The community use of the site is protected by Policy SP5 of the Croydon Local Plan .The retention of a community facility will assist the sustainability of the site. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.			Post <del>2026</del> <u>2032</u>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>18</u> <del>7 to 23</del>

**Site 286: 35-47 Osborne Road**

<b>Place</b>	<b>Postcode</b>	<b>Size</b>	<b>Site description</b>	<b>Type of location</b>	<b>Public Transport Accessibility</b>	<b>Local character</b>	
Thornton Heath	CR7 8PD	0.37ha	Disused warehouse and factory buildings	Urban	Medium	Industrial Estates; Terraced houses and cottages	
<b>Description of option</b>		<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential development		<p>As part of the Croydon Local Plan 2018 any town centre or scattered employment site that has been vacant for more than 18 months is being proposed for redevelopment if it could accommodate 10 or more new homes. Policy SP3.2 of the Croydon Local Plan 2018 requires that evidence of lack of demand for the existing premises or site for an employment use be provided before other uses can be considered. However, the need for new homes in the borough is so great that, as a plan-making process, a plan-led release of vacant town centre and scattered employment sites is proposed to help meet the need for new homes. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.</p>			2021 – 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	17 to 62

Site 294: Croydon College Annexe, Barclay Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1PF	0.32ha 0.14ha	The former art block of Croydon College	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential redevelopment with community uses and Creative and Cultural Industries Enterprise Centre. There is one record of sewer flooding.		This site is well suited to provide a home to the creative and cultural industries enterprise centre for Croydon Metropolitan Centre. The existing building is a community facility which is protected by Policy SP5 of the Croydon Local Plan . Residential development will help to meet the need for new homes in the borough. The Fairfield Masterplan encourages a high standard of design which will help the sustainability of the site.			2022-2027	<p><u>Site is subject to developer interest and has permission</u></p> <p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	<p><u>76</u></p> <p><del>20 to 56</del></p>

Site 295: 2 Zion Place							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR7 8SD	0.15ha	Former Jacques & Co factory building	Urban	High	Industrial Estates; Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development		<p>As part of the Croydon Local Plan 2018 any town centre or scattered employment site that has been vacant for more than 18 months is being proposed for redevelopment if it could accommodate 10 or more new homes. Policy SP3.2 of the Croydon Local Plan 2018 requires that evidence of lack of demand for the existing premises or site for an employment use be provided before other uses can be considered. However, the need for new homes in the borough is so great that, as a plan-making process, a plan-led release of vacant town centre and scattered employment sites is proposed to help meet the need for new homes. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.</p>			2021 – 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	7 to 39

<b>Site 301: Sea Cadet Training Centre, 34 The Waldrons</b>							
<b>-Place</b>	<b>-Postcode</b>	<b>Size</b>	<b>-Site description</b>	<b>Type of location</b>	<b>-Public Transport Accessibility</b>	<b>-Local character</b>	
Waddon	CR0 4AZ	0.14ha	Derelict building	Urban	Medium	Large buildings with surrounding space; Large houses on relatively small plots	
<b>-Description of option</b>		<b>-Justification for option</b>			<b>Anticipated phasing of development</b>	<b>-Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential use		The existing structure on the site is fire damaged and cannot be reused. Residential development will help to meet the need for new homes in the borough. The community use of the site is protected by Policy SP5 of the Croydon Local Plan 2018. The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment.			2021 – 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	7 to 48



Site 306: The Good Companions Public House site, 251 Tithe Pit Shaw Lane							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Sanderstead	CR6 9AW	<del>0.30ha</del> 0.52ha	Cleared site	Suburban	Low	Planned estates of semi-detached houses, Suburban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use of Residential development and retail		<p><del>Site lies within the Hamsey Green Local Centre so is suitable for retail use. Retail use will assist in providing an active frontage to the ground floor</del></p> <p>Residential development will help to meet the need for new homes in the borough.</p> <p><del>The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.</del></p>			2022-2027	<p>Site is subject to developer interest <u>with a planning application likely soon</u> but there are a number of issues that need to be overcome before the site can be developed</p>	<p><u>41</u></p> <p>8 to 24</p>

Site 311: Mott Macdonald House, 8 Sydenham Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2EE	0.24ha	Office building	Central	High	Large buildings with surrounding space, Large buildings with well-defined building line and adjacent to other buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Offices and residential and/or hotel <del>(with healthcare facility if required by the NHS)</del>		In accordance with Policy SP3 of Croydon Local Plan , office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon station but outside of the Primary Shopping Area. <del>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place.</del> A community use could assist the sustainability of the site.			Post <del>2026</del> <u>2032</u>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>76</u> <del>34 to 97</del>

Site 314: Valley Park (B&Q and Units A-G Daniell Way), Hesterman Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Broad Green & Selhurst)	CR0 4YJ	<u>6.74ha</u> <del>11.5ha</del>	Out of town retail warehouses and surface car parking	Urban	Low	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and town centre, <u>with scope to include industrial, warehousing and distribution</u>		<p>Potential for a new Town Centre in the Valley Park area is identified in the <u>Purley Way Transformation Area and Strategic Policies of the Local Plan 2018</u> Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential and retail use alongside new ,community and leisure uses and retail. <u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u> <del>Flood mitigation measures must be incorporated in the development to assist sustainability. As the site is within Flood Zone 2 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'</del></p>			Post 2026 <u>2032</u>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>976</u></p> <p>403 to 1092</p>

Site 316: PC World (Fabb Sofas and Next at Home), 2 Trojan Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Waddon)	CR0 4XL	<u>0.96ha</u> <u>1.03ha</u>	Retail Warehouse and car park	Urban	Medium	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community <u>and part of the potential Waddon Marsh Town Centre and environs</u>		<p><u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan.</u> Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. <del>Residential development will help to meet the need for new homes in the borough. As the site lies outside of a Primary Shopping Area it is not suited to intensification of the existing retail use. As the site is within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment.</del></p> <p><u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p>			<u>2027-2032</u>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	184 <del>47 to 175</del>

Site 324: Purley Oaks Depot, 505-600 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 2BG	1.038ha	Council refuse and recycling centre	Suburban	Medium	Industrial Estates, large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
20 Gypsy and traveller pitches		The site is in Council ownership and the existing employment use can be relocated to underused land in Factory Lane which is also owned by the Council. It is the only deliverable site for Gypsy and Traveller pitches that has been identified and will contribute to meeting the need for Gypsy and Traveller pitches in Croydon.			Post 2032	In Council ownership	n/a

Site 325: Telephone Exchange, 88-90 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 4DA	0.34ha	Four storey telephone exchange	Urban	High	Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Conversion of existing building to residential use if no longer required as a telephone exchange in the future		The conversion of this building could help to meet the need for new homes in the borough. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	19 to 77

Site 326: Ambassador House, 3-17 Brigstock Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR7 7JG	<u>0.37ha</u> <del>0.56ha</del>	Various retail units at ground level and offices above (with some community use)	Urban	High	Large buildings with well-defined building line and adjacent to other buildings, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use conversion comprising residential, retail and community facilities ( <u>which include a healthcare facility if required by the NHS</u> )		<p>Office use is not protected in this location which is within the Primary Shopping Area (so retail is a preferred use at ground floor level). The community use in Ambassador House is protected by Policy SP5. <u>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place.</u> Residential development would help to meet the need for homes in the borough. The building is built above the London to Brighton railway line and so conversion is likely to be preferable to new build because of cost of building above Network Rail infrastructure. To assist sustainability the development must incorporate acoustic measures to reduce noise impact of the development. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.</p> <p>The site is located in Flood Zone 1, low probability of flooding from rivers.</p>			<p><u>2022-27</u></p> <p>Post 2026</p>	<p><u>Site has planning permission</u></p> <p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	<p><u>66</u></p> <p><del>26 to 145</del></p>

Site 332: Superstores, Drury Crescent							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Waddon)	CR0 4XT	1.45ha	Retail Warehouses and car park	Urban	Medium	Large buildings with well-defined building line and adjacent to other buildings, Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community uses and a primary school to form the basis of a new residential community and part of the potential Waddon Marsh Town Centre environs.</p>		<p><u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. <del>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. As the site is within Flood Zone 2 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'.</del></u></p> <p><u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p>			<p><u>2027-2032</u></p> <p>Post-2026</p>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>265</u></p> <p>66 to 246</p>

Site 334: Valley Leisure Park, Hesterman Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way ( Broad Green & Selhurst )	CR0 4YA	<u>2.42ha</u> <del>0.95ha</del>	Vue Cinema and Valley Park Leisure Complex	Urban	Low	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment of this area to provide a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre		<p><u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p> <p><del>Potential for a new Local Centre in the Valley Park area is identified in the Croydon Local Plan 2018. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential and retail use alongside new community and leisure uses. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. Flood mitigation measures must be incorporated in the development to assist sustainability. As the site is within Flood Zone 2 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'</del></p>			Post 2026 <u>2032</u>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	n/a



Site Zodiac Court, 161-183 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR0 2RJ	0.71ha	Residential building with ground floor commercial units	Urban	High	Large buildings with well-defined building line and adjacent to other buildings; Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential redevelopment		Redevelopment provides an opportunity to intensify the use of the site. However, it is noted that there are significant issues with viability of redevelopment that will need to be overcome before this site could be developed. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	32 to 184

**Site 345 Normanton Park Hotel, 34-36 Normanton Road**

<b>Place</b>	<b>Postcode</b>	<b>Size</b>	<b>Site description</b>	<b>Type of location</b>	<b>Public Transport Accessibility</b>	<b>Local character</b>	
South Croydon	CR2 7AR	0.40 ha	Normanton Park Hotel & grounds	Urban	Medium	Compact houses on relatively small plots; Large houses on relatively small plots	
<b>Description of option</b>		<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential development with primary school expansion if required (otherwise the whole site may be used for residential development).		Residential development will help to meet the need for new homes in the borough. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.			2021-2026	Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed	14 to 38

Site 347: Tesco, 2 Purley Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 2HA	3.80ha	Tesco store & associated car park	Urban	High	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use residential, healthcare facility (if required by the NHS) and retail development		Site has an existing retail use and has potential for intensification of use of the site with the addition of residential units which will help to meet the need for new homes in the borough. Measures to mitigate flood risk will need to be included in the development to assist sustainability. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. As the site is within Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment.			<p><u>2027-2032</u></p> <p>2021-2026</p>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	<p><u>479</u></p> <p><del>172 to 990</del></p>

Site 348: Homebase & Matalan stores, 60-66 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Broad Green & Selhurst)	CR0 3JP	<u>3.03ha</u> <u>2.84ha</u>	Retail stores and associated car park	Urban	Medium	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use residential and retail development <u>within the potential Valley Park Town Centre and environs</u>		<p><del>Residential development would help meet the need for new homes in the borough. Premises are currently on long leases which will not expire until the mid-2020. Potential for a new Town Centre in the Valley Park area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, retail community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</del></p> <p>The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.</p>			<p><u>2022-2027</u></p> <p>Post 2026</p>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p>	<p><u>685</u></p> <p>128 to 482</p>

Site 349: Harveys Furnishing Group Ltd, 230-250 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4XG	0.46ha	Retail stores and car parks	Urban	Medium	Industrial Estates, Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community and part of a Waddon Marsh Town Centre environs. As the site is partly within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment</p>		<p><u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan. Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of retail and residential, community uses and retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan. As the site lies outside of a Primary Shopping Area it is not suited to intensification of the existing retail use.</u></p>			<p><u>2027-2032</u></p> <p>Post 2026</p>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>146</u></p> <p>21 to 78</p>

Site 350: Wing Yip, 544 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way (Waddon)</u>	CR0 4NZ	1.53ha	Wing Yip retail warehouse & car park	Urban	Medium	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community		Potential for a new Town Centre in the Fiveways area is identified in the <u>Purley Way Transformation Area and Croydon Local Plan 2018</u> . Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, and retail use alongside new community uses and leisure uses retail. <u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u>			Post 2031 Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	69 to 260

Site 351: Furniture Village, 222 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4XG	0.71	Retail warehouse & car park	Urban	Medium	Industrial Estates, Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by NHS) and community uses to form the basis of a new residential community.		<p><u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan.</u> Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, <del>and retail.</del></p> <p><u>Community uses and retail.</u> Residential development will help to meet the need for new homes in the borough. <del>As the site lies outside of a Primary Shopping Area it is not suited to intensification of the existing retail use. As the site is partly within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment. Development should enable inclusion of attenuation SuDS where possible.</del></p> <p><u>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p> <p><del>Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'</del></p>			<p><u>2027-2032</u></p> <p>Post 2026</p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>124</u></p> <p><del>32 to 120</del></p>

Site 355: Decathlon, 2 Trafalgar Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Waddon)	CR0 4XT	<u>1.35ha</u> <u>1.30ha</u>	Decathlon Store & car park	Urban	Medium	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community <u>and part of the potential Waddon Marsh Town Centre and environs.</u>		<p><u>Potential for a new Town Centre in the Waddon Marsh area is identified in the Purley Way Transformation Area and Croydon Local Plan.</u> Over the lifetime of the Croydon Local Plan reconfiguration of out of town retail warehouses in the borough will provide an opportunity for redevelopment with a mix of residential, community uses and retail. Residential development will help to meet the need for new homes in the borough. <del>Measures to mitigate flood risk will need to be included in the development to assist sustainability.</del> <u>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating. As the site is within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</u></p>			<p><u>2022-2027</u></p> <p>Post 2026</p>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>260</u></p> <p>59 to 224</p>



Site 357: Norwood Heights Shopping Centre, Westow Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Crystal Palace & Upper Norwood	SE19 3AH	1.46ha	Sainsbury's supermarket and smaller retail units	Urban	High	Retail Estates & Business & Leisure Parks, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Retail, replacement community use, residential and office		<p>Site is a relatively low density site within the Primary Shopping Area of Crystal Palace Town Centre which has potential for redevelopment. Residential development will help to meet the need for new homes in the borough.</p> <p><del>The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment.</del></p> <p><u>The site is within the Upper Norwood Triangle Conservation Area and immediate setting of the listed war memorial alongside other heritage assets. The development should respond to the character of the area to preserve or enhance the significance of the heritage assets. The Council's relevant Conservation Area Guidance and Management Plans will need to be adhered to.</u></p>			<p><u>Post 2032</u></p> <p>Post 2026</p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>Up to 135</u></p> <p><del>39 to 223</del></p>

Site 372: Car park, Lion Green Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Coulsdon	CR5 2NL	0.81ha 4.08ha	Car Park (within Coulsdon Town Centre)	Suburban	Medium	Industrial Estates	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p><u>Residential development</u>  <del>Mixed use development comprising leisure, community facilities and retention of car parking spaces. Also retail so long as the current planning permission is extant.</del></p>		<p><u>Residential development would help meet the need for new homes in the borough. The development should secure improvements and access to the adjacent railway embankment scheduled monument alongside heritage interpretation and improved landscape in its setting.</u>  <del>Site lies within Coulsdon District Centre but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location. The site has planning permission for a retail use having passed the sequential test. Should the planning permission expire, retail use would cease to be an acceptable use on this site unless a new sequential test demonstrates that there are no sequentially preferable sites available that are suitable for the type of retail use proposed.</del></p>			2022-2027	<p>Site has planning permission but there are a number of issues that need to be overcome before the site can be developed</p>	<u>157</u> n/a

Site 374: Reeves Corner former buildings, 104-112 Church Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1RD	0.08ha 0.16ha	Vacant Land with designated Secondary Retail Frontage	Urban	High	Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Mixed use with residential to upper storeys and retail on ground floor. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface' (BGS Susceptibility to Groundwater Flooding). A high risk of surface water flooding surrounds the site, particularly across the road network such as Cairo New Road and Church Street. There is one historic record of surface water flooding held by Croydon Council in this location.</p>		<p><del>It will Residential development will help meet the need for housing in the borough. Retail or a community use will assist in providing an active frontage to the ground floor. Previous use of the site was retail so new retail use is acceptable. As</del>  <del>The site is in within the Church Street Conservation Area</del>  <del>the Council's Conservation Area Guidance and Management Plans will need to be adhered to and proposals assessed against this. The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment.</del>  <u>And the setting of a number of listed and locally listed buildings including the Grade I Listed Croydon Minster. The development should respond to the character of the area, to preserve and enhance the significance of heritage assets. The Council's relevant Conservation Area Guidance and Management Plans will need to be adhered to.</u></p>			<p><u>2027-2032</u></p> <p>2021—2026</p>	<p>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</p>	<p><u>Up to 21</u></p> <p>23 to 64</p>

<b>Site 375: Northern part of, 5 Cairo New Road</b>							
<b>-Place</b>	<b>-Postcode</b>	<b>Size</b>	<b>-Site description</b>	<b>Type of location</b>	<b>-Public Transport Accessibility</b>	<b>-Local character</b>	
Croydon Opportunity Area	CR0 1XP	0.91ha	Church in former Factory building	Urban	High	Institutions with associated grounds; Linear Infrastructure	
<b>-Description of option</b>		<b>-Justification for option</b>			<b>Anticipated phasing of development</b>	<b>-Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential redevelopment above community use. The surrounding areas of Cairo New Road and Roman Way are shown to be at a high risk of surface water flooding.		Residential development will help to meet the need for new homes in the borough. The community use of the site is protected by Policy SP5 of the Croydon Local Plan 2018.			2021—2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	128 to 368

Site 392: Carolyn House, 22-26 Dingwall Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 9XF	0.13ha	Office building	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Offices and residential and/ or hotel (with healthcare facility if required by the NHS)		In accordance with Policy SP3 of the Croydon Local Plan 2018, office refurbishment/redevelopment and mixed use should be explored fully. The site is suitable for all town centre uses except retail as it is within Croydon Metropolitan Centre close to East Croydon Station but outside of the Primary Shopping Area. The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	23 to 64

Site 393 Whitgift centre, North end							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1UB	8.8	Shopping Centre,	Central	High	Shopping centres, precincts	
Description of option			Justification for option		Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Expansion of shopping centre, improved public realm and residential development and car parking provision. The majority of the site is shown to be at a very low risk. The surrounding areas are generally at a low risk of surface water flooding with the areas of the road network (i.e. Wellesley Road) being shown to be at high risk. There are three historic records of surface water flooding and one historic record of sewer flooding.</p>			<p>Planning permission <del>has been granted</del> for this site <u>has recently expired. However, the landowners and their delivery partners are working closely with the Council and other stakeholders, to formulate a revised deliverable scheme for this strategic part of Borough. This will</u> <del>which represents form</del> a comprehensive major regeneration scheme for Croydon Metropolitan Centre which will secure an improved quality and expanded shopping centre along with new homes that will help to meet the need for new homes in the borough. The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment.</p>		<p><u>2027-2032</u></p> <p><del>2016—2021</del></p>	<p><u>The planning permission has recently expired. The landowner is working with a range of stakeholder to formulate a revised scheme</u></p> <p><del>Site has planning permission and landowner is likely to develop the site themselves</del></p>	<p>650</p> <p><del>400 to 1,000</del></p>

Site 396: Praise House, 145-149 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR0 2RG	0.25ha	Former office building of 4 floors currently with a community use with extension at rear last used as garage. Frontage used as tyre fitters.	Urban	High	Industrial Estates, Retail Estates & Business & Leisure Parks, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment for mixed use residential and community use		Site has an existing community use that is protected. The redevelopment of this site would help to meet the need for new homes in the borough. Currently it is not likely to be viable so development of the site is not likely to be completed before 2026.			2027-2032 Post 2026	<u>Site has planning permission but there are a number of issues that need to be overcome before the site can be developed</u> <del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del>	39 9 to 52

<b>Site 398: Coombe Cross, 2-4 South End</b>						
<b>Place</b>	<b>Postcode</b>	<b>Size</b>	<b>Site description</b>	<b>Type of location</b>	<b>Public Transport Accessibility</b>	<b>Local character</b>
Groydon Opportunity Area	CR0 1DL	0.26ha	4-storey office building	Urban	High	Large buildings with well-defined building line and adjacent to other buildings; Urban Shopping Areas
<b>Description of option</b>	<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential development. It should be noted that ordinary watercourses have not have been included in the fluvial modelling of the River Wandle and therefore a fluvial flood risk from this watercourse may be present. There are further areas of medium risk of surface water flooding to the west of the site. The surrounding area is generally an area of low to medium surface water flood risk. However, there are areas of high risk in regards to surface water flooding in areas such as Parker Road and South End. There are two historic records of surface water flooding.	The redevelopment of this site could help to meet the need for new homes in the borough.			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	37 to 105



Site 400: Day Lewis House, 324-338 Bensham Lane							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR7 7EQ	0.25ha	Large office/factory building	Urban	Medium	Industrial Estates; Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential redevelopment		The site consists of an office building with prior approval to convert to residential use, a temporary community use and a small area of warehousing. The office and temporary community uses are not protected and the remaining area of Class B8 use is small. Residential use of this site will help to meet the need for new homes in the borough			2021 to 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	12 to 42

Site 404: Vistec House & 14 Cavendish Road, 185 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR0 2RJ	0.69 ha	6 storey office building fronting London Road and 2 storey warehouse on Cavendish Road	Urban	High	Large buildings with well defined building line and adjacent to other buildings; Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

Site 404: Vistec House & 14 Cavendish Road, 185 London Road				
Residential development	The redevelopment of this site could help to meet the need for new homes in the borough and as it is outside the Local Centre and Primary Shopping Area retail and other town centre uses are not preferred uses on this site.	2016—2021	Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves	32 to 179

Site 405: Capella Court & Royal Oak Centre, 725 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 2PG	0.5ha 1.30ha	<u>Single storey block with leisure and other uses</u> A 5 storey office in the middle of a roundabout and a single storey block on the south side of the roundabout connected by a footbridge to the main building and group of single storey commercial units at rear of Capella Court	Urban	Medium	Industrial Estates, Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

Site 405: Capella Court & Royal Oak Centre, 725 Brighton Road				
<p>Residential development and health facility, and reconfiguration of existing uses and their floor space with no net loss of flood storage capacity</p>	<p>The redevelopment of this site could help to meet the need for new homes in the borough. The site lies outside of Purley District Centre so is not a suitable location for town centre uses including retail and offices. The Shopping Parade on the southern part of the site is proposed for de-designation as it does not have any shops in it. The current community use within the site should be included to assist sustainability in the local context. As the site is within a Flood Zone 3 it will be subject to the Exception Test as part of a Site Specific Flood Risk Assessment. Any development which involves an increase in building footprint should ensure there is no impact on the ability of the floodplain to store water. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.</p>	<p><u>Post 2032</u>  Post 2026</p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p><u>99</u>  59 to 224</p>

Site 407: 797 London Road							
<del>Place</del>	<del>Postcode</del>	<b>Size</b>	<del>Site description</del>	<b>Type of location</b>	<del>Public Transport Accessibility</del>	<del>Local character</del>	
Thornton Heath	CR7 6AW	0.15ha	Six storey office building and car park at least part vacant	Urban	Medium	Large buildings with surrounding space; Urban Shopping Areas	
<del>Description of option</del>		<del>Justification for option</del>			<b>Anticipated phasing of development</b>	<del>Evidence of deliverability</del>	<b>Indicative number of homes</b>

**Site 407: 797 London Road**

Conversion or redevelopment to residential use	Office use is not protected in this location and residential use would help meet the borough's need for new homes. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.	Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	7 to 25
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Site 409: Beech House, 840 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 2BH	0.14ha	4-storey office building	Urban	High	Large buildings in an urban setting; Large buildings with surrounding space; Large buildings with well-defined building line and adjacent to other buildings	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Conversion of the office building to residential uses.		<p>Located outside the proposed District Centre boundary so residential would be the preferred use, however the existing office use could be retained on the site. Residential development will help to meet the need for new homes in the borough. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development. As 22% of the site is in Flood Zone 2 any proposal for redevelopment should locate buildings within Flood Zone 1.</p>			2016—2021	Site has planning permission and there is nothing preventing the site from being developed	36 to 45

Site 410: 100 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 4DA	0.19ha 0.22ha	Co-op funeral service premises	Urban	Medium	Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use residential and retail development		Site has an existing retail use and has potential for intensification with the addition of residential units which will help to meet the need for new homes in the borough.			Post 2032  Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	18  40 to 37

Site 411: Palmerston House, 814 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 2BR	0.07ha	Office Building	Urban	High	Large buildings with surrounding space, Medium rise blocks with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

Site 411: Palmerston House, 814 Brighton Road				
Residential redevelopment	Site is an office in an edge of centre location where residential use is preferable. Residential development will help to meet the need for new homes in the borough. Conversion could be considered to reduce the environmental impacts of the development with flood mitigation measures. As part of the site is in Flood Zone 2 and 3 an Exception Test is required as part of a Site Specific Flood Risk Assessment. Any redevelopment of the site should seek to locate buildings in Flood Zone 1.	<u>Post 2032</u> <del>Post 2026</del>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>8</u> <del>4 to 18</del>

Site 416: Challenge House, 618 Mitcham Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR0 3AA	0.80ha	3-storey office building	Urban	Medium	Industrial Estates, Institutions with associated grounds, Terraced houses and cottages	
Description of option	Justification for option				Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential redevelopment or conversion. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.	Office use is not protected. The Council's preferred location for offices is in the New Town and East Croydon station areas of Croydon Metropolitan Centre and in other District Centres. The redevelopment of this site will help to meet the need for new homes in the borough. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating				<u>Post 2032</u> <del>Post 2026</del>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>40</u> <del>36 to 136</del>

Site 417: Stonemead House, 95 London Road						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character

Site 417: Stonemead House, 95 London Road							
Croydon Opportunity Area	CR0 2RF	<del>0.14ha</del> 0.16ha	Vacant office building	Urban	High	retail Estates & Business & Leisure Parks, Urban Shopping Areas	
<b>Description of option</b>		<b>Justification for option</b>		<b>Anticipated phasing of development</b>		<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential development		The redevelopment or conversion of the building could help to meet the need for new homes.		<u>Post 2032</u>  2021—2026		Site has no known developer interest and the Council will need to work with landowner to bring it forward	<u>24</u>  23 to 64
Site 430: Grafton Quarter, Grafton Road							
<del>Place</del>	<del>Postcode</del>	<del>Size</del>	<del>Site description</del>	<del>Type of location</del>	<del>Public Transport Accessibility</del>	<del>Local character</del>	
Waddon	CR0 3RP	0.62ha	Various industrial buildings and office block that are vacant	Urban	Medium	Industrial Estates; Institutions with associated grounds; Terraced houses and cottages	
<del>Description of option</del>		<del>Justification for option</del>		<del>Anticipated phasing of development</del>		<del>Evidence of deliverability</del>	<del>Indicative number of homes</del>
Creative and Cultural Industries Enterprise Centre and residential development		It is an objective of the Croydon Local Plan 2018 to encourage creative and cultural industries in the borough. Permitting residential development on part of this site enables the development of a Creative and Cultural Industries Enterprise Centre on the remaining part of the site as it makes the overall development viable and assists with the sustainability of the site along with mitigation of the loss of employment with the retention of some skills and training on the site.		2016—2021		Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves	28 to 131





Site 468: Grass area adjacent to, 55 Pawsons Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR0 2QA	0.27ha	Fenced off grass area to the rear of shops on Whitehorse Road and adjacent to estate of 1 – 55 Pawsons Road and former depot at rear of 57 Pawsons Road	Urban	Medium	Medium rise blocks with associated grounds, Terraced houses and cottages, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development		Residential development will help to meet the need for new homes in the borough. The Sustainability Appraisal recommends that development proposals should seek to ensure that any loss of open land is mitigated through alternative provision.			Post 2032 <del>2016 – 2024</del>	In Council ownership	<u>30</u> <del>13 to 45</del>

Site 471: Masonic Hall car park, 1- 1B Stanton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR0 2UN	0.15ha	Private Car Park between 1 and 1 B Stanton Road, called Masonic Hall car park.	Urban	High	Large houses on relatively small plots, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes

Site 471: Masonic Hall car park, 1- 1B Stanton Road						
Residential development	Residential development will help to meet the need for new homes in the borough. Delivery will be an issue with the land in private ownership and as a car park for a hall the Community Policy SP5 must be complied with. A Contaminated Land Assessment will be required.			Post 2032 Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	16 7 to 39
Site 474: Rear of The Cricketers, 47 Shirley Road						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character
Addiscombe	CR0 7ER	0.18ha	Amenity land to the rear of the pub's car park	Suburban	Medium	Terraced houses and cottages; Urban Shopping Areas
Description of option		Justification for option		Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development		Residential development will help to meet the need for new homes in the borough. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.		Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	7 to 17

Site 486: Land and car park at rear of The Beehive Public House, 45A Woodside Green						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character
South Norwood & Woodside	SE25 5HQ	0.15ha	Amenity land & car park	Urban	Medium	Compact houses on relatively small plots; Terraced houses and cottages; Urban Shopping Areas

**Site 486: Land and car park at rear of The Beehive Public House, 45A Woodside Green**

<b>Description of option</b>	<b>Justification for option</b>	<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential development	Residential development will help to meet the need for new homes in the borough.	Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	7 to 25

**Site 488: Canius House, 1 Scarbrook Road**

<b>Place</b>	<b>Postcode</b>	<b>Size</b>	<b>Site description</b>	<b>Type of location</b>	<b>Public Transport Accessibility</b>	<b>Local character</b>
Croydon Opportunity Area	CR0 1SQ	0.07ha	5 storey vacant office block bordering Surrey Street	Central	High	Large buildings with well-defined building line and adjacent to other buildings; Medium rise blocks with associated grounds
<b>Description of option</b>	<b>Justification for option</b>			<b>Anticipated phasing of development</b>	<b>Evidence of deliverability</b>	<b>Indicative number of homes</b>
Residential conversion	A prior notification under the General Permitted Development Order has been made for this site. Residential development will help to meet the need for new homes in the borough. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development. The Sustainability Appraisal highlights the context of the Conservation Area which development proposals will need to consider and which this site is adjacent to.			2016—2021	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	30



Site 489: Corinthian House, 17 Lansdowne Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2BX	0.21ha	Locally listed office building	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Retention of offices, with residential conversion, and/or hotel (with healthcare facility if required by the NHS). A locally listed building.		<p>As a locally listed building redevelopment is not an acceptable option. In accordance with Policy SP3 of Croydon Local Plan , office refurbishment/redevelopment and mixed use should be explored fully. The site lies within Croydon Metropolitan Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location. <del>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities. The inclusion of healthcare facilities should be explored with the NHS before development takes place.</del></p>			<p><u>Post 2032</u></p> <p>Post 2026</p>	Site has no known developer interest and the Council will need to work with landowner to bring it forward	<p><u>50</u></p> <p><del>30 to 85</del></p>

**490: 95-111 Brighton Road and 1-5, 9-15 and 19 Old Lodge Lane**

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 4DA	1.02ha 0.40ha	<u>Public car park, demolished houses, retail units with residential above Gym car park and derelict houses</u>	Urban	Medium	Planned estates of semi-detached houses; Transport Nodes; Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<u>Primary school (on up to 0.4ha of the site) and residential development, to be brought forward in one phase, and limited retail / food and drink (up to existing floor space)</u>		The site is of a suitable size for a primary school, is in an area that has a high demand for school places and can make a significant contribution to meeting this demand. <u>Residential development will help to meet the need for new homes in the borough.</u>			<u>Post 2032</u> <u>2021—2026</u>	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>36</u> <u>n/a</u>

Site 492: 5 Bedford Park							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2AQ	0.18ha	Vacant office building	Central	High	Large buildings with surrounding space	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential conversion		A prior notification under the General Permitted Development Order has been made for this site. Residential development will help to meet the need for new homes in the borough. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.			2016—2021	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	82 to 91



Site 493: Pinnacle House, 8 Bedford Park							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2AP	0.31ha	Office building	Central	High	Institutions with associated grounds, large buildings with surrounding space	
Description of option			Justification for option		Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use of residential with offices (or a healthcare facility if required by the NHS) on the ground floor			<p>In accordance with Policy SP3 of Croydon Local Plan , office refurbishment/redevelopment and mixed use should be explored fully. The site lies within Croydon Metropolitan Centre close to East Croydon station but outside the Primary Shopping Area so all town centre uses except retail are acceptable in this location.</p> <p><del>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities.</del></p> <p><del>The inclusion of healthcare facilities should be explored with the NHS before development takes place.</del></p>		Post 2026 <u>2032</u>	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>158</u> 44 to 125

Site 495: Dairy Crest dairy, 823-825 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 2BJ	<u>0.34ha</u> <del>0.45ha</del>	Dairy depot with buildings fronting on to Brighton Road being a locally listed building	Urban	Medium	Compact houses on relatively small plots, Industrial Estates, Large houses on relatively small plots, Medium rise blocks with associated grounds, Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Conversion of buildings fronting Brighton Road to studio space (with potential for a Creative and Cultural Industries Enterprise Centre serving Purley) with new light industrial units to the rear		The buildings fronting Brighton Road are locally listed so conversion is the only acceptable option. Policy SP3 of the Croydon Local Plan sets out the need for a Cultural and Creative Industries Enterprise Centre in Purley and the conversion of the buildings on Brighton Road could lend themselves to studio spaces. The Sustainability Appraisal recommends that public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating. As the site is within Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment.			<u>Post 2032</u>  2021—2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	n/a

Site 499: Croydon University Hospital Site, London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR7 7YE	8.2ha	Various hospital and medical associated buildings along with a staff car park on Bensham Lane	Urban	Medium	Industrial Estates, Large buildings with well-defined building line and adjacent to other buildings, Medium rise blocks with associated grounds, Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Consolidation of the hospital uses on a smaller area of the site with enabling residential development on remaining part subject to there being no loss of services provided by the hospital in terms of both quantity and quality,		In order to fund improvements to the existing hospital buildings residential development on part of the site may be required. This option is dependent on their being no loss of services provided by the hospital both in terms of quantity and quality. <u>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities.</u> <u>The inclusion of healthcare facilities should be explored with the NHS before development takes place.</u>			2027-2032	Site is part of a partners' Estate Strategy	<u>372</u> <del>77 to 290</del>

Site 502: Coombe Farm, Oaks Road						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character

**Site 502: Coombe Farm, Oaks Road**

Shirley	CR0 5HL	<del>3.99ha</del> 2.84ha	Former school and hostel buildings	Suburban	Low	Green Infrastructure; Institutions with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development so long as the development has no greater footprint, volume or impact on openness on the Metropolitan Green Belt than the existing buildings on the site		Although the site is in the Green Belt, it already has built form. Residential development will help to meet the need for new homes in the borough.			2022-2027	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	90

Site 504: Stroud Green Pumping Station, 140 Primrose Lane							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Shirley	CR0 8YY	0.72ha	Thames Water pumping station (which is a Locally Listed Building) and surrounding land	Suburban	Medium	Green Infrastructure, Industrial Estates, Planned estates of semi-detached houses	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development (including the conversion of the Locally Listed pumping station) if the site is no longer required for its current use in the future. It should be noted that ordinary watercourses have not have been included in the fluvial modelling of the River Wandle and therefore a fluvial flood risk from this watercourse may be present		This site does not meet the criteria for designation as Metropolitan Open Land as it does not contribute to the physical structure of London, it does not include open air facilities which serve the whole or significant parts of London and it does not contain features or landscapes of national or metropolitan importance. For this reason it has been assessed by the same criteria as other non-Metropolitan Open Land sites and is considered acceptable for development. Residential development will help to meet the need for new homes in the borough. <u>The locally listed building should be converted in a sensitive manner that responds to its special interest. Development in the grounds would need to demonstrate that it can be accommodated in a manner that responds to the locally listed building and preserves or enhances its setting.</u>			<u>Post 2032</u> <del>Post 2026</del>	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>Up to 24</u> <del>26 to 68</del>

Site 517: Milton House, 2-36 Milton Avenue							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR0 2BP	1.32ha	Mostly vacant & semi derelict factory units in integrated industrial location surrounding Milton Avenue	Urban	Medium	Compact houses on relatively small plots; Industrial Estates; Large buildings in an urban setting; Terraced houses and cottages	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential and employment uses		The redevelopment of this site could help to meet the need for new homes in the borough, whilst also providing some employment and mitigating against possible loss of employment in the area. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating and that mitigation of loss of employment might take the form of requirements around training and skills development.			2016—2021	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	74

Site 522: Surface car park, Wandle Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area		0.6ha	Council Surface Car park	Central	High	Large buildings with well-defined building line and adjacent to other buildings; Linear Infrastructure; Medium-rise blocks with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Bus stand underneath the flyover and a district energy centre and residential development on the remainder of the car park. The majority of the site is within Flood Zone 3a to the south-west and the rest of the site are within Flood Zone 1. This More Vulnerable development should be preferably located in Flood Zone 1. If it is essential to build on Flood Zone 3a, then all residential uses should be located in the first floor level or above. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface' (BGS Susceptibility to Groundwater Flooding).</p>		<p>TfL Buses require a bus standing space in Croydon Metropolitan Centre so that bus stands can be removed from the Mid-Croydon Masterplan area. A district energy centre is a policy aspiration of the Croydon Local Plan 2018 and the Wandle Road surface car park has been identified as the most cost-effective and realisable site for its location. The remaining capacity can be used for new housing which will help to meet the need for new homes in the borough. As the site is within a Flood Zone 3 it will be subject to the Sequential Test as part of the Strategic Flood Risk Assessment.</p>			2021—2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	Up to 40

Site 662: Coombe Road Playing Fields, Coombe Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
South Croydon	CR0 5RB	10.80ha	Playing fields	Suburban	Medium	Detached houses on relatively large plots; Green Infrastructure; Institutions with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Secondary school with retention of playing pitches		The site is of a suitable size for a secondary school, is well connected to an area that has a high demand for school places and can make a significant contribution to meeting this demand. The site has met the criteria for de-designation as Green Belt and part of the site will be de-designated to accommodate a school. The site is currently used as playing pitches which are protected so any redevelopment for a school should look to retain some of this use. Development could potentially require mitigation to address the effects of impact on the adjacent SNCI.			2016—2021	In Council ownership	n/a



Site 683: Purley Back Lanes, 16-28 Pampisford Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley		0.62ha 0.54ha	Single Storey Garage Engineering works at Russell Hill Place, car park and domestic garages at rear of Tudor Court, Russell Hill Parade. Two four storey detached houses in use as D1 facilities on Pampisford Road	Urban	High	Large houses on relatively small plots, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development and public car park including new industrial units to replace those currently on the site		Part of the site is currently an operational town centre employment site where there is a presumption against residential development. However, development of the site could enable the replacement of the industrial units with more modern and more accessible premises whilst providing new homes that are needed to meet the borough's need for housing.			<u>Post 2032</u>  2021—2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>99</u>  Up to <del>94</del>

Site 937: Kempfield House, 1 Reedham Park Avenue							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Kenley and Old Coulsdon	CR8 4BQ	0.19ha <del>0.48ha</del>	Former Croydon Council children's home	Suburban	Low	Institutions with associated grounds, Mixed type flats, Planned estates of semi-detached houses	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development <del>with community use</del>		Residential development to help meet the need of the borough. The Sustainability Appraisal recommends public transport improvements are made as part of the proposal to mitigate the site's low public transport accessibility rating.			2022-2027 <del>2016—2021</del>	Site is subject to developer interest and an <u>application is pending decision.</u> <del>A planning application is likely soon with the landowner looking to develop the site themselves</del>	12

Site 945: Waitrose, 110-112 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Coulsdon	CR5 2NB	0.27ha	Waitrose supermarket	Urban	Medium	Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential, retail and car parking ( <del>and healthcare facility if required by the NHS</del> )		<p>The site has been identified by the NHS as being in an area with a need for additional healthcare facilities.</p> <p>Residential development would help to meet the need for new homes in the borough. The site has an existing retail use.</p>			<p><u>2027-2032</u></p> <p>2021—2026</p>	<p><u>Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed</u></p> <p><del>Site has no known developer interest and the Council will need to work with landowner to bring it forward</del></p>	<p><u>66</u></p> <p><del>55 to 90</del></p>

Site 946: Stubbs Mead Depot, Factory Lane							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
<u>Purley Way</u> (Waddon)	CR0 3RL	2.71ha	Council Depot with parking area, and six buildings and one bay of fuel pumps.	Urban	High	Industrial Estates	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed residential and employment (industry and warehousing)		The employment use is a protected use and therefore need to be retained on the site. The redevelopment of this site could help to meet the need for new homes in the borough. The provision of flood prevention measures is required to improve the sustainability of the development. Self-contained residential basements and bedrooms at basement level are not permitted in areas that have 'potential for groundwater to occur at the surface'.			<u>Post 2032</u> 2021 – 2026	In Council ownership	<u>385</u> 157 to 440

Site 947: 359-367 Limpsfield Road							
<del>Place</del>	<del>Postcode</del>	<del>Size</del>	<del>Site description</del>	<del>Type of location</del>	<del>Public Transport Accessibility</del>	<del>Local character</del>	
<del>Sanderstead</del>	<del>CR2 8BV</del>	<del>0.325ha</del>	<del>Car repair garage</del>	<del>Suburban</del>	<del>Low</del>	<del>Retail Estates &amp; Business &amp; Leisure Parks</del>	
<del>Description of option</del>		<del>Justification for option</del>			<del>Anticipated phasing of development</del>	<del>Evidence of deliverability</del>	<del>Indicative number of homes</del>
<del>Residential with 1 - 3 commercial units on ground floor</del>		<del>Residential development will help to meet the need for new homes in the borough.</del>			<del>2016 – 2021</del>	<del>Site has planning permission and there is nothing preventing the site from being developed</del>	<del>10 to 22</del>

Site 948: 230 Addington Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Selsdon	CR2 8LL	0.11ha	Disused art deco dance hall last used as a car repair garage	Suburban	Medium	Suburban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential with retail on ground floor (up to 3 units).		Residential development will help to meet the need for new homes in the borough. Retail development will help to re-establish the primary shopping area of the district centre given the site's Main Retail Frontage designation.			2022-2027	Site has planning permission and is subject to further developer interest but there are a number of issues that need to be overcome before the site can be developed. The site has been identified by the NHS as being in an area with a need for additional healthcare.	44 <u>26</u>

Site 950: Norfolk House, 1-28 Wellesley Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2AE	<u>0.68ha</u> <del>0.708ha</del>	Retail/commercial and hotel uses of 2 - 11 storeys. Wellesley Road elevation is within a Main Retail Frontage, and George Street elevation is within a Secondary Retail Frontage. Part of the site is locally listed.	Central	High	Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development to include retail, residential, office and hotel uses.		The site is located in an area where mixed use development is acceptable and redevelopment of the site would rejuvenate this key site. <u>The Locally Listed Building should be retained and converted. New development on the site should seek to respond to the special architectural and historic interest of the Locally Listed Building.</u>			<u>Post 2032</u> 2021 – 2026	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>133</u> 125 to 255

Site 951: 1485-1489 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Norbury	SW16 4AE	<u>0.03ha</u> <del>0.17ha</del>	The existing site consists of 2-storey buildings with 3 retail units and 3 two bedroom flats above fronting London Road and at the rear an existing two storey supermarket facing Fairview Road	Urban	Medium	Terraced houses and cottages, Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment for residential and retail		The site is suitable for mixed use development with retail development and a community use on the ground floor with residential accommodation on the upper floors. Previous use of the site was retail and would be acceptable as it is also partly within a Primary Shopping Area. Community use would add to the network of community facilities throughout the borough and new homes would help alleviate the need for new homes in the borough. <u>The buildings fronting on to London Road contribute to the Local Heritage Area and should be retained and converted as part of the proposal.</u>			<u>2022-202</u> <del>2016-2024</del>	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	<u>24</u> <del>15 to 22</del>

Site 952: 103 - 111A High Street Croydon CR0 1QG							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Areas	CR0 1QG			Central	High		
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use residential and commercial floor space (.e.g. A, B & D class uses)		Xxx to be advised			2022-27	Site is subject to developer interest and an application is likely to be submitted.	121



## Appendix 8 – Delivery matrix

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
SP1 - The Places of Croydon	New developments that contribute to an enhanced sense of place and improved local character	Croydon Council Developers Landowners Neighbourhood Forums Public bodies Neighbouring local authorities Businesses Service Providers	A range of policies to promote high quality new development through the pre-application and development management process. Future policies will be guided by the Borough Character Appraisal, other place-based evidence and the LDF, including the Croydon Local Plan's Detailed Policies and Proposals and future Neighbourhood Plans.	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan within <b>5 years of adoption 2018</b> and Borough Character Appraisal  Provide further assistance to Neighbourhood Plans to help implement policy

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Growth in homes, jobs and services	Croydon Council Developers Landowners Service providers Infrastructure providers Neighbourhood Forums Registered Providers Service providers Businesses	Other policies forming part of the Local Development Framework  Croydon Opportunity Area Planning Framework	<del>2011-36</del> 2019-2039	Primarily in Croydon Opportunity Area, including approximately a third of the borough's residential growth, with Waddon, Purley, and Broad Green & Selhurst, and Thornton Heath and Coulsdon, accommodating medium and moderate residential growth and, to a more limited extent in the other Places	Review Croydon Local Plan 2018  Provide further assistance to Neighbourhood Plans to help implement policy  Work with infrastructure providers to deliver infrastructure necessary to support Places of Croydon

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
SP2 - Homes	A total of 32,890 new homes between 2016 and 2036	Developers Landowners Registered providers Croydon Council GLA	Allocating land for new homes in the Croydon Local Plan's Detailed Policies and Proposals and to guide development of new homes  Working with developers and landowners through the development management process to secure the best use of land in Croydon	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018  Review Community Infrastructure Levy requirements  Apply planning obligations requirements more flexibly
	6,970 xxxx homes on allocated sites outside of Croydon Opportunity Area including preferred unit mix (tenure and size)	Croydon Council GLA Developers Landowners	Croydon Council will allocate sites for new homes in the Detailed Proposals of the Croydon Local Plan 2018 in partnership with GLA, developers and landowners	<del>2011-36</del> 2019-2039	All Places except Croydon Opportunity Area	Delivered in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	40,760 <del>xxxx</del> homes on allocated sites inside Croydon Opportunity Area including preferred unit mix (tenure and size)	Croydon Council GLA Developers Landowners	Croydon Council will allocate sites for new homes in Croydon Local Plan's Detailed Policies and Proposals in partnership with GLA, developers and landowners	<del>2011-36</del> 2019-2039	Croydon Opportunity Area	Delivered in Croydon Local Plan 2018
			Opportunity Area Planning Framework will set out approach and preferred unit mix	Adopted in 2013		Transfer delivery to Croydon Local Plan: 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	25% of all new homes to be social or affordable rented homes (with a minimum of 8,175 xxxx in total) and 15% of all new homes to be intermediate affordable homes for low cost shared home ownership, intermediate rent or starter homes (with a minimum of 4,905 new homes)	Developers and Croydon Council working in partnership with Registered Providers	<p>Planning obligation agreements with developers</p> <p>Croydon Council New Build Programme</p> <p>Registered Providers build programmes</p>	<p>2011-36</p> <p>2019-2039</p>	All Places	<p>Review policy in Croydon Local Plan 2018 and in particular the requirements for on-site provision of affordable homes</p> <p>Apply other planning obligations requirements more flexibly</p> <p>Work with Registered Providers to seek other funding sources for affordable homes</p>
	Mechanism for calculating commuted sums for affordable housing	Croydon Council	Non-statutory guidance on Planning Obligations and Community Infrastructure Levy	<p>2011-36</p> <p>2019-2039</p>	All Places	Non-statutory guidance on Planning Obligations

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	<p>Framework for provision of homes including approach to mix of homes across borough</p> <p>Framework for provision of homes including minimum design and amenity standards for family homes</p>	Croydon Council will set framework	Croydon Local Plan's Detailed Policies and Proposals	<p><del>2011-36</del></p> <p>2019-2039</p>	All Places	Delivered in Croydon Local Plan 2018
	Provision of affordable homes	Developers and Croydon Council working in partnership with Registered Providers	<p>Planning obligation agreements with developers</p> <p>Croydon Council New Build Programme</p> <p>Registered Providers build programmes</p>	<p><del>2011-36</del></p> <p>2019-2039</p>	All Places	<p>Review policy in Croydon Local Plan 2018</p> <p>Update Affordable Housing Viability Assessment</p> <p>Review Housing Strategy</p>

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	36 new pitches for Gypsy and Travellers	Croydon Council	Croydon Council allocates land for new pitches in the Croydon Local Plan's Detailed Policies and Proposals. Provision of pitches on a site dependent either on a private development or a Registered Provider.	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018  Re-appraise availability of land in borough to identify new sites for Gypsy and Traveller pitches  Work with Registered Providers and public sector land owners in Croydon to identify other potential for new pitches

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
SP3 - Employment	Innovation and investment into the borough will be increased	Croydon Council Coast to Capital Local Enterprise Partnership Developers Landowners	Croydon Council will allocate land for employment activities and Enterprise Centres in the Croydon Local Plan's Detailed Policies and Proposals  Coast to Capital LEP will assist with promotion	<del>2011-36</del> 2019-2039	Croydon Opportunity Area and Coulsdon	Review policy in Croydon Local Plan 2018  Review Economic Development Strategy  Apply planning obligations requirements more flexibly
	A network of Enterprise Centres	Croydon Council Coast to Capital Local Enterprise Partnership Studio space providers Landowners	Croydon Council will allocate land  Coast to Capital LEP will assist with promotion  Studio space providers will provide Enterprise Centres	<del>2011-36</del> 2019-2039	Croydon Opportunity Area, Purley, Crystal Palace & Upper Norwood and South Norwood/Portland Road	Review policy in Croydon Local Plan 2018  Review Economic Development Strategy



Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Protection of industrial and warehousing land and premises	Croydon Council	Croydon Council will use the Development Management process to protect existing industrial and warehousing land and premises from change of use or redevelopment to non Class B uses	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018  Review Economic Development Strategy  Work with Croydon Council's Economic Development service to promote industrial areas
	Workshop/ studios for Class B industrial uses in town centre locations	Croydon Council  Developers  Landowners  Coast to Capital Local Enterprise Partnership	Policy encouraging development in these locations  Coast to Capital LEP will assist with promotion	<del>2011-36</del> 2019-2039	Croydon Metropolitan Centre and all District and Local Centres	Review policy in Croydon Local Plan 2018  Review Economic Development Strategy  Work with the Croydon Council's Economic Development service to promote workshop space

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Remodelled Fairfield Halls	Croydon Council Fairfield Halls	Croydon Council Capital Programme  College Green Masterplan	2012-2020	Fairfield Halls	Review Croydon Council Capital Programme  Seek other sources of funding for remodelling
	Use of empty buildings and cleared sites by creative industries and cultural organisations	Croydon Council  Voluntary sector partners Private sector partners Landowners Property Agents	Where Croydon Council is the land owner it will seek to ensure this happens. Where the Council is not the land owner, it will use its Development Management function to promote this activity.	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Town centre health checks	Croydon Council GLA	Undertake town centre health checks in partnership with GLA and relevant neighbouring boroughs to consider the vitality of existing town centres and in accordance with Policy 2.15 of the London Plan, also consider the case for identifying new centres.	2011-36 2019-2039 (every 3 to 5 years)	All Places except Kenley & Old Coulsdon	Review policy in Croydon Local Plan 2018
	Define the boundaries of Primary Shopping Areas	Croydon Council	In the Croydon Local Plan's Detailed Policies and Proposals	2011-2017	Croydon Metropolitan Centre and all	Delivered in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Focus town centre uses in Croydon Metropolitan Centre, District and Local Centres	Croydon Council London Borough of Lambeth London Borough of Bromley			District and Local Centres	
	Reduced levels of vacancy amongst Class A units within Croydon Metropolitan Centre and the District and Local Centres	Croydon Council Retailers Property Agents	Business Improvement Districts stimulating developer interest and promoting the centres  Regular town centre 'health checks' and the Croydon Monitoring Report will instigate a boundary review if the number of vacant shops units becomes a sustained and significant issue	<del>2011-36</del> 2019-2039	Croydon Metropolitan Centre and all District and Local Centres	Review policy in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Up to 92,000m <sup>2</sup> of new and refurbished office floor space in Croydon Metropolitan Centre and up to 7,000m <sup>2</sup> of new and refurbished office floor space in District Centres	Croydon Council  GLA  Developers  Landowners  Coast to Capital Local Enterprise Partnership	The Croydon Local Plan 2018 promotes a flexible approach to development in Croydon Metropolitan Centre with Opportunity Area Planning Framework promoting conversion of surplus office space to other uses	2011-36 2019-2039	Croydon Metropolitan Centre	Review policy in Croydon Local Plan 2018  Review Opportunity Area Planning Framework  Review Economic Development Strategy  Apply planning obligations requirements more flexibly
			Promoting refurbishment of remaining office buildings and development of new floor space  Coast to Capital LEP will assist with promotion	2011-36 2019-2039	Croydon Metropolitan Centre and all District Centres	Increased promotion of office space in Croydon

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Healthy and vibrant Croydon Metropolitan Centre and the surrounding area	Croydon Council Retailers Businesses Landowners	Policies to promote a wide range of complementary town centre uses and bring forward the upgrading of retail and office stock. This is supplemented by the Croydon Opportunity Area Planning Framework, the relevant Masterplans, and the Croydon Local Plan's Detailed Policies and Proposals and a Public Realm Framework.	2011-36 2019-2039	Croydon Opportunity Area	Review Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
SP4 - Local Character	High quality new development which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities.	Croydon Council  Developers	A range of policies in the Croydon Local Plan's Detailed Policies and Proposals to promote high quality new development. This will be supplemented by the Croydon Opportunity Area Planning Framework, Public Realm framework and the relevant Masterplans.	2011-36 2019-2039	All Places	Review policy in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Vacant buildings/sites will be utilised for temporary activities	Croydon Council Developers Voluntary sector partners Private sector partners Landowners Property agents	Where Croydon Council is the land owner it will seek to ensure this happens. Where the Council is not the land owner, it will use its Development Management function to promote this activity.	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018



Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Improved quality public realm	Croydon Council Developers Landowners	<p>Croydon Local Plan's Detailed Policies and Proposals sets out a range of policies detailing the standards to which public realm improvements must adhere. This is supplemented by the Croydon Opportunity Area Planning Framework, Public Realm Framework and the relevant Masterplans.</p> <p>The Community Infrastructure Levy will part fund public realm improvements.</p>	<p><del>2011-36</del> 2019-2039</p>	All Places	<p>Review Croydon Local Plan 2018</p> <p>Review Regulation 123 list (identifying infrastructure that Community Infrastructure Levy will fund) and consider funding public realm improvements via planning obligations instead</p>

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Heritage assets will be protected and utilised	Croydon Council Landowners Developers Historic England Amenity Societies	Croydon Local Plan's Detailed Policies and Proposals includes a range of policies setting out the extent and nature of protection for Croydon's heritage assets as well as guidance on ensuring the continued use of heritage assets. This is supplemented by the Croydon Opportunity Area Planning Framework, Conservation Area Appraisals and Management Plans and the relevant Masterplans.	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018 and Development Management processes

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
SP5 - Community Facilities and Education	Developments that provide healthy living by including walking and cycling, good housing design, sufficient open space and opportunity for recreation and sound safety standards, and the retention of existing community facilities	Croydon Council Developers	Croydon Local Plan's Detailed Policies and Proposals  Planning Obligations  Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	New development will be expected to contribute to the provision of infrastructure needed to support growth in accordance with the priorities identified by the Infrastructure Delivery Plan	Croydon Council Developers Service providers Infrastructure providers NHS	Croydon Local Plan's Detailed Policies and Proposals  Planning Obligations  Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018  Review Infrastructure Delivery Plan (including priorities)  Work with service providers to promote more co-locating of facilities
	Community Infrastructure Levy	Croydon Council	Collecting Community Infrastructure Levy from new development	Introduced in 2013	All Places	Review Community Infrastructure Levy charging schedule
	The provision and improvement of places of worship	Local faith organisations/ groups with the support of Croydon Council	Croydon Local Plan's Detailed Policies and Proposals	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	The temporary occupation of empty buildings for community uses	Croydon Council Landowners Developers Voluntary sector Property agents	Croydon Local Plan's Detailed Policies and Proposals	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018
	Sites for additional schools	Croydon Council Free Schools Academies	Croydon Local Plan's Detailed Policies and Proposals  Education Estates Strategy	<del>2011-36</del> 2019-2039	All Places	Review policy in Croydon Local Plan 2018, School Estates Strategy  Work with neighbouring local authorities to find school places in areas with spare capacity outside of borough
	Children's Centres and pre-school facilities will be enhanced and updated	Croydon Council Private Sector	Capital Funding (Public & Private)	<del>2011-36</del> 2019-2039	In areas with deficiency in access to these facilities	Review policy in Croydon Local Plan 2018 Reassess School Estates Strategy

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Children's Centres and pre-school facilities will be provided			2011-36 2019-2039		
SP6 - Environment and Climate Change	Development of district energy networks in areas of high heat density within the borough	Croydon Council Developers Energy Providers	Croydon Local Plan's Detailed Policies and Proposals  Croydon Council will work with	2011-2021	Croydon Opportunity Area	Review Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
			<p>developers through the development management process to work towards provision of district energy networks in the borough</p> <p>Community Infrastructure Levy could part fund development of network</p>	<p><del>2011-36</del> 2019-2039</p>	<p>Places with high heat density or areas where future development will increase heat density</p>	

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Installation of sustainable drainage systems (SuDS) for all new development including conversions	Croydon Council Developers Freeholders of residential and commercial property Thames Water Sutton and East Surrey Water	Croydon Local Plan's Detailed Policies and Proposals  Croydon Council will work with partners and developers through the development management process to work towards provision of SuDS to fulfil the requirements of the Flood Water Management Act 2010	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018



Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Safeguarding groundwater Source Protection Zones	Croydon Council The Environment Agency Thames Water Sutton and East Surrey Water	Croydon Local Plan's Detailed Policies and Proposals  Croydon Council will work with the Environment Agency through the development management process to ensure groundwater and aquifers are protected	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	De-culvert sections of the River Wandle, Norbury Brook and Caterham Bourne	Croydon Council Developers The Environment Agency GLA Thames Water Neighbouring local authorities	Funding and planning obligations have been secured to de-culvert sections of the River Wandle within Wandle Park and the adjoining New South Quarter development. A pre-feasibility assessment has been carried out for sections of the Norbury Brook within Norbury Park, with further assessment required of the initial options. Capital funding, CIL, planning obligations and enabling development Are required.	River Wandle (2011-2013), Norbury Brook and Caterham Bourne (2013-2031)	Norbury, Thornton Heath, Waddon, Croydon Opportunity Area, Purley, Kenley and Old Coulsdon	Review policy in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Enhanced access improvements for the boroughs ponds, open water and water heritage sites	Croydon Council Developers The Environment Agency GLA	Development management process and progress of the Downlands and Wandle Valley Green Grid Area Frameworks	<del>2011-36</del> 2019-2039	Places with ponds and open water	Review Croydon Local Plan 2018
	Overland flow paths, surface water ponding areas, urban watercourse buffer areas and multi-use flood storage areas	Croydon Council Developers The Environment Agency GLA Thames Water Sutton and East Surrey Water Neighbouring local authorities	Development management process, progress of the London Downlands and Wandle Valley Green Grid Area Frameworks and detailed policy/guidance within the Croydon Local Plan's Detailed Policies and Proposals to fulfil requirements of the Flood Water Management Act 2010	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Preferred locations in collaboration with the neighbouring boroughs of Merton, Kingston and Sutton to maximise self-sufficiency in managing the waste generated	Croydon Council Royal Borough of Kingston upon Thames London Borough of Merton London Borough of Sutton Developers South London Waste Partnership	Private sector delivery will be guided by the South London Waste Plan DPD Applications made outside of this process will be subject to policy in the Croydon Local Plan 2018 and South London Waste Plan DPD	<del>2011-2021</del> (plan period for the South London Waste Plan DPD) and 2021-2036	Broad Green and Selhurst, Waddon, South Croydon, Purley, Coulsdon, Addington	As set out in South London Waste Plan
	Protection and enhancement of aggregates recycling facilities	Croydon Council	The South London Waste Partnership will be guided by the South London Waste Plan DPD Applications made outside of this process will be subject to policy in the Croydon Local Plan 2018 and South London Waste Plan DPD	<del>2011-36</del> 2019-2039	Purley	Review policy in Croydon Local Plan 2018

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
SP7 - Green Grid	Improved access and links between and through green spaces. Deliver the All London Green Grid through development of the London Downlands and Wandle Valley Green Grid Area Frameworks Accessible open spaces.	Croydon Council GLA Other local authorities City of London Natural England South London Partnerships London Wildlife Trust Groundwork Wandle Valley Forum Wandle Valley Regional Park Trust Wandle Trust The Environment Agency National Trust Thames Water Historic England Sustrans Downland Countryside Management Project Developers Landowners	Croydon Local Plan's Detailed Policies and Proposals  Croydon Council will work with partners to progress work on the Downlands and Wandle Valley Green Grid Area Frameworks  Development management processes, masterplans, capital funding, planning obligations and Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018, Downlands and Wandle Valley Green Grid Area Frameworks, the Biodiversity Action Plan and internal Development Management processes

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Improve the quality, function and offer of open spaces across the borough	Croydon Council City of London Voluntary Sector Partners Private Sector Partners Landowners	Croydon Local Plan's Detailed Policies and Proposals  Masterplans, capital funding, planning obligations and Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018
	Street tree planting and installation of green roofs/ walls to assist urban cooling and new publicly accessible open spaces	Croydon Council Developers Transport for London Voluntary Sector Partners Private Sector Partners Landowners	Croydon Local Plan's Detailed Policies and Proposals  Requirements for BREEAM will assist the delivery of this policy  Transport for London Local Implementation Plans  Public Realm Framework	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018  Review Design/ Landscape Guidance

	<p>Protection and enhancement of sites of biological and geological diversity.</p> <p>Improved quality of current sites through habitat management.</p> <p>Increase in size of wildlife areas of existing sites.</p> <p>The creation of new areas for wildlife.</p> <p>Reduction in the pressure on sensitive wildlife sites by improving the buffer areas around sites and the naturalisation of landscapes.</p>	<p>Croydon Council GLA City of London Natural England South London Partnerships London Wildlife Trust Groundwork Wandle Valley Forum Wandle Valley Regional Park Trust Wandle Trust The Environment Agency National Trust Thames Water Historic England Downland Countryside Management Project Developers Landowners 'Friends of' Group British Trust of Conservation Volunteers</p>	<p>Croydon Local Plan's Detailed Policies and Proposals</p> <p>Development management processes, masterplans, capital funding, planning obligations, Community Infrastructure Levy and projects within the emerging Biodiversity Action Plan</p>	<p><del>2011-36</del> 2019-2039</p>	<p>All Places</p>	<p>Review Croydon Local Plan 2018, Downlands and Wandle Valley Green Grid Area Frameworks, the Biodiversity Action Plan and internal Development Management processes</p>
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	<p>Protection and enhancement of allotments, community gardens, green spaces, and woodland.</p> <p>Food growing, tree planting and forestry including the temporary utilisation of cleared sites.</p> <p>Incorporation of growing spaces at multiple floor levels, including edible planting in residential schemes.</p> <p>Flexible landscaping so that spaces may be adapted for growing opportunities.</p>	<p>Croydon Council GLA City of London Natural England South London Partnerships London Wildlife Trust Groundwork Wandle Valley Forum Wandle Valley Regional Park Trust Wandle Trust The Environment Agency National Trust Downland Countryside Management Project Developers Landowners 'Friends of' Groups British Trust of Conservation Volunteers Allotment Societies</p>	<p>Croydon Local Plan's Detailed Policies and Proposals</p> <p>Capital Growth initiative, capital funded projects, Community Infrastructure Levy, the development management process, masterplans and projects within the emerging Biodiversity Action Plan</p>	<p>2011-2012 (Capital Growth)</p> <p><del>2011-36</del> 2019-2039</p>	<p>All Places</p>	<p>Review Croydon Local Plan 2018, Downlands and Wandle Valley Green Grid Area Frameworks, the Biodiversity Action Plan and internal Development Management processes</p>
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Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
SP8 - Transport and Communication	Enhancement of the borough's sub-regional transport role	Croydon Council Developers Transport for London Network Rail Landowners Developers Neighbouring local authorities	Croydon Opportunity Area Planning Framework  Croydon Local Plan's Detailed Policies and Proposals  Local Implementation Plan  Capital Funded Projects  Masterplans  Planning Obligations  Community Infrastructure Levy  Influencing national rail policy	<del>2011-36</del> 2019-2039	Croydon Opportunity Area	Review Croydon Local Plan 2018 and Opportunity Area Planning Framework

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
			Input into Rail Utilisation Study			
	Management of urban growth to high PTAL areas and co-locating facilities in order to reduce the need to travel	Croydon Council Transport for London Landowners Developers Neighbouring local authorities	Croydon Opportunity Area Planning Framework  Croydon Local Plan's Detailed Policies and Proposals	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018
	Improvement in the borough's Wi-Fi, fibre optic broadband and mobile broadband	Croydon Council Tele-communications Suppliers Utilities Providers Landowners Developers	In partnership with private investors, utilities providers and tele-communication partners	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018 and Opportunity Area Planning Framework

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Improved permeability, connectivity and way finding with enhanced crossings, footpaths, strategic walking routes and links through green spaces	Croydon Council Developers Transport for London Neighbouring local authorities	Croydon Opportunity Area Planning Framework  Croydon Local Plan's Detailed Policies and Proposals  Masterplans  Local Implementation Plan  Capital Funded Projects  Planning Obligations  Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018 and Opportunity Area Planning Framework

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Accessible, safe, and convenient direct routes to transport interchanges, schools and community facilities	Croydon Council Developers Landowners Transport for London Network Rail Neighbouring local authorities	Croydon Opportunity Area Planning Framework  Croydon Local Plan's Detailed Policies and Proposals  Masterplans  Local Implementation Plan  Capital Funded Projects  Planning Obligations  Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018 and Opportunity Area Planning Framework

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Enhanced and expanded cycle network with new routes through development sites Segregated/ priority cycle lanes	Croydon Council Transport for London Sustrans Developers Network Rail GLA Neighbouring local authorities	All London Green Grid Area Frameworks including Green Grid projects  Opportunity Area Planning Framework  Croydon Local Plan's Detailed Policies and Proposals  Local Implementation Plan  Capital Funded Projects  Planning Obligations  Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018 and Opportunity Area Planning Framework, East/West Croydon Masterplans, and Downlands and Wandle Valley Green Grid Area Frameworks

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	<p>Cycle alighting and parking at public transport interchanges including cycle hubs at East and West Croydon stations</p> <p>Improved cycle facilities at the borough's schools, colleges and railway stations</p>	<p>GLA Croydon Council Transport for London Developers Landowners Network Rail</p>	<p>Croydon Local Plan's Detailed Policies and Proposals</p> <p>Local Implementation Plan</p> <p>Opportunity Area Planning Framework</p> <p>Capital Funded Projects</p>	<p><del>2011-36</del> 2019-2039</p>	<p>All Places</p>	<p>Review Croydon Local Plan 2018</p>

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	<p>Extra capacity on the Tram network and reduced congestion Promotion of extensions of Tramlink to Streatham, Brixton, Tooting, Bromley, Sutton, and Crystal Palace</p>	<p>Croydon Council GLA Transport for London Neighbouring local authorities</p>	<p>Relieving bottlenecks on the network and increased frequencies of tram services</p> <p>Extra carriage in each tram</p> <p>Working with Transport for London to facilitate extension of tram network including safeguarding of land</p> <p>Additional funding from Planning Obligations and Community Infrastructure Levy</p>	<p><del>2011-36</del> 2019-2039</p>	<p>Croydon Opportunity Area, Broad Green and Selhurst, Waddon, Addiscombe, South Norwood &amp; Woodside, Addington, Thornton Heath and Norbury</p>	<p>Review Croydon Local Plan 2018 and Opportunity Area Planning Framework</p>

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Improved interchange facilities, pedestrian links and increased capacity at East and West Croydon railways stations and to East Croydon and the area north for Brighton Main Line Railway Access and movement improvements in areas next to rail stations	Croydon Council Transport for London Developers Landowners Network Rail	Opportunity Area Planning Framework  Croydon Local Plan's Detailed Policies and Proposals  Local Implementation Plan  Capital Funded Projects  Planning Obligations  Community Infrastructure Levy	2011-36 2019-2039	Croydon Opportunity Area, Norbury, Thornton Heath, South Norwood & Woodside, Waddon, South Croydon, Purley, Coulsdon, Addington, Kenley & Old Coulsdon, and Sanderstead	Review Croydon Local Plan 2018 and Opportunity Area Planning Framework, and East/West Croydon Masterplans



Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	<p>New bus stops/standing at West Croydon</p> <p>Improvements to orbital bus routes</p> <p>Improved bus interchange and improvements to bus stops and stands in Croydon Opportunity Area</p>	<p>Croydon Council</p> <p>Transport for London</p> <p>Network Rail</p>	<p>Croydon Opportunity Area Planning Framework</p> <p>Croydon Local Plan's Detailed Policies and Proposals</p> <p>Masterplans</p> <p>Local Implementation Plan</p> <p>Capital Funded Projects</p> <p>Planning Obligations</p> <p>Community Infrastructure Levy</p>	<p><del>2011-36</del></p> <p>2019-2039</p>	<p>Croydon Opportunity Area, Broad Green &amp; Selhurst, Waddon, Addiscombe, South Croydon, Norbury, Thornton Heath, Purley and Coulsdon</p>	<p>Review Croydon Local Plan 2018 and Opportunity Area Planning Framework, and East/West Croydon Masterplans</p>

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Electric Vehicle infrastructure	Croydon Council Transport for London Neighbouring local authorities	Croydon Local Plan's Detailed Policies and Proposals  Croydon Capital Funded Projects  Planning Obligations  Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018
	Improved taxi ranks/waiting and coach parking interchanges at East and West Croydon	Network Rail Developers Landowners	Croydon Opportunity Area Planning Framework  Masterplans	<del>2011-36</del> 2019-2039	Croydon Opportunity Area	Review Croydon Local Plan 2018  Review Opportunity Area Planning Framework

Policy (Where we want to be)	What will be delivered	Who will deliver it	How it will be delivered	When it will be delivered	Where it will be delivered	What we will do if the policy is not being delivered
	Improved conditions for pedestrians, cyclists, public transport and freight at pressure points in the street network, including key junctions	Croydon Council Transport for London Sustrans Network Rail	Croydon Opportunity Area Planning Framework  Croydon Local Plan's Detailed Policies and Proposals  Masterplans  Local Implementation Plan  Capital Funded Projects  Planning Obligations  Community Infrastructure Levy	<del>2011-36</del> 2019-2039	All Places	Review Croydon Local Plan 2018

## Appendix 9 – Monitoring framework

Policy (Where we want to be)	The outcomes that we want	The indicators we will use to monitor the desired outcomes	The targets for the outcomes	The Places that the targets relate to
SP1 - The Places of Croydon	<del>Adopted DPDs covering Detailed Policies for development management and Proposals for site allocations</del>	<del>Adoption date of the Croydon Local Plan 2018</del>	By December 2017	All Places
	New development in the borough to contribute to enhancing a sense of place and improving the character of the area	The percentage of approved applications for major developments in the borough where Policy SP1.2 is cited as a reason for granting permission	100%	
	Growth in homes, jobs and services will be directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further sustainable infrastructure investment within the plan period to 2036	Net additional development (either unit or floor space) by use class and by Place	There should be a higher proportion of growth in Croydon Opportunity Area, including approximately a third of the borough's residential growth with Waddon, Purley, Broad Green & Selhurst, Thornton Heath and Coulsdon accommodating medium and moderate residential growth	

Policy (Where we want to be)	The outcomes that we want	The indicators we will use to monitor the desired outcomes	The targets for the outcomes	The Places that the targets relate to
SP2 - Homes	32,890 <del>41,800</del> new homes between 2016 and 2036	The number of new homes completed in the borough	Annual average of 1,600 <del>2079</del> homes between 2016 and 2036 with at least 16,000 completed by 2026	All Places
		Completion of the Croydon Local Plan's Detailed Policies and Proposals	Completion of the Croydon Local Plan's Detailed Policies and Proposals allocating land for at least 6,970 <del>xxxxx</del> homes outside of Croydon Opportunity Area and 10,760 <del>xxxxx</del> homes within the Opportunity Area	All Places
	A choice of homes being built in the borough to address the borough's need for affordable homes	The number of new homes completed in the borough by tenure	25% of all new homes to be social or affordable rent	All Places
			15% of all new homes to be intermediate shared ownership, intermediate rent or starter homes	All Places

Policy (Where we want to be)	The outcomes that we want	The indicators we will use to monitor the desired outcomes	The targets for the outcomes	The Places that the targets relate to
		Amount of money from commuted sums received and number of affordable homes provided from this income	The total sum of affordable homes provided on site, on donor sites and via commuted sums should result in the equivalent of the borough-wide minimum provision on all sites with 10 or more new homes	All Places
	A choice of homes being built in the borough to address the borough's need for homes of different sizes	The number of new homes completed in the borough by size of home	30% of new homes to have 3 or more bedrooms	All Places
	New homes meet the needs of the residents over a lifetime	The percentage of homes achieving the minimum standards set out in the Mayor's Housing Supplementary Planning Guidance and National Technical Standards (2015) (or equivalent)	100%	All Places
		The percentage of wheelchair homes completed in the borough	10%	All Places
	Meeting the need for gypsy and traveller pitches	The number of authorised pitches for Gypsies and Travellers in the borough	36 authorised pitches for Gypsies and Travellers by 2033	All Places

Policy (Where we want to be)	The outcomes that we want	The indicators we will use to monitor the desired outcomes	The targets for the outcomes	The Places that the targets relate to
SP3 - Employment	Innovation and investment will be encouraged	The number of Innovation (based on Standard Industrial Classification (SIC) code with exact definition to be developed), jobs in the borough	An increase of 5% by 2021 and 10% by 2031 from the 2012 baseline	All Places
	Strong protection for the borough's stock of industrial/warehousing premises	The amount of floor space in industrial/warehousing use in Tiers 1 to 4 Locations	No net loss of floor space for industrial and warehousing activity across the 4 tiers – greater flexibility in Tier 4 and Tier 2 will lead to loss of industrial/warehousing floor space. This should be offset by Tier 3 additions and by intensification in Tier 1.	All Places
	Growth and expansion of the creative and cultural industries sector in Croydon	The number of Creative & Cultural Industries (detailed SIC code definition to be developed) jobs in the borough	An increase of 5% by 2021 and 10% by 2031 from the 2012 baseline	All Places
		Delivery of the Creative & Cultural Industries and Enterprise Centres	All 4 Enterprise Centres to be delivered by 2021 to enable growth needed to reach 2031 target	Croydon Opportunity Area, Crystal Palace & Upper Norwood, Purley, South Norwood & Woodside

Policy (Where we want to be)	The outcomes that we want	The indicators we will use to monitor the desired outcomes	The targets for the outcomes	The Places that the targets relate to
	Remodelled Fairfield Halls	Completion of the remodelling of Fairfield Halls	Fairfield Halls remodelled by 2020	Croydon Opportunity Area
	The temporary occupation of a number of empty buildings and cleared sites by creative industries and cultural organisations	The number of empty buildings and cleared sites used by creative industries and cultural organisations in Croydon Opportunity Area	By 2021 and thereafter, at least 10% of vacant commercial floor space and at least one cleared development site to be in use by creative industries and/or cultural organisations	All Places
	Development of new and refurbished office floor space in Croydon Metropolitan Centre and District Centres	Amount of vacant Class B1 floor space within Croydon Opportunity Area and the District Centres	Vacancy level no greater than 12% by 2021 and no greater than 8% by 2031 and thereafter	Croydon Opportunity Area, Addington, Addiscombe, Coulsdon, Crystal Palace & Upper Norwood, Norbury, Purley, Selsdon, South Norwood & Woodside, and Thornton Heath
		Net increase in office floor space by 2031	Up to <del>xxxxx</del> 92,000m <sup>2</sup> by 2031 new and refurbished floor space in Croydon Metropolitan Centre and <del>xxxxx</del> 7,000m <sup>2</sup> new and refurbished floor space in District Centres	
	Retail vitality and viability of Croydon Metropolitan Centre, District and Local Centres	Amount of vacant Class A1 to A5 floor space within District and Local Centres	Vacancy level no greater than 12% by 2021 and no greater than 8% by 2031 and thereafter	All Places except Kenley & Old Coulsdon and Waddon



Policy (Where we want to be)	The outcomes that we want	The indicators we will use to monitor the desired outcomes	The targets for the outcomes	The Places that the targets relate to
SP4 - Local Character	Development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities	The percentage of approved applications for major developments in the borough where Policy SP4.1 or Policy SP4.2 are cited as a reason for granting permission	100%	All Places
		The percentage of approved applications for major developments in the Croydon Opportunity Area where Policy SP4.4 is cited as a reason for granting permission	100%	Croydon Opportunity Area
	Tall buildings to take account of local area	The percentage of approved applications for tall buildings in the borough where Policies SP4.5 and SP4.6 are cited as a reason for granting permission	100%	All Places
	Establishing a public realm hierarchy to guide delivery of public realm improvements	Completion of guidelines	Completion of public realm framework guidelines setting out hierarchy to direct public realm improvements	
	Establishing guidelines for materials and layout for the public realm		Completion of guidelines on materials and layouts for public realm improvements	

<b>Policy (Where we want to be)</b>	<b>The outcomes that we want</b>	<b>The indicators we will use to monitor the desired outcomes</b>	<b>The targets for the outcomes</b>	<b>The Places that the targets relate to</b>
	Resist the loss of, strengthen the protection of and promote improvements to heritage assets and their settings	Changes to designation of heritage assets	No net loss	
		Change in number of heritage assets at risk in borough	No increase in number of heritage assets at risk in borough	
SP5 - Community Facilities and Education	Provision for sufficient places for children's education in the borough	Capacity of pre-school, primary and secondary schools/centres compared to the need for places for children's education	A 5% excess of capacity over need at all times	All Places
	The temporary occupation of a number of empty buildings and cleared sites by community organisations	The percentage of empty buildings in new developments or changes of use of cleared sites used by community organisations in the borough	Net increase in percentage of empty buildings in use for community organisations	All Places
SP6 - Environment and Climate Change	Reduction in CO <sub>2</sub> emissions	Development of a district heating network	Development of a district heating network in Croydon Metropolitan Centre	Croydon Opportunity Area
		% of major developments incorporating a site-wide communal heating system and network connection	100%	All Places

<b>Policy (Where we want to be)</b>	<b>The outcomes that we want</b>	<b>The indicators we will use to monitor the desired outcomes</b>	<b>The targets for the outcomes</b>	<b>The Places that the targets relate to</b>
	High standards of sustainable design and construction	Percentage of dwellings and commercial buildings meeting the new National Technical Standards (2015) and London Plan requirements (or equivalent) or BREEAM 'Excellent'	100% of new development to achieve the new National Technical Standards (2015) and London Plan requirements (or equivalent) or BREEAM 'Excellent'	All Places
	Sustainable drainage systems (SuDS) for all development	Percentage of new dwellings and commercial buildings meeting the requirement for SuDS to be installed	100% of new dwellings and commercial buildings to meet the requirement for SuDS to be installed	All Places
	Clean aquifers and groundwater	Number of developments granted permission against Environment Agency advice per year	All new development to comply with Environment Agency Source Protection Zone policy	All Places
	Reestablishment of waterways	Metres of de-culverted waterways per year	Net increase in de-culverted waterways	Norbury, Thornton Heath, Waddon, Croydon Opportunity Area, Kenley & Old Coulsdon and Purley
	Improved adaptation to flood events	Number of flood storage schemes and highways improvement schemes implemented per year	Establishment of safe corridors and flood storage space in the borough's Critical Drainage Areas (as identified in the Surface Water Management Plan)	All Places

<b>Policy (Where we want to be)</b>	<b>The outcomes that we want</b>	<b>The indicators we will use to monitor the desired outcomes</b>	<b>The targets for the outcomes</b>	<b>The Places that the targets relate to</b>
	Moving towards self-sufficiency in managing waste	Diversion of biodegradable waste from landfill	Working towards the Mayor's zero municipal waste to landfill target by 2025	All Places
	Increased recycling rates	Recycling and composting of household waste and recovery of municipal waste	Working towards the Mayor's zero waste to landfill target by 2031 Recycling targets will be reviewed for the period 2020-2031 to be in conformity with local, regional and national targets	All Places
SP7 - Green Grid	Improved pedestrian, cycle and equestrian access between and through green spaces	Number of new Green Grid links established per year	Net gain each year	All Places
	Urban greening (including green roofs and walls) to ameliorate the urban heat island effect	Number of new street trees planted in the public highway in Croydon, Square metres of new green roofs/walls installed per year	Reduction in the urban Heat Island Effect by meeting Mayoral targets: Increase tree cover by 5% by 2025 from 2009 levels	All Places
	Enhanced biodiversity and geological diversity Expanded and improved wildlife areas and the	Percentage of borough designated as deficient in access to nature	Maintain baseline populations/coverage whilst seeking increases	All Places

Policy (Where we want to be)	The outcomes that we want	The indicators we will use to monitor the desired outcomes	The targets for the outcomes	The Places that the targets relate to
	creation of new wildlife areas	Populations of selected species/Biodiversity Action Plan priority species Plant diversity/Biodiversity Action Plan priority habitats – Total extent and condition Protected areas - Total extent of protected areas and condition of Sites of Special Scientific Interest		
	Enhanced allotments, community gardens, and woodland	New growing spaces provided per year (including new allotment plots and growing areas provided in new development)	All residents to be within 15 minute walk time of good quality provision (Minimum site sizes: 0.4ha or 0.025ha per plot)	All Places
	Increases in local food growing, tree planting and forestry		Total of 198.65ha required over the plan period	
	Growing areas, edible planting and flexible landscaping designed into new developments to increase food production			
SP8 - Transport and Communication	Reduction in travel through development concentrated in high PTAL areas	Proportion of new development by use class and floor space or unit numbers by PTAL area	Majority of new development to be located in PTALs 4, 5, 6a or 6b	All Places

<b>Policy (Where we want to be)</b>	<b>The outcomes that we want</b>	<b>The indicators we will use to monitor the desired outcomes</b>	<b>The targets for the outcomes</b>	<b>The Places that the targets relate to</b>
	Fast and reliable Wi-Fi, fibre optic broadband and mobile broadband	Bandwidth of broadband in Croydon Metropolitan Centre and District Centres	Bandwidth comparable to the City, Canary Wharf and Stratford	Croydon Opportunity Area, Addington, Addiscombe, Coulsdon, Crystal Palace & Upper Norwood, Norbury, Purley, Selsdon, South Norwood & Woodside, and Thornton Heath
	Improved conditions for walking and enhanced pedestrian experience	Mode share (main mode of trip) by borough of residence (% of residents' trips by main mode)	Top 10 of the 33 London boroughs	All Places
		Number of improved crossings in Croydon Opportunity Area, District Centres and around schools	An increase year on year	
		Number of pedestrian streets created from underused side streets and delivery lanes in Croydon Opportunity Area and District Centres	An increase year on year	Croydon Opportunity Area, Addington, Addiscombe, Coulsdon, Crystal Palace & Upper Norwood, Norbury, Purley, Selsdon, South Norwood & Woodside and Thornton Heath
	New and improved cycle infrastructure	Cycling trips as percentage of all London residents' trips by borough origin	Mayor's objective of a 400% increase in cycle journeys	All Places

<b>Policy (Where we want to be)</b>	<b>The outcomes that we want</b>	<b>The indicators we will use to monitor the desired outcomes</b>	<b>The targets for the outcomes</b>	<b>The Places that the targets relate to</b>
		Mode share (main mode of trip) by borough of residence (% of residents' trips by main mode)		
		Establishment of cycle hubs at East and West Croydon stations	New cycle hubs at East and West Croydon stations	Croydon Opportunity Area
	Extra capacity on Tram network and Tram extensions to Streatham, Brixton, Tooting, Bromley, Sutton and Crystal Palace	Tram capacity improvement projects per year	Increase in tram capacity per year	Croydon Opportunity Area, Broad Green & Selhurst, Crystal Palace & Upper Norwood, Waddon, Addiscombe, South Norwood and Woodside, Addington, Thornton Heath and Norbury
		Tram extensions to Streatham, Brixton, Tooting, Bromley, Sutton, and Crystal Palace	Opening of extension	
		Mode share (main mode of trip) by borough of residence (% of residents' trips by main mode)	Top 10 of the 33 London boroughs	
	Improvements to bus services in Croydon	New bus stand and stopping facilities at West Croydon	Introduction of new bus stand and stopping facilities	Croydon Opportunity Area
		Estimated total annual vehicle delay on Transport for London's network of interest	Year on year reduction and top 10 of the 33 London boroughs	All Places
		Mode share (main mode of trip) by borough of residence (% of residents' trips by main mode)	Top 10 of the 33 London boroughs	

Policy (Where we want to be)	The outcomes that we want	The indicators we will use to monitor the desired outcomes	The targets for the outcomes	The Places that the targets relate to
	Improve air quality and decarbonise private transport	Number of electric vehicle charging points available in the borough	Increase in electric charging points each year	All Places
		Greenhouse gas emissions for transport, showing principal sources and per capita emissions for resident population	Mayor's 60% CO <sub>2</sub> emissions reduction over 1990 levels by 2025, moving towards the UK target of 80% by 2050	
	Improved conditions for all modes at pressure points in the street network and at key junctions	Average vehicle speeds (flow-weighted) during the weekday morning peak on locally managed 'A' roads by local authority	Top 10 of the 33 London boroughs	All Places



## ~~Appendix 10 – Saved Unitary Development Plan policies~~

~~Upon its adoption in 2013 the Croydon Local Plan: Strategic Policies replaced some of the saved policies in the Unitary Development Plan. The tables below set out which policies were replaced by the Strategic Policies in 2013, which are replaced by the Croydon Local Plan 2018, and which are being deleted and Croydon Council will use the National Planning Policy Framework and the London Plan instead.~~

## Sustainable Development

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
SP1	Sustainable Development	SP1 SP2 SP3 SP4 SP5 SP6 SP7 SP8		

## Urban Design

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
SP3	Design standards	SP4		
UD1	High Quality and Sustainable Design	SP4		
UD2	Layout and Sitting of New Development		DM10	
UD3	Scale and Design of New Buildings		DM10	
UD4	Shopfront Design		DM11	

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
UD5	Advertisements		DM10 DM12	
UD6	Safety and Security		DM10	
UD7	Inclusive Design		DM10	
UD8	Protecting Residential Amenity		DM10	
UD9	Wooded Hillside and Ridges		DM10	
UD10	High Buildings	SP4		
UD11	Views and Landmarks		DM10 DM17	
UD12	New Street Design and Layout		DM10	
UD13	Parking Design and Layout		DM10 DM29 DM30	
UD14	Landscape Design		DM10 DM28	
UD15	Refuse and Recycling Storage		DM13	
UD16	Public Art		DM14	

## Urban Conservation and Archaeology

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
UC1	Designation of Conservation Areas	SP4		
UC2	Control of Demolition in Conservation Areas		DM18	
UC3	Development Proposals in Conservation Areas		DM18	
UC4	Changes of Use in Conservation Areas		DM18	
UC5	Local Areas of Special Character		DM18	
UC8	Use of Listed Buildings		DM18	
UC9	Buildings on the Local List		DM18	
UC10	Historic Parks and Gardens		DM18	
UC11	Development Proposals on Archaeological Sites		DM18	
UC13	Preserving Locally Important Remains		DM18	
UC14	Enabling Development		DM18	

## Open Land and Outdoor Recreation

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
SP5	Metropolitan Green Belt and Metropolitan Open Land	SP7		
SP7	Provision of new and enhanced open space in the borough	SP7		
RO1	Maintaining open character of Metropolitan Green Belt and Metropolitan Open Land		DM26	
RO2	Control of Development Associated with Residential Properties in Metropolitan Green Belt and Metropolitan Open Land		DM26	
RO3	Changes of Use of Existing Buildings in Metropolitan Green Belt and Metropolitan Open Land		DM26	
RO4	Conversions of buildings to residential use in Metropolitan Green Belt and Metropolitan Open Land		DM26	

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
RO5	Land Use Objectives in Metropolitan Green Belt and Metropolitan Open Land	SP7		
RO6	Protecting the Setting of the Metropolitan Green Belt and Metropolitan Open Land		DM26	
RO7	Cane Hill Hospital Site		DM37	
RO8	Protecting Local Open Land			✓
RO9	Education Open Space			✓
RO10	Education Open Space			✓
RO11	Improving access to Local Open Land	SP7		
RO12	Local Open Land in residential schemes			✓
RO13	Green Corridors and Green Chains	SP7		
RO15	Outdoor Space and Recreation		DM26	
RO16	Selhurst Park		DM20	

## Nature Conservation

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
NC1	Sites of Nature Conservation Importance		DM27	
NC2	Specially Protected and Priority Species and their Habitats		DM27	
NC3	Nature Conservation Opportunities throughout the Borough		DM27	
NC4	Woodland, Trees and Hedgerows		DM27 DM28	

## Environmental Protection

UDP Policy	Title	Replaced in 2012 by the South London Waste Plan	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
SP11	Waste Planning		SP6		
SP12	Minerals Planning		SP6		
SP13	Energy		SP6		

UDP Policy	Title	Replaced in 2012 by the South London Waste Plan	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
EP1	Control of Potentially Polluting Uses			DM23	
EP2	Land Contamination —Ensuring land is suitable for development			DM24	
EP3	Land Contamination —Development on land known to be contaminated			DM24	
EP7	Blue Ribbon Network		SP6		
EP8	New Waste Management Facilities	WP4 WP5 WP6 WP7 WP9			
EP9	Loss of Existing Waste Management Facilities	WP3			
EP11	Hazardous Installations				✓
EP14	Transport of Minerals		SP6		
EP15	Renewable Energy				✓



UDP Policy	Title	Replaced in 2012 by the South London Waste Plan	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
EP16	Incorporating Renewable Energy into New Developments				✓

### Transport

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
SP14	Transport	SP8		
T2	Traffic Generation from Development		DM29	
T3	Pedestrians	SP8		
T4	Cycling		DM29	
T5	Major Developments at or near Public Transport Interchanges	SP8		
T6	Development at Railway Stations			✓
T8	Car Parking Standards in New Development		DM30	

**Economic Activity**

<b>UDP Policy</b>	<b>Title</b>	<b>Replaced in 2013 by Strategic Policy</b>	<b>Replaced in 2018 by Policy</b>	<b>Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead</b>
EM1	Offices and Other Business Uses	SP3		
EM2	Industry and Warehousing in Employment Areas		DM9	
EM3	Industry and Warehousing outside Employment Areas			✓
EM4	Offices outside Croydon Metropolitan Centre and Town Centres		DM8	
EM5	Retaining Industrial and Warehousing Uses Outside Designated Locations			✓
EM6	Redevelopment or Extension for Industrial or Warehousing Uses Outside Employment Areas			✓
EM7	Redevelopment or Extension for Offices outside Croydon Metropolitan Centre and the Town, District and Local Centres		DM8	

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
EM8	Gane Hill Major Development Site	SP3		

### Housing

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
SP20	The Design of Residential Developments	SP2		
SP24	Encouraging Mixed Use Developments	SP2		
SP22	Meeting the Housing Needs of Everyone in the Borough	SP2		
H1	Retention of Residential Uses		SP2	
H2	Supply of New Housing			✓
H3	Planning Commitments and Identifying Housing Sites		DM34 to DM49	
H4	Dwelling Mix on Large Sites	SP2		

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
H5	Back Land and Back Garden Development		DM10	
H7	Conversions		DM1	
H8	Conversion of Dwellings to Non-Self-Contained Units			✓
H11	Retaining Small Houses		DM1	
H12	Residential Care Homes		DM3	
H13	Affordable Housing	SP2		
H15	Accommodation and Pitches for Gypsies and Travellers	SP2		

### Shopping

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
SH1	Retail Development in Primary Shopping Areas	SP3	DM4	
SH3	Control of Retail Units outside Primary Shopping Areas		DM4 DM8	

<b>UDP Policy</b>	<b>Title</b>	<b>Replaced in 2013 by Strategic Policy</b>	<b>Replaced in 2018 by Policy</b>	<b>Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead</b>
SH4	Retail Vitality within Main Retail Frontages and Shopping Area Frontages		DM4	
SH5	Retail Vitality within Secondary Retail Frontages		DM4	
SH6	Retail Vitality within Shopping Parades		DM6	
SH7	Loss of Convenience Shops			✓

#### **Hotels and Tourism**

<b>UDP Policy</b>	<b>Title</b>	<b>Replaced in 2013 by Strategic Policy</b>	<b>Replaced in 2018 by Policy</b>	<b>Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead</b>
HT1	Visitor Accommodation		DM8	

## Leisure and Indoor Recreation

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
LR2	Development of Leisure and Indoor Sports, Arts, Culture and Entertainment Facilities outside of Croydon Metropolitan Centre and town and district centres		DM8	
LR3	Retaining Existing Leisure and Indoor Sports, Arts, Culture and Entertainment Facilities			✓

## Community Services

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
CS1	Development of New Community Facilities		DM19 DM21 DM22	
CS2	Retaining Existing Community Facilities		DM19 DM21	

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
CS3	Community Facilities in Mixed-Use Developments	SP5		
CS5	Capacity of Off-Site Service Infrastructure			✓
CS6	Tele-communications		DM33	
CS7	Surplus Land			✓

#### Croydon Metropolitan Centre

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
SP28	Regeneration of Croydon Metropolitan Centre		DM38	
CMC1	The Croydon Gateway Site	SP1 SP2 SP3 SP4 SP5 SP8		
CMC2	The Fairfield Site and Adjacent Area	"		
CMC3	The Park Place Site	"		
CMC4	The West Croydon Site	"		

UDP Policy	Title	Replaced in 2013 by Strategic Policy	Replaced in 2018 by Policy	Policy deleted and the National Planning Policy Framework, London Plan and non-specific policies of the Croydon Local Plan 2018 will be used instead
CMC5	Randolph and Pembroke House site	SP1 SP2 SP3 SP8		
CMC6	11-16 Dingwall Road	SP1 SP3 SP8		
CMC7	The Porter and Sorter Public House, Cherry Orchard Road and 1-5 Addiscombe Road	SP1 SP2 SP3 SP8		
CMC8	Land at junction of College Road and George Street	-		
CMC9	Primary Shopping Area	SP3		
CMC 10	Retail Development in the Rest of Croydon Metropolitan Centre	SP3		
CMC 11	Croydon Metropolitan Centre Pedestrian Links	SP1 SP8		
CMC 12	Active Frontages for Pedestrian Links	SP4		
CMC 13	Improvements to Public Transport	SP1 SP8		
CMC 14	High Buildings	SP4		
CMC 15	Views and Landmarks	SP1 SP4		
CMC 16	Croydon Skyline	SP4 SP5		



# Appendix 11 - Housing Trajectory

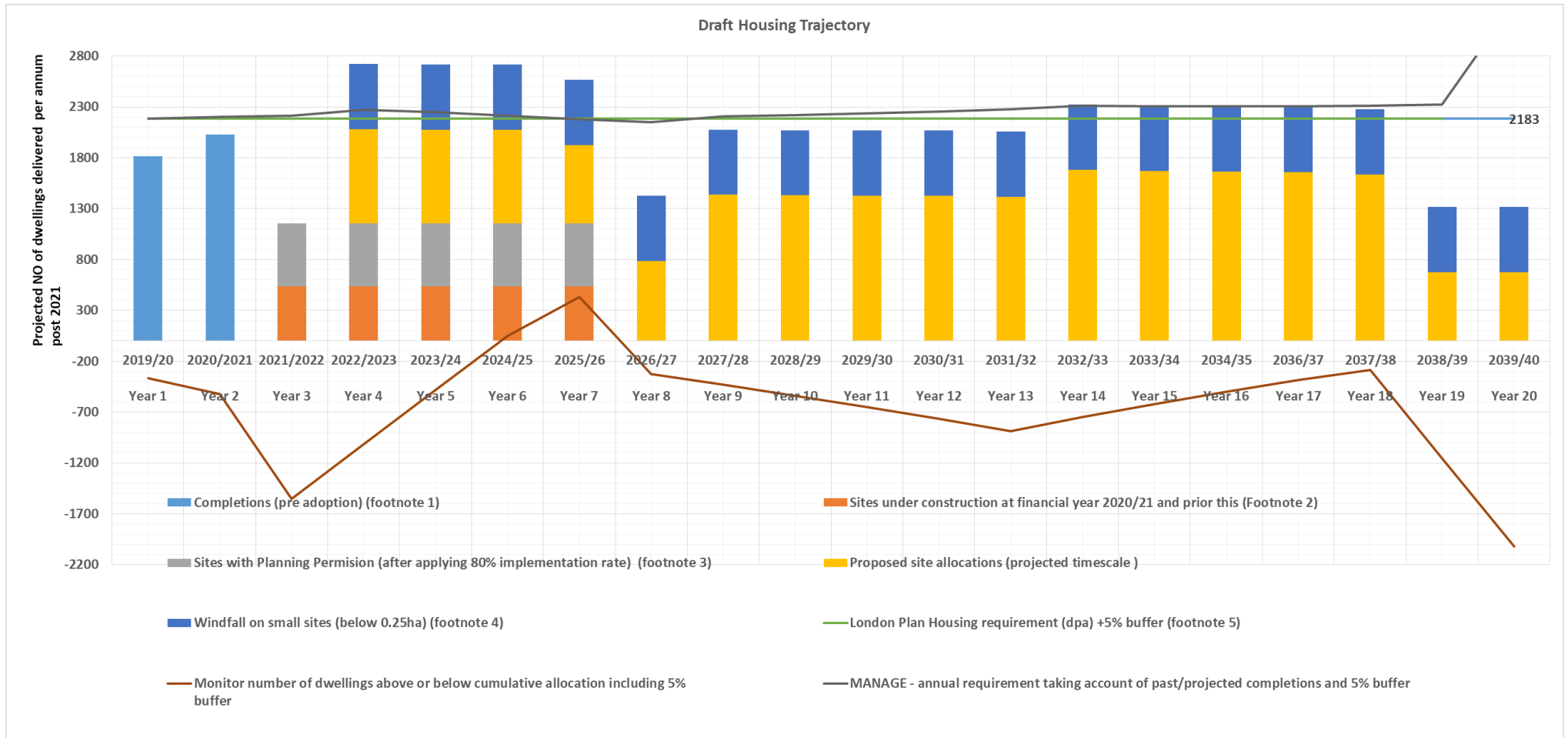
Housing Supply [To be factually updated at submission]

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20		
Source of Supply	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2036/37	2037/38	2038/39	2039/40	Total	
Completions (pre adoption) (footnote 1)	1815	2029																				
Sites under construction at financial year 2020/21 and prior this (Footnote 2)			537	537	537	537	537															
Sites with Planning Permission (after applying 80% implementation rate)			616	616	616	616	616															
Proposed site allocations (projected timescale )				928	922	920	770	785	1436	1431	1430	1430	1418	1681	1668	1665	1659	1637	676	675	21133	
Windfall on small sites (below 0.25ha) (footnote 4)				641	641	641	641	641	641	641	641	641	641	641	641	641	641	641	641	641	10897	
London Plan Housing requirement (dpa) +5% buffer (footnote 5)	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	2183	43659
total housing capacity of all supply per annum (footnote 6)	1815	2029	1153	2722	2716	2714	2564	1426	2077	2072	2071	2071	2059	2322	2309	2306	2300	2278	1317	1316	41639	
Cumulative housing capacity	1815	3844	4997	7719	10435	13150	15714	17140	19217	21289	23360	25431	27490	29812	32121	34427	36727	39006	40323	41639		
Cumulative target	2183	4366	6549	8732	10915	13098	15281	17464	19647	21830	24013	26195	28378	30561	32744	34927	37110	39293	41476	43659		
Monitor number of dwellings above or below cumulative allocation including 5% buffer	-368	-522	-1552	-1013	-480	52	433	-324	-429	-540	-652	-765	-888	-749	-623	-500	-383	-287	-1153	-2020		
MANAGE - annual requirement taking account of past/projected completions and 5% buffer	2183	2202	2212	2274	2246	2215	2179	2150	2210	2222	2237	2255	2279	2310	2308	2308	2308	2311	2327	3336		

## Footnotes

1. This is based on provisional data provided of completions for the April 2019 to March 2021. This will be subject to change at a future date, based on verified data from GLA.
2. This based on provisional site start data provided for April 2020 to March 2021. Verified site start data for April 2019 to March 2020 needs to be included. Provisional starts data for older permissions between 2016 -19 (excluded 2018/19 financial year) was used with older permissions sifted out based on officer knowledge and soundness. Provisional data will be subject to change at a future date, based on updated verified data from GLA.
3. Provisional data of site with permissions was used for period between April 2019 to April 2020 and will be subject to change in the future, based on verified data from GLA. Data for permissions for period from April 2020 and March 2021 (and after this) needs to be included. This also included data for extant permissions from 2018/19 onwards until March 2020 (FYR 2019/20), after an officer soundness sift. An 80% implementation rate was applied based on past completion trends data of permissions.
4. This was based on a London Plan Policy H2 small sites target of 641 (\*17 years) dwellings per annum. This is not based on past trends of windfall completions on sites below 0.25ha, which indicatively suggest a supply of 750 per annum. No assumptions have been applied to take account of potential windfall sites above 0.25ha.
5. In line with para 74a of the NPPF (2021) , a 5% buffer was applied to the London Plan target, to ensure choice and competition in the market for potential housing land supply.
6. Further sites may be included into the future supply from a Brownfield Land Register.

# Housing Trajectory – Plan monitor manage



<b>REPORT TO:</b>	<b>LICENSING COMMITTEE</b> <b>23 NOVEMBER 2021</b>
<b>SUBJECT:</b>	<b>THE GAMBLING ACT 2005 – REVIEW OF LONDON BOROUGH OF CROYDON STATEMENT OF PRINCIPLES</b>
<b>LEAD OFFICER:</b>	<b>Interim Corporate Director – Sustainable Communities, Regeneration and Economic Recovery</b>
<b>WARDS:</b>	<b>ALL</b>
<b>CORPORATE PRIORITY/POLICY CONTEXT:</b> The Gambling Act became fully operational on 1 <sup>st</sup> September 2007. The Council has been processing applications with regard to this legislation since 21 May 2007.	
<b>FINANCIAL SUMMARY:</b> There are no direct financial implications associated with this report, save for those set out in the body of the report with regard to decision making by the licensing committee and full Council. The costs of administering the functions associated with this report will be met from existing budget.	
<b>FORWARD PLAN KEY DECISION REFERENCE NO.:</b> N/A. Not an Executive Decision.	

<p><b>1. RECOMMENDATIONS</b></p> <p>The Committee is asked to:</p> <p>1.1 Consider the comments received as part of the formal consultation on the draft Gambling Act 2005 Statement of Principles at Appendix 3 and officers' responses to those comments at Appendix 4.</p> <p>1.2 Approve the revised Statement of Principles, at Appendix 5 to this report and recommend to Full Council that the Statement of Principles be adopted by Full Council.</p>
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## **2. EXECUTIVE SUMMARY**

- 2.1 The Gambling Act 2005 (the Act) came into force on 1<sup>st</sup> September 2007 and made local authorities, as licensing authorities, responsible for the administration of licences, registrations, permits, notices and notifications under the Act.
- 2.2 Local authorities are only responsible for licensing the premises on which

gambling takes place. They are not responsible for licensing operators as this function falls to the Gambling Commission. As well as issuing premises licenses, local authorities are also responsible for issuing permits in respect of:

- Gaming machines in alcohol-licensed premises, such as pubs
- Gaming machines in members clubs
- Gaming in members clubs
- Unlicensed family entertainment centres (small stake and payout machines only)
- Prize gaming
- Occasional Use Notices
- Temporary Use Notices
- Provisional Statements

2.3 For the Committee's information, as a comparison, the following shows the current number of premises licenses, as opposed to that in 2007:

- Betting Shops – 2007 **59** – 2021 **44**
- Bingo Premises – 2007 **1** – 2021 **2**
- Adult Gaming Centres – 2007 **8** – 2021 **7**
- Family Entertainment Centres – 2007 **0** – 2021 **0**

2.4 The Council licensing team undertake inspections and enforce the conditions on these issued licences as well as permits and notices. It also registers small scale society lotteries.

2.5 In addition to processing applications and compliance/enforcement responsibilities, the Act requires each local authority to prepare and publish a Statement of Principles (the Statement) setting out how it will exercise its functions under the Act. The first London Borough of Croydon Statement of Principles was published on 3 January 2007. In each 3 year period thereafter, the Council must keep its policy under review and revise it as it considers appropriate. In any event, before the conclusion of each 3 year period, the Act requires the Council to formally consult on its Statement of Principles, revise and/or amend it and re-publish it accordingly.

2.6 The Council's Statement of Principles was variously reviewed and published in 2009, 2012, 2015 and most recently in 2018.

2.7 For the fifth statutory review, the Council must publish its revised Statement 4 weeks before the existing Statement expires on 31 January 2022 and therefore publication needs to take place no later than 31 December 2021.

### **3. DETAIL**

3.1 On 29 September 2021, as part of the formal consultation on the proposed revisions, the draft Statement of Principles was circulated to a number of stakeholders including individuals and bodies in the gambling industry, together with a covering letter which outlined the changes proposed to the current Statement. A copy of that covering letter is attached at Appendix 1.

- 3.2 The consultation period ended on 10 November 2021. A list of the individuals and bodies consulted in accordance with the statutory requirements is attached at Appendix 2.
- 3.3 Written responses were received during the consultation period. Copies are attached at Appendix 3.
- 3.4 A schedule of the specific comments made in those responses is attached at Appendix 4. This also shows where the Statement has, or has not, been changed as a result of those comments.
- 3.5 Attached at Appendix 5, and having due regard to the responses received during the consultation, is a copy of the draft, revised Statement of Principles that the Committee is recommended to approve for adoption by full Council.
- 3.6 Attached at Appendix 6 is a Glossary of Terms for the Gambling Act 2005.

#### 4. CONSULTATION

- 4.1 The timetable leading up to the Statement of Principles being republished is as follows:

DATE	ACTION
10.11.21	Deadline for consultation responses.
23.11.21	Licensing Committee
13.12.21	Full Council
31.12.21	Publication (by)

#### 5. FINANCIAL CONSIDERATIONS

- 1 **Revenue and Capital consequences of report recommendations**  
There are no direct financial implications associated with this report. This matter is being processed as part of normal duties and therefore the work associated with it is contained within the departmental budget.
- 2 **The Effect of the Decision**  
There are no direct financial implications associated with this report.
- 3 **Risks**  
There are no direct risks associated with the recommendations in this report.
- 4 **Options**  
There are no other options available to the Council.
- 5 **Savings/Future Efficiencies**  
None identified.

## **6. LEGAL CONSIDERATIONS**

- 6.1 The Solicitor to the Council comments that Section 349 of the Gambling Act 2005 (“the Act”) requires the Council as Licensing Authority to review and then publish its Statement of Principles at least every three years. In determining what revisions may be appropriate, it must consider any comments made during the formal consultation period in the context of the Act, and any guidance or regulations made under it.
- 6.2 In preparing a statement or revision as required by the Act a licensing authority shall consult the chief officer of police for the authority's area, one or more persons who appear to the authority to represent the interests of persons carrying on gambling businesses in the authority's area, and one or more persons who appear to the authority to represent the interests of persons who are likely to be affected by the exercise of the authority's functions under this Act.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law, for and on behalf of, Director of Law and Governance and Deputy Monitoring Officer

## **7. HUMAN RESOURCES IMPACT**

- 7.1 The workload associated with the review of the Statement of Principles has been undertaken within existing resources.

## **8. EQUALITIES IMPACT**

- 8.1 There are no perceived inequalities associated with this legislation.

## **9. ENVIRONMENTAL IMPACT**

- 9.1 There are potential environmental and design impacts associated with the development of large casinos. However, the majority of gambling premises in Croydon are small buildings like betting shops, amusement arcades and bingo halls. Many of these premises already have established use and are not considered to impact on the local environment.

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

- 10.1 There are not considered to be any local crime and disorder problems associated with the local authority having responsibility for the administration of licences and permits etc. under the Gambling Act 2005. The local authority is only responsible for premises licensing. The licensing of operators is the responsibility of the Gambling Commission.

## **11. DATA PROTECTION IMPLICATIONS**

- 11.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROPROCESSING OF ‘PERSONAL DATA’?**  
**NO**

The Director of Sustainable Communities comments that agreeing the recommendations in this report will not result in the processing of personal data.

Approved by: Steve Iles, Director of Sustainable Communities

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**CONTACT OFFICER:** Michael Goddard, Head of Environmental Health, Trading Standards and Licensing Tel. Ext. 61838

**BACKGROUND DOCUMENTS:** None

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**CROYDON  
COUNCIL**

# **STATEMENT OF PRINCIPLES**

**PUBLISHED IN ACCORDANCE WITH THE PROVISIONS OF THE  
GAMBLING ACT 2005**

**IF YOU WOULD LIKE THIS STATEMENT IN LARGER PRINT,  
PLEASE CONTACT THE LICENSING TEAM ON 020 8760 5466  
OR AT [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk)**

**London Borough of Croydon  
STATEMENT OF PRINCIPLES  
Gambling Act 2005**

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*This Statement of Principles was approved by the London Borough of Croydon on \*\*\*\*.*

*All references to the Guidance refer to the Gambling Commission's Guidance to Licensing Authorities, last updated 13 May 2021*



## PART A

### **1. The Licensing Objectives**

In exercising their functions under the Gambling Act 2005 ('the Act'), licensing authorities must have regard to the licensing objectives as set out in section 1 of the Act which the authority seeks to promote through this Statement of Principles. The licensing objectives are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

It should be noted that the Gambling Commission has stated: 'The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling'. The Council is aware of the National Strategy to Reduce Gambling Harms and the importance of close working between teams to deliver important results in promoting the third licensing objective of 'protecting children and other vulnerable persons from being harmed or exploited by gambling'. A database of national, regional and local initiatives can be found on the Commission website.

The Council is aware that, as provided by Section 153 of the Act, in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling in so far as it thinks it is:

- in accordance with any relevant code of practice issued by the Gambling Commission; and
- in accordance with any relevant guidance issued by the Gambling Commission; and
- reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of principles.

### **2. Introduction**

The London Borough of Croydon covers an area of 86.5 square kilometres and has a population of approximately 388,500. The borough is mainly urban in character, being made up of a number of district retail and commercial centres each surrounded by residential accommodation. Croydon town centre is a well defined retail and commercial area with a large number of shops and offices.

The London Borough of Croydon ('the Council') is the Licensing Authority for the purposes of the Act and is required to publish a Statement of Principles ('the Statement') which it proposes to apply when exercising its licensing functions under the Act. The Council's original Statement was approved by the full Council on 27 November 2006. Statements last for a maximum of three years but can be reviewed and revised by the Council at any time. All such reviews and revisions of the Statement will be subject to consultation and subsequent re-publication. The Statement was last reviewed in 2018 and subsequently re published by the Council, in accordance with the legislation. This is the fifth statutory review the Council has undertaken.

The Council consulted widely upon this Statement and in accordance with the Act's requirements before its final approval. A list of the persons and bodies consulted is attached at Appendix 1 to this Statement and included:

- The police for this Licensing Authority's area
- Croydon Children's Safeguarding Partnership
- All other Responsible Authorities under the Act
- Public Health Croydon
- GamCare
- Representatives of organisations involved in gambling in the area
- All elected Croydon borough councillors, the GLA Assembly Member for Croydon & Sutton and the three borough MP's
- The Council's Access Officer
- Croydon BID
- The Council also engaged with residents, businesses and community & voluntary groups in the borough via a variety of communication means
- The adjoining London boroughs of Lambeth, Sutton, Merton and Bromley

Consultation took place between 29 September 2021 and 10 November 2021.

The full list of consultees, comments received and details of their consideration by the Council are available on request to: The Licensing Team, Place Department, London Borough of Croydon, 6<sup>th</sup> Floor, Zone A, Bernard Weatherill House, 8 Mint Walk, Croydon or via the Council's website at: [www.croydon.gov.uk](http://www.croydon.gov.uk).

It should be noted that this Statement sets out the factors the Council may take into account when considering applications made under the Act, and matters it will consider when deciding to review a licence. However it will not override the right of any person to make an application, make representations about an application, or apply for a review of a licence, as each will be considered on its own merits and according to the statutory requirements of the Act.

To assist the reader, a Glossary of Terms is attached at Appendix 2 to this Statement. In addition, at Appendix I in their statutory guidance, the Gambling Commission provide a glossary of terms.

### **3. Declaration**

In producing the Statement, the Council declares that it has had regard to the licensing objectives of the Act, the Guidance to Licensing Authorities ('the Guidance') issued by the Gambling Commission, and any comments received from those consulted on it.

### **4. Responsible Authorities**

In exercising its discretion under Section 157(h) of the Act to designate a body which is competent to advise the Council about the protection of children from harm, the following principles have been applied:

- the need for the body to be responsible for the whole of the licensing authority's area

- the need for the body to be answerable to democratically elected persons, rather than any particular vested interest group etc.
- 

With those principles in mind this Council designates the Croydon Children's Safeguarding Partnership (CSCP) as competent to advise it.

The contact details of all the Responsible Authorities under the Act are available via the Council's website at: [www.croydon.gov.uk](http://www.croydon.gov.uk) or by contacting the Council's licensing team on 020 8760 5466 or at [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk).

### 5. Interested parties

Interested parties can make representations about licence applications, or apply for a review of an existing licence. An interested party is defined in the Act as a person who in the opinion of the licensing authority which issues the licence or to whom the application is made:

- a) lives sufficiently close to the premises to be likely to be affected by the authorities activities,
- b) has business interests that might be affected by the authorised activities, or
- c) represents persons who satisfy paragraph (a) or (b)

The Council will determine whether a person is an interested party with regard to particular premises on a case by case basis and will not apply a rigid rule to its decision making. In doing so it will have regard to the below mentioned factors drawn from paragraphs 8.12 and 8.15 of the Statutory Guidance.

The factors the Council will take into account in each case when determining what 'sufficiently close to the premises' means will include relevant factors such as:

- the size of the premises
- the nature of the premises
- the distance of the premises from the location of the person making the representation
- the potential impact of the premises such as the number of customers, routes likely to be taken by those visiting the establishment
- the circumstances of the person who lives close to the premises. This is not their personal characteristics, but their interests which may be relevant to the distance from the premises. (8.12)

The factors the Council may consider relevant when determining whether persons have business interests which may be affected include:

- the size of the premises
- the 'catchment' area of the premises, that is, how far people travel to visit the premises
- whether the person making the representation has business interests in that catchment area that might be affected. (8.15)

Interested parties can be persons who are democratically elected such as Councillors and MP's. Whilst the Members Code of Conduct adopted by the

Council pursuant to the Localism Act 2011 may place restrictions on ~~Councillors appearing at and addressing licensing committee hearings~~ if they have a disclosable pecuniary interest (DPI), other interest as defined by the Code or conflict of interest in relation to the matter under consideration, this does not prevent them from making written representations. Councillors should however ensure that the Monitoring Officer is made aware of any such interests and declare these at the meeting if these are not already on the Members' register of interests. Where the restrictions apply, it is recommended that councillors seek specific advice from the Council's Monitoring Officer in relation to their ability to make representations to or address the Committee if they have a DPI, "other" interest as defined by the Code or potential or actual conflict of interest.

Further advice can be obtained with regard to applications and representations under the Act by contacting the Council's licensing team on 020 8760 5466 or at [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk). If an MP/councillor is asked to represent an interested person at a hearing, no specific evidence of being asked to represent that interested person will be required as long as the councillor/MP represents the ward likely to be affected. Likewise, parish councils likely to be affected, will be considered to be interested parties. Other than these however, this authority will generally require written evidence that a person/body (e.g. an advocate/relative) 'represents' someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or has business interests that might be affected by the authorised activities. A letter from one of these persons, requesting the representation is sufficient.

If individuals wish to approach councillors to ask them to represent their views then care should be taken that the councillors are not part of the Licensing Committee dealing with the licence application. Again, if there are any doubts then please contact the licensing team on 020 8760 5466 or at [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk).

## **6. Exchange of Information**

When exercising its functions under sections 29 and 30 of the Act with respect to the exchange of information between it and the Gambling Commission, and the functions under section 350 of the Act with respect to the exchange of information between it and the other persons listed in Schedule 6 to the Act, the Council will act in accordance with the provisions of the Act and ensure compliance with the provisions of the General Data Protection Regulations and the Data Protection Act 2018. The Council will also have regard to any Guidance issued by the Gambling Commission to Licensing Authorities on this matter, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Act and principles of better regulation.

The Guidance for local authorities refers to this matter and some relevant sections are:

- "Licensing authorities do not need to investigate the suitability of an applicant for a premises licence, including in relation to crime. The issue of suitability will already have been considered by the Commission, because any applicant (except occupiers of tracks who do not propose to offer

gambling themselves) will have to hold an operating licence from the Commission before the premises licence can be issued. However, if the licensing authority receives information during the course of considering a premises licence application, or at any other time that causes it to question the suitability of the applicant to hold an operating licence, these concerns should be brought to the attention of the Commission without delay.”

(5.10).

- “Regulatory issues arising from the prevention of disorder are likely to focus almost exclusively on premises licensing, rather than on operating licences. However, if there are persistent or serious disorder problems that an operator could or should do more to prevent, the licensing authority should bring this to the attention of the Commission so that it can consider the continuing suitability of the operator to hold an operating licence.” (5.6).
- “If it comes to the attention of licensing authorities that alcohol-licensed premises or clubs or institutes are playing bingo during the course of a week which involves significant stakes and prizes, that makes it possible that the £2,000 in seven days is being exceeded, authorities should inform the Commission. To help clubs and institutes to comply with the full range of statutory requirements for gaming, the Commission has developed a statutory code of practice “the Code of Practice for gaming in clubs and premises with an alcohol licence.” (18.16).

## 7. Enforcement

When exercising its functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified, the Council will be guided by the Guidance for local authorities and will also carry out its regulatory functions in accordance with good enforcement practice and will adhere to fundamental principles. Accordingly, enforcement shall be:

- Targeted
- Consistent
- Transparent
- Proportionate
- Necessary
- Also, so far as possible, the Council will endeavour to avoid duplication with other regulatory regimes and aim to adopt a risk based inspection programme.

The main enforcement and compliance role for this Council in terms of the Act will be to ensure compliance with premises licences and the other permissions which it authorises. The Gambling Commission will be the enforcement body for operating and personal licences. Concerns about manufacture, supply or repair of gaming machines will not be dealt with by the Council but will be notified to the Gambling Commission.

With regard to betting offices, the Council recognises that certain bookmakers have a number of premises within its area. In order to ensure that any compliance issues are recognised and resolved at the earliest stage, operators are requested to give the authority a single named point of contact,



who should be a senior individual and whom the authority will contact first should any compliance queries or issues arise.

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This Council recognises that it is subject to and will comply with the Regulators' Code developed by the Better Regulation Delivery Office in relation to matters of gambling licensing and enforcement.

For the purposes of transparency, this Council's enforcement/compliance protocols/written agreements will be available upon request to the licensing department on 020 8760 5466 or at [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk). Our risk methodology will also be available upon request.

### **8. Licensing Authority functions**

As required under the Act, this Council will:

- Be responsible for the licensing of premises where gambling activities are to take place by issuing *Premises Licences*
- Issue *Provisional Statements*
- Regulate *members' clubs* and *miners' welfare institutes* who wish to undertake certain gaming activities via issuing Club Gaming Permits and/or Club Machine Permits
- Issue *Club Machine Permits to Commercial Clubs*
- Grant permits for the use of certain lower stake gaming machines at *unlicensed Family Entertainment Centres*
- Receive notifications from alcohol licensed premises (under the Licensing Act 2003) for the use of two or fewer gaming machines
- Issue *Alcohol Licensed Premises Gaming Machine Permits* for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where there are more than two machines
- Register *small society lotteries* below prescribed thresholds
- Issue *Prize Gaming Permits*
- Receive and Endorse *Temporary Use Notices*
- Receive *Occasional Use Notices*
- Provide information to the Gambling Commission regarding details of licences issued (see section above on 'information exchange')
- Maintain registers of the permits and licences that are issued under these functions

This Council will not be involved in licensing remote gambling, as this falls to the Gambling Commission via operating licences.

## PART B PREMISES LICENCES

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### 1. General Principles

Premises licences are subject to the requirements set-out in the Act and regulations, as well as specific mandatory and default conditions which are detailed in regulations issued by the Secretary of State. Licensing authorities are able to exclude default conditions and also attach others, where it is believed to be appropriate. The Guidance makes clear that Licensing authorities should not turn down applications for premises licences where relevant objections can be dealt with through the use of conditions.

This Council is aware that in making decisions about premises licences it should aim to permit the use of premises for gambling in so far as it thinks it is:

- in accordance with any relevant code of practice issued by the Gambling Commission; and
- in accordance with any relevant guidance issued by the Gambling Commission ; and
- reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of licensing policy.

It is appreciated that as per the Guidance for local authorities "moral or ethical objections to gambling are not a valid reason to reject applications for premises licences" In addition, whereas previous legislation required that the grant of certain gambling permissions should take account of whether there was unfulfilled demand for the facilities, this is no longer the case and each application must be considered on its merits without regard to demand.

**Meaning of "premises"** – the following paragraphs are taken from the statutory guidance produced by the Gambling Commission -

'In the Act, 'premises' is defined as including 'any place'. S.152 therefore prevents more than one premises licence applying to any place. But, there is no reason in principle why a single building could not be subject to more than one premises licence, provided they are for different parts of the building, and the different parts of the building can reasonably be regarded as being different premises. This approach has been taken to allow large, multiple unit premises such as pleasure parks, tracks, or shopping malls to obtain discrete premises licences, where appropriate safeguards are in place. However, licensing authorities should pay particular attention if there are issues about sub-division of a single building or plot and should ensure that mandatory conditions relating to access between premises are observed. (7.5)

In most cases the expectation is that a single building/plot will be the subject of an application for a licence, for example, 32 High Street. But that does not mean that 32 High Street cannot be the subject of separate premises licences for the basement and ground floor, if they are configured acceptably. Whether different parts of a building can properly be regarded as being separate premises will depend on the circumstances. The location of the premises will clearly be an important consideration and the suitability of the division is likely

to be a matter for discussion between the operator and the licensing authority.  
(7.6)

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The Commission does not consider that areas of a building that are artificially or temporarily separated, for example by ropes or moveable partitions, can properly be regarded as different premises. If a premises is located within a wider venue, a licensing authority should request a plan of the venue on which the premises should be identified as a separate unit. (7.7)

The Commission recognises that different configurations may be appropriate under different circumstances but the crux of the matter is whether the proposed premises are genuinely separate premises that merit their own licence – with the machine entitlements that brings – and are not an artificially created part of what is readily identifiable as a single premises. (7.8)

The Act sets out that the type and number of higher stake gaming machines allowable in premises is restricted according to the type of premises licence or permit granted. For example, a converted casino licence allows for 20 gaming machines in categories B, C or D. With the exception of AGCs and FECs, premises are not permitted to be used exclusively for making gaming machines available, but rather to provide the gaming facilities corresponding to the premises licence type. Further detail on gaming machines is set out in Part 16 of this guidance. (7.9)

The Act states that an application must be made to a licensing authority in whose area the premises are wholly or partly situated. In circumstances where the premises lie in more than one licensing authority's area, the operator should make their application to just one of those authorities. As both licensing authorities are responsible authorities under s.157 of the Act, the other licensing authority must be notified of the application and is entitled to make representations. As a responsible authority, it has an opportunity to pass relevant information about the premises to the licensing authority determining the application. Further detail on responsible authorities is set out at Part 8 of this guidance. (7.10)

Casino premises are subject to separate regulations, involving a two-stage application process. Details of the two stage process can be found in Part 17 of this guidance.' (7.11)

This Council takes particular note of the Guidance for local authorities, which at paragraphs 7.32 & 7.33 states:

'Licensing authorities should take particular care in considering applications for multiple premises licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular they should be aware of the following:

- The third licensing objective seeks to protect children from being harmed by gambling. In practice that means not only preventing them from taking part in gambling, but also preventing them from being in close proximity to gambling in which by law they are not allowed to

participate. Therefore premises should be configured so that children are not invited to participate in, have accidental access to, or closely observe gambling where they are prohibited from participating.

- Entrances to and exits from parts of a building covered by one or more premises licences should be separate and identifiable so that the separation of different premises is not compromised and people do not 'drift' into a gambling area. In this context it should normally be possible to access the premises without going through another licensed premises or premises with a permit.
- Customers should be able to participate in the activity named on the premises licence' (7.32).

'In determining whether two or more proposed premises are truly separate, the licensing authority should be aware of factors which could assist them in making their decision. Depending on all the circumstances of the case, these may include:

- Is a separate registration for business rates in place for the premises?
- Is the premises' neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or a public passageway?
- Can the premises only be accessed from any other gambling premises?' (7.33)

The Council will consider these and all other relevant factors in making its decision, depending on all the circumstances of the particular case.

### **Gaming Machines in Gambling Premises**

Attention is drawn to Social Responsibility Codes 9.1.1, 9.1.2 and 9.1.3 of the Licence Conditions and Codes of Practice document produced by the Gambling Commission, a copy of which can be found at <https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp/2/9>

To assist, Code 9.1.1 states as follows –

#### **“Social responsibility code provision 9.1.1**

#### **Gaming machines in gambling premises – betting**

#### **All non-remote general betting operating licences, except where betting is offered under a 2005 Act casino premises licence**

**1** Gaming machines may be made available for use in licensed betting premises only where there are also substantive facilities for non-remote betting, provided in reliance on this licence, available in the premises.

**2** Facilities for gambling must only be offered in a manner which provides for appropriate supervision of those facilities by staff at all times.

**3** Licensees must ensure that the function along with the internal and/or external presentation of the premises are such that a customer can

reasonably be expected to recognise that it is a premises licensed for the purposes of providing betting facilities.”

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The meaning of ‘available for use’ is discussed further in paragraphs 16.16 to 16.26 of the statutory guidance published by the Gambling Commission (13 May 2021 version) and some key components are as follows, with the specific wording taken direct from the statutory guidance –

*‘that a gaming machine is ‘available for use’ if a person can take steps to play it without the assistance of the operator’ (16.17)*

*‘More than the permitted number of machines may be physically located on a premises but the onus is on licensees to demonstrate that no more than the permitted number are ‘available for use’ at any one time’ (16.18)*

*‘Gaming machine entitlements in AGC or bingo premises set out that only 20% of machines can be category B machines in order to ensure a balanced offering of gambling products and restrict harder gambling opportunities.’ (16.21)*

*‘We updated our ‘available for use’ guidance in 2019 to make it clear that for the purpose of calculating the category B machine entitlement in gambling premises, gaming machines should only be counted if they can be played simultaneously by different players without physical hindrance.’ (16.23)*

*We have published our ‘available for use’ guidance on the Commission website, and provided additional information specifically in relation to when is a gaming machine ‘available for use’ in AGC or bingo premises under the 20% regulations. (16.26)*

**Location** - The Council is aware that demand issues cannot be considered with regard to the location of premises but that considerations in terms of the licensing objectives can be. As per the Guidance for local authorities, this authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.

Croydon is a very diverse borough, both culturally and socio economically and also has areas where levels of crime and disorder and anti-social behaviour are more prevalent than in others.

The Gambling Commission’s Licence Conditions and Codes of Practice (LCCP), formalise the need for operators to consider local risks. The current version, effective from 31 October 2020, is available on the Gambling Commission’s website.

In this regard, operators are specifically referred to the Social Responsibility (SR) code 10.1.1 which requires all premises licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and have policies, procedures and control measures to mitigate those risks. In undertaking their risk assessments, they must take

into account relevant matters identified in the Council's statement of licensing policy (Statement of Principles).

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This Council expects all operators to prepare robust and considered assessments of the local risks to the licensing objectives posed by the provision of gambling facilities at the application premises and address any factors that may have a negative impact on the licensing objectives. In addition, the Council expects all operators to review (and update as necessary) their local risk assessments:

- to take account of significant changes in local circumstances, including those identified in this statement of licensing policy;
- when there are significant changes at a licensee's premises that may affect their mitigation of local risks;
- when applying for a variation of a premises licence; and
- in any case, undertake a local risk assessment when applying for a new premises licence.

It is not possible to provide a complete list of factors to consider in relation to the risk assessment but the following are examples of the factors the Council would expect gambling operators to consider –

- The location of schools, sixth form colleges and youth centres in the local area of the licensed or application premises, with reference to the potential risk of under age gambling or the direct exposure to gambling by under age persons as a result and the mitigation measures the operator intends to introduce to reduce any such risks;
- The location of hostels or places offering support services for vulnerable people, such as those with addiction issues in the local area of the licensed or application premises. The Council expects operators to give very careful consideration to the suitability of locating new licensed premises close to such sensitive premises, or to varying the terms of existing licenses in such areas, given the greater risk of problem gambling amongst these groups and would expect to see clear and robust mitigation measures from the operator on how they would intend to reduce any such risks;
- Any reasonably available information about issues with problem gambling in the area of the licensed or application process. In assessing the negative impact premises may have on the licensing objectives, the Council will expect operators to include consideration of the existing density of licensed gambling premises and the status of the night time economy in the area local to their licensed or application premises. The Council will expect operators to particularly assess the risk of gambling being a source of crime, being associated with crime or being used to support crime in that area and to set out any mitigation measures they would intend to introduce to reduce any such risks.
- The Council will expect operators, perhaps in prior discussions with the Police, to assess patterns of crime, disorder and anti-social behaviour

in the area local to the licensed or application premises, specifically ~~that linked to gambling premises and set out the measures they believe~~ will mitigate any risks of their premises having a negative impact on those crime etc. patterns.

While none of the above preclude any application being made and each application will be decided on its merits, it is expected that any application will demonstrate how potential risks/concerns can be overcome.

The Council will expect licensees to share their risk assessment with licensing authorities when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise at the request of the licensing authority, such as, for example, when there is an inspection of a premises. Ideally, a copy of the current local area risk assessments will be kept at the licensed premises.

### **Local Area Profiles**

The Council is aware of the Gambling Commission recommendation that licensing authorities map and prepare their own assessments of local risks, in the form of local area profiles. Such profiles will be prepared and be available for operators to utilise when preparing their risk assessments through a specific request to the Council licensing team.

Undoubtedly, such local areas profiles will develop over time but at the outset, to assist operators, they will incorporate data on the matters listed above.

**Duplication with other regulatory regimes** - The Council will seek to avoid any duplication with other statutory/regulatory systems where possible, including planning. The Council will not consider whether a licence application is likely to be awarded planning permission or building regulations approval, in its consideration of it. It will, however, listen to, and consider carefully, any concerns about conditions which are not able to be met by licensees due to planning restrictions, should such a situation arise. Operators are also reminded of the 'Sui Generis Use Class' status of betting shops in the Planning context which came into being in 2016.

**Licensing objectives** - Premises licences granted must be reasonably consistent with the licensing objectives. With regard to these objectives, the Council has considered the Guidance to local authorities:

Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime - The Council is aware that the Gambling Commission takes a leading role in preventing gambling from being a source of crime. The Guidance does however envisage that licensing authorities should pay attention to the proposed location of gambling premises in terms of this licensing objective. Therefore, where an area has known high levels of organised crime this authority will carefully consider the effect on the licensing objectives of gambling premises being located in this area and whether additional conditions may be appropriate. The Council is aware of the distinction

between disorder and nuisance and in determining whether disorder may occur, will consider factors such as whether police assistance was required and how threatening the behaviour was to those who could see or hear it, so as to make that distinction.

Ensuring that gambling is conducted in a fair and open way - The Council has noted that licensing authorities would generally not be expected to become concerned with ensuring that gambling is conducted in a fair and open way as this will be addressed via operating and personal licences. However its role with regard to tracks is explained in more detail at paragraph 7.

Protecting children and other vulnerable persons from being harmed or exploited by gambling – The Council notes that this objective means preventing children from taking part in gambling and is aware of the content of the following paragraphs in the statutory guidance –

The Gambling Act 2005 permits the advertising of gambling in all forms, provided that it is legal and there are adequate protections in place to prevent such advertisements undermining the licensing objectives. The Advertising Standards Authority (ASA) is the UK's independent regulator of advertising. It enforces the UK Advertising Codes (the Codes), written by the Committees of Advertising Practice. The Codes cover the content and placement of advertising and are designed to ensure that advertisements for gambling products are socially responsible, with particular regard to the need to protect children, young persons under 18 and other vulnerable persons from being harmed or exploited. The Codes also require that advertisements for gambling products or services do not mislead. Any complaint about the content and placement of advertising or marketing communications should be sent directly to the ASA. (1.19)

The LCCP requires licensees to ensure that their policies and procedures for preventing underage gambling take account of the structure and layout of their gambling premises. This therefore requires licensees not only to be able to supervise their premises but also that they should mitigate the risks of under 18s being attracted to enter premises by the products available within them. Where a licensing authority has concerns that such products are visible, they could for example require the licensee to re-site the products out of view. (7.29)

The Council will therefore consider, as suggested in the Guidance, whether specific measures are required at particular premises, with regard to this licensing objective. Appropriate measures may include:

- proof of age schemes
- supervision of entrances
- supervision of machine areas
- physical separation of areas
- appropriate notices/signage
- location of entry

The Council will make itself aware of the Codes of Practice which the Gambling Commission issues as regards this licensing objective, in relation to



specific premises. In addition, the Council is aware of the concerns set out by the Gambling Commission in their briefing paper entitled 'Gambling-related harm as a public health issue' dated February 2018, of the advice to local authorities from the Local Government Association in their document entitled 'Tackling gambling related harm – A whole Council approach', last updated in November 2018 and of the National Strategy to Reduce Gambling Harms, which was most recently updated on 8 December 2020.

The Council is also aware of the Social Responsibility Charter for Gaming Machines in Pubs, produced by the British Beer & Pub Association (BBPA) and UK Hospitality, which '*sets out a Code of Practice with regards to gaming machines in pubs, and in particular the steps to take to tackle and prevent under-age players of these machines.*'

As regards the term "vulnerable persons" it is noted that the Gambling Commission is not seeking to offer a definition but states that "it will for regulatory purposes assume that this group includes people who gamble more than they want to; people who gamble beyond their means; and people who may not be able to make informed or balanced decisions about gambling due to a mental impairment, alcohol or drugs." In relation to this licensing objective, the Council will consider each application on a case by case basis. Should a practical definition prove possible in future then this policy statement will be updated.

**Conditions** – The starting point when considering an application is that it will be granted subject only to the mandatory and default conditions and additional conditions will only be imposed where there is evidence of a risk to the licensing objectives, such that there is a need to supplement the existing mandatory and default conditions.

Any additional conditions attached to licences will be proportionate and will be:

- relevant to the need to make the proposed building suitable as a gambling facility;
- directly related to the premises and the type of licence applied for;
- fairly and reasonably related to the scale and type of premises; and
- reasonable in all other respects.

Decisions upon additional conditions will be made on a case by case basis, although there will be a number of measures that the Council will consider utilising should there be a perceived need. There are specific comments made in this regard under some of the licence types below.

The Council may consider measures to meet the licensing objectives, such as:

- leaflets giving assistance to problem gambling to be clearly displayed in all areas of the premises
- self exclusion forms to be made available for customer use
- machines such as fixed odds betting terminals to clearly display odds
- ATM or cash terminals to be sited away from gaming machines

- Details of the GamCare helpline and website to be displayed prominently in premises
- 

The Council will also consider specific measures which may be required for buildings which are subject to multiple premises licences. Such measures may include the supervision of entrances; segregation of gambling from non-gambling areas frequented by children; and the supervision of gaming machines in non-adult gambling specific premises in order to pursue the licensing objectives. These matters are in accordance with the Guidance.

The Council will also ensure that where category C or above machines are on offer in premises to which children are admitted:

- all such machines are located in an area of the premises which is separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance;
- only adults are admitted to the area where these machines are located;
- access to the area where the machines are located is supervised;
- the area where these machines are located is arranged so that it can be observed by the staff or the licence holder; and
- at the entrance to and inside any such areas there are prominently displayed notices indicating that access to the area is prohibited to persons under 18.

These considerations will apply to premises including buildings where multiple premises licences are applicable.

A summary of machine provisions by premises is provided in Appendix A and a summary of gaming machine categories and entitlements in Appendix B of the Statutory Guidance published by the Gambling Commission.

The Council is aware that tracks may be subject to one or more than one premises licence, provided each licence relates to a specified area of the track. There cannot be more than one premises licence covering the same area of the track. As per the Guidance, the Council will consider the impact upon the third licensing objective and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

It is noted that there are conditions which the Council cannot attach to premises licences which are:

- any condition on the premises licence which makes it impossible to comply with an operating licence condition;
- conditions relating to gaming machine categories, numbers, or method of operation;
- conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated); and
- conditions in relation to stakes, fees, winning or prizes.

**Door Supervisors** – this Council notes that licensing authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protecting children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime. Whilst there is currently no apparent evidence that the operation of betting offices requires door supervisors for the protection of the public, this authority will consider making a door supervision requirement with regard to a betting office if there is clear evidence from the history of trading at the premises that the premises cannot be adequately supervised from the counter and/or that door supervision is both necessary and proportionate.

Where operators and the Council decide that supervision of entrances/machines is appropriate for particular cases, it will need to be decided whether these staff need to be Security Industry Authority (SIA) licensed or not. Furthermore, if a person carries out 'door supervisor' duties but is exempt from the requirement to be licensed by the SIA, the Council will expect that person to be trained to a nationally recognised standard and be able to show that they have undergone relevant and appropriate police records checks. Door supervision will not, however be seen in isolation as the only remedy for concerns and the Council will consider other options, if considered appropriate, to achieve the licensing objectives.

## **2. Adult Gaming Centres**

The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to, for example, ensure that under 18 year olds do not have access to the premises.

The Council may consider measures to meet the licensing objectives, such as:

- Proof of age schemes
- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare.

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

The Council also notes that paragraph 21.4 in the statutory guidance issued by the Gambling Commission states –

Social Responsibility Code Provision 3.5.6 requires that all non-remote casino and bingo and betting licences (except those at a track) and holders of

gaming machine general operating licences for adult gaming centres must offer self-exclusion schemes to customers requesting such a facility. There is also an Ordinary Code provision at 3.5.7. The full details can be found within the LCCP (Licence Conditions and Codes of Practice).

### **3. (Licensed) Family Entertainment Centres**

The Council will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority, for example, that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machine areas.

The Council may consider measures to meet the licensing objectives, such as:

- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare.
- Measures / training for staff on how to deal with suspected truant school children on the premises

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

The Council will, as per the Guidance, refer to the Commission's website to see any conditions that apply to operating licences covering the way in which the area containing the category C machines, should be delineated. The Council will also make itself aware of any mandatory or default conditions on these premises licences, when they have been published.

### **4. Casinos**

The Council has not passed a 'no casino' resolution under Section 166 of the Act but is aware that it has the power to do so. Should the Council decide in the future to pass such a resolution, it will update this policy statement with details of that resolution. Any such decision will be made by the full Council.

The Council is aware that, where its area is enabled to grant a premises licence for a new style casino (i.e. the Secretary of State has made such regulations under Section 175 of the Gambling Act 2005), there are likely to be a number of operators which will want to run the casino. In such situations the Council will run a 'competition' under Schedule 9 of the Act and in line with any regulations / codes of practice issued under the Act.

## 5. Bingo premises

The Council notes that the Guidance states:

Licensing authorities need to satisfy themselves that bingo can be played in any bingo premises for which they issue a premises licence. An operator may choose to vary their licence to exclude a previously licensed area of that premises, and then apply for a new premises licence, or multiple new premises licences, with the aim of creating separate premises in that area. Essentially providing multiple licensed premises within a single building or site. Before issuing additional bingo premises licences, licensing authorities need to consider whether bingo can be played at each of those new premises (18.5).

Children and young people are allowed into bingo premises; however they are not permitted to participate in the bingo and if category B or C machines are made available for use these must be separated from areas where children and young people are allowed. Social Responsibility (SR) code 3.2.5 (3) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling (18.7).

S.172(7) (of the Act), as amended, provides that the holder of a bingo premises licence may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises. For example, a premises with a total of 25 gaming machines available for use can make five or fewer category B3 gaming machines available on that premises. Premises that were licensed before 13 July 2011 are entitled to make available eight category B gaming machines, or 20% of the total number of gaming machines, whichever is the greater. There are no restrictions on the number of category C or D machines that can be made available. Regulations state that category B machines at bingo premises are restricted to sub-category B3 (SI 2007/2158: Categories of Gaming Machine Regulations 2007) (but not B3A) and B4 machines. Licensing authorities should ensure that gambling machines are made available for use in a manner consistent with our guidance within Part 16. For the purpose of calculating the category B machine entitlement in gambling premises, gaming machines should only be counted if they can be played simultaneously by different players without physical hindrance. This includes tablets. (18.8)

The gaming machines must remain within the licensed area covered by the premises licence. In the unusual circumstance that an existing bingo premises covered by one premises licence applies to vary the licence and acquire additional bingo premises licences (so that the area that was the subject of a single licence will become divided between a number of separate licensed premises) it is not permissible for all of the gaming machines to which each of the licences brings an entitlement to be grouped together within one of the licensed premises (18.9).

The Council will have regard to the Guidance on the issues that licensing authorities should take into account in relation to the suitability and layout of bingo premises.

## 6. Betting premises

The Council notes the following paragraphs from statutory guidance –

Children and young persons are not permitted to enter premises with a betting premises licence, although exemptions apply to tracks, as explained in Part 20 of the Gambling Commission guidance, and s.46 and s.47 of the Act set out offences of inviting, causing or permitting a child or young person to gamble, or to enter certain gambling premises. Social Responsibility (SR) code 3.2.7(3) in the Licence Conditions and Codes of Practice (LCCP) states that 'licensees must ensure that their policies and procedures take account of the structure and layout of their gambling premises' in order to prevent underage gambling. Children and young persons are not allowed to be employed at premises with a betting premises licence. (19.4)

S.172(8) (of the Act) provides that the holder of a betting premises licence may make available for use up to four gaming machines of category B, C or D. Regulations state that category B machines at betting premises are restricted to sub-category B2, B3 and B4 machines (the terminals commonly in use are able to provide both B2 and B3 content). (19.5)

Self-service betting terminals (SSBT's) –

S.235(2)(c) provides that a machine is not a gaming machine if it is designed or adapted for use to bet on future real events. Some betting premises may make available machines that accept bets on live events, such as horse racing, as a substitute for placing a bet over the counter. These SSBTs are not gaming machines and therefore neither count towards the maximum permitted number of gaming machines, nor have to comply with any stake or prize limits. SSBTs merely automate the process that can be conducted in person and the Act exempts them from regulation as a gaming machine. (19.7)

S.181 contains an express power for licensing authorities to restrict the number of SSBTs, their nature and the circumstances in which they are made available by attaching a licence condition to a betting premises licence or to a casino premises licence (where betting is permitted in the casino). When considering whether to impose a condition to restrict the number of SSBTs in particular premises, the licensing authority, amongst other things, should take into account the ability of employees to monitor the use of the machines by children and young persons or by vulnerable people. (19.10)

The Council may consider measures to meet the licensing objectives, such as:

- leaflets giving assistance to problem gambling to be clearly displayed in all areas of the premises
- self exclusion forms to be made available for customer use
- if available, QR (Quick Response) Codes for accessing the above information/forms
- machines such as fixed odds betting terminals to clearly display odds
- ATM or cash terminals to be sited away from gaming machines

- details of the GamCare helpline and website to be displayed prominently in premises
- provide door supervision

With regard to door supervision, whilst there is no apparent evidence that the operation of betting offices requires door supervisors for the protection of the public, this authority will consider making a door supervision requirement if there is clear evidence from the history of trading at the premises that the premises cannot be adequately supervised from the counter and/or that door supervision is both necessary and proportionate.

With regard to applications to re-site betting office premises in the locality to provide improved facilities for customers, this authority will treat any such application on its individual merits but recognises that such applications may enhance the quality of the facility provided for the benefit of the betting public.

The Council will expect that sufficient facilities are available at individual licensed premises for the provision of betting and attention is drawn again to Social Responsibility Code 9.1.1., referenced at page 9 above.

Where two or more Betting shops are sited in a neighbourhood shopping area or town centre, the Licensing Authority strongly encourages the managers of each shop to meet with the Police and representatives of the other Responsible Authorities on at least a quarterly basis to discuss local crime and disorder problems and certain individuals that persistently cause crime and disorder in Gambling Premises.

## 7. Tracks

S.353 of the Act defines a track as a horse racecourse, greyhound track or other premises on any part of which a race or other sporting event takes place or is intended to take place.

The following paragraphs from the statutory guidance, issues by the Gambling Commission provide further information about tracks –

The on-course betting operator is one who comes onto the track, temporarily, while races or sporting events are taking place. On-course betting operators tend to offer betting only on the events taking place on the track, that day. For example, betting operators attending horserace and greyhound racing meetings will only attend on race days. Similarly, betting operators at cricket and football grounds are only likely to attend on days when matches are taking place. (20.17)

Betting on tracks is organised in different ways and can take place in different parts of the track in many different forms. These include the following:

- **'Betting rings'** The ring can be dispersed throughout the track, and can include 'temporary' rings at large meetings, but all different locations form part of the betting area. On-course betting operators will be located in the betting ring according to a position (pitch) allocated to

them under the commercial arrangement they have with the track owner.

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- **Betting counters or kiosks** A betting counter or booth may be a permanent or temporary outlet from which a bookmaker provides betting facilities. Examples include manned stands or porta-cabins located at football grounds on match days, and the temporary kiosks used by bookmakers at cricket grounds during test matches.
- **Mobile betting** Mobile betting machines (often handheld) operated by employees of betting operators allow customers to place a bet or receive payouts away from betting kiosks or the betting ring, most commonly in hospitality areas.
- **Self-service betting terminals (SSBTs)** SSBT, described in paragraph 19.6, lack the direct human intervention of a betting counter staffed by a cashier, and can be located at different parts of tracks. See below more details on SSBTs at tracks.
- **Pool betting** This involves the pooling of stakes on a given event, and the splitting of the total pool, less a commission for the operator amongst the winners. Pool betting at horseracing and greyhound tracks can be offered under a pool betting operating licence – be that the owner of the track or a third party provider. Tracks may also conduct inter-track pool betting when other tracks are holding races. (20.18)

### Off-course betting

Off-course betting operators are typically those who provide betting facilities from betting premises such as those found on the high street. In addition to such premises, betting operators may operate self-contained betting premises or designated areas such as a row of betting kiosks within the track premises. These premises provide facilities for off-course betting (in effect, the opportunity to bet on other events not just those taking place on the track), although they normally operate only on race days. (20.19)

The provision of off-course betting facilities as described above is generally conducted in reliance on the track premises licence held by the occupier of the track and consequently the off-course operator is prohibited from making any gaming machines available for use unless they hold a separate betting premises licence in relation to part of the track. The track premises licence holder will need to vary their existing premises licence so that it does not have effect in relation to the area where the additional betting premises licence is located. The additional betting premises licence would need to be secured by the holder of an appropriate betting operating licence. Such a premises would then be subject to the conditions outlined in Part 19 (of the guidance). (20.20)



As per the Gambling Commission's Guidance, this licensing authority will especially consider the impact upon the third licensing objective (i.e. the protection of children and vulnerable persons from being harmed or exploited by gambling) and the need to ensure that entrances to each type of premises are distinct and that children are excluded from gambling areas where they are not permitted to enter.

This authority will therefore expect the premises licence applicant to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young persons will be permitted to enter track areas where facilities for betting are provided on days when dog-racing and/or horse racing takes place, but that they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

This licensing authority may consider measures to meet the licensing objectives such as:

- Proof of age schemes
- CCTV
- Supervision of entrances / machine areas
- Physical separation of areas
- Location of entry
- Notices / signage
- Specific opening hours
- Self-exclusion schemes
- Provision of information leaflets / helpline numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures.

Gaming machines - Where the applicant holds a pool betting operating licence and is going to use the entitlement to four gaming machines, machines (other than category D machines) should be located in areas from which children are excluded.

The following paragraphs from the statutory guidance are in relation to self-service betting terminals (SSBTs) –

S.235(2)(c) of the Act provides that a machine is not a gaming machine by reason only of the fact that it is designed or adapted for use to bet on future real events. Betting operators may make available machines that accept bets on live events, such as horseracing, as a substitute for placing a bet with a member of staff. These self-service betting terminals are not gaming machines; they merely automate the process that can be conducted in person and therefore are not regulated as gaming machines. (20.39)

Licensed operators may install SSBTs on tracks. There is no restriction on the number of SSBTs that may be in use but operators must, by virtue of their

operating licence conditions, supervise such terminals to prevent them being used by those under 18 years of age. (20.40)

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There is no formal requirement on track premises licence holders to involve themselves in the procedures used by betting operators to supervise their SSBTs (unless specific local conditions specifying supervisory arrangements are added to the track premises licence by the licensing authority). Some betting operators may agree supervisory assistance to be provided by employees of the track premises licence holders, but this is a commercial matter between the track owner and betting operators. (20.41)

While track premises licence holders have no formal responsibilities in this regard, the Commission has advised them to inform it of instances where they are aware that betting operators are persistently failing to ensure the adequate supervision of their SSBTs. (20.42)

### **8. Travelling Fairs**

It will fall to the Council to decide whether, where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair, is met.

The licensing authority will also consider whether the applicant falls within the statutory definition of a travelling fair.

It has been noted that the 27-day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. The Council will work with its neighbouring authorities to ensure that land which crosses our boundaries is monitored so that the statutory limits are not exceeded.

### **9. Provisional Statements**

The Act allows an operator to apply for a provisional statement if a building is not yet complete, needs alteration or he/she does not yet have a right to occupy it. This would allow an operator to know whether a full premises licence would, in due course, be granted.

The Council notes however that the Guidance states that "requiring the building to be complete ensures that the authority could, if necessary, inspect it fully".

In terms of representations about premises licence applications, following the grant of a provisional statement, no further representations from relevant authorities or interested parties can be taken into account unless they concern matters which could not have been addressed at the provisional statement stage, or they reflect a change in the applicant's circumstances. In addition, the Council, as licensing authority may refuse the premises licence (or grant it on terms different to those attached to the provisional statement) only by reference to matters:

- (a) which could not have been raised by objectors at the provisional licence stage; or
- 
- (b) which in the Council's opinion, reflect a change in the operator's circumstances.

The Council notes that in determining matters licensing authorities should not take into consideration matters that are not related to gambling and the licensing objectives. One example of such a matter would be the likelihood of the applicant obtaining planning permission or building regulations approval for the proposal.

### **10. Reviews**

Requests for a review of a premises licence can be made by interested parties or responsible authorities however, it is for the Council to decide whether the review is to be carried-out. This will be on the basis of whether the request for the review is relevant to the matters listed below, in that the request is:

- in accordance with any relevant code of practice issued by the Gambling Commission;
- in accordance with any relevant guidance issued by the Gambling Commission;
- reasonably consistent with the licensing objectives; and
- in accordance with the authority's statement of licensing policy.

As licensing authorities are required to permit the use of premises for gambling, in so far as it is in accordance with the s.153 principles, applications that raise general objections to gambling as an activity, that relate to demand for gambling premises, or raise issues relating to planning, public safety, and traffic congestion are unlikely to be considered an appropriate basis for review, leading to rejection under the bullet points above.

In addition, consideration will be given as to whether the request for review is frivolous, vexatious, would not cause the Council to wish to alter/revoke/suspend the licence or to remove, amend or attach conditions on the premises licence, or whether it is substantially the same as previous representations or requests for review.

The Council can also initiate a review of a licence on the basis of any reason which it thinks is appropriate. In doing so, the Council will be mindful of the fact that licensing authority actions, including reviews, should be in pursuit of the principles set out in s.153 of the Act or underpinned by reasonable concerns, such as changes to the local environment or resident complaints.

## PART C

### Permits / Temporary & Occasional Use Notice

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#### **1. Unlicensed Family Entertainment Centre gaming machine permits (Statement of Principles on Permits - Schedule 10 paragraph 7)**

Where premises do not hold a premises licence but wish to provide gaming machines, it may apply to the licensing authority for this permit. The applicant must show that the premises will be wholly or mainly used for making gaming machines available for use (Section 238).

The Council may prepare a separate *statement of principles* that it would propose to consider in determining the suitability of an applicant for a permit and in preparing this statement, and/or considering applications, it need not (but may) have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission under section 25 of the Act. It is proposed that any statement regarding Unlicensed Family Entertainment Centre (FEC) permit applications be appended to this main statement of principles.

An application for a permit may be granted only if the Council is satisfied that the premises will be used as an unlicensed FEC, and if the chief officer of police has been consulted on the application. The Council may ask applicants to demonstrate:

- a full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs;
- that the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act); and
- that staff are trained to have a full understanding of the maximum stakes and prizes.

It should be noted that the Council cannot attach conditions to this type of permit.

The Council has not currently adopted a Statement of Principles on Permits. Should it decide to do so it will be available from the Licensing Team. Potential applicants / other interested persons are advised to check with the Licensing Team as to whether a Statement of Principles on Permits has been adopted.

#### **2. (Alcohol) Licensed premises gaming machine permits - (Schedule 13 paragraph 4(1))**

There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have 2 gaming machines, of categories C and/or D. The premises merely need to notify the licensing authority. The licensing authority can remove the automatic authorisation in respect of any particular premises if:

- provision of the machines is not reasonably consistent with the pursuit of the licensing objectives;
- gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act (i.e. that written notice has been provided

to the licensing authority, that a fee has been provided and that any ~~relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with~~);

- the premises are mainly used for gaming; or
- an offence under the Gambling Act has been committed on the premises.

If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the Council will consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Act, and “such matters as they think relevant.”

The Council considers that “such matters” will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from being harmed or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under 18 year olds do not have access to the adult only gaming machines. Measures which will satisfy the Council that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff who will monitor that the machines are not being used by those under 18. Notices and signage may also help. As regards the protection of vulnerable persons applicants may wish to consider the provision of information leaflets/helpline numbers and where available, QR (Quick Response) Codes for organisations such as GamCare. Each application for more than 2 gaming machines in licensed premises shall, therefore be dealt with on its merits.

The Council can decide to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than these) cannot be attached.

It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

It is recognised that some alcohol licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would most likely need to be applied for, and dealt with as an Adult Gaming Centre premises licence.

### **3. Prize Gaming Permits - (Statement of Principles on Permits - Schedule 14 paragraph 8 (3))**

The Act states that a licensing authority may prepare a *statement of principles* that they propose to apply in exercising their functions under this Schedule which may, in particular, specify matters that the licensing authority proposes to consider in determining the suitability of the applicant for a permit. It is proposed that any statement regarding Prize Gaming Permit applications be appended to this main statement of principles.

The Council may require applicants to set out the types of gaming that he or she is intending to offer and furthermore that the applicant should be able to demonstrate:

- that they understand the limits to stakes and prizes that are set out in Regulations;
- and that the gaming offered is within the law.

In making its decision on an application for this permit the licensing authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.

Though there are conditions in the Act with which the permit holder must comply the licensing authority cannot attach its own conditions. The conditions in the Act are:

- limits on participation fees, as set out in regulations;
- all chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played;
- the prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- participation in the gaming must not entitle the player to take part in any other gambling.

#### **4. Club Gaming and Club Machines Permits**

Members Clubs and Miners' Welfare Institutes (but not Commercial Clubs) may apply for a Club Gaming Permit or a Club Machine Permit. The Club Gaming Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D), equal chance gaming and games of chance as set-out in regulations. A Club Machine Permit will enable the premises to provide gaming machines (3 machines of categories B, C or D).

Members clubs must have at least 25 members and be established and conducted "wholly or mainly" for purposes other than gaming, unless the gaming is permitted by separate regulations. It is anticipated that this will cover bridge and whist clubs, which will replicate the position under the Gaming Act 1968. A members' club must be permanent in nature, not established to make commercial profit, and controlled by its members equally. Examples include working men's clubs, branches of Royal British Legion and clubs with political affiliations.

The Council may only refuse an application on the grounds that:

- (a) the applicant does not fulfil the requirements for a members' or commercial club or miners' welfare institute and therefore is not entitled to receive the type of permit for which it has applied;
- (b) the applicant's premises are used wholly or mainly by children and/or young persons;
- (c) an offence under the Act or a breach of a permit has been committed by the applicant while providing gaming facilities;
- (d) a permit held by the applicant has been cancelled in the previous ten years; or
- (e) an objection has been lodged by the Commission or the police.

There is also a 'fast-track' procedure available under the Act for premises which hold a Club Premises Certificate under the Licensing Act 2003 (Schedule 12 paragraph 10). Under this procedure there is no opportunity for objections to be made by the Commission or the police, and the grounds upon which an authority can refuse a permit are reduced. However an application under the process may be refused due to the fact that:

- (a) that the club is established primarily for gaming, other than gaming prescribed under schedule 12;
- (b) that in addition to the prescribed gaming, the applicant provides facilities for other gaming; or
- (c) that a club gaming permit or club machine permit issued to the applicant in the last ten years has been cancelled."

There are statutory conditions on club gaming permits that no child uses a category B or C machine on the premises and that the holder complies with any relevant provision of a code of practice about the location and operation of gaming machines.

Additional information about Club Gaming and Club Machine Permits can be obtained from the Council's Licensing team prior to applying by contacting: [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk) .

### **5. Temporary Use Notices**

Temporary Use Notices allow the use of premises for gambling where there is no premises licence but where a gambling operator wishes to use the premises temporarily for providing facilities for gambling. Premises that might be suitable for a Temporary Use Notice, according to the Gambling Commission, would include hotels, conference centres and sporting venues.

The licensing authority can only grant a Temporary Use Notice to a person or company holding a relevant operating licence, i.e. a non-remote casino operating licence.

The Secretary of State has the power to determine what form of gambling can be authorised by Temporary Use Notices, and The Gambling Act 2005 (Temporary Use Notices) Regulations 2007 (SI. No. 3157) state that Temporary Use Notices can only be used to permit the provision of facilities or equal chance gaming, where the gaming is intended to produce a single winner.

The meaning of "premises" in Part 8 of the Act is discussed in Part 7 of the Gambling Commission Guidance to Licensing Authorities. As with "premises", the definition of "a set of premises" will be a question of fact in the particular circumstances of each notice that is given. In the Act "premises" is defined as including "any place". In considering whether a place falls within the definition of "a set of premises", the licensing authority needs to look at, amongst other things, the ownership/occupation and control of the premises.

The Council may object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises."

## 6. Occasional Use Notices

The Council has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. The Council will though consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.

## 7. Small Society Lotteries

This licensing authority will adopt a risk based approach towards its enforcement responsibilities for small society lotteries. This authority considers that the following list, although not exclusive, could affect the risk status of the operator:

- submission of late returns (returns must be submitted no later than three months after the date on which the lottery draw was held)
- submission of incomplete or incorrect returns
- breaches of the limits for small society lotteries

Non-commercial gaming is permitted if it takes place at a non-commercial event, either as an incidental or principal activity at the event. Events are non-commercial if no part of the proceeds is for private profit or gain. The proceeds of such events may benefit one or more individuals if the activity is organised:

- by, or on behalf of, a charity or for charitable purposes
- to enable participation in, or support of, sporting, athletic or cultural activities.

Charities and community groups should contact this licensing authority on 020 8760 5466 to seek further advice.

### NOTE:

Information regarding this Statement of Principles and the Act in general can be obtained from:

The Licensing Team, Place Department, London Borough of Croydon, Bernard Weatherill House, 8 Mint Walk, Croydon, CR0 1EA.

E-mail: [licensing@croydon.gov.uk](mailto:licensing@croydon.gov.uk) or telephone 020 8760 5466.

Information about the Act can also be obtained from the Gambling Commission website at [www.gamblingcommission.gov.uk](http://www.gamblingcommission.gov.uk) or the Department of Culture, Media and Sport website at [www.culture.gov.uk](http://www.culture.gov.uk)