

Cabinet Agenda, 27th March 2024



To: Mayor Jason Perry (Chair)

Councillors Jeet Bains, Jason Cummings, Maria Gatland, Lynne Hale,
Yvette Hopley, Ola Kolade, Scott Roche and Andy Stranack

A meeting of the **Cabinet** which you are hereby invited to attend, will be held
**Wednesday, 27 March 2024 at 6.30 pm. Council Chamber, Town Hall, Katharine
Street, Croydon CR0 1NX.**

Katherine Kerswell
Chief Executive
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

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AGENDA

1. **Apologies for Absence**

2. **Minutes of the previous meeting** (Pages 5 - 28)

To approve the minutes of Cabinet, 14th February 2024 as an accurate record.

3. **Disclosure of Interests**

Members and co-opted Members of the Council are reminded that, in accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, they are required to consider **in advance of each meeting** whether they have a disclosable pecuniary interest (DPI), an other registrable interest (ORI) or a non-registrable interest (NRI) in relation to any matter on the agenda. If advice is needed, Members should contact the Monitoring Officer **in good time before the meeting**.

If any Member or co-opted Member of the Council identifies a DPI or ORI which they have not already registered on the Council's register of interests or which requires updating, they should complete the disclosure form which can be obtained from Democratic Services at any time, copies of which will be available at the meeting for return to the Monitoring Officer.

Members and co-opted Members are required to disclose any DPIs and ORIs at the meeting.

- Where the matter relates to a DPI they may not participate in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation.
- Where the matter relates to an ORI they may not vote on the matter unless granted a dispensation.
- Where a Member or co-opted Member has an NRI which directly relates to their financial interest or wellbeing, or that of a relative or close associate, they must disclose the interest at the meeting, may not take part in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation. Where a matter affects the NRI of a Member or co-opted Member, section 9 of Appendix B of the Code of Conduct sets out the test which must be applied by the Member to decide whether disclosure is required.

The Chair will invite Members to make their disclosure orally at the commencement of Agenda item 3, to be recorded in the minutes.

4. **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.

5. **Scrutiny Stage One: Recommendations arising from Scrutiny**
(Pages 29 - 38)
6. **Scrutiny Stage Two: Responses to Recommendations**
(Pages 39 - 54)
7. **Future Croydon - the Transformation Plan 2024 - 2029**
(Pages 55 - 90)
8. **Partial Local Plan Review**
(Pages 91 - 1000)
9. **Proposed Parking Charge Amendments 2024/2025**
(Pages 1001 - 1036)
10. **Update on the Housing Transformation Programme**
(Pages 1037 - 1068)
11. **Period 9 Financial Performance 2023/24**
(Pages 1069 - 1106)
12. **Procurement Pipeline**
(Pages 1107 - 1148)
13. **Oracle Improvement Programme Business Case**
(Pages 1149 - 1200)
14. **Local Government & Social Care Ombudsman Decision Finding of Fault Causing Injustice and Action Plan to Prevent Reoccurrence**
(Pages 1201 - 1224)
15. **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 AGENDA

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Public Document Pack Agenda Item 2

Cabinet

Meeting of held on Wednesday, 14 February 2024 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Mayor Jason Perry (Chair);

Lynne Hale (Deputy (Statutory) Executive Mayor and Cabinet Member for Homes (Vice-Chair)), Councillors Jeet Bains (Cabinet Member for Planning and Regeneration), Jason Cummings (Cabinet Member for Finance), Maria Gatland (Cabinet Member for Children and Young People), Yvette Hopley (Cabinet Member for Health and Adult Social Care), Ola Kolade (Cabinet Member for Community Safety), Scott Roche (Cabinet Member for Streets and Environment) and Andy Stranack (Cabinet Member for Communities and Culture)

Also Present: Councillors Rowenna Davis (Chair of Scrutiny and Overview Committee), Stuart King (Leader of the Opposition), Callton Young (Deputy Leader of the Opposition and Shadow Cabinet Member for Finance), Janet Campbell (Shadow Cabinet Member for Health and Adult Social Care), Christopher Herman (Shadow Cabinet Member for Streets and Environment), Chrishni Reshekaron (Shadow Cabinet Member for Homes) and Leila Ben-Hassel

PART A

117/24 **Minutes of the previous meeting**

The part A minutes of the Cabinet meeting held on Wednesday 31 January 2024 were agreed as an accurate record.

118/24 **Disclosure of Interests**

There were none.

119/24 **Urgent Business (If any)**

There were no items of urgent business.

120/24 **Mayor's Business Plan 2022-2026 Performance Report**

The Executive Mayor introduced the Mayor's Business Plan 2022-2026 Performance Report which provided further update of achieving outcomes and Key Performance Indicators (KPIs).

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, shared with Cabinet that the KPIs had shown a clear indication of where the Housing department were and the scale of challenge, they were facing to improve the service. The aim was to build strong sustainable foundations across the service including developing KPIs based on accurate and reliable data, monitoring, and the use of data. The Housing Strategy, which aligned with the recent resident's charter, was to form as part of the decision process for long-term foundations in the service. The contact centre had faced a significant number of high calls and staff resource issues, and now a new inhouse contact centre had been overwhelmed by the demand. Following the problems seen, a new staffing plan had been developed and a contact centre refreshed with permanent staff appointed receiving bespoke training programme. With shared accommodation being a national problem, Croydon council aimed to refocus services to prevent homelessness at a much earlier stage. There was progression on the key priority of voids, where 650 voids were made to offer homes to families who had spend years on temporary accommodation. Overall, a new NEC system was being stabilised, data was under validation and cleansing, permanent staffing were under recruitment, with refocus on customer service through the customer care training programme, closer performance monitoring and management, would see improvement in service delivery.

The Cabinet Member for Children and Young People, Councillor Maria Gatland, shared with Cabinet of the known demand for statutory social work service which had risen by 16% in 2022 and 2023 and highlighted some red indicators, though there was positive factors such as the proportion of 16 and 17 year olds who were not in education, employment or training (NEET) had received positive work with increased availability with face-to-face learning for 16 to 18 year olds, other means to assist learns and a robust , further with an additional case worker externally funded to work with the pupil referral unit in supporting the school year 11 with post 16 planning and transition. Further, the EHPC had a huge amount of work undertaken with quality and design which was highly rated by the DfE. Since June 2022 there was introduction of weekly reporting by team managers to their heads of service for scrutinising weekly performance; further there was equality SEND database to inform practice. Child protection plans was monitored very closely. The transformation with the front door service – the Multi-Agency Safeguarding Hub (MASH) with enhanced management oversight would help monitor the indicators which were all under scrutiny.

The Cabinet Member for Health and Adult Social Care, Councillor Yvette Hopley, shared with Cabinet in detail that the indicators for the percentage of safeguarding intervention leading to reduction/removal of risk, the rate of 65+ clients in long term care, and the rate of 65+ clients supported to live independently were currently in the green zone in performance. The amber indicators concerning the percentage of people who approached the council for help with adult care and resolved at the point of initial

contact, the percentage of people still at home after 91 days after returning home from using reablement service, and the rate of 18-64 year-old clients supported to live independently, have seen more strategic work in each segment. The red risks indicators noted the management in the demand programme with significant shifts in the transformation work that had started; further, more work was to be done on rehabilitation, and the service was looking to improve the facilitation of people into their own homes. There were other projects to be delivered, and new technology and smarter working would help move figures into the right direction.

The Cabinet Member for Communities and Culture, Councillor Andy Stranack, shared with Cabinet that the latest London Borough of Culture statistics had been collated as of November 2023, highlighting that over 200 cultural events had taken place across the borough reaching over one million people. There were 14,000 opportunities for young people to engage with the culture sector, there were over 6000 volunteers helping and taken part in the events, and 104 local schools had taken part in some way. "A Very Croydon Christmas" was a recent event which took place in the Croydon Clocktower, Queens Garden and the Fairfield Halls which received feedback as good or very good. The real value of events came from personal impacts of the individuals. The key aim of the year was to shine a positive light on Croydon and its amazing cultural talent.

The Cabinet Member for Community Safety, Councillor Ola Kolade, shared with Cabinet that the council was continuing to make Croydon a safer place to be through the Safer Croydon Partnership. Further work was undertaken through the Community and Safety Engagement Board working with a number of community groups to address crime and antisocial behaviour to provide the assurance of safety in workplaces and residence in the borough of Croydon. Reviewing the key performance indicators in detail, the domestic violence offences rate saw it was ringfenced and maintained the family justice budget through working closely with public health to protect and safeguard local residents within the borough. This remained the highest issue, where the family justice service would be leading on. The knife crime with injury indicator had shown that the service was launching a new youth outreach which would run for a full year to give additional support for young people. The service was acting much quicker in response to street robberies and antisocial behaviour in the district and town centre and investing in additional resources.

The Cabinet Member for Planning and Regeneration, Councillor Jeet Bains, shared with Cabinet that the service continued to see performance improving each quarter which was a reflection of the work as part of the planning transformation programme and the clearance of the backlog. The key indicators addressing the major planning applications determined in time over a rolling 2 year period, remained well above the government target threshold of over 90% within target, and the non-major planning applications determined in time over a rolling 2 year period, was also above target with more than 80% in target.

The Cabinet Member for Streets and Environment, Councillor Scott Roche, shared with Cabinet that further improvements continued to be made within the service, and though more work was to be done, the progress of improvement was on the right track. The key performance indicators relating to the percentage of reported flytips removed within one working day showed a strong response with over 97% in target and matched feedback from residents, however, the overall concern for flytipping still remained high. A new force of policy was to be produced and enforced in the future. The percentage of waste rejected as contamination by Croydon's processing facility had seen an increase in volume in the recycling waste rejected and redirected for further processing. The service would be seeking assistance from landlords and managing agents to address contamination and increase the quality of recycling. The household waste recycling rate saw an increase of rejection rate which had a corresponding impact on the recycling rate along with the seasonal variation in the amount of garden waste collected and recycled. In relation to street cleansing and the percentage of street below grade rectified within 24hrs, this was at 93%. Lastly with the percentage of household waste collected on time, this had remained at a high level at 99% within target.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet that the council balanced its books and the net budget recorded was zero, and was positive with the direction of the finance sector.

The Leader of the Opposition, Councillor Stuart King, had a question on the KPIs and asked whether there were concerns that 30 of the 84 KPIs portrayed no target at all, and where no target had been set, this proposed a risk and therefore not monitored. Further, with the 54 KPIs with a target set, 50% of those KPIs were red and 38 KPIs had performance not improving.

The Executive Mayor responded that the KPIs were a new process the council took to monitor each service area in greater detail, and to benchmark. The performance seen reflected on where the council currently stood following the trajectory of improvement from being under special measures. Trust with residents and working with services would provide a better journey for improvement.

The Director of Quality Performance, David Courcoux clarified that the vast majority of the indicators that did not have targets were categorised within the appendices as partnership KPIs (i.e. where the council did not have direct control over). The indicators that related to the council and measured organisational performance would have targets.

The Executive Mayor in Cabinet **RESOLVED:** To

Note the Mayors Business Plan performance report (Appendix A and B) with latest data available on 30 November 2023 (unless otherwise stated) regarding overall council and partnership performance, and actions being taken to improve outputs.

Note the Mayors Business Plan performance report (Appendix A and B) with latest data available on 30 November 2023 (unless otherwise stated) regarding overall council and partnership performance, and actions being taken to improve outputs.

121/24

Brick by Brick Closure Report

The Executive Mayor introduced the Brick by Brick Closure Report which was established in 2014 to build council homes and deliver housing projects affordably for the council, however, following the council's declaration of bankruptcy in 2021, the council had to make significant steps to recover money from Brick by Brick and now on a process of winding down Brick by Brick to deliver financial stability to the council.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet that the key momentum was to close Brick by Brick, having reflected that there had been options in managing Brick by Brick with choices to either continue working with Brick by Brick. To close was the right decisions made following the loss made which has now stopped.

The Leader of the Opposition, Councillor Stuart King, welcomed the report and asked in relation to recommendation 2.3 of the possible sale of Brick by Brick, and whether there had been enquires that this should be included in the list of recommendations; also, in relation to recommendation 2.2 whether a decision had been made for the asset and liabilities to be released to the general fund or Housing Revenue Account.

The Cabinet Member for Finance, Councillor Jason Cummings, responded that with regards to recommendation 2.3 and any potential sale, there was opportunity for a party to purchase Brick by Brick, though noted that during the original options submitted, when reviewing market value, a decision was made to continue the build out. This report, however, sought to cover any options that may create exceptional circumstances where the council would have an offer for better value. With regards to recommendation 2.2 and the Housing Revenue Account and general funds, this regarded an assessment of the individual assets that remained by Brick by Brick to be worked through and value assessed for its use. It was currently unknown what assets would remain, though this was to be addressed on an individual basis.

The Executive Mayor in Cabinet **RESOLVED**:

- 1.1. To approve that Brick by Brick Croydon Ltd be closed down on a solvent basis as detailed under Option 1 of Section 8.

- 1.2. To delegate to Corporate Director of Resources (S151 Officer), in consultation with Director of Legal Services, Corporate Director Housing and Director of Commercial Investment & Capital to decide whether the Council under its Housing Revenue Page 82 Account (HRA) and/or General Fund (GF) acquire all or part of the remaining assets and liabilities of BBB if not disposed within a reasonable time frame.
- 1.3. To delegate to Corporate Director of Resources (S151 Officer), in consultation with Executive Mayor, Lead Member of Finance, Director of Legal Services, Director of Commercial Investment & Capital to negotiate the sale of Brick by Brick Croydon Ltd should an offer that improves the Council's financial position, against the winddown position, be received before the proposed winddown date of the company.
- 1.4. To delegate to Corporate Director of Resources (S151 Officer), in consultation with Executive Mayor, Lead Member of Finance, Director of Legal Services and Director of Finance to enter into any final legal agreements on behalf of the Council as Shareholder and/or Lender and make any necessary shareholder resolutions, where relevant to give effect to the recommendations and delegated decisions in this report as part of the winddown process.
- 1.5. To delegate to Corporate Director of Resources (S151 Officer), in consultation with the Executive Mayor, Lead Member of Finance, Director of Legal Service and Director of Finance to approve the final loan principle write off amount, up to £70m, at the point of winddown.
- 1.6. To delegate to the Corporate Director of Resources (S151 Officer), in consultation with the Executive Mayor, Lead Member of Finance, Director of Legal Service and Director of Commercial Investment & Capital to issue letters to current Directors requesting their resignations and to approve indemnification of liability in line with the Outside Bodies Protocol approved by Ethics Committee on 8th February 2023.
- 1.7. To delegate to Corporate Director of Resources (S151 Officer), in consultation with the Executive Mayor, Lead Member of Finance, Director of Legal Service and Director of Commercial Investment & Capital to appoint new Directors on the Board of the BBB.

122/24

Budget 2024-25 and Medium Term Financial Strategy 2024-28

The Executive Mayor introduced the Budget 2024-25 and Medium Term Financial Strategy 2024-28 Report which proposed a deliverable budget for 2024-25. The budget planned to include £30 million in savings for

2024-25 with an ongoing asset disposal programme that aimed to deliver £200 million of receipts over the period 2022-2026.

The Chair of Scrutiny and Overview, Councillor Rowenna Davis, shared with Cabinet that following the Scrutiny and Overview Committee (the Committee) receiving the report, the outcome concluded with the following:

- That the council could not balance its books without exceptional support of national government, and there was a gap of £38 million pounds wide that was to be filled next year. To fill this hole, the council was to seek permission to borrow from national government for capitalisation and selling assets to meet general expenditure. Though there was no guarantee national government would provide the money for the council to stay afloat.
- The Committee noted that the council was doing all that they could with ambitious plans for savings, and based on the information provided, it was concluded that those proposed were deliverable whilst meeting the statutory needs of vulnerable residents, although the scale, pace and wide-ranging nature of the savings meant that they would need to be closely monitored.
- The Homes Sub-Committee had reservations relating to the Housing Revenue Account and was not assured without further data particularly on the housing stock conditions survey which should reveal more on sale of investment needed.
- In comparison to last years budget there was concern relating to the £5 million pound economic demand pressures budget which had been removed; though the use of this budget had helped balance the books for this years budget to plug the increased costs associated with rises in demand for emergency accommodation; and thus without this extra cushion of the economic demand fund, the pressure on the council to stick to its budget would become even greater.
- It was important how the council would mitigate risks and, on the risks register in Appendix L, not all risks listed were quantified and some did not have any mitigating actions attached.
- In regard to transformation, the scale and pace of this was essential though not where it needed to be.
- The Committee noted that the council was sticking with the government maximum rise of 4.99% in council tax. The reduction of the council tax hardship fund from £2 million pounds to £500,000 pounds was questioned, and the Committee was pleased that the money had been reallocated to the council tax support scheme, though the Committee was not convinced that the low take up of the scheme was due to the lack of need rather than lack of awareness, and more work to promote awareness was advised.
- Real improvements in the quality of transparency were noted by the Committee, though in the budget an extra £9.4 million pounds of capitalisation above and beyond of what was expected was to be requested from government due to a historic contractual issue for

highway works and improvements and requested for more thorough information on this.

The Cabinet Member for Finance, Councillor Jason Cummings, informed the Cabinet in terms of the council tax, that it was a 4.99% increase in terms of the council's portion of council tax which was in fulfilment of the promise made from last year to not go over the cap this year. Borrowing was not forecasted to increase this year or next year, which was good for the council, though this was limited by the extent of the asset disposal programme. The removal of the economical demands pressures had made the budget slightly riskier, though still predicated on the £38 million pound capitalisation direction, however pointed out that in this financial year, the capitalisation direction was £63 million pounds which showed an improvement in terms of the reduction in capitalisation of £25 million pounds year on year which was a significant move. Lastly, the off-log financial sustainability data had shown that the average debt servicing cost was 8% across England, and 16% in Croydon, further, the total debt of a council across England was 226%, and in Croydon 478% which had shown that the debt Croydon was carrying was heavily significant.

The Corporate Director of Resources and Section 151 Officer, Jane West, shared that in Appendix K, the pressures the council faced focused back on the historic s114 which was served. In regard to the robustness in the budget estimates, a lot of work had been undertaken for the budget to remain robust for this financial year, this included working thoroughly with the Corporate Management Team. In regard to the removal of economic pressures contingency budget, the accuracy of the budget in place had given reassurance for a robust budget, though the position was more at risk than the current year with less room to maneuverer. Lastly, the balances available had not been used and the reserves held had not been used.

The Shadow Cabinet Member for Finance, Councillor Callton Young, asked whether the report in the public interest could be amended to be more open about the following key aspects of the budget and budget strategy; what progress was there on the negotiations with government for the debt write-off; and could there be more transparency on the budget setting process. On the general funds, could the council properly fulfil its roles without having all the key papers, and was there satisfaction that the report was sufficient for all Members to challenge the risks to the council of the removal of the economic demand reserves for 2024/25 and the provision proposed for demand and demographic pressures in 2024/25 where half was provided in the following year. Also, the reduction of two-thirds of the council's hardship funds that was designed to protect low-income households with financial difficulties in relation to council tax increases. Further, was there satisfaction that the report and in Appendix D was sufficient enough for Members to provide challenge to the transformation plans. Lastly, with the forecast that £142 million pounds should be received by the council at the end of next month from assets disposals, did the report adequately allow Members to challenge the

contribution and pace of asset disposals that the council needed to make to reduce debt, and what contribution did the capital receipt from the councils rent resonance investment made to the debt reduction.

The Executive Mayor responded that the process of the budget was more open and transparent with the Scrutiny and Overview Committee receiving papers at a much earlier stage to review and asked questions and provided recommendations, and further there was opportunity for all Members of the council to review and seek support from offices to address alternatives or other options for the budget should this be required. The negotiations with government were on-going. The council's hardship fund was being moved to the council tax team, and it was noted that many more people were being supported through the council tax support scheme and the council was ensuring all residents were aware of all types of support available. The Corporate Director of Resources and Section 151 Officer, Jane West, added that the hardship fund £1.5 million was being reallocated to the council tax support as the request for such support was required by residents; further, relating to the resonance investments, the figures were included in the capital receipts projections and a third of the money had been received.

The Executive Mayor in Cabinet **RESOLVED**: To

- 1.1. Consider the responses to the budget engagement with residents and statutory consultation with businesses (set out in Section 10 of this report and detailed more fully in Appendix J).
- 1.2. Consider and have due regard to the equalities impact assessment undertaken on the budget proposals as set out in Appendix N.
- 1.3. Approve the responses to the Scrutiny and Overview Committee recommendations (to follow after publication of this report – Appendix O) on the budget proposals as set out in Section 20.
- 1.4. Approve that (subject to Full Council approving the budget and any further decisions required of the Executive) that Corporate Directors be authorised to implement their respective growth and savings proposals for 2024-25 in accordance with the recommendations within this report, the Council's Constitution, Financial Regulations, relevant Schemes of Delegation and undertake any further consultation required, including regarding the Equalities Impacts of specific decisions within the Budget envelope as approved by Full Council.
- 1.5. Propose to Full Council for approval an increase in the Croydon element of the 2024-25 council tax charge by 2.99% (Band D £53.98).
- 1.6. Propose to Full Council for approval a 2% increase (Band D £36.11) in the 2024-25 Adult Social Care precept levy.

- 1.7. Note, based on the Mayor of London's draft consolidated budget, a proposed 8.58% (Band D £37.26) increase regarding the Greater London Authority precept.
- 1.8. Propose to Full Council for approval, the calculation of budget requirement and council tax as set out in Appendix I and note that the inclusion of the GLA precept will result in a total increase of 5.69% (Band D £127.35) in the overall Croydon council tax bill.
- 1.9. Propose to Full Council for approval the setting of the Council's own total net expenditure budget for 2024-25 at £361.267m.
- 1.10. Propose to Full Council for approval the detailed programme of revenue savings, income, demand pressures and legacy budget corrections, by directorate, as set out in Appendix C.
- 1.11. Propose to Full Council the proposed £5m budget in 2024-25 to support delivery of the transformation programme.
- 1.12. Propose to Full Council the Reserves Policy set out in Appendix M.
- 1.13. Propose to Full Council for approval that the Corporate Director of Resources be authorised to collect and recover National Non-Domestic Rate and council tax in accordance with the Local Government Finance Act 1988 (as amended) and the Local Government Finance Act 1992.
- 1.14. Note the revenue budget assumptions detailed in the report and budget projections to 2027- 28 made by the Corporate Director of Resources in agreement with the Chief Executive and with the Corporate Management Team.
- 1.15. Note the Council's request for a Capitalisation Direction from the Department of Levelling Up, Housing and Communities [DLUHC] of up to £38m for 2024-25, £9.439m relating to 2019-20 and current assumption that up to a further £38m per annum in exceptional financial support will be required for future years.
- 1.16. Note that all Directors will be required to report on their projected financial position compared to their revenue estimates in accordance with the 2024-25 monthly financial performance reporting timetable.
- 1.17. Note the statement (Appendix K of the Report) of the Corporate Director of Resources and S151 Officer, under Section 25 of the Local Government Act 2003, regarding the adequacy of reserves and robustness of estimates.

- 1.18. Note that the provisional Dedicated Schools Grant allocation for 2024-25 will increase by £28.583m to £466.825m (section 12 of the Report).
- 1.19. Propose to Full Council that the necessary determinations are made as billing authority under Section 11B of the Local Government Finance Act 1992 for financial year 2024- 2025 to the effect that where permitted, for dwellings that have been unoccupied and substantially unfurnished for a period of at least one year the amount of Council Tax will be increased by 100% where the period is less than 5 years, by 200% where the period is at least 5 years but less than 10 years, and by 300% where the period is at least 10 years, and that the discount under Section 11(2)(a) shall not apply.
- 1.20. Propose to Full Council that the necessary determinations are made under Section 11C of the Local government Finance Act 1992 as billing authority for financial year 2025-2026 to the effect that where permitted, for dwellings where there is no resident of the dwelling and the dwelling is substantially furnished, the amount of Council Tax will be increased by 100%, and the discount under Section 11(2)(a) shall not apply.
- 1.21. Propose to Full Council that the Council Tax Support scheme (statutory local council tax reduction scheme) under Section 13A(2) of the Local Government Finance Act 1992 is not changed from that agreed by Full Council resolution on 1st March 2023.

123/24

2023-24 Period 8 Financial Performance Report

The Executive Mayor introduced the 2023-24 Period 8 Performance Report, which showed the budget moving into an underspend position.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet that there was improvement in every department, which was a great position for the council to be in. The £5 million pound in-year contingency budget was not being used to balance the budget as the council had moved to an underspend position.

The Shadow Cabinet Member for Finance, Councillor Callton Young, welcomed the report and asked why the adjudication panel ruling regarding the £9.439 million pound payment of the former contractor relating to work dating back to 2011 not mentioned within the report; secondly, why was the £5 million pounds of grant from the Contain Outbreak Management Fund (COMF) in the context of covid only now allocated for spending.

The Cabinet Member for Finance, Councillor Jason Cummings, responded that there was no in-year impact on the £9.439 million pound in terms of the period monitoring report as it related to a prior accounting year. Relating to the COMF money, the service reviewed and assessed when allocation was to be made at a particular point in time. The impact of covid was still ongoing, and thus the continued use of the money within the time it could be spent was still mitigating the impact of covid and was being used for its original intention. The Director of Finance, Allister Bannin, added that the result of the adjudication related to a contract that finished before 2019/20, and the adjustments in the accounts were being made for 2019/20 as the accounts were still open, as mentioned in three other reports presented within this agenda. Adding to the point on COMF, it was said that every local authority received a lot of money by government during covid and recognised that the effects of covid had a long-term effect, and therefore extended the grant for local authorities to use for a longer period of time.

The Executive Mayor in Cabinet **RESOLVED**:

- 1.1. To note the General Fund revenue budget outturn is forecast to underspend by £1.3m at Period 8, after the budgeted utilisation of £63m capitalisation directions requested from DLUHC.
- 1.2. To approve within budget the inter-directorate virement of £2.1m non-pay inflation budget from the Adult Social Care & Health directorate to the Housing directorate on a one-off basis in 2023-24, as set out in paragraph 4.12.
- 1.3. To note the progress in MTFs savings achievement as set out in paragraph 4.103.
- 1.4. To note the work that has commenced on the Council's Transformation Programme as set out from paragraph 4.98.
- 1.5. To note the Housing Revenue Account (HRA) revenue budget outturn is forecast to overspend by £12.0m.
- 1.6. To note the General Fund capital programme 2023-24 forecast underspend of £20.7m against the revised capital budget of £127.1m. The 2023-24 General Fund capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 6 December 2023.
- 1.7. To note the HRA capital programme 2023-24 forecast overspend of £1.8m against the revised capital budget of £37.2m. The 2023-24 HRA capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 6 December 2023.

- 1.8. To note the Council's historic borrowing and subsequent debt burden continues to be critical to the non-sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of structural indebtedness to ensure it can deliver sustainable local government services.
- 1.9. To note that the Council continues to operate Spend Control Panels to ensure that tight financial control and assurance oversight are maintained.
- 1.10. To note that current forecasts are based on the best available information at the time and will be subject to review and change during the financial year.

124/24

Repairs Contracts Update

The executive Mayor introduced the Repairs Contract Update report which provided an update on the progress of the implementation of the new repairs contract since August 2023.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, shared with Cabinet that the report provided an overview of the organisation of the housing response repairs contract and sets out how the service was performing, further highlighting the delivery of social value initiatives. Since August 2023, there had been a significant increase of around 200 additional calls per month, a significant increase in the repair orders rate of 1500 a month, and there had been high levels of sickness absence amongst temporary staff which had impacted service. Admittedly, the new service was not working as well as foreseen with various contributing current and historic factors which had impacted on the ability of the new contractors to deliver the services' requirement. This spike of demand had caused intense pressure to the in-year 2023/24 budget and the resourcing of staff, as such, additional budget provisions were required for this year and in future years. The service recognised the challenges put before them and were keen to improve in all areas. Positively, the repairs team had significantly reduced the number of legacy VOIDS and had resolved a large number of overdue complaints and Member enquiries.

The Corporate Director for Housing, Susmita Sen, added that the council were not only addressing improvement in the existing service but had also improved services with a new IT programme and contact centre, further the transformation of the performance in culture was focused on the residents.

The Shadow Cabinet Member for Homes, Councillor Chrishni Reshekaron, noted a number of elements within the report and asked why

so many targets had been missed when the contractors had been mobilised more than six months ago.

The Executive Mayor responded that the procurement process was based around information provided at the time by the previous contractor which was not visible prior to August 2023. Further, the lack of investment in the housing stock over the last few years had meant that the level of repairs was much higher than what it ought to have been resulting in the struggle of the service to address particular issues. Having acknowledged the problems within the report, the council was striving towards a better investment to deliver better outcomes.

The Executive Mayor in Cabinet **RESOLVED**:

- 1.1. To note the progress following mobilisation of the new housing repair contracts on 1 August 2023.
- 1.2. To agree the actions proposed as outlined in this report and to report back to Members with an update within six months.

125/24

HRA Rent Setting 2024-25

The Executive Mayor introduced the HRA Rent Setting 2024-25 report, which detailed the process undertaken in setting the rents for 2024-25.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, shared with Cabinet that the report proposed an increase of social rent of 7.7% which was also a similar increase in the tenants service charges, this equates to an average weekly increase of £7.19 on a 1-bedroom property. An estimate of 68% of the council's tenants were eligible for housing benefits, though the remaining 32% received no benefits who would potentially be at some point in a financial risk as a result of the increase. The continuation of the housing revenue account specific discretionary fund was therefore proposed to remain in place to assist households in financial difficulties, which was set up in 2023/24 and £59,000 pounds in payment to date had been made to 118 residents.

The Shadow Cabinet Member for Homes, Councillor Chrishni Reshekaron, noted that only 2% (97 of the 4795 tenants), had received support in 2023/24 from the HRA discretionary fund who were not entitled to any benefits, and asked what actions would be taken to ensure more tenants were receiving support from the HRA discretionary fund in the next financial year following the decision to increase the rent by 7.7% and the government's decision to end the household support fund.

The Executive Mayor responded that the action to provide a hardship fund had been put in place which would continue in the following financial year. Officers added that there was a multi-prudent approach in addressing the

needs of tenants which included the “get to know your tenant”, and there were other benefits tenants were entitled to access support.

The Executive Mayor in Cabinet **RESOLVED**:

- 1.1. To agree the social rents increase of 7.7% from April 2024 based on the current final year of the government’s Social Housing Rent Policy, (applying September 2023 CPI + 1%)
 - 1.2. To agree the request to set the tenants service charges increase at the same level as the rents (7.7%) for the financial year 2024-25.
 - 1.3. To agree the continuation of the Housing Revenue Account (HRA) hardship fund aimed at assisting tenants who are financially impacted by the 2024-25 rent increase, subject to obtaining a further Direction in appropriate terms from the Secretary of State.
 - 1.4. To agree, the nil increase to the garage rents on the proviso that a full review of the viability of assets is carried out in 2024-25 and reported back to Cabinet.
 - 1.5. To agree the request to set the increase in the caravan site plot charges in line with September CPI of 6.7%.
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 - 1.4. To agree, the nil increase to the garage rents on the proviso that a full review of the viability of assets is carried out in 2024-25 and reported back to Cabinet.
 - 1.5. To agree the request to set the increase in the caravan site plot charges in line with September CPI of 6.7%.

126/24

HRA Business Plan and Budget Update 2024-25

The Executive Mayor introduced the HRA Business Plan and Budget Update 2024-25 report, which included a £7.1 million increase to invest in council homes and modernise them to a standard fit in line with resident needs.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, shared with Cabinet that the report sets out the legislative position in a thirty-year Housing Revenue Account (HRA) business plan and identifies the pressures on the plan. Growth of 33% in the response's repairs budget was proposed to fund an increase in repairs demand caused by a number of factors. New emphasis had been put in place for fire safety requirements, as requirements to comply with the Fire Safety and Building Safety Acts had been put in place. The council had undertaken requisite surveys and building safety case reviews to ensure compliance. The HRA business plan had more focus for the first five years where there was more certainty on costs, demands, and pressures, that demanded and demonstrated that the investment proposals were fundable subject to the assumptions made within the plan and also that the HRA remained sustainable and viable over the thirty-year period. The budget had been set with the most accurate data available reflecting on the significant pressures on repairs and maintenance costs.

The Shadow Cabinet Member for Homes, Councillor Chrishni Reshekaron, had asked whether the risks associated with the capital programme based on a 5% sample survey of the housing stock condition had been considered and had the Improvement and Assurance Panel provided any advice.

The Executive Mayor responded that the service had undertaken the inherited 5% housing stock and noted that by March it was anticipated that the housing stock would be up at 40%, further, that the council was working with the Improvement and Assurance Panel around housing which was an area to improve, and more data once received, would be reflected in the business plan. The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, clarified that the stock condition survey data would need to be worked through which would feed into the asset management strategy, and would enable the service to conduct a full re-budget review of the whole HRA business plan. The Corporate Director for Housing, Susmita Sen, added that the intention to reach 40% by the end of the financial yearend was achievable though data would need to be uploaded, and from that in addition to the asset management strategy, the direction of work within the procurement strategy would need to be clear to receive very good value for money.

The Executive Mayor in Cabinet **RESOLVED**:

- 1.1. To recommend Full Council to agree the proposed HRA budget for 2024-25.
- 1.2. To recommend Full Council to agree the update to the HRA 30 years Business plan based on the HRA budget for 2024-25.
- 1.3. To note the assumptions in the Business Plan and the associated risk.

- 1.4. To note the ongoing work required on the asset management strategy and the enhanced stock condition surveys that are underway which will further inform the next iteration of the Business Plan.

127/24

The Future of the Experimental Healthy Neighbourhoods

The Executive Mayor introduced the Future of the Experimental Healthy Neighbourhoods report which promoted road safety, supporting vulnerable road users, improving air quality and promoting sustainable modes of travel. Further, the consultation highlighted areas where further work was required to improve schemes for local residents.

The Cabinet Member for Streets and Environment, Councillor Scott Roche, shared with Cabinet that following feedback from residents, the improvements implementing from September 2022 such as the removal of physical barriers not only helped restore access to the residents' streets but also allowed vehicles to also gain access to most of the roads and schemes as required without hinderance from the physical barriers as they were previously. Additional signs were also added on key junctions and main roads approaching the schemes, to help lower instances from where vehicles and residents going to the zones unknowingly. There was further ongoing work to improve the schemes, further investigating ways to help deal with issues associated with travel displacement and also the impact on local roads.

The Corporate Director for Sustainable Communities, Regeneration and Economic Recovery, Nick Hibberd, added that the supplementary report added to the agenda provided an updated set of appendices that included the analysis and statutory objections for Holmesdale healthy neighbourhood which was omitted in error.

The Shadow Cabinet Member for Streets and Environment, Councillor Christopher Herman, had a question in relation to the seven LTN schemes, and asked what listening was had during the process; what led to a change of heart; and what specific consideration was there to any further healthy neighbourhoods.

The Executive Mayor responded and clarified that there were only six schemes going forward, with major changes made to all the schemes, introducing free resident parking permits, removed planters, street furniture physically blocking roads. There was also a third tranche of LTN schemes built into the budgets and LIP programme also removed. Further, there had been ongoing communications with residents to improve schemes, review traffic displacement and establish what measures could be put in place to mitigate the issues.

The Executive Mayor in Cabinet **RESOLVED:**

- 1.1. A) To proceed with making permanent the Healthy Neighbourhood ref 1,2,3,4,6 and 7 as outlined below and to continue to work with residents to ensure signage is improved as where necessary to raise awareness.

Ref	Healthy Neighbourhood	Wards	Experimental Order	Order Ref
1	Albert Rd	Woodside	The Croydon (Traffic Movement)No17 Exp Order 2022	2022 No 63
2	Dalmally Rd	Addiscombe West	The Croydon (Traffic Movement)No12 Exp Order 2022	2022 No 29
3	Elmers Rd	Addiscombe West	The Croydon (Traffic Movement)No14 Exp Order 2022	2022 No 37
4	Holmesdale Rd	South Norwood	The Croydon (Traffic Movement)No16 Exp Order 2022	2022 No 58
6	Parsons Mead	Broad Green	The Croydon (Traffic Movement)No15 Exp Order 2022	2022 No 40
7	Sutherland Rd	Broad Green	The Croydon (Traffic Movement)No13 Exp Order 2022	2022 No 34

- B) To remove The Kemerton Rd Healthy Neighbourhood, detailed below:

Ref	Healthy Neighbourhood	Ward	Experimental Order	Order Ref
5	Kemerton Rd (single residential road between two residential roads with a point closure at its end with Jesmond Rd)	Addiscombe West	The Croydon (Prohibition and Restriction of Stopping, Loading and Waiting) and (Free Parking Places) (No 3) Experimental Order 2022	2022 No 32

Kemerton Rd was closed at its junction with Jesmond Rd with lockable bollards which the emergency services can unlock in an emergency. There is no evidence to demonstrate that it was a road used by through traffic, and it does not form part of a wider healthy neighbourhood scheme. Residents who came to the drop-in sessions were not supportive of it remaining. The opening of the road to traffic would not necessarily create an opportunity for through traffic to by-pass any roads as it is a

short length of highway between two main roads, no real gains in using it to access the road on either side.

1.2. To agree that officers will work with residents on adjustments to improve the following Croydon Healthy Neighbourhoods (CHN), Ref 1, 4 ,and 7 Subject to Paragraph 1.1 A

A) To work with residents of Albert Rd (Ref CHN 1) to agree adjustments that can be made between Eldon Rd and Harrington Rd. This section is currently unrestricted due to the on-going development requiring a temporary closure.

B) To work with residents of 1) Holmesdale HN (Ref CHN 4) to reduce the impact in Dixon Rd due to displaced traffic, and 2) to work with residents of Priory Rd and Wentworth Rd (Ref CHN 7) to reduce the impact caused by displaced traffic. Any adjustments to 1) and 2) will be integral to the 2024-25 TfL funded LIP programme to ensure the Healthy Neighbourhoods deliver a coherent approach to improving conditions in residential roads through reducing the degree on impact.

Ref	CHN	Unrestricted residential roads within HN subjected to displaced traffic	Residential Roads outside of HN subjected to displaced traffic	Experimental Order	Order Ref
4	Holmesdale Rd	Dixon Rd		The Croydon (Traffic Movement)No16 Exp Order 2022	2022 No 58
7	Sutherland Rd		Wentworth Rd and Priory Rd	None	None

1.3. Subject to approval of recommendations 1.1 above, to delegate authority to the Corporate Director of Sustainable Communities, Regeneration & Economic Recovery to undertake all measures necessary to make the above referenced experimental orders permanent Traffic Management Orders, including pursuant to the statutory requirements of the Road Traffic Management Act 1984 and Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 and make arrangements for the enforcement thereof.

128/24

Capital Programme and Capital Strategy 2023-29

The Executive Mayor introduced the Capital Programme and Capital Strategy 2023-29 report which focused on the maintenance of council assets.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet that there has been a significant improvement in governance

put in place over the capital programme and the performance which went into the programme. The report highlighted that the council would be incurring a nil borrowing in the financial year of 2023/24 and 2024/25.

The Shadow Cabinet Member for Finance, Councillor Callton Young, asked for more details on the progress of the debt write-off negotiations or other options the Department for Levelling Up, Housing and Communities (DLUHC) had requested for, for Members to know and rigorously challenge the budget.

The Executive Mayor responded that the council continued to negotiate with government on moving forward which was not an easy solution as there were a number of issues the government would need to consider. It was clear that the council could not resolve this matter in solitary and attempted to change the way the council operated with the transformation programme in place. The Cabinet Member for Finance, Councillor Jason Cummings, added that the programme had predicted a borrowing of £164.67 million over a period of time should capitalisation carry on for £38 million pounds per year, though the council's expectation was for this to not happen. With no resolution at the current moment, the MTFs could only be put forward as it stood though it was agreed it was not sustainable.

The Executive Mayor in Cabinet **RESOLVED** to:

- 1.1. Approve the Council's 2023-29 General Fund Capital Programme which includes planned expenditure of £479.68m (including capitalisation directions) across the six years.
- 1.2. Approve the Council incurring nil General Fund borrowing for financial years 2023-24 and 2024-25 and borrowing of £164.67m over 2025-29. The cost of this future borrowing is factored into the Council's Medium Term Financial Strategy.
- 1.3. Approve the 2024-25 Housing Revenue Account (HRA) Capital Programme with investment planned of £57.24m with borrowing of nil.
- 1.4. Approve an increase to the 2023-24 HRA capital budget from £33.248m to £37.162m, owing to increased major repairs and improvements, with this £3.914m increase funded by HRA reserves.
- 1.5. Approve the Council's Capital Strategy, as detailed within Appendix A of this report.
- 1.6. Note the Council's historic legacy borrowing and debt burden continues to be critical to the sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of

indebtedness to ensure it can deliver sustainable local government services.

129/24

Treasury Management Strategy Statement, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2024/25

The Executive Mayor introduced the Treasury Management Strategy Statement, Minimum Revenue Provision Policy Statement and Annual Investment Strategy 2024/25 which detailed how the council managed cash flow and borrowing whilst minimising the level of risk.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet that the council defined its treasury management in line with the Chartered Institute of Public Finance and Accountancy (CIPFA) as the management of the council's borrowing, investments and cash flows, including its banking, money market, capital market transactions and the effective control of the risks associated with those activities, and the pursuit of optimal performance consistent with those risks. The report highlighted the affordability prudential indicators which published the ratio of debt to net revenue stream of the general fund. This had the ratio of the Capital Financial Requirement (CFR) to the net revenue stream and also the ratio of debt. Reviewing the ratio of the CFR, the net revenue stream was 4.4 times (in March 2023), with the aim of the council to bring it down to 2.5 times to a point of sustainability. The MTFs dropped from 4.4 each year to 3.6, therefore the MTFs as it stood, with the capitalisation directions included showed improvement within the long-term sustainability of the council with more work to achieve without incurring continuous increase of debt.

The Shadow Cabinet Member for Finance, Councillor Callton Young, welcomed the report and had a question on Member training in order to have knowledge and the skills to understand and scrutinise the council's treasury management and asked whether the required training was scheduled to take place as Members would be asked to approve the strategy at the upcoming budget Council meeting, or whether the training was scheduled for a later time.

The Corporate Director for Resources (Section 151 Officer), Jane West, responded that training had been put together for Members which would take place after the budget Council as further discussions with the provider were taking place. It was noted that training had been previously provided, and this training was an update. The Cabinet Member for Finance, Councillor Jason Cummings, added that there were also existing ongoing training opportunities within the LGA which were also recommended for all Members to take for personal development.

The Executive Mayor in Cabinet **RESOLVED:**

- 1.1. The Treasury Management Strategy Statement 2024/25 as set out in this report;
- 1.2. The Prudential Indicators as set out in Appendix A of this report;
- 1.3. The Annual Minimum Revenue Provision Policy Statement (required by the Local Authorities (Capital Financing and Accounting) (England) (Amendment) Regulations 2008SI 2008/414) as set out in Appendix B;
- 1.4. The Borrowing Strategy and Investment Strategy; and
- 1.5. Note the requirement for Members to undertake training in order to have the appropriate knowledge and skills to enable them to understand and scrutinise the Council's treasury management.

130/24

Review of Council Tax Care Leavers Relief Scheme

The Executive Mayor introduced the Review of Council Tax Care Leavers Relief Scheme which explored the council tax relief given to care leavers ages 18-24. The report further upheld the council's commitment as corporate parent to Croydon's own care experienced young people, to provide support in crucial times in their lives.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet of the changes within the report in relation to fairness and savings. The council would continue paying council tax to all Croydon care leavers as part of the support package offered, residing inside the borough and outside of borough where they would also have to pay council tax. The previous system also meant that the council had a responsibility to pay for care leavers that came into the borough from other boroughs, and this was a change that the council had made which would add savings and fairness. Another fairness change was where a care leaver was living in another property, but the principle paying council tax person was not a care leaver, the current system provided free council tax to anyone else residing in that property. The system has now shifted where the council would not offer free council tax relief to anyone that resided in the property. However, the report in paragraph 4.22, covered clarification in regard to foster care arrangements, which would also be under review on the allowance arrangements, and further for carers on the staying put arrangements to include support for council tax scheme so there was no disadvantage.

The Cabinet Member for Children and Young People, Councillor Maria Gatland, added that supporting care leavers in Croydon or placed outside

Croydon had been a top priority and welcomed the continuation of the council tax support, additionally, the support made to foster carers.

The Shadow Opposition Leader, Councillor Stuart King, had a question relating to the corporate parenting principles set to seek the best outcomes for care leavers, and asked how had the council reconciled the requirement to remove council tax relief from households when there was no make-up of the 54 households, to know whether there was an impact or not.

The Executive Mayor responded that the council's responsibility as corporate parents were to look after the care leavers of Croydon. The Cabinet Member for Finance, Councillor Jason Cummings added for clarification that in reviewing the 54 households this was in relation to a change in the automatic exclusion of the 100% council tax relief which did not preclude the use of the normal council tax support system when the financial assessment of the household council taxpayer was taken into account. The council also had a very good council tax support scheme supporting residents. Further, it was fair to review the impact, if any, this may bring in those households following this change. The Director of Finance, Alister Bannin, added that should a household be affected in paying their council tax they would have access to other council tax support mechanisms such as the main council tax support scheme, transitional fundings, or the council tax hardship funds to apply for. The Head of Payments, Revenues, Benefits & Debt, Catherine Black, added insight to the consultation, which was sent out to over 350 care leavers, further informing care leaving teams that a consultation had been launched, followed up on communications and had encouraged feedback to the consultation.

The Executive Mayor in Cabinet **RESOLVED**: To

- 1.1. Consider the outcome from the consultation as per 6.14, 6.15 and 6.16 below and the equalities impact assessment.
- 1.2. To agree that the CLRS is updated to only support care leavers where Croydon is the Corporate Parent.
- 1.3. To agree that the CLRS is updated to include only care leavers where they are named as a liable party in line with the Council Tax hierarchy of liability, as per 4.16 below.

131/24

Croydon Companies Supervision and Monitoring Panel - Update Report

The Executive Mayor introduced the Croydon Companies Supervision and Monitoring Panel report which updated work in detail ensuring that appropriate management oversight was in place.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet that this report highlighted an update on the progress and clarity in the current position with Croydon companies. This covered the Croydon affordable homes and related companies and others that still existed. Progress was moving forward in terms of simplification and reduction agenda, though there were some delays in relation to the LLPs and which was still progressing.

The Shadow Cabinet Member for Finance, Councillor Callton Young, welcomed the updated report and the council's involvement and noted the actions stated that were dependant upon council's 2019/20 accounts being certified.

The Executive Mayor in Cabinet **RESOLVED:**

1.1. To note the status of Croydon Council companies, excluding Brick by Brick (Croydon) Limited

132/24

Exclusion of the Press and Public

This was not required.

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133/24

Brick by Brick Closure Report - PART B - Appendix 1

The meeting ended at 8:51pm

Agenda Item 5

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE	27 March 2024	
REPORT TITLE:	STAGE 1: RECOMMENDATIONS ARISING FROM SCRUTINY	
LEAD OFFICER:	Jane West, Corporate Director for Resources Adrian May, Interim Head of Democratic Services <u>adrian.may@croydon.gov.uk</u>	
LEAD MEMBER:	Councillor Rowenna Davis Chair, Scrutiny and Overview Committee	
AUTHORITY TO TAKE DECISION:	Recommendations that have been developed from the Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting are provided in the appendices to this report. The constitution requires that an interim or full response is provided within 2 months of this Cabinet meeting.	
KEY DECISION?	No	N/A
CONTAINS EXEMPT INFORMATION?	No	Public
WARDS AFFECTED:	All	

1. SUMMARY OF REPORT

- 1.1 This report presents recommendations to the Executive from Scrutiny following meetings of the Homes Sub-Committee held on 23 October 2023 and the Scrutiny & Overview Committee held on 16 January 2024.

2. RECOMMENDATIONS

- 2.1 The Executive Mayor has the power to make the decisions set out in the recommendations contained within this report. The Executive Mayor in Cabinet is asked to:
1. Receive the recommendations arising from the meetings of the Homes Sub-Committee held on 23 October 2023 (Appendix 1) and the Scrutiny & Overview Committee held on 16 January 2024 (Appendix 2).
- 2.2 To provide a substantive response to the recommendation (a Scrutiny Stage 2 Report) at the Cabinet meeting on 15 May 2024.

3 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 3.1** Part 4E of the Council's Constitution: Scrutiny and Overview Procedure Rules (paragraphs 8.5 – 8.7) and Section 9FE of the Local Government Act 2000 require the executive to consider and respond to a Scrutiny and Overview report within 2 months beginning with the date on which the executive receive the report or recommendation.

4 BACKGROUND AND DETAILS

Homes Sub-Committee

Item: Croydon Housing Approach to the development of the Resident Engagement Structure

- 4.1** The Sub-Committee commended the work and acknowledged that this piece of work was needed and significant progress.
- 4.2** The Sub-Committee acknowledged that this piece of work was necessary. However, it was very important to make it to a high standard, even if it would take more time to complete it.
- 4.3** The Sub-Committee took reassurance from the acknowledgement of officers that there was a need to change the culture within the service and that this work was ongoing. It was agreed that the Sub-Committee would be able to assess the pace of change when it looked at the cultural transformation workstream at its meeting in April 2024.

Item: Report on principles for HRA Business Plan 2024-25

- 4.4** The Sub-Committee acknowledged that there had been a significant improvement in the approach to developing the Housing Revenue Account Business Plan and the plans were promising.
- 4.5** The Sub-Committee commended the identified priorities for the Business Plan and agreed that they reflected the current needs within the service and of residents.
- 4.6** The Sub-Committee was reassured that the Council had sufficient reserves available to cover the overspend on the repairs backlog.
- 4.7** The Sub-Committee agreed that the information provided through the stock survey would form a crucial evidence base for the forthcoming Business Plan and agreed that it needed to be progress as quickly as possible and include as wider as variety of housing types as possible to provide better inform the development of the Plan.
- 4.8** The Sub-Committee noted that gaining access to properties to complete the surveys was impacted the completion rate and agreed that further work was needed in this area.

Scrutiny & Overview Committee – 16 January 2024

Item: 6. Capital Programme and Capital Strategy 2023-29

- 4.9** The Committee acknowledged that both transparency and the governance processes of the Council have been improved due to the hard work of officers and the Cabinet. However, despite this hard work, the financial situation remained dire and potentially dangerous with the £38m budget gap remaining unresolved without further capitalisation and the Council being in breach of the Prudential Code.
- 4.10** The Committee also acknowledged that the financial situation for the Housing Revenue Account capital budget was much healthier than the General Fund capital budget and was supportive of the proposal to use reserves, rather than borrowing, to fund capital works in 2024-25.

Item: 7. Quarterly Procurement Plan Update

- 4.11** The Committee agreed that it was unable at this stage to provide reassurance that the Council's procurement process was as good as should be expected. However, it was acknowledged that significant progress had been made with improving the service.
- 4.12** The Committee was reasonably reassured that both council officers and the Cabinet Member for Finance were aware of the issues to be resolved and were taking steps to continue the improvement journey.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** Scrutiny meetings do not necessarily result in any recommendations to the executive.

6 CONSULTATION / PRE-DECISION SCRUTINY

- 6.1** The recommendations were developed from the deliberations of either the Scrutiny & Overview Committee or one of its Sub-Committees.

7 CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

- 7.1** Outcome 1: The Council balances its books, listens to residents and delivers good sustainable services:

Priority 4: Ensure good governance is embedded and adopt best practice. The Council must learn the lessons of past failures and embed sound governance processes to ensure that decision-making is transparent, open and honest. These must ensure effective control of our projects and programmes and encourage meaningful scrutiny and challenge.

- 7.2** Outcome 3: Children and young people in Croydon have the chance to thrive, learn and fulfil their potential:

Priority 2: Make Croydon safer for young people. Making the borough safer for our young people is a top priority. In the year to July 2022, serious youth violence in Croydon rose by almost a quarter compared to the previous 12 months. We will work

as one Council to strengthen partnerships with the voluntary, business and statutory sectors and schools in Croydon to tackle the root causes of youth crime, protect those at risk of offending and embed a strong joint approach to prevent youth violence and help our young people to be, and feel, safe.

7.3 Outcome 4: Croydon is a cleaner, safer and healthier place, a borough we're proud to call home:

Priority 1: Make our streets and open spaces cleaner so that Croydon is a place that residents and businesses can feel proud to call home. Residents expect and deserve to feel proud of our borough as they walk down the street. That means working with them and partners to look after our streets, parks and open spaces, and crack down on the graffiti and litter which blight our communities.

Priority 4: Ensure new homes are safe, well-designed and in keeping with the local area. New development will be design-led, not density-led. While we must continue to plan for new homes, schemes must respect the views of local people, enhance the character of our places, and recognise the need for amenity space.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 The Scrutiny recommendations to the Executive may have financial implications. Following the recommendations being received at Cabinet, the Executive will identify and consider any financial implications as part of their response.

8.1.2 If any recommendation is subsequently progressed for consideration and decision by the Executive Mayor in Cabinet, full financial (as well as legal and equalities implications) would be presented.

8.2 LEGAL IMPLICATIONS

8.2.1 Under Section 9F Local Government Act 2000 ("The Act"), Scrutiny and Overview Committee (SOC) have the powers to review or scrutinise decisions made, or other action taken in connection with the discharge of any executive and non-executive functions and to make reports or recommendations to the executive or to the authority with respect to the discharge of those functions. SOC also has the power to make reports or recommendations to the executive or to the authority on matters, which affect the authority's area or the inhabitants of its area.

8.2.2 Under Section 9FE of the Act, there is a duty on Cabinet to respond to the scrutiny report, indicating what (if any) action Cabinet proposes to take, within 2 months of receiving the report and recommendations.

8.2.3 Approved by: Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (06/02/2024)

8.3 HUMAN RESOURCES IMPLICATIONS

8.3.1 There are no human resource implications arising directly from the contents of this report

8.4 EQUALITIES IMPLICATIONS

8.4.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 of the Equality Act 2010. The Council must in the performance of its functions, therefore, have due regard to:

- i. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
- ii. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- iii. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.4.2 The recommendations in the appendices to this report have equality implications and will require an EQIA as part of the development of the proposals. The implications will be explored to identify impact and mitigation utilised to negate any adverse impact where necessary.

8.5 ENVIRONMENTAL IMPLICATIONS

8.5.1 There are no environmental implications arising directly from the contents of this report, the report received recommendations from scrutiny, but no decision for recommendation.

8.6 CRIME AND DISORDER REDUCTION IMPLICATIONS

8.6.1 There are no crime and disorder implications arising directly from the contents of this report, the report received recommendations from scrutiny, but no decision for recommendation.

8.7 DATA PROTECTION IMPLICATIONS

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

There are no Data Protection implications at this stage, but that the situation will be reviewed again at Stage 2 when Cabinet provide their response to the proposed recommendations.

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

NO

9 APPENDICES

Appendix 1 – Scrutiny Stage 1: Recommendations from Homes Sub-Committee – 23 October 2023

Appendix 2 – Scrutiny Stage 1: Recommendations from Scrutiny & Overview Committee – 16 January 2023

10 BACKGROUND DOCUMENTS

Meeting of the Homes Sub-Committee held on 23 October 2023

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=485&MId=3707&Ver=4>

Meeting of the Scrutiny & Overview Committee held on 16 January 2024

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=3514&Ver=4>

Appendix 1 – Recommendations arising from Homes Sub-Committee, 23 October 2023

Item: Croydon Housing Approach to the development of the Resident Engagement Structure

Recommendation Number	Recommendation	Political Lead	Officer Lead
HS.9.23/24	The Homes Sub-Committee recommends that ward councillors are informed when there is a planned resident engagement event within their constituency.	Cllr Lynne Hale	Susmita Sen

Item: Report on principles for HRA Business Plan 2024-25

Recommendation Number	Recommendation	Political Lead	Officer Lead
HS.10.23/24	The Homes Sub-Committee recommends that there is further engagement with residents on the benefits of the stock survey, including work with the contractor, using the social values aspects of their contract.	Cllr Lynne Hale	Susmita Sen

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Appendix 2 – Recommendations arising from Scrutiny & Overview Committee – 21 November 2023

Item: Capital Programme and Capital Strategy 2023-29

Recommendation Number	Recommendation	Political Lead	Officer Lead
SOC.21.23/24	The Scrutiny & Overview Committee recommends that organisations including the LGA or London Councils are approached to review whether there is any currently untapped external funding sources available to the Council for capital projects, to provide reassurance that every avenue for inward funding was being explored.	Councillor Jason Cummings	Allister Bannin – Director of Finance
SOC.22.23/24	The Scrutiny & Overview Committee recommends that the potential business case for either extending the existing Growth Zone or establishing a new Growth Zone are explored, which would give Croydon the chance to keep a higher proportion of any new business rates generated as a result, rather than passing them to central government.	Councillor Jason Cummings	Allister Bannin – Director of Finance

Item: Quarterly Procurement Plan Update

Recommendation Number	Recommendation	Political Lead	Officer Lead
SOC.23.23/24	The Scrutiny & Overview Committee recommends that a method for publishing further information on agreed contract variations is explored through the procurement reporting process.	Councillor Jason Cummings	Scott Funnell - Head of Strategic Procurement

Agenda Item 6

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE	27 March 2024	
REPORT TITLE:	<p style="text-align: center;">Scrutiny Stage 2 Responses to Recommendations arising from: Children & Young People Sub-Committee held on 10 October 2023 (Appendix 1), the Streets and Environment Sub-Committee held on 1 November 2023 (Appendices 2 & 3) and the Scrutiny & Overview Committee held on 21 November 2023 (Appendices 4 & 5).</p>	
LEAD OFFICER:	<p>Jane West, Corporate Director for Resources</p> <p>Adrian May, Interim Head of Democratic Services adrian.may@croydon.gov.uk</p>	
LEAD MEMBER:	<p>Cllr Rowenna Davis Chair, Scrutiny and Overview Committee</p>	
AUTHORITY TO TAKE DECISION:	<p>The Constitution requires that in accepting a recommendation, with or without amendment, from a Scrutiny and Overview Committee or Sub-Committee, the Executive Mayor shall agree an action plan for the implementation of the agreed recommendations and shall delegate responsibility to an identified officer to report back to the Scrutiny and Overview Committee or Sub-Committee, within a specified period, on the progress made in implementing the action plan.</p>	
KEY DECISION?	No	N/A
CONTAINS EXEMPT INFORMATION?	No	Public
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

1.1 This report invites the Executive Mayor to approve the full response reports arising from the Stage 1 reports presented to the Cabinet meeting held on 31 January 2024, including:

- Action plans for the implementation of agreed recommendations, or;
- Indicating where a recommendation is already in progress, or;
- Reasons for rejecting the recommendations.

and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

- 1.2 The Constitution requires that in accepting a recommendation, with or without amendment, from a Scrutiny and Overview Committee or Sub-Committee, the Executive Mayor shall agree an action plan for the implementation of the agreed recommendations and shall delegate responsibility to an identified officer to report back to the Scrutiny and Overview Committee or Sub-Committee, within a specified period, on the progress made in implementing the action plan.

2 RECOMMENDATIONS

- 2.1 The Executive Mayor, in Cabinet, has the power to make the decisions set out in the recommendation below and is **RECOMMENDED** to:

- 2.1.1 Approve the responses and action plans attached to this report as Appendices 1, 2, 3, 4 & 5; and
- 2.1.2 Delegate authority to the officers identified in Appendices 1, 2, 3, 4 & 5 to report back to the Scrutiny and Overview Committee, or relevant Sub-Committee, within the periods specified in the agreed responses and action plans, and on progress made in implementing any action plan.

3 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 3.1 Part 4E of the Council's Constitution: Scrutiny and Overview Procedure Rules (paragraphs 8.5 – 8.7) and Section 9FE of the Local Government Act 2000 require the Cabinet to respond to a Scrutiny and Overview report within 2 months beginning with the date on which the executive received the report.
- 3.2 Detailed reasons for individual responses and action plans recommended are contained in the appendices to this report.
- 3.3 Scrutiny and Overview Committee and relevant Sub-Committees are responsible for monitoring progress in implementation of recommendations to the Cabinet.

4 SCRUTINY RECOMMENDATIONS

- 4.1 The Scrutiny recommendations are set out in the appendices to this report.
- 4.2 The detailed responses, including reasons for rejected recommendations and action plans for the implementation of agreed recommendations are also contained in these appendices.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1 These are contained in the appendices to this report.

6 CONSULTATION / PRE-DECISION SCRUTINY

- 6.1** The recommendations have been developed following the deliberations of either the Scrutiny and Overview Committee or one of its Sub-Committees.
- 6.2** The recommendations in the appendices to this report may involve further consultation and as each recommendation is developed, these implications will be explored and approved through appropriate decision-making routes.
- 6.3** Some of the recommendations in the appendices to this report are the result of Pre-Decision Scrutiny.

7 CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

- 7.1** Outcome 1: The Council balances its books, listens to residents and delivers good sustainable services:

Priority 4: Ensure good governance is embedded and adopt best practice. The Council must learn the lessons of past failures and embed sound governance processes to ensure that decision-making is transparent, open and honest. These must ensure effective control of our projects and programmes and encourage meaningful scrutiny and challenge.

- 7.2** Outcome 3: Children and young people in Croydon have the chance to thrive, learn and fulfil their potential:

Priority 2: Make Croydon safer for young people. Making the borough safer for our young people is a top priority. In the year to July 2022, serious youth violence in Croydon rose by almost a quarter compared to the previous 12 months. We will work as one Council to strengthen partnerships with the voluntary, business and statutory sectors and schools in Croydon to tackle the root causes of youth crime, protect those at risk of offending and embed a strong joint approach to prevent youth violence and help our young people to be, and feel, safe.

- 7.3** Outcome 4: Croydon is a cleaner, safer and healthier place, a borough we're proud to call home:

Priority 1: Make our streets and open spaces cleaner so that Croydon is a place that residents and businesses can feel proud to call home. Residents expect and deserve to feel proud of our borough as they walk down the street. That means working with them and partners to look after our streets, parks and open spaces, and crack down on the graffiti and litter which blight our communities.

Priority 4: Ensure new homes are safe, well-designed and in keeping with the local area. New development will be design-led, not density-led. While we must continue to

plan for new homes, schemes must respect the views of local people, enhance the character of our places, and recognise the need for amenity space.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 The recommendations set out in the appendices to this report may have a financial implication and as each recommendation is developed the financial implication will be explored and approved through appropriate decision-making routes.

8.2 LEGAL IMPLICATIONS

8.2.1 Under Section 9F Local Government Act 2000 (“the Act”), Scrutiny and Overview Committee have the power to review or scrutinise decisions made or other action taken in connection with the discharge of any executive and non-executive functions and to make reports or recommendations to the executive or to the authority with respect to the discharge of those functions. The Committee also has the power to make reports or recommendations to the executive or to the authority on matters, which affect the authority’s area or the inhabitants of its area. To discharge this scrutiny function, the Committee has appointed Scrutiny Sub-Committees. Pursuant to the above provisions the Committee, and its Sub-Committees, have made recommendations arising from their scrutiny of areas under their remit, which are detailed in the attached appendices.

8.2.2 Under Section 9FE of the Act, there is a duty on the executive to respond to the scrutiny reports, indicating what (if any) action they propose to take, within 2 months beginning with the date on which the executive received the report.

8.2.3 *Approved by:* Sandra Herbert, Head of Litigation & Corporate Law, on behalf of the Director of Legal Services and Monitoring Officer (22/02/2024).

8.3 HUMAN RESOURCES IMPLICATIONS

8.3.1 The recommendations in the appendix to this report may have a Human Resources impact and as each recommendation is developed these implications will be explored and approved through appropriate decision-making routes.

8.4 EQUALITIES IMPLICATIONS

- 8.4.1** The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Section 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:
1. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
 2. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 3. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.4.2** The recommendations set out in the appendices of this report may have equality implications and may require an EQIA as part of the development of the proposals. The implications will be explored to identify impact and mitigation utilised to negate any adverse impact where necessary.

9 APPENDICES

- 9.1** Appendix 1 – Scrutiny Stage 2 Responses: Recommendations from Children & Young People Sub-Committee, Item: Youth Justice Plan 23/24, 10 October 2023

Appendix 2 – Scrutiny Stage 2 Responses: Recommendations from Streets and Environment Sub-Committee, Item: Cleaner Croydon, 1 November 2023

Appendix 3 – Scrutiny Stage 2 Responses: Recommendations from Streets and Environment Sub-Committee, Item: Local Plan Review, 1 November 2023

Appendix 4 – Scrutiny Stage 2 Responses: Recommendations from Scrutiny & Overview Committee, Item: 2023-24 Period 5 Financial Performance Monitoring Report, 21 November 2023

Appendix 5 – Scrutiny Stage 2 Responses: Recommendations from Scrutiny & Overview Committee, Item: Pre-Decision Scrutiny: Progress update on tranche 1 asset disposals, seeking approval for tranche 2 of asset for disposal and approval of the update of the Community Asset Transfer Policy, 21 November 2023

10 BACKGROUND DOCUMENTS

- 10.1** Meeting of the Children & Young People Sub-Committee held on 10 October 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=167&MId=3751>

Meeting of the Streets and Environment Sub-Committee held on 1 November 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=3507>

Meeting of the Scrutiny & Overview Committee held on 21 November 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=3513&Ver=4>

Meeting of the Cabinet held on 31 January 2024
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=3578>

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Appendix 1 – Item: Youth Justice Plan 23/24

Considered by Children & Young People Sub-Committee on 10 October 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 45 P.2.23/2</p>	<p>The Sub-Committee commended the inclusion of parents and carers in delivering prevention and intervention work in the Youth Justice Service (YJS) but recommended that there should be greater involvement of parents and carers in the development of the next Youth Justice Plan for 24/25.</p>	<p>Councillor Maria Gatland CYPE</p>	<p style="text-align: center;">Already in Progress</p> <p>YJS promotes the completion of a parent self-assessment on all young people who enter Youth Justice system. Parents are invited to panels and reviews to ensure parental voices are heard and feed into developments in both practice and service development.</p> <p>YJS currently have a Parenting survey open to ascertain parental views on the Service (closing date mid-February).</p> <p>YJS will be hosting a 'Meet the Youth Justice Management Team' with parents in February 2024 to promote accessibility and also, to gauge views on the Service and parental feelings on Serious Youth Violence in the borough. This will be an evening event to promote participation and seek views on how we can improve engagement with parents and the community.</p> <p>Parent representative role to be created within the Youth Crime Board.</p>	<p>Róisín Madden, Director of Children's Social Care</p>	<p>Financial impact is met from current service budget.</p>	<p>Continuous Action</p> <p>February 2024</p> <p>February 2024</p> <p>June 2024</p>	<p>TBC</p>

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Appendix 2 – Item: Cleaner Croydon

Considered by Streets & Environment Sub-Committee on 1 November 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SE.14.23/24	The Sub-Committee recommended that Members were engaged for their views on how well the 'Love Clean Streets' app was working, as well as for their input as to how the implementation of the app in Croydon could be made more accessible for residents.	Councillor Scott Roche SCRER	Accepted	Karen Agbabiaka, Director of Streets & Environment/Paul Golland, Interim Chief Digital Officer & Director of Resident Access	N/A	31 May 2024 - Engage Members for their views on how well the 'Love Clean Streets' app was working 31 May 2024 - for Members input as to how the implementation of the app in Croydon could be made more accessible for residents.	July 2024
SE.15.23/24	The Sub-Committee recommended that regular walkabouts for Ward Councillors were scheduled with the new Client Officer team to identify issues and feedback local knowledge concerning street cleaning, fly tipping, weeding and graffiti.	Councillor Scott Roche SCRER	Already In Progress A key part of the new Contract Monitoring Officer's role is to work with each of the ward councillors and undertake joint site visits to identify concerns and observations regarding waste collection and street cleansing (including fly tipping).	Karen Agbabiaka, Director of Streets & Environment	N/A	Walkabouts to start from January 2024 with a continuous series of walkabouts across the borough.	July 2024

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Appendix 3 – Item: Local Plan Review

Considered by Streets & Environment Sub-Committee on 1 November 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SE.16.23/24	The Sub-Committee welcomed the inclusion of the Green Grid and Local Green Spaces in the Local Plan Review, and recommended that Blue Corridors (watercourses and natural ponds) were explicitly referenced and considered in this area of work.	Councillor Jeet Bains SCRER	Already in Progress	Heather Cheesbrough, Director of Planning & Sustainable Regeneration	N/A	Reference to Blue Corridors will be included in the Proposed Submission / Regulation 19 Local Plan Review – January 2024	TBC

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Appendix 4 – Item: 2023-24 Period 5 Financial Performance Monitoring Report

Considered by Scrutiny & Overview Committee on 21 November 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SOC.18.23/24 Page 51	The Scrutiny & Overview Committee recommends that with the reintroduction of council tax enforcement, a meeting should be arranged with local advocacy organisations, such as the CAB and the South West London Law Centre, after a few months of operation to review the processes to ensure that the available support is reaching those who need it most.	Councillor Jason Cummings Resources	<p style="text-align: center;">Already in Progress</p> <p>The Revenues and Benefits Service has already met with CAB, South West London Law Centre & Money Advice and Pensions Service to advise that recovery will recommence for these residents and have stated to them that we will meet again after commencement to check how it is progressing. In addition, the CAB has agreed to come into Access Croydon on commencement to support residents affected.</p>	Allister Bannin, Director of Finance	None	N/A	N/A
SOC.19.23/24	The Scrutiny & Overview Committee recommends that future iterations of the budget consultation are subject to independent review before publication.	Councillor Jason Cummings Resources	Accepted	Allister Bannin, Director of Finance	It may be necessary to commission an external review but the cost will be met from existing budgets	October 2024	TBC

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Appendix 5 – Item: Pre-Decision Scrutiny: Progress update on tranche 1 asset disposals, seeking approval for tranche 2 of asset for disposal and approval of the update of the Community Asset Transfer Policy

Considered by Scrutiny & Overview Committee on 21 November 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
OC.20.23/24	The Scrutiny & Overview Committee recommends that there is preliminary engagement with existing tenants on the possibility of an asset being identified for disposal before any report identifying assets is published.	Councillor Jason Cummings Resources	<p style="text-align: center;">Already In Progress</p> <p>The Council does advise tenants in advance of sales being published. This was undertaken successfully with the Tranche 1 disposals list. On the matter of Tranche 2, given that the only Scrutiny meeting date available was November 21st (3 weeks in advance of the planned Cabinet meeting scheduled for December 6th), the Scrutiny report had to be brought forward to meet this date. The disposals list was finalised on November 17th and published on November 20th; this was a day before the Scrutiny meeting. The property team worked at pace during the Monday and Tuesday before Scrutiny to try and contact all tenants on the list. It should also be noted that the Tranche 2 list did include the following wording; -</p> <p><i>‘To be sold, with lease to current tenant in place’</i></p> <p>The property team are continuing to work with organisations and tenants of the properties about any proposals and will work with them throughout the process to avoid any unnecessary concern. Each sale will be handled on a case-by-case basis in conjunction with relevant partners.</p>	Huw Rhys Lewis, Interim Director Commercial Investment & Capital	N/A	N/A	TBC

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SOC.21.23/24	The Scrutiny & Overview Committee recommends that local councillors are informed, prior to publication, that an asset in their ward will be listed for disposal.	Councillor Jason Cummings Resources	<p style="text-align: center;">Rejected</p> <p>Ward councillors are already informed on potential disposals in their ward through the issue of Cabinet papers before decisions on disposals are taken. For this reason, no further action or change is required</p> <p>It is important to note and understand that advance notice prior to publication is likely to prejudice the Council's ability to formally market these properties for sale and to secure best considerations for the properties in question.</p>	Huw Rhys Lewis, Interim Director Commercial Investment & Capital	N/A	N/A	TBC

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27 March 2024	
REPORT TITLE:	“Future Croydon” - the Transformation Plan 2024 – 2029	
CORPORATE DIRECTOR	Katherine Kerswell, Chief Executive Jane West, Corporate Director of Resources and S151 Officer Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Debbie Jones, Corporate Director Children, Young People & Education Annette McPartland, Corporate Director Adult Social Care & Health Susmita Sen, Corporate Director of Housing Marie Snelling, Interim Assistant Chief Executive	
LEAD OFFICER:	Sharon Godman, Director of Transformation Email: Sharon.godman@croydon.gov.uk	
LEAD MEMBER:	Mayor Jason Perry	
KEY DECISION? 1024EM	Yes	REASON: Decision incurs expenditure, or makes savings, of more than £1,000,000 or such smaller sum which the decision-taker considers is significant having regard to the Council’s budget for the service or function to which the decision relates.
CONTAINS EXEMPT INFORMATION?	NO	
WARDS AFFECTED:	All Wards	

1 SUMMARY OF REPORT

- 1.1 This report presents “Future Croydon” - the Transformation Plan 2024 - 2029 for adoption at appendix one. It builds on the foundations of the significant improvement work undertaken to date.
- 1.2 The Transformation Plan 2024 - 2029 sets out the intent and commitment of the council to radically transform the way that it operates, how it delivers services to the people of Croydon and how it connects with and supports residents across the borough. In so doing, the council will continue to deliver the Executive Mayor’s Business Plan priorities and the Medium-Term Financial Strategy, saving just under £100m over the next four financial years.
- 1.3 At appendix two is an update of the existing transformation plan, agreed at Cabinet in November 2022, which is renamed the Council Improvement Programme 2022 – 2027.

It includes existing and new improvement projects critical to strengthening the foundations for future transformation. This is aligned to the delivery of Medium-Term Financial Strategy and Mayor's Business Plan.

2 RECOMMENDATIONS

For the reasons set out in the report and its supporting appendices, the Executive Mayor in Cabinet, is recommended to:

- 2.1 Approve the "Future Croydon" - the Transformation Plan 2024 – 2029 and its reporting cycle back to Cabinet every six months.
- 2.2 Approve the update to the existing transformation plan, previously agreed at Cabinet in November 2022, renamed the Council Improvement Programme 2022 – 2027.

3 REASONS FOR RECOMMENDATIONS

- 3.1 On 6th March 2024, the Council agreed the Medium-Term Financial Strategy, at the Council Tax and Budget Setting meeting. This requires the council to deliver savings of just under £100m over the next four years. The Improvement and Assurance Panel and the council agreed in 2023, to deliver the Intervention Exit Strategy. It commits the council to demonstrate, by July 2025, it is on a path towards financial sustainability and can meet its duty of best value without government oversight. "Future Croydon" - the Transformation Plan 2024 – 2029 sets out a clear intention to radically transform, increasing the pace and breadth of change, that enables the council to fully realise the priorities as agreed in the Executive Mayor's Business Plan to meet these commitments.

4 BACKGROUND AND DETAILS

Improvement Journey

- 4.1 Since the Autumn of 2020, the Council has worked hard to improve and address the legacy of governance, financial and operational service failures.
- 4.2 The journey the council has been on, has seen the implementation of a whole series of improvements that have built the necessary foundations, including a new organisational operating model, new senior officer leadership and the delivery of large elements of the equality strategy. A new system of internal control has been introduced, governing behaviour and the use of resources. This includes new service plans, performance management and regular public reporting, risk management, as

well as monthly financial assurance and oversight of the budget and reporting, to ensure transparency.

- 4.3 Since 2021-22 the council has delivered £137m of savings which equates to approximately £45m per year with a further £30m planned for 2024-25. These savings have been significantly higher than other London boroughs and our statistical neighbours and since 2021-22 the council has stayed within its overall annual budget, delivering an underspend each year.
- 4.4 In March 2021, ITV news revealed the truly shocking state of the council's housing service. Since then, significant changes have taken place which include: a new leadership team, service restructure, reprocurring a new repairs service, new inhouse contact centre, new business processes, and a new housing IT system to drive effective behaviour and provide essential data on the service. All overseen and supported by the Housing Improvement Board. The ITV news story focussed on the Regina Road estate. Since then, significant work has been underway to rebuild relationships with residents resulting in a successful ballot as well as securing of £57m from the Greater London Authority (GLA). Residents have been fully involved in driving this change.
- 4.5 In November 2022, Cabinet approved a transformation plan which proposed a new approach to "change in Croydon". It was described as an "evolving programme of work bringing activity designed to transform the council for residents". It included improved project governance and invested in capability to deliver key projects. The plan focussed on establishing the right foundations through a range of major programmes of improvement across services including children's, adults, planning, and housing. At appendix two is an updated plan renamed, the Council Improvement Programme 2022 – 2027. It sets out existing approved programmes and projects as well as those that are new and critical to enabling our 'Future Croydon', the Transformation Plan 2024 – 2029, aligned to the delivery of the Medium-Term Financial Strategy and Executive Mayor's Business Plan.

Transformation

- 4.6 The Improvement and Assurance Panel presented their Exit Strategy in 2023. It commits the Council to demonstrate, by July 2025, that it is on a path towards financial sustainability and can continue to transform without the need for Government oversight.
- 4.7 Children and Adult services have begun to lay the groundwork for radical transformation. Adult social services have already started work with a strategic partner to map out future opportunities and Children's services are soon to do the same.
- 4.8 The findings of the Resident Survey 2023 make clear that the people of Croydon want the Council to work better for them, and to understand them and their needs.
- 4.9 While there has been significant progress in the improvement of the Council and an increase in pace, the financial challenge of the Medium-Term Financial Strategy remains significant and exceptional in nature.

- 4.10 The Council is now at a critical point if it is to meet the aspirations of the people of Croydon and Council staff to deliver best value. A radical change is needed in the way the council works and how it delivers all the services it is required to.
- 4.11 Savings to date have been delivered that are significantly higher than other London boroughs. However, just under £100m more needs to be saved over the next four years, to deliver the Medium-Term Financial Strategy.
- 4.12 “Future Croydon” - the Transformation Plan 2024 - 2029 provides a framework for radical change over the next five years to deliver the priorities in the Executive Mayor’s Business Plan and the Medium-Term Financial Strategy. This transformation plan is framed through the lenses of **Our Council**, **Our Residents**, and **Our Place**.
- 4.13 For **Our Council** the aim is to be the most cost-efficient and effective council in London, totally focussed on its residents. The culture will be one that puts the customer first, organising around needs and experiences, harnessing technology, data, and the workforce to deliver a council that does less but what it does, it does better.
- 4.14 For **Our Residents** the aim is to put residents first. The council will continually strive to engage, listen, and empower residents. It will provide modern services with excellent customer care working closely with partners. Strategic partners are being brought in to help transform services to the most vulnerable. Improving the housing service is a priority and will be a relentless focus.
- 4.15 For **Our Place** the aim is for Croydon to be a cleaner, safer, and healthier borough. The council understands the importance of feeling good about the place where residents live, relax and work. The priority is to restore Croydon’s place as an important economic hub, regenerate the Town Centre and unlock the enterprise of the borough’s young people, addressing social issues and perceptions of safety and cleanliness. The council will promote respect across our neighbourhoods, harnessing the value of the diversity of the borough, fully recognising the importance of people’s values, beliefs, cultures, and lifestyles.
- 4.16 ‘Future Croydon’ - the Transformation Plan 2024 – 2029 will deliver programmes of work which will both transform the council and deliver the necessary savings in the Medium-Term Financial Strategy.
- 4.17 The plan has been developed in consultation with the Improvement and Assurance Panel, the Executive Mayor’s Advisory Board and Corporate Management Team and has involved senior managers. It builds on the programmes found in the Council Improvement Programme 2022 – 2027 that is already underway and sets a new direction to transform.
- 4.18 People and Culture Transformation Strategy, agreed at Cabinet in January 2023 was informed by engagement, consultation, and feedback from staff which provides a key foundation to build upon. Feedback at staff webinars and through existing improvement programmes highlight the need to improve the council’s systems and processes.

- 4.19 There should be no doubt that there will have to be difficult decisions about the money the council spends, the services it provides and how those services are delivered. The council will engage staff, partners, and residents in shaping the redesign of the council and services. There will be a detailed programme of staff engagement to support the development and delivery of improvement and transformation programmes and projects.
- 4.20 The scope of the change needed cannot be delivered solely by the council. There will also be engagement with council partners to build a shared understanding of the challenges the council faces to determine new ways of working in partnership. It means working closely with partners in the voluntary, business, and statutory sectors, being vigilant in seeking out funding opportunities where they exist and be intentional in bringing local communities together to support the council's transformation agenda.
- 4.21 This will be a radical piece of organisational redesign underpinned by data and digital ways of working supported by a modern, customer-focussed workforce.

Governance

- 4.22 The Executive Mayor and the Corporate Management Team are responsible for the delivery of the council's improvement and transformation work. Programmes will change over time, to reflect emerging and changing priorities including feedback from staff, partners, and residents. These will be continually monitored, and progress reported publicly every six months to the Executive Mayor in Cabinet.
- 4.23 At present, some of the projects found in the Council Improvement Programme 2022 - 2027 have already been separately reported to members for approval and these projects will continue to report to members as they progress and to seek necessary approvals and guidance. In respect of new programmes and projects, found in the Council Improvement Programme 2022 – 2027 and 'Future Croydon' the Transformation Plan 2024 - 2029 as this progress and are scoped, they will need to be specifically reported to members for approval where they are key decisions, setting out critical information for those individual projects around parameters, timeframes, objectives, financial implications, legal requirements, and any associated risks.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1 The council's approach to its financial situation has delivered annual savings that are significantly higher than other London boroughs and our statistical neighbours. The current approach is not sustainable and what is required is a radical approach to transformation.

6 CONSULTATION

- 6.1 Findings from the Residents Survey in 2023 suggest that 45% of residents are satisfied with the way the council runs things. Residents who are satisfied with the council say this is because engagement with the council has been positive. Whereas those who are dissatisfied reference the councils' previous financial issues. Along with council satisfaction, 34% say the council represents value for money, and 41% feel it does a good job of keeping them updated. The council will continue to work to restore trust, demonstrating it is listening, and acting on residents' concerns.
- 6.2 Residents do however think highly of their local communities, with 82% agreeing that their local area is a place where people from different backgrounds get on well together, and 78% agreeing that they feel a sense of belonging to their local area. The council will continue to work with partners and residents to restore pride in the borough.
- 6.3 "Future Croydon" - the Transformation Plan aims to improve these perceptions by putting residents first, making the borough cleaner safer and healthier and by making the council one of the most efficient and effective in London. The council will work with staff, partners and residents to build pride in the borough.
- 6.4 Consultation and engagement around specific project proposals will be conducted as appropriate. We welcome comments and suggestions on the transformation plan. Please email transformation@croydon.gov.uk.

7 CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1 'Future Croydon' the Transformation Plan 2024 - 2029 is a key element of the Croydon Mayoral Business Plan Outcome 1: Getting our finances right. With the council still reliant on government support, getting a grip on the finances is a top priority. This will mean difficult but necessary decisions will have to be made to make us financially sustainable for the future.
- 7.2 By transforming the council, through Outcome 1, we will be better placed to achieve the other 4 outcomes:
- Outcome 2: A place of opportunity
 - Outcome 3: Children and young people,
 - Outcome 4: Cleaner, safer, and healthier,
 - Outcome 5: Living healthier independent lives.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1 'Future Croydon' - the Transformation Plan will be funded from the 2023-24 existing £14m funding (£10m budget and £4m earmarked reserves) and the annual £5m budget proposed in the Medium-Term Financial Strategy. The aim of the transformation plan is to deliver circa £100m of savings required by the Medium-Term Financial Strategy.
- 8.1.2 The November 2022 transformation plan, along with the existing budget allocations will be subsumed into the Council Improvement Programme 2022 - 2027. The Corporate Management Team will have direct responsibility for the allocation of 'Future Croydon' – the Transformation 2024 - 2029 Plan resources. The Executive Mayor in Cabinet will continue to receive monthly financial performance information showing project budget allocations, spend to date and forecast spend for the financial year as has been the case through the financial performance reports in 2023-24.

Comments approved by Allister Bannin, Director of Finance (Deputy s151 Officer), 04/03/2024.

8.2 LEGAL IMPLICATIONS

- 8.2.1 The Council as a best value authority "must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness" (Section 3 Local Government Act (LGA) 1999). The Best Value Duty applies to all functions of the Council.
- 8.2.2 On 20th July 2023, the Secretary of State for Levelling Up, Housing and Communities ("the SoS") issued Directions under Section 15(5) of the LGA to the Council on the on the basis that the Council was failing to comply with its Best Value Duty and setting out actions to be taken by the Council to comply the duty. The SoS Directions require the Council to, amongst others, continue to address the culture of poor financial management and to restore public trust and confidence by transforming the Council's activities, practices, and omissions to ensure that they are compatible with the best value duty. In addition, the Council is required to secure as soon as practicable that all its functions are exercised in conformity with the best value duty thereby delivering improvements in services and outcomes for the people of Croydon.
- 8.2.3 The Council's budget and policy framework procedure rules (Part 4C of the Constitution) provides that the Executive may only take decisions which are in line with the Budget and Policy Framework. As projects are further developed and additional information is available, they will need to be reported to members and shared with colleagues in finance and legal to assess the degree to which the proposals are within the Budget and Policy framework adopted by Full Council.

- 8.2.4 At present, the decision sought does not amount to approval of individual proposals and projects which may form part of the current plan or delivery document. There is insufficient detail for most of these at present to assess implications and risks arising; and each such project will need to be separately reported to Members as relevant information is available. In respect of a number of projects already in progress, these have been separately reported to members for consideration and approval and that will continue to be the case as these progress.
- 8.2.5 In respect of projects which have not already been reported to members and do not already have separate member approval and engagement; and which form part of the proposed plan/programme: as greater detail is available, not only will officers need to separately report to members for approval of decisions needed to take projects forward, but in addition, officers will need to seek specific legal advice as to the potential impacts and risks associated with the proposals as these proposals are developed and sought to be implemented. If any decisions fall within the remit of Full Council to determine as reserved functions they will, where that is relevant, need to be taken to Full Council for decision. There may be procurement requirements and to that extent, any such decisions will need to comply with the Council's Tenders and Contracts Regulations. Where contractual requirements are impacted by proposals, these will need to be addressed within the relevant change control process for the contract/s in question. There may be statutory or common law consultation requirements associated with individual proposals and projects – as yet this is not clear – and where this is the case, these duties will need to be adhered to in order to ensure that the project/proposal is lawfully implemented. There may be specific equalities impacts associated with individual proposals and projects which will need to be appropriately assessed and addressed as part of project development and implementation. Assessment of equalities impacts is an ongoing duty.
- 8.2.6 In addition, as projects which form part of the proposed plan/programme are scoped and brought forward, officers will need to be undertaking the necessary Data Protection Impact Assessments to support the Council's data protection duties, including in relation to ensuring privacy by design as part of the projects and their implementation. Under the UK GDPR and Part 3 (section 57) of the Data Protection Act 2018, the Council has a general obligation to implement appropriate technical and organisational measures to show that it has considered and integrated the principles of data protection into its processing activities.

Comments approved by the Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 12/03/2024)

8.3 EQUALITIES IMPLICATIONS

8.3.1 The council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the council must in the exercise of all its functions, “have due regard to” the need to comply with the three arms or aims of the general equality duty.

These are to:

- eliminate unlawful discrimination, harassment, victimisation, and any other conduct prohibited by the Act,
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, and
- foster good relations between people who share a protected characteristic and people who do not share it.

8.3.2 The transformation has a range of projects that will be required to undertake an equality analysis at various stages to assess impact, taking appropriate mitigation action as required to support any decisions that are made.

8.3.3 An annual review of the improvement and transformation programmes and projects will be conducted to inform future planning.

8.3.4 Comments approved by Denise McCausland, Equalities Programme Manager. (12/02/2024)

9 APPENDICES

- Appendix one – ‘Future Croydon’ the Transformation Plan 2024–2029 (Final Draft)
- Appendix two - Council Improvement Programme 2022 - 2027

10 BACKGROUND DOCUMENTS

None

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Future Croydon

The council's transformation plan 2024 – 2029

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Foreword

Executive Mayor Jason Perry

Back in 2022 when I became Croydon's first directly elected Mayor, the council had just undergone a significant governance and financial collapse and the impacts were being felt across the borough.

The first Report in the Public Interest in 2020 had identified wide-ranging and significant failures in leadership, governance and financial management, and serious weaknesses in the authority's commercial investment and residential development.

The state of the council's finances forced the organisation to effectively declare itself bankrupt. Residents were facing a 'broken windows' effect across the borough, with decline leading to further decline. In 2022 I led an 'Opening the Books' exercise to find out the extent of the damage and to understand the scale of the challenge ahead.

The historic issues we uncovered and have had to put right, have left the council with a recurring budget gap, a significant amount of which relates to the exceptional costs of servicing the council's £1.4bn debt.

The people of Croydon have put their trust in me to turn around the council. In return I want to deliver a council that puts them first, and supports all the different neighbourhoods in our borough we are proud to call home.

We cannot make the improvements we need to without making radical changes to the way we work. The whole council must change. For some, that might not be defined as radical. What makes this a radical transformation is the scale of the change, from the current reality of how we deliver to our residents, to the future way we should be delivering, I know so many of them want.



I am committed to making the council more efficient and effective in the work that we do: we must do less, but what we do, we must do well. I want maximum value from every penny of taxpayers' money we spend.

But it's not just the council transforming on its own. That would mean we have learned nothing from the past. We will work with residents and partners across Croydon in new ways to make this happen to bring this transformation plan to life.

My promise is to turnaround Croydon, and in so doing, ensure the council genuinely listens and responds to the needs of our residents and reflects their priorities for their communities. This will be the only way we can restore trust and pride with the people of Croydon.

Executive Mayor Jason Perry

Introduction

What this plan is about

The Future Croydon transformation plan builds on the foundations of our improvement work to date and seeks to radically change the way we deliver services for our residents and how we connect with our communities. In so doing, we will deliver the Mayor's Business Plan priorities and the Medium-Term Financial Strategy, saving just under £100m.

Over the life of this plan our aim is to radically transform the way the council works, and this plan sets out the intent and commitment of the council to do so.

We have framed this transformation plan through the lenses of **Our Council, Our Residents, and Our Place.**

Our story so far

Since the autumn of 2020, the council has worked hard to address the legacy of the governance, financial and operational failures that gave rise to two reports in the public interest, three S114 (bankruptcy) notices, and government statutory intervention.

Our journey to date has seen the implementation of a whole series of improvements including a new organisational operating model, senior officer leadership, and we have delivered large elements of our equality strategy.

We have introduced a new system of internal control, governing behaviour, and the use of resources as well as monthly financial assurance and oversight of the budget. We have new risk and performance management arrangements as well as service plans and transparency in reporting.

Through a range of major programmes of improvement across several services, including children's, adults, and planning, we have established the foundations for this plan. This has involved working with residents, listening to their voices, reducing costs, and improving outcomes. In addition, we have implemented a new telephony system to make it easier for residents to contact us.



In March 2021, ITV news revealed the truly shocking state of the council's housing service. Since then, changes have taken place in the service: a new leadership team, restructure, and culture change; reprocurring a new repairs service and new inhouse contact centre; a new resident charter written by our tenants; new business processes and a new housing IT system to drive effective behaviour and provide essential data on the service. All overseen and supported by the independent Housing Improvement Board with the involvement of residents.

Between 2021-22 and 2023-24 our hard work has delivered £137m savings, on average that equates to approximately £45m+ per year with a further £30m planned for 2024-25. These savings have been significantly higher than other London boroughs and our statistical neighbours.

This provides the foundation on which we now need to pivot at pace from the very necessary concentration on recovery and building the basics of improvement, to the new radical transformation plan.

Introduction continued

Our challenge

While we have made significant progress and increased the pace of our improvement, our financial challenge remains significant and exceptional in nature.

The Improvement and Assurance Panel and the council agreed in 2023, to deliver their Exit Strategy. It commits the council to demonstrate, by July 2025, it is on a path towards financial sustainability and can meet its duty of best value without statutory government oversight.

We also know our residents want their council to work better for them, to understand them and their needs better and to support the different communities of Croydon more effectively.

To achieve this, residents and our staff need access to data, processes and systems that are seamless and easy to use. If we are to meet the aspirations of the people of Croydon and deliver best value, then we need to make a radical change in the way we work and how we deliver the services.



Without a radical change in the way we deliver services and how we support communities more effectively: we will be unable to save just under £100m over the next four years.

What does our radical transformation plan mean?

We will be a council that continues to deliver its statutory responsibilities but does it in a way that:

- Fundamentally transforms how we engage with residents and communities, fostering trust and promoting independence.
- Provides a new customer experience, so that interacting with the council is seamless and hassle-free.
- Significantly reduces our operating costs by just under £100m over the next four years through new digital technology enabling more effective business processes.

The implementation of this is a radical piece of organisational redesign, underpinned by new data and digital ways of working, delivered by a customer focused workforce.

To fundamentally change culture in a large organisation to be totally customer focused is considered a significant transformation programme.

To change our culture AND anchor new customer focused behaviours with new digital models, integrated technology systems and new business processes, WHILE, improving and introducing new legacy systems, AND save between £20m – £25m of operating costs each year, is a radical transformation.

The scale, scope, and pace of this change from our current reality is what makes this truly radical.

Our transformation

Our council

Our aim ‘is to be the most cost effective and efficient council in London’.

To achieve this, we will need to maximise the opportunity new technology brings in everything we do while being totally focused on our residents and customers.

We know from the 2023 Residents’ Survey that only 45% of residents are satisfied with the way the council is run and 32% are dissatisfied. More residents think that the council doesn’t provide value for money than do.

To reach financial sustainability we need to be one of the most efficient councils in London. We will need to be smaller, maximising the productivity gains that new digital technology and effective business processes can bring to do less, but crucially do what we do better, in a way which is more effective and responsive to the needs of residents.



Reducing the council’s operating costs and being smaller will mean we take a hard look at our most expensive areas of spend on people, services, contracts, and assets.

At the heart of the organisation will be integrated technology providing effective data and digital business processes and systems that streamline the experience for staff and residents.

Our aim means we will:

- Adopt a ‘customer first’ culture, prioritising value, and outcomes over process.
- Offer residents choices in the way they want to interact with us, making sure that no-one is left behind.
- Organise our services around residents’ needs and experiences to prevent duplication and “residents falling between the cracks”.

This means we will:

- Adopt a single view of the customer to provide real-time personalised services.
- Optimise and automate core systems making sure we do it once and do it right.
- Redesign our businesses processes to be among the best in class for efficiency.
- Harness new digital and data capabilities and solutions to radically improve staff, resident, and customer experiences, saving time and money.

We want our staff to feel proud to work for Croydon and recognise the important role they play in transforming the council. We value the diversity of our staff and want to build a workforce with the right attitudes, skills, knowledge, behaviour, and experience for the future.

We will adopt an ‘integrated council’ approach, removing any silos between teams and put the needs of residents at the centre of designing the services of the future.

Our transformation continued

Our residents

Our aim 'is to put residents first'

We know from the 2023 Residents' Survey that only 41% of residents feel that the council listens to them while 47% feel the council does not listen and 47% do not trust the council.

Our aim means we will:

- Engage with and listen to residents, enabling them to be heard on matters that impact them.
- Provide services in an accessible way with excellent customer care.
- Empower residents and communities to help themselves and their neighbours.
- Work with partners including voluntary, community and faith sectors to transform services for vulnerable residents.

Services to our most vulnerable residents such as housing, children and adult social care are difficult to transform especially when demand is rising.

Resources are finite and at Croydon these services are some of the most expensive in London. Therefore, we are bringing in experienced strategic partners to help us. Children and adult services have begun to lay the groundwork for radical transformation. Adult social services have already started work with a strategic partner on a diagnostic to map out future opportunities and children's services are soon to do the same.

Our housing service is improving, and we will continue to have a relentless focus on getting this right for our residents. In June 2022 the council approved a Residents' Charter which was initiated by residents. We have worked hard to gain the confidence of residents beginning with Regina Road where we successfully secured 88% of eligible residents support for the proposal to regenerate the estate.



Our transformation continued

Our place

Our aim: 'is to be a cleaner, safer, and healthier borough'.

We know from the 2023 Residents' Survey that just under seven in 10 residents (69%) report that they are satisfied with their local area as a place to live and just over three fifths of residents (61%) report that they feel safe in their local area during the evening. The vast majority of residents (82%) agree that the local area is a place where people from different backgrounds get on well together. These are huge strengths that we can build on.

We understand the importance of feeling good about the place where residents live, work, and relax, and want to create a cleaner, safer, and healthier borough for all.

Our aim means we will:

- Restore Croydon's place as an important economic hub in south London.
- Unlock the aspiration and enterprise of our young people.
- Address social issues, perceptions of safety and cleanliness.
- Regenerate the town centre and manage the benefits of our £18.5m investment in our 'Reconnecting Croydon' programme.

Building on our strong local neighbourhoods and working together with our partners, we want our all our communities to be at the forefront of driving the change that matters to them.

As a council we want to empower our residents to achieve their full potential and to support each other, enabling individual independence and participation whatever residents' abilities, backgrounds, or their lifestyle choices.

We will promote respect across our neighbourhoods, fully recognising the importance of people's values, beliefs, and cultures.



Case studies

CASE STUDY 1

Current

I'm a retired business owner from the north of the borough, and I've recently become an active member of my neighbourhood community group. Volunteering with the group is a great way for me to stay active and meet local people, helping me reach my daily step target set by my GP.

During my volunteer shifts, I often notice areas in our neighbourhood with lots of litter or graffiti-covered walls.

I'm passionate about improving our community and I want to address these issues by bringing them to the attention of the local council. I report these issues by phone and sometimes send emails in, but I never know whether this is the most effective way and not sure whether my concerns have been heard or addressed appropriately.

I know the council has days where they blitz clean a local area, and I am keen to get involved, as are other people in our area but not sure whether it is the council or a local group who can help my volunteering group clean up our neighbourhood. I just feel we could do so much more locally if only they would let us.

Future

I am a retired business owner, living in the north of the borough and active community member. I recently joined our local volunteer group that meets weekly at the community hub, situated in the library on our high street. We are committed to ensuring our neighbourhood and town centre is a friendly and welcoming environment. I believe that volunteers like us are leading the way in coming together using cutting-edge technology to enhance our local environment.

Using augmented reality (AR) technology on my smartphone, I can quickly identify areas of litter or graffiti. With just a tap on my phone, I report these issues through a state-of-the-art AR-powered app directly linked to the council's database. This app not only captures images but also provides real-time data analysis using advanced AI algorithms, allowing the council to swiftly prioritise responses.

The council uses AI-driven chatbots on social media platforms to engage with volunteers like me. These chatbots offer personalised guidance and assistance in the moment, helping us determine if an issue is reportable and streamlining the reporting process for prompt resolution.

The technology in my smart phone continuously analyses data collected from us volunteers, identifying emerging trends and hotspots for litter and graffiti. The council also shares this and other valuable



information on local community forums and enables us to sign-up to wider alerts and communications about what they are doing locally and how to get involved. This helps me, and neighbourhood volunteer groups like mine, to make the best use of our time and skills to the local issues that matter the most to the community.

Our community initiatives are using integrated advanced technology. I feel rewarded knowing I am truly making a difference in enhancing the appearance of our community spaces, our neighbourhoods, and town centre. We are fully encouraged and supported to do our own community cleaning and blitzes. New reporting technology tackles issues as they arise in the most cost-effective way and helps fly-tipping reduce by being able to catch people in the act or very soon after it happens.

There are so many benefits to collaborating like this. It not only helps identify what we need to do but fosters a real sense of collective responsibility and pride among all the community groups and volunteers. I've met lots of new people in my community and as a result we are now looking to set up a range of other projects to support and improve our local neighbourhood.

Case studies



CASE STUDY 2

Current

I am a council worker who lives in the south of the borough. My job involves supporting families in need. I frequently drive to different locations throughout the borough to meet with families at their home or in the local community or family hub. I really enjoy spending time with them listening to their concerns as well as assisting with form completion and assessing whether they meet the criteria for support.

This can be quite time-consuming as I need to return to the office to document the discussions, analyse the situation, write-up supporting evidence, and devise a plan of action that aligns with the family's needs. After we've agreed on the best course of action, I sometimes guide them to other council services that may also provide the specific assistance required.

While parts of my job take time, like writing up notes, I enjoy working with our residents and it's rewarding to see matters resolved satisfactorily in the end.

Future

As a council worker, I utilise our advanced technology to transform how I assist families seeking support. Using cutting-edge AI systems, I can meet families at their local community hub, at home, or where they feel most comfortable to gather information for assessments, ensuring accuracy and eligibility for support. AI-powered assistants, like chatbots, streamline this process, prompting me to collect missing information during visits or consultations.

When I visit a family, I ask whether they mind if I record the interview explaining what happens with the information. The data is processed in the meeting, and I receive instant feedback on the family's support eligibility along with a personalised support plan that I agree with the family. An easy read version is given to the family with a list of community resources. The recording of the meeting is submitted to the system as meeting notes and automatically updates the family's online records in real-time, facilitating continuity of care. The new technology allows me to check-in with the family and we organise a proactive meeting at the local community hub to discuss progress.

Overall, my role is characterised by seamless integration of technology, personalised support plans, and proactive monitoring, ensuring families

are assessed quickly and I can make decisions about the assistance that support their strengths that they need to thrive. I am no longer driving backwards and forwards across the borough or spending time writing notes. I have developed close relationships with the local community and voluntary sector that operate from community hubs. I can now really enjoy my work, offering the best support I can provide, and feel I'm really making a difference in my role.



Case studies



CASE STUDY 3

Current

I work full time and am a council housing tenant, living in the heart of the borough. With winter here my boiler has been broken for three days, making it unbearable at home. During my breaktime I tried calling the repairs helpline, but the long wait time made me give up. Feeling frustrated, I sent an email to the housing officer as an alternative, but unfortunately I haven't received any response yet.

In the past I have had appointments made by the council for me which I couldn't get to as I work full time. I pay my rent on time, but I am in the dark about how I get through to people who are meant to help me. I am cold and am getting frustrated and angry.

Future

As a council tenant in full time employment, I rely on an advanced 24/7 online platform, powered by AI, to handle repairs to alert the council to the fact that my boiler has broken down and request for it to be repaired. Through this platform I can easily select a convenient time slot for the repair, that fits with my availability and submit the request. Upon submission I receive a unique case number for tracking purposes and an appointment slot.

On the scheduled appointment day, I receive a notification from the engineer indicating their imminent arrival. Upon arrival, the engineer explains the required repairs and provides an estimated timeline for completion. Additionally, they note that the property has not undergone a gas safety check in the past year and promptly schedule one, confirming the date and time with me.

After the repair is completed, I receive a follow-up call to ensure the boiler is functioning properly and to inquire if I require any further assistance. During this call, I am also asked to provide feedback on my experience.

Once I agree to provide feedback, I promptly receive a text containing a survey through the user-friendly interface of the platform. I effortlessly share my experience and suggestions, contributing to the continuous improvement of the service provided.

I know what is happening and when, and I am in control of when things get fixed in my own home. I am no longer in the dark about how I access support when I need it. I am no longer cold.



Transformation plan on a page



Council Transformation Programme 2024 – 2029 Radical redesign of the council

A customer first programme

Adult social care and health strategic delivery partner

Asset transformation

Borough regeneration

Corporate contract review

Council workforce transformation

Children young people and education strategic delivery partner

Data driven council

Digitally-led council

Target operating model & council vision

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The programmes in the above tables are listed in alphabetical order

Making it happen

The Mayor is accountable for the transformation set out in this plan. The Mayor, cabinet, chief executive, and corporate management team are collectively responsible for delivery.

The corporate management team meet monthly to both act as the design authority and lead the coordination of programmes, allocation of resources, review and challenge progress, and management of risks.

The directorate management teams and related improvement and transformation boards are responsible for programme delivery and are accountable to the corporate management team and the Mayor and cabinet.

Projects and programmes are directly overseen by a relevant board which report into the directorate management team related improvement and transformation board.

All projects and programmes are aligned with the Medium-Term Financial Strategy and are documented on the corporate project management system.

Our plans will change over time, to reflect emerging and changing priorities. As some projects end, others will begin, and some may require revision to meet the changing and challenging delivery environment.

The council will produce regular monitoring reports and provide a formal progress report to cabinet every six months.


The information we will use to baseline our position and track progress, includes:


- Medium Term Financial Strategy 2024-25
- Benchmarking the cost of services against other councils 2022-23 outturn
- Residents' survey 2023
- Staff survey 2024
- Investors in People 2024



Contact us:

 corporatetransformation@croydon.gov.uk

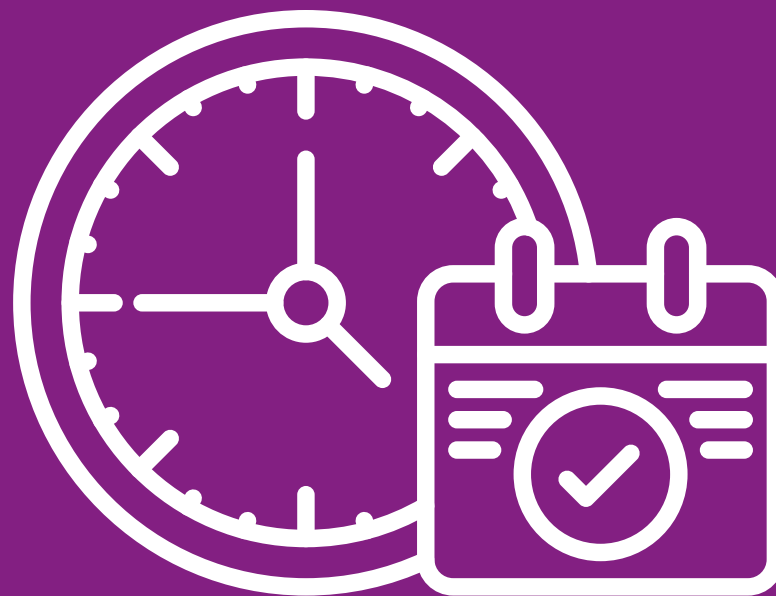
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 @IloveCroydon

Appendix 1

The council transformation programme 2024 - 2029





Appendix 1: The council transformation programme 2024 - 2029

Programmes	Title (VERTO No)	Description	Key Milestones	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
<p>Redesign of the council</p>	A customer first programme (New)	Embed a positive customer experience as part of the design and delivery of all services that is consistent across all interactions with residents, partners, businesses, members, and staff.	<p>Adopt ‘customer first’ approach across all services:</p> <ul style="list-style-type: none"> • Launch of revised council Customer Standards – Jun 24 • Appointment of Customer Experience Ambassadors – Jun 24 • Delivery of ‘customer first’ programme - Oct 24 <p>Develop digital customer offer and enhance customer access:</p> <ul style="list-style-type: none"> • Business case for website and customer access improvements agreed - Jun 24 • Strategic approach agreed for use of council assets aligned to community and family hub development – Sep 24 • Launch of improved Access Croydon customer offer - Mar 25 <p>Embed resident feedback to drive service improvement:</p> <ul style="list-style-type: none"> • Collection of customer feedback standardised across all services - Jun 24 • Revised complaints process in place - Jul 24 <p>Embed consistent approach to communication and engagement:</p> <ul style="list-style-type: none"> • Establish Engagement Community of Practice Group – Jun 24 • Refresh style guide for written communication - Oct 24 	Discovery	TBC	<p>Not expected to contribute directly.</p> <p>Cost avoidance through improved customer services</p>	<p>Not expected to contribute directly.</p> <p>Cost avoidance through improved customer services</p>	<p>Elected Mayor</p> <p>Cabinet Member for Finance</p>	<p>Assistant Chief Executive</p>



Appendix 1: The council transformation programme 2024 - 2029

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Programmes	Title (VERTO No)	Description	Key Milestones	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
Redesign of the council	ASCH Strategic Delivery Partner (New)	Enhancing the work of ASCH managing demand transformation programme; key features will include design and implementation of a new target operating model, with performance aligned to London benchmarking, an appropriately skilled workforce, use of digital and technology, and a sustainable budget.	<p>PHASE 1: (in progress)</p> <ul style="list-style-type: none"> • Procurement exercise - Nov/Dec 23 • Diagnostic review - Feb-Apr/May 24 <p>PHASE 2: (requires MAB/CMT/DMT sign off to proceed)</p> <ul style="list-style-type: none"> • Design (approx. 6 months) • Adopt and implement (approx. 6-12 months) • Sustain (approx. 3-6 months) <p>Phase 2 timescales depend on the size of the programme of work signed off following submission of the diagnostic review</p>	Design	£1,134,480	24/25 - £0m* 25/26 - £4m 26/27 - £4m * There is a £5m efficiency, but this is being delivered by the directorate and not aligned to the transformation plan.	Further savings to be confirmed as the review progresses	Cabinet Member for Health and Adult Social Care	Corporate Director Adult Social Care & Health
Redesign of the council	Asset Transformation Programme PR000115 Including Croydon Campus PR000104	A programme that supports the delivery of the MTFS and aligned to the new target operating model including annual asset disposal plan, supporting the MTFS & reduction in borrowing and revenue costs and the reconfiguration of Croydon Campus – including Town Hall, Davis House & Bernard Weatherill House.	<ul style="list-style-type: none"> • £50 million in capital receipts 23/24 – Mar 24 • Tranche 3 agreed list ready - May 24 • Heat Map to be completed - Mar 24 	Delivery	£124,507	£100m (capital receipts 2023/24 & 2024/25) Too Early to define - on Croydon Campus	Contribution to £94m TBC – Circa £10m	Cabinet Member for Finance	Corporate Director for Resources
Redesign of the council	Corporate Contract Review (New)	A review of the scope & content of contracts on the corporate register to ensure alignment with new target operating model.	<ul style="list-style-type: none"> • Review to be completed - Mar 25 	Discovery	TBC	TBC	Contribution to £94m TBC – Circa £10m	Cabinet Member for Finance	Corporate Director for Resources



Appendix 1: The Council Transformation Programme 2024 - 2029

Programmes	Title (VERTO No)	Description	Key Milestones	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
Redesign of the council	CYPE Strategic Delivery Partner (New)	To accelerate the pace and increase the impact of the transformation, CYPE is commissioning a Strategic Transformation Partner.	<ul style="list-style-type: none"> • Procurement event - Jan 24 • Route to market - Apr 24 • Amplified analysis - Sep 24 • Design and implementation - Mar 25 • Sustainability – Mar 26 	Discovery	£2,580,542	No savings yet included in the MTFS, as project not commenced.	Savings planned 24/25 - £.5m 25/26 - £1m 26/27 - £3m 27/28 - £5m Contribution to £94m	Cabinet Member for Children and Young People	Corporate Director Children, Young People & Education
Redesign of the council	Target Operating Model & council Vision (New)	Radical redesign of the council’s operating model through a fundamental review of what we do, how we do it & who does it including our ways of working, opportunities for consolidation, rationalisation, automation, a new commissioning & commercial approach and working with communities and partners.	<ul style="list-style-type: none"> • Procure a strategic partner – May 24 • Development of a new Target Operating Model blueprint – Sep 24 • Delivery of blueprint with a multi-year delivery plan aligned to the MTFS 	Discovery	TBC	TBC	Contribution to £94m TBC – Circa £10m	Executive Mayor	Chief Executive
Redesign of the council	Council Workforce Transformation (New)	This project is intended to support the new target operating model in delivering a future workforce. Subset of the TOM.	<ul style="list-style-type: none"> • Development of future Croydon workforce plan, including delivery of skills audit and enhanced change management and leadership capability 	Discovery	TBC	TBC	Not expected to contribute	Cabinet Member for Finance	Assistant Chief Executive

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Appendix 1: The council transformation programme 2024 - 2029

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Programmes	Title (VERTO No)	Description	Key Milestones	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
Redesign of the council	Data driven council (New)	This project aims to bolster the new council design (or target operating model) with data-driven approaches. It will enhance the ability deliver better target services, promote collaboration among council services, partners, and the community, and support the council to pinpoint opportunities for prevention unnecessary expenditure and cost reduction. Subset of the TOM.	<ul style="list-style-type: none"> Development of a future Croydon data strategy and roadmap 	Discovery	TBC	TBC	Contribution to £94m TBC – Circa £10m	Cabinet Member for Finance	Assistant Chief Executive
Redesign of the council	Digitally led council (New)	This project is intended to support the new target operating model in delivering a digitally led new design including ways of working and interacting with the council. Subset of the TOM.	<ul style="list-style-type: none"> Development of a future Croydon digital strategy and roadmap 	Discovery	TBC	TBC	Contribution to £94m TBC – Circa £10m	Cabinet Member for Finance	Assistant Chief Executive
Borough Regeneration	Croydon Town Centre Programme (New)	A programme to oversee and ensure the delivery of town centre regeneration, including the delivery of the Levelling Up Fund (LUF) and Growth Zone projects and programmes.	<p>LUF Programme:</p> <ul style="list-style-type: none"> Programme development – April 2024 Programme update report to Cabinet – June 24 Procurement of design and build package – Oct 24 Final delivery completion – March 2026 <p>Town Centre Vision, Spatial Framework & Regeneration Strategy:</p> <ul style="list-style-type: none"> Engagement with partners and residents. Jan – Aug 24 New Vision – Oct 24 Spatial Framework – Jan 25 Regeneration Delivery Plan Jan 25 	Design	£18.5m LUF £7.2m Growth Zone in 2024/25	TBC	TBC	Cabinet Member for Streets & Environment	Cabinet Member for Streets & Environment

Council Improvement Plan 2022 – 2027

Update to the November 2022 Cabinet Transformation Plan containing existing and new improvement programmes and projects aligned to the delivery of the Medium-Term Financial Strategy and Mayor's Business Plan.

Programmes	Title (VERTO No)	Description	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
ASCH Improvement Programme	Community Equipment Service Review PR000092	Outsourcing of the community equipment service and procurement of a partner. This follows a review of the financial sustainability and options to reduce costs while maintaining service standards.	Delivery	£234,000	-	Projected financial benefits from the approach profiled at approx. £3m over 7 years of a contract.	Cabinet Member for Health & Adult Social Care	Corporate Director Adult Social Care & Health
Asset Management Programme	CALAT PR000110	Review of the Croydon Adult Learning and Training Services (CALAT)	Delivery	£50,000	-	£20,000	Cabinet Member for Finance	Corporate Director for Resources
Borough Regeneration Programme	Building Control Transformation PR000108	To transform the service, to ensure it meets statutory requirements, and value for money	Delivery	£450,000	£300,000 (2024/25)	-	Cabinet Member for Planning and Regeneration	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Borough Regeneration Programme	Parking Review PR000357	Review of the existing Parking Policy	Delivery	£200,000	£951,100 (additional income in 2024/25)	-	Cabinet Member for Streets & Environment	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Borough Regeneration Programme	Planning & CIL Transformation PR000109 i.e. Community Infrastructure Levy (CIL)	Review and revamping of the Development Management Planning Service, to ensure it is more efficient, effective and offers greater value for money	Delivery	£300,000	-	-	Cabinet Member for Planning and Regeneration	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Business Improvement Programme	Business Process Improvement Programme PR000105	Review of all service business processes and identify recommendations for savings, improvement & transformation.	Discovery	£200,000	TBC	TBC	Cabinet Member for Finance	Assistant Chief Executive
Business Improvement Programme	Contract Management Improvement (New)	Improve contract management arrangements – to include contract register review, record holding & payments.	Design	TBC	TBC	TBC	Cabinet Member for Finance	Corporate Director of Resources
Business Improvement Programme	Council Wide Business Intelligence & Improvement Programme	The Business Intelligence project is a council wide programme which seeks to improve accessibility and use of data. Building on the success of phase one of the Business Intelligence review, this second phase will improve our data culture,	Discovery	TBC	TBC	-	Cabinet Member for Finance	Corporate Director of Resources

Programmes	Title (VERTO No)	Description	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
		literacy and maturity and explore opportunities to use data usage, AI and predicative analytics to improve services and reduce cost.						
Business Improvement Programme	HR & Organisational Development redesign PR000359 (was PR000052)	A collection of projects supporting HR & Organisational Design, service improvements, culture change and financial savings. A restructure of the HR Service.	Delivery	£93,000	£50,000 in 2024/25 and £50,000 in 2025/26	-	Cabinet Member for Finance	Assistant Chief Executive
Business Improvement Programme	Income & Collection Programme PR000094	To correctly price fees and charges and improve management of demand	Delivery	£50,000	£150,000 - 2023/24	£2,297,000 - 2024/25 £1,757,000 - 2025/26	Cabinet Member for Finance	Corporate Director Resources
Business Improvement Programme	Passenger SEND Transport Transformation PR000065	To implement a joined up strategic approach to SEND Transport across the Council - and cost mitigation measures which can be delivered	Discover	£100,000	-	-	Cabinet Member for Streets & Environment	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Business Improvement Programme	People & Culture Change Delivery Plan (New)	Implement the People & Culture Change delivery plan comprising of projects focussed on workforce improvement, leadership, culture, EDI, wellbeing, skills, recruitment, retention, pay and reward, and employer brand, performance management and compliance culture	Delivery	TBC	TBC	TBC	Cabinet Member for Finance	Assistant Chief Executive
Business Improvement Programme	Procurement Improvement Plan (New)	Procurement supports commissioning & contract management cycle - including review skill gaps for involved staff	Design	TBC	TBC	TBC	Cabinet Member for Finance	Corporate Director Resources
Business Improvement Programme	Public Health Improvement (New)	The public health transformation programme sets out the way in which the Council will achieve the commitment to ensure maximum impact and value for money from the whole of the Public Health Grant.	Design	-	£3.0m	TBC	Cabinet Member for Finance	Assistant Chief Executive
Business Improvement Programme	Review of Croydon Digital Service - CDS	This project is intended to conduct a review of Croydon's Digital Service to assess the service for opportunities of	Discovery	£80,000	TBC	TBC	Executive Mayor Cabinet Member for Finance	Assistant Chief Executive

Programmes	Title (VERTO No)	Description	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
	PR000053	transformation including the structure, tools and processes used by the service						
Cleaner Croydon Programme	Develop New Environmental Enforcement Policy (New)	A review and service redesign of the Environmental Health, Trading Standards and Licensing division	Discovery	TBC	TBC	TBC	Cabinet Member for Streets & Environment	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Cleaner Croydon Programme	Grounds Maintenance Transformation (New)	A review of the operating model for grounds maintenance	TBC after discovery phase	TBC after discovery phase	TBC after discovery phase	TBC after discovery phase	Cabinet Member for Streets & Environment	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Cleaner Croydon Programme	Improvement to Waste & Recycling Contract Management (New)	Procurement of the waste, recycling, and street cleansing contract and implementation of a strengthened contract management function	Delivery	N/A	N/A	N/A	Cabinet Member for Streets & Environment	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
CYPE Improvement Programme	Calleydown Transformation PR000089	Explore scope for transforming Calleydown and the associated improvement works Review of staffing levels and structure/additional resources required to support any potential increased capacity Review and improve emergency placement process	Discovery	£134,000	£142,000 in 2024/25 & £142,000 in 2025/26	-	Cabinet Member for Children and Young People	Corporate Director Children, Young People & Education
CYPE Improvement Programme	Corporate Parenting Transformation PR000079	To improve the outcomes for children and young people who come into the care of Croydon and those young people who have experienced care, increasing effectiveness and efficiency, through governance, permanence, fostering, family & friends, care experiences, and placements	Delivery	£742,750	£225,000 in 2023/24 & £900,000 in 2024/25	-	Cabinet Member for Children and Young People	Corporate Director Children, Young People & Education
CYPE Improvement Programme	CYPE Joint Funding Arrangement PR000074	To improve joint funding arrangements and processes across Children's Social Care, Health, and Education for children and young people, delivering quality care to meet assessed needs of children and young people in the most effective and efficient manner, whilst ensuring the	Delivery	£110,000	£250,000 in 2024/25	-	Cabinet Member for Children and Young People	Corporate Director Children, Young People & Education

Programmes	Title (VERTO No)	Description	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
		appropriate apportioning of costs across the partnership according to each partner's respective responsibilities						
CYPE Improvement Programme	SEND Locality Model PR000063	Increase pupil numbers in mainstream education educated in the borough & early support for special need pupils	Delivery	£240,000	This project will not directly deliver a general fund saving but will be an enabler for the organisation to meet the KPIs and continue to implement the strategies within the Safety Valve process	-	Cabinet Member for Children and Young People	Corporate Director Children, Young People & Education
CYPE Improvement Programme	Sustaining demand at the front door PR000078	To develop systems & processes in the front door of Children's Social Care to maximise efficiencies, increase multi-agency contributions to target council resources to greatest effect, reducing the need for high-cost interventions including care placements	Delivery	£190,000	£200,000 in 2023/24	-	Cabinet Member for Children and Young People	Corporate Director Children, Young People & Education
Digital and Legacy Improvement	Core Digital System Improvements (New)	Programme to be scoped	Discovery	TBC	TBC	TBC	Cabinet Member for Finance	Assistant Chief Executive
Digital and Legacy Improvement Programme	Oracle Improvement Programme PR000344	Improvements to the Oracle System and Finance, HR, Procurement modules and associated Business Processes	Design	£915,000	-	-	Corporate Director Resources	Corporate Director Resources
Digital and Legacy Improvement Programme	Re-procurement of IT systems for Planning, Building control, regulatory	Re-procurement of IT systems for Planning, Building control, regulatory services (environmental health, trading standards, and licensing).	TBC	TBC	TBC	TBC	Corporate Director Resources	Assistant Chief Executive

Programmes	Title (VERTO No)	Description	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
	services (environmental health, trading standards, and licensing).							
Housing Improvement Programme	Homelessness (New)	TBC	TBC	TBC	TBC	TBC	Cabinet Member for Homes	Corporate Director Housing
Housing Improvement Programme	Housing Association Liaison & Recharges PR000165	Improved governance & maximising nomination contracts & agreements for emergency & temporary accommodation	Delivery	£59,000	TBC	TBC	Cabinet Member for Homes	Corporate Director Housing
Housing Improvement Programme	Housing Benefit Subsidy – SEA, EA/TA PR000059	Review SEA properties with Housing Benefit in payment and establish occupation and charging principles as well as review the level of support being provided	Delivery	-	£1,483,000 in 2023/24 & £1,312,000 in 2024/25	-	Cabinet Member for Homes	Corporate Director Housing
Housing Improvement Programme	Housing Dynamic Purchasing System PR000087	Addresses procurement & compliance issues in the acquisition of emergency accommodation	Delivery	£142,000	<ul style="list-style-type: none"> • Improve practice • Manage demand • Improve efficiency • Increase effectiveness 	-	Cabinet Member for Homes	Corporate Director Housing
Housing Improvement Programme	Housing Investment (New)	TBC	TBC	TBC	TBC	TBC	Cabinet Member for Homes	Corporate Director Housing
Housing Improvement Programme	Housing Needs Restructure PR000132	Review of the Housing Needs & Homelessness Service	Delivery	£260,000	£625,000 in 2023/24 & £625,000 in 2024/25	-	Cabinet Member for Homes	Corporate Director Housing
Housing Improvement Programme	Supported Housing Review PR000166	A review of housing related contracts across Housing/CYPE/ ASC&H to formalise arrangements, ensuring best value, compliance	Discovery	£80,000	£240,000 in 2026/27	-	Cabinet Member for Homes	Corporate Director Housing
Housing Improvement Programme	Temporary Accommodation	Facilitate occupancy checks in emergency and temporary accommodation – supporting improved welfare checks and	Delivery	£491,000	£600,000 in 2023/24 &	-	Cabinet Member for Homes	Corporate Director Housing

Programmes	Title (VERTO No)	Description	Project Phase	Investment	Efficiency (in MTFS)	Efficiency (to be added to MTFS)	Cabinet Lead	CMT Lead
	Case Review PR000161	resident experience NB. 7 Feb 2024 - 1785 inspections carried out, accessed 1,340 units			£450,000 in 2024/25			
Libraries, Community Hubs & Museum Programme	Croydon Museum Transformation PR000068	Conduct a best value review and more sustainable approach for service delivery	Delivery	£169,600	-	-	Cabinet Member for Communities and Culture	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Libraries, Community Hubs & Museum Programme	Library Service Review (was Community Hubs) PR000049	To consolidate the use of libraries, for better customer experience & maximisation of building facilities	Design	£250,000	-	£54,000	Cabinet Member for Communities and Culture	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
Safer Croydon Programme	Tackling Violence Against Women & Girls Delivery Plan - VAWG (New)	A new VAWG Delivery Plan to build on the work of the previous Domestic Abuse strategy to enable us to better tackle all forms of gender-based violence, including safety on our streets, domestic violence, sexual abuse, protecting women in public spaces and tackling perpetrators of gender based violence	Discovery	N/A	N/A	N/A	Cabinet Member for Community Safety	Corporate Director of Sustainable Communities, Regeneration & Economic Recovery

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27th March 2024	
REPORT TITLE:	PARTIAL LOCAL PLAN REVIEW	
CORPORATE DIRECTOR / DIRECTOR:	Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Heather Cheesbrough, Director of Planning & Sustainable Regeneration	
LEAD OFFICER:	Julia Dawe - Plan Making Team Leader Steve Dennington – Service Head for Spatial Planning, Growth Zone and Regeneration Email: Julia.dawe@croydon.gov.uk Steve.Dennington@croydon.gov.uk	
LEAD MEMBER:	Cllr Jeet Bains, Cabinet member for Planning and Regeneration	
KEY DECISION?	YES <i>Key Decision no 4923EM</i>	Decision significantly impacts on communities living or working in all Wards of the Borough.
WARDS AFFECTED:	ALL	

1 SUMMARY OF REPORT

- 1.1 This report seeks approval of the Executive Mayor in Cabinet to publish the Proposed Submission draft of the Croydon Local Plan review for public consultation to be undertaken in accordance with Regulation 19 of the of the Town and Country Planning (Local Plan) Regulations 2012.
- 1.2 Cabinet and Council approval was given on 13 December 2021 for a previous version of the Proposed Submission draft Croydon Local Plan review to be published for representations under Regulation 19 of the Town and Country Planning (Local Plan) Regulations 2012 on 6th January 2022 for a statutory 6- week period closing on 17 February 2022.
- 1.3 This resulted in a significant number of representations from local communities in opposition, particularly in relation to the areas proposed for high and moderate suburban intensification. As a result, in early 2022, and having regard to the concerns raised by the Mayoral candidates in their manifestos, the decision was made to “pause” work on the Local Plan and to seek instruction from the new Executive Mayor once elected.
- 1.4 Following the election of Mayor Perry, who stood on a clear manifesto commitment to listen to residents and amend planning policy and guidance, the Mayor’s Business Plan (2022-2026) was published which required additional changes to be made as part of

the Local Plan Review. Specifically, this required amendments to be made to Croydon's Local Plan to remove intensification zones, scrutinise and refine housing targets, support sustainable development and emphasise design and character over density. As a result, additional work was required to remove and re-draft policies within the Local Plan and Cabinet approval was needed for an amended timetable to the Local Development Scheme (LDS) to incorporate the Mayor's changes.

- 1.5** As previously stated, the most significant changes to the Local Plan are the removal of the intensification areas and the housing target has been revised in line with the London Plan. Following the commissioning of further evidence other changes have been made in the review of the Local Plan to ensure that the policies follow a design and character led approach over density as set out in the Mayor's Business Plan, whilst still planning for new homes and meeting the London Plan housing target. The revised Local Plan has also been updated to address Houses in Multiple Occupation with the inclusion of a new policy which ensures that any accommodation created is of a high standard of living environment and that proposals do not give rise to significant adverse amenity impact(s) on the surrounding neighbourhood including cumulative impacts arising from an overconcentration of HMOs within an area. These changes have now been incorporated into the Local Plan Review and the next step is to seek approval from Cabinet to publish the Local Plan Review for a further round of representations required under Regulation 19 of the Town and Country Planning (Local Plan) Regulations 2012. Once this has been undertaken, following approval by Council in April, the Local Plan Review together with the Regulation 19 responses will be submitted to the Secretary of State for Independent Examination.
- 1.6** Throughout the process Officers have held workshops with internal colleagues, engaged with residents' associations and held on-going meetings across the Council's Political Groups. Further details are set out in section 6 of the report below. The Local Plan Review was also considered by the Council's Streets and Environment Scrutiny Sub-Committee on 1st November 2023.
- 1.7** Subject to Cabinet approval thereafter the Regulation 19 consultation will run for a 6-week period during May and June 2024 with the aim of submitting the Local Plan Review to the Secretary of State for independent examination in October 2024.

2 RECOMMENDATIONS

For the reasons set out in the report and its appendices and to deliver the requirements of the Mayor's Business Plan, the Executive Mayor in Cabinet, is recommended:

- 2.1.** to agree 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;
- 2.2** to agree that the Proposed Submission draft of the Croydon Local Plan review be recommended to Full Council for submission to the Secretary of State upon expiry of the statutory 6-week publication period including, if applicable, any minor changes arising from any representations received in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012;

- 2.3 delegate minor and/or factual changes to the Proposed Submission draft of the Croydon Local Plan review including the Policies Maps, prior to publication to the Director of Planning and Sustainable Regeneration in consultation with the Executive Mayor and Cabinet Member for Planning and Regeneration.
- 2.4 delegate to the Corporate Director for Sustainable Communities, Regeneration and Economic Recovery, in consultation with the Executive Mayor and Cabinet Member for Planning and Regeneration, the publication of draft Supplementary Planning Documents.
- 2.5 delegate to the Corporate Director for Sustainable Communities, Regeneration and Economic Recovery, in consultation with the Executive Mayor and Cabinet Member for Planning and Regeneration, the publication of draft Community Infrastructure Levy Charging Schedule: and
- 2.6 delegate to the Corporate Director for Sustainable Communities, Regeneration and Economic Recovery, in consultation with the Executive Mayor and Cabinet Member for Planning and Regeneration, the publication of the Council's Authority's Monitoring Reports and Infrastructure Funding Statements.

3 REASONS FOR RECOMMENDATIONS

- 3.1. Croydon needs to review its existing Local Plan 2018 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.
- 3.2 This Proposed Submission draft of the reviewed Croydon Local Plan sets out how Croydon might contribute to meeting its own housing needs, with design and character led development; whilst tackling the causes of climate change in the borough and ensuring that it is developing vibrant places for people to live, work and visit focused on Town Centre and district centre renewal and regeneration.
- 3.3 It is a statutory requirement for the Council to have an up-to-date Local Plan to ensure that the Council can determine planning applications in accordance with up-to-date Local Plan policies and resist inappropriate development and minimise the level of developments occurring in the borough through the planning appeal process.
- 3.4 For this reason, it is recommended to approve the Proposed Submission draft of the reviewed Croydon Local Plan for publication and, subject to Council approval, 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. As minor changes may arise through representations received in accordance with Regulation 19 delegated authority is recommended to make these prior to submission.
- 3.5. The recommendations relating to the publication of other components of the LDS enable the LDS to be delivered in a timely manner and at the earliest opportunity for consultation to occur.

4 BACKGROUND AND DETAILS

Background

- 4.1** A key aim of the Local Plan Review is to address the need for Croydon to help deliver more high-quality housing, of the right design, in sustainable places and with affordable housing. This housing will support vibrant places to live, work, visit and socialise. It is important to note that this is a partial review of the Croydon Local Plan 2018. As such this document is an edited version of the Croydon Local Plan 2018 rather than a rewritten new document and as before with the previous consultation, it will be presented as a tracked change document (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.
- 4.2** The Local Plan Review continues to include three additional strategic transformation areas for Purley Way, North End Quarter and Brighton Main Line & East Croydon Transformation Corridor. The revised Local Plan also includes updates to existing policies to reflect changes in central government policy and using existing and updated evidence for thematic policy areas 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.
- 4.3** The Local Plan 2018 existing Focused Intensification Areas and additional areas proposed for intensification in the December 2021 edition have been removed from the Local Plan Review, in accordance with Priority 4 of the Mayor’s Business Plan. 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. The strategy sets out in the proposed submission document, the vision for these areas, as well as the proposed growth scenario.

Detail

- 4.4** 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 beyond together with ensuring 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 will contribute to meeting its own housing needs, with design and character led development; whilst tackling the causes of climate change in the borough, and ensuring it is developing vibrant places for people to live, work and visit focused on the town centre and district centre renewal and regeneration.
- 4.5** The London Plan was adopted in March 2021. Policy H1 of the London Plan and requires the borough to set a 10-year housing target for Croydon of 20,790 dwellings to be constructed between 2019-2029 i.e., over a 10-year period. This equates to 2,079 dwellings per annum. The 2021 Regulation 19 version of the Local Plan took this number and used it for the following ten years resulting in a housing target of 41,580, which received much criticism from residents as it went beyond the London Plan requirement for the last 10 years of the plan period. The Local Plan Review now sets out a strategy to accommodate at least 33,985 homes between 2019 – 2040, of which 20,790 homes are those required to be delivered by 2029 to conform with the London Plan requirements. Thereafter the housing target for the remaining period of the plan reduces to 1,465 dwellings per annum.

- 4.6** In summary the revised housing target for the Plan period to 2040 has been reduced from a total of 42,000 homes to 33,985 homes since the last Regulation 19 consultation version. The reduction in the housing number has been informed by the capacity constraints in the borough i.e. the Green Belt and the 2017 London wide SHLAA findings (as required by the London Plan) together with the Council's strategic approach to housing. The housing targets are set out in detail in paragraphs 3.15A – 3.13I in the Local Plan Review.
- 4.7** The Proposed Submission draft of the Croydon Local Plan covers the following sections:
- Strategic Option
 - Three strategic transformation areas
 - Thematic Policy Areas (including strategic and development management polices)
 - Place Specific Policies

Strategic Option

- 4.8** 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 2040. 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 by a Secretary of State appointed independent planning inspector.
- 4.9** 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 by a strategic approach as follows:
- the Croydon Opportunity area;
 - existing and additional site allocations;
 - existing permissions across the Borough; and
 - windfall sites.
- 4.10** To deliver additional growth as set out in the London Plan 2021 there is a focus on the Croydon Opportunity Area and district centres. There is a strategic level of development focused on the Purley Way which is proposed to accommodate up to 7,515 homes over mostly the later part of the plan period, through a 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 and will be adopted alongside the Local Plan Review. No Green Belt nor Metropolitan Open Land release is proposed to accommodate the London Plan housing target or infrastructure provision.

- 4.11** Under the Proposed Submission draft of the Croydon Local Plan, homes by place (2019-2039) are proposed through site allocations which are listed in Appendix 7 of the Local Plan.
- 4.12** Each of the thematic policy areas have been reviewed given the clear priorities set out in the Mayor's Business Plan. Also, policies have been reviewed having regard to feedback from the Regulation 19 consultation (2022). As this is a partial review, the suite of Development Management policies has only been updated to reflect changes in central government legislation such as the changes to the Use Classes Order for example. Policies have also been updated as necessary to reflect the London Plan and any revisions to the National Planning Policy Framework (NPPF) as amended on 19th December 2023. In addition, there are a number of "living" technical documents which have been used to inform any updates to existing policies. These documents are approved under delegation. These are:
- The Council's Annual Monitoring Report;
 - The Infrastructure Delivery Plan; and
 - The Infrastructure Funding Statement

Where appropriate the following policy areas state and draw upon where new evidence has informed the review. The following amendments have been made to the Plan to support the delivery of the strategy, to ensure consistency with the NPPF (as revised December 2023) and the London Plan and to address environmental and climate change issues.

Urban Design Heritage and Local Character

- 4.13** This chapter has been substantially redrafted to remove all policies relating to the existing and proposed intensification areas in accordance with the Mayor's Business Plan. Policies SP4 and DM10 have been updated and strengthened to place greater emphasis on design and character over density and enhancing Croydon's varied local character. The Tall Buildings policy is being reviewed to take account of the findings from the Tall Buildings Study and ensure that the policy is in conformity with London Plan Policy D9. The policy will identify locations in the borough where tall buildings will be appropriate, set a Borough wide definition for tall buildings, and establish maximum heights in the Borough's 'places' where appropriate. This is a requirement of the London Plan.

Environment and Climate change

- 4.14** This chapter has been re-named to Sustainable Design and Construction and contains policies to address climate change. Climate change is a global issue with many local impacts, such as flooding events. Croydon is the 4th most susceptible town in the UK for surface water flooding.
- 4.15** 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 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 amendments to the NPPF, including, the change to paragraph 157 to reflect current government policy on national technical standards;
- Additional Policy has been provided to promote the Circular economy;
- Policies amended to embed climate adaptation and carbon reduction actions.

Green Grid

- 4.16** 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. No changes are proposed to the existing Green Belt boundaries.
- 4.17** 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 borough's water bodies;
 - Providing 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 based on the evidence received from the wider community.

Housing (including affordable housing)

- 4.18** The Strategic Housing Market Assessment evidence 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 1,817 affordable rented homes a year would be needed in Croydon to meet the housing need of lower income households. There is also a need for 1,028 immediate homes in the borough per year. Immediate Homes are a form of affordable housing consisting of London Living Rent homes and Shared Ownership homes. 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; and

- New policy to manage the quality and cumulative impact of Houses of Multiple Occupation.

Employment and Retail:

4.19 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, the NPPF, the latest Retail Needs Study and respond to the changing function and use of all tiers of centres:

- Updates 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 Classes Order;
- With the London Plan 'no net loss' provision for industrial and employment sites removed, policies have been amended to protect this land and encourage intensification to support the borough's economy, supported by the evidence from the Employment Land Review;
- Additional policies supporting the creative economy and providing benefits to the local workforce;
- Strengthen the protection of employment land, and
- Supporting the warehousing sector.

Community facilities:

4.20 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;
- Need to match facilities with new development to mitigate impact; and
- Burial space provision

Transport

4.21 In accordance with the London Plan and the London Mayor's Transport Strategy, changes to the transportation policies aim to address the climate emergency and enable growth in the borough. The following policy changes have been made:

- Addressing the London Plan parking standards as appropriate for the borough;
- Promote changes to support reducing climate change impacts – promote development in sustainable locations (overall strategy);
- Reinforce and strengthen extant policies encouraging and delivering sustainable travel, resulting in reduced vehicle emissions and the promotion of physical activity with the added health benefits; and,
- Address development phasing and construction

Transformation Areas

The Purley Way

4.22 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 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:

4.23 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 bottlenecks 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.
- Allocations included to phase and guide development sites adjacent to the station post construction of the project.

The North End Quarter

4.24 A chapter setting out the statutory planning framework / policies for the renewal and regeneration of the Town Centre around North End. The chapter provides a planning vision and strategy for the transformation of this area as the role of town centres change and evolve in response to the pandemic and much changed function and role of town centres. The chapter will be supplemented by URW's current masterplanning exercise, the Council's Town Centre Vision, Regeneration Framework and Delivery Plan commission and the outputs from the Croydon Urban Room.

The 16 Places

4.25 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 and these updates have been done with reference to the Borough character appraisal.

Allocations

- 4.26** 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 or Transformation Chapter.

Local Green Spaces

- 4.27** 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 105 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 106 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), tranquillity or richness of its wildlife; and
- local in character and is not an extensive tract of land."

- 4.28** The NPPF (paragraph 107) also requires that policies for managing development within a Local Green Space should be consistent with those for Green Belts.

- 4.29** In 2016, as part of the preparation of the Croydon Local Plan 2018, the Council tried to introduce 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 previous Planning Inspector, appointed by the Secretary of State to examine the adopted 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.*"

- 4.30** In preparation for the Local Plan Review, between 4th June 2019 to 22nd 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.”

- 4.31** 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 of the Croydon Local Plan. The proposed Local Green Spaces are set out under each Place and include the reason why they are demonstrably special.
- 4.32** It should be noted that 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 33,985 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 fulfil the criteria to be designated as “local green spaces” will be protected in the Local Plan review under an ‘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.
- 4.33** These spaces that are proposed to be protected through an “Important Green Spaces” designation 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.

4.34 Sites contained within the proposed categories of green space designations (Local Green Spaces and Important Green Spaces) are based upon two rounds of public consultation undertaken in 2019 and 2020. The assessment carried out by the Council thus far has been largely qualitative, so it is important that the quantitative value of the local spaces is included in the assessment of their suitability for designation. The Council has appointed consultants to carry out this work, who also updated the available qualitative evidence. The list of local green spaces is in line with the findings of the open space study.

Other Local Development Framework Work

4.35 The Local Development Framework consists of a series of documents that are created to produce a policy framework. The Local Plan is the key document in this however there are other documents that are produced. The Local Development Scheme (LDS) includes other supporting documents to be prepared in order to enable the delivery of development and appropriate infrastructure. These include:

- Review of the CIL Charging Schedule;
- Preparation of a Financial Contributions SPD; and
- Webb Estate Conservation Area Appraisal and Management Plan as an SPD;
- Preparation of Residential Extensions and Alterations SPD

4.37 To provide guidance to support the policies seeking to protect the character of the borough the Conservation Area Appraisal SPD's and Residential Extensions SPD are needed.

4.38 To support the delivery of infrastructure set out in the Infrastructure Delivery Plan and mitigate the impact of development, the Council has commenced a review of the Community Infrastructure Levy (CIL) charging schedule originally adopted in 2013. In addition, work has also commenced on a Financial Contributions Supplementary Planning Document (SPD) which will set out additional contributions that will be secured through a Section 106 Planning Obligations. Both of these documents will seek to strike an appropriate balance between additional investment through CIL and Section 106 contributions to infrastructure to support development and the potential effect on the viability of developments.

4.39 Work has commenced on all four of the above documents and are progressing well and it is anticipated that these will be completed within the time frames set out in the LDS. These documents are finally adopted by Council, but the draft consultation documents are approved under delegation.

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 It is a statutory requirement for the Council to prepare a Local Plan and keep it up to date in order to ensure compliance with national planning policy and the London Plan. Paragraph 33 of the NPPF states that policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once

every five years and should then be updated as necessary. An up-to-date Local Plan ensures that the Council is able to determine planning applications in accordance with a robust planning policy framework and resist inappropriate development.

- 5.2** The Council's Local Plan was adopted in 2018 some 5 years ago and therefore needs to either be updated or reviewed in accordance with Paragraph 33 of the NPPF. Failure to update the Local Plan will result in a set of policies which are out of date leaving the Council vulnerable to unplanned development being allowed through the planning appeal process.

6 CONSULTATION

- 6.1** The Croydon Local Plan Review (partial) has been subject to consultation from the start and has been on - going as it has progressed. It has previously been considered by the Streets Environment and Homes Sub-Committee. At meetings of the Sub-Committee on 16 March 2021 recommendations related to Low Traffic neighbourhoods and sustainability objectives. These recommendations have been taken on board and Strategic Policy SP1 has been amended to include references to the Healthy Streets initiative as set out in the Mayor's Business Plan. The London Plan has been adopted since the Sub-Committee last met and contains more robust sustainability objectives and climate change policies which have been reflected in the Local Plan Review.
- 6.2** The Issues and Options consultation for the Local Plan took place between 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.
- 6.3** The Local Plan Review was published for consultation under Regulation 19 of the Town and Country Planning (Local Plan) Regulations 2012 on 6th January 2022 for a statutory 6 - week period closing on 17 February 2023. More than 8,000 representations were received in response, including significant numbers from local residents' associations, individual residents, local councillors and the local MP. The vast majority of the representations objected to the proposed designation of intensification areas and particularly Addiscombe. A number of comments were also made in relation to the timing of the Local Plan review and that it should not be progressed until after the Mayor had been elected (May 2022). As a result of the above together with issues raised by the previous Regulation 19 consultation, the decision was made to "pause" work on the Local Plan until the Mayor was in office and the Mayor's Business Plan had been published.
- 6.4** The final development of the policies in the revised Local Plan started in September 2023 with briefings for all members which explained; the scope of the review, feedback from the previous Regulation 19 consultation and the changes required to be made as a result and the additional evidence needed. Ahead of the all-member briefings officers met with all the Council's political parties to ensure that the briefings included issues that they wished to be covered. Officers have also met with the representatives from the opposition parties on a regular basis during the formulation of the revised Local Plan. A draft copy of the revised Local Plan has been provided two months ahead of this Cabinet meeting. All feedback has been carefully reviewed and used to inform the policies in the revised Local Plan.

- 6.5 The Local Plan Review has been considered by the Council's Streets and Environment Scrutiny Committee on 1st November 2023. At this meeting Members considered a number of issues but particularly welcomed the inclusion of the Green Grid and Local Green Spaces in the Local Plan Review. The Committee recommended "that Blue Corridors (watercourses and natural ponds) were explicitly referenced and considered in this area of work." This matter has been addressed in the revised Local Plan.
- 6.6 A programme of meetings with Local Residents' Associations, other community groups and representatives across the Council's political groups has taken place. These series of meetings took place during October 2023. The events comprised a presentation which set out the proposed changes to the Local Plan as detailed in this report, including the removal of proposed intensification areas followed by a question and answer session, which have informed the final drafting of policies. Members were able to come along to hear what was being asked and the answers given. Feedback from these sessions has been positive and welcomed by the community groups.
- 6.7 Given the proposed changes it will now be necessary to invite further representations under Regulation 19. Subject to approval from Cabinet in accordance with Regulation 19 representations will be invited starting in May 2024 for a period of no less than 6 weeks. Officers will then collate the responses which will be submitted alongside the Local Plan to the Secretary of State, for Examination. This is anticipated to be at the beginning of October 2024. Dependent on the workload of the Planning Inspectorate (which is out of the Council's control), the Examination is likely to commence in the late Spring of 2025. The Local Plan will be brought back to Council for adoption which is anticipated to be at the end of 2025.
- 6.8 Engagement with officers at the GLA and TfL and other neighbouring authorities has been on-going.

7. CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1 The Local Plan Review is key to delivering Priority 4 in the Mayor's Business Plan "Ensure new homes are safe, well-designed and in keeping with the local area." The Business Plan states that we will: "**Review Croydon's Local Plan to remove intensification zones, support sustainable development and emphasise design and character over density**". The Local Plan Review addresses this key priority.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1 The project is funded from an approved the Local Plan Earmarked Reserve. The reserve totals £1,268,000 across 2023/25. A proportion of Spatial Planning staff costs of £484,000 are funded from the Local Plan Earmarked Reserve per annum. The evidence update (Retail Needs Assessment, Strategic Housing market Assessment, Green Spaces Study and Tall Buildings Study for example) to support the amendments and undertake testing of the policies such as Sustainability Appraisal and All Plan Viability Testing represent further expenditure for 23/24 financial year (£142,430). There is £157,570 for the remaining period (2023/25) to pay for costs associated with the Local Plan Review Examination and adoption and the adoption of Supplementary Planning Documents listed in paragraph 4.35.
- 8.1.2 The effect of the decision would be to publish the document and undertake the consultation.

8.1.3 Comments approved by Nish Narendran, Finance Manager Sustainable Communities, Regeneration and Economic Recovery on behalf of Corporate Director for Resources and 151 Officer. (Date 21/02/2024).

8.2 LEGAL IMPLICATIONS

8.2.1 Regulation 10 A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which was introduced in 2017 provides that local planning authorities must review their plans every five years from adoption. Section 17 of the Planning and Compulsory Purchase Act 2004 required local planning authorities to keep Local Plans and Statement of Community Involvement under review and the new Regulation 10 A formalises this requirement further.

8.2.2 Regulation 19 of the above-mentioned 2012 Regulations required consultation to be undertaken so as to provide an opportunity to the public for representations to be made on the Local Plan before it is submitted to a planning Inspector for Examination. Although a sound plan is required to be submitted, as the need for minor changes may arise following receipt of representations in accordance with Regulation 19 full Council will be asked to delegate authority to officers to make such changes.

8.2.3 National Planning Policy Framework (NPPF) (2023) paragraph 33 states that “Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every 5 years and then should be updated as necessary. Reviews should be completed no later than 5 years from the adoption date of the plan and should take in to account changing circumstances affecting the area and or any relevant changes in national policy. Relevant strategic policies will need updating at least once every 5 years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future.”

8.2.4 As set out in the report the Council is complying with its statutory obligations by undertaking a review of the Local Plan and is following a detailed statutory process.

8.2.5 Once the Local Plan in due course has been declared sound by the examining planning inspector then such Local Plan together with a report will be submitted to full Council exercising non- Executive function for adoption of the Local Plan.

8.2.6 The Local Plan will form part of the Development Plan.

8.2.7 The adopted Local Plan will become the starting point for determining any planning applications that are submitted to the Council for consideration. The planning applications must be determined in accordance with the Development Plan unless material planning considerations dictate otherwise pursuant to Section 38(6) of the Planning and Compulsory Purchase Act 2004.

8.2.8 Comments approved by Samra Yunus, Corporate Solicitor on behalf of Stephen Lawrence-Orumwense the Director of Legal Services and Monitoring Officer 19/02/2024.

8.3 EQUALITIES IMPLICATIONS

8.3.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Section 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who don't.
- Foster or encourage good relations between people who share a protected characteristic and those who don't.

8.3.2 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.

8.3.3 An equality review has been undertaken and approved in October 2023, to align the plan to current organisational priorities and to consider current data in respect of each characteristic.

8.3.4 Comments reviewed by Helen Reeves Head of Strategy & Policy 21 February 2024.

9. APPENDICES

9.1 Appendix 1

a Proposed Submission Draft of Croydon Local Plan

b Proposed Submission Draft of Croydon Local Plan – Policies Maps

9.2 Appendix 2 Sustainability Appraisal

10. BACKGROUND DOCUMENTS

Previous Sustainability Appraisal, Equalities Impact Assessment [Sustainability Appraisal and Equalities Impact Assessment | Croydon Council](#)

Additional Evidence Produced as a result of the review of the Local Plan since 2019

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 Destination of Retailing 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](#)

Further Evidence Produced to inform the review of the Local Plan since the previous Regulation 19 consultation in 2021

Tall Buildings Study (new):

A new study is required to meet the requirements of London Plan Policy D9 and the GLA 'Characterisation and Growth Strategy LPG'. Refer to existing 'Borough Character Appraisal' and existing ['Urban Design, Local Character and Heritage' evidence](#) on the Council website.

Open Spaces Study (new)

A new study is required to quantify the value of community-nominated open space which reflects the community desire to strengthen the protection of open space. See also existing ['Nature and open space' evidence](#) on the Council website.

Town Centre and Retail Study (new)

A new study is required as the existing evidence is out of date. The overall retail need for the borough and the full suite of main town centre uses needs to be reviewed to inform policy choices, both in terms of quantum of supply, and uses on individual site allocations. The existing town centre hierarchy and designations will also need to be reviewed and re-confirmed. See existing ['Economy and employment' evidence](#) on the Council website.

Strategic Housing Market Assessment (SHMA) (update)

An update to the existing [2019 SHMA](#) is needed to take into account of the new economic climate, updated affordable products and housing mix. Refer to existing SMHA and current ['Homes' evidence](#) on the Council website.

Whole Plan Viability Appraisal (update)

An update to the existing [Whole-Plan Viability 2020](#) is required to take account of the new economic climate. The study will need to focus on updated development mix and affordability. Refer to existing ['Viability' evidence](#) on the Council website

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>

Scrutiny Committee Report "Croydon Local Plan" 1 November 2023

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=3507>

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](#)

Inspector's report into the adopted Local Plan 2018:

<https://www.croydon.gov.uk/sites/default/files/2022-01/inspectors-report-on-the-croydon-local-plan.pdf>

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Croydon Local Plan 2018 - revised

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.**

~~February 2018~~ **March 2024**

Croydon Local Plan 2018

A Development Plan Document forming part of the development plan for Croydon.

27 February 2018

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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.

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 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.

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

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:

Strategic Objectives and related Croydon Local Plan strategic policies;

Why we need this policy;
The policy itself
How the policy works; and
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



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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 DM13: Design and Character
Small residential development (up to nine new homes)	<p>Policy SP6: Environment and Climate Change</p> <p>Policy DM13: 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 DM13: Design and Character</p> <p>Policy DM13: Refuse and recycling</p> <p>Policy DM14: Public art</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
Change of use of a retail unit to a flat	<p>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</p> <p>Policy DM6: Development in Shopping Parades</p> <p>Policy DM13: Design and Character</p> <p>Policy DM11: Shop front design and security</p> <p>Policy DM13: Refuse and recycling</p> <p>Any applicable Place-Specific policy</p>
A new retail unit (change of use)	<p>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</p> <p>Policy DM5: Development in Neighbourhood Centres</p> <p>Policy DM6: Development in Shopping Parades</p> <p>Policy DM8: Development in Edge of Centre and Out of Centre locations</p> <p>Policy DM11: Shop front design and security</p> <p>Any applicable Place-Specific policy</p>

Type of development	Applicable policies
<p>A new build retail unit (any size)</p>	<p>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</p> <p>Policy DM5: Development in Neighbourhood Centres</p> <p>Policy DM6: Development in Shopping Parades</p> <p>Policy DM8: Development in Edge of Centre and Out of Centre locations</p> <p>Policy DM11: Shop front design and security</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
New office or leisure use	<p>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</p> <p>Policy DM5: Development in Neighbourhood Centres</p> <p>Policy DM6: Development in Shopping Parades</p> <p>Policy DM8: Development in Edge of Centre and Out of Centre locations</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>
Loss of an existing or former employment use (including offices and changes of use) to residential	Policy SP3: Employment
Loss of an existing or former community use to any other use	<p>Policy SP5: Community Facilities and Education</p> <p>Policy DM19: Providing and protecting community facilities</p>
Change of use of a public house	<p>Policy SP5: Community Facilities and Education</p> <p>Policy DM21: Protecting public</p>

Type of development	Applicable policies
Proposed development in a garden	<p>Policy DM13: Design and Character</p> <p>Policy DM13: Refuse and recycling</p> <p>Policy DM27: Protecting and enhancing our biodiversity</p> <p>Policy DM28: Trees</p> <p>Any applicable Place-Specific policy</p>
Proposed development in Green Belt or on Metropolitan Open Land	<p>Policy SP7: Green Grid</p> <p>Policy DM26: Metropolitan Green Belt, and Metropolitan Open Land and</p>
Proposed development affecting a heritage asset (such as Listed Building or Conservation Area)	<p>Policy SP4: Urban Design and Local Character</p> <p>Policy DM18: Heritage assets and conservation</p>

1. Introduction

1.1 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.

1.2 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.

1.3 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.

1.4 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**

1.5 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.

1.6 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

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~~.

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Historical context

2.2 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.

2.3 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 500,000m² 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.

~~**2.4** 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

~~2.5 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.

~~2.6 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 20th 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

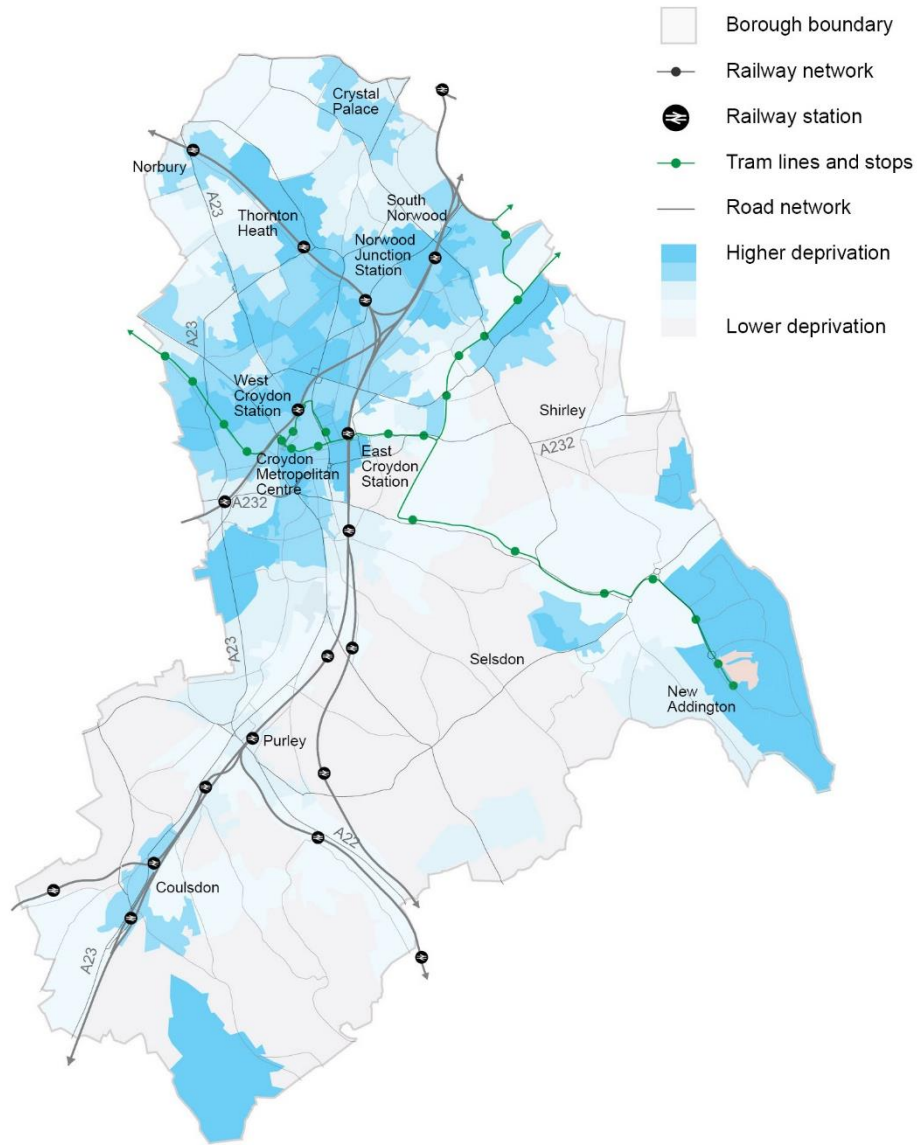
2.7 In Croydon Metropolitan Centre the borough has more shops in one location than anywhere else in London apart from the West

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

2.8 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



2.9 ~~In 2011 the borough ranked as the 14th 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.~~

2.10 ~~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 population¹. Croydon is home to 396,837 people² and this is expected to increase to just under 500,000³ by 2050. They will need to have homes in which to live.**

2.11 ~~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 17⁴.** 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%⁵. 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 community⁶, compared to 36% in 2001⁷. The challenge for the Strategic Policies is to meet the needs of the population growth, the aging population and the cultural diversity.

2.12 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.

Croydon in the wider sub-region

2.13 The future of Croydon needs to be viewed in the context of growth and development in London and the south east of

⁵ As above

⁶ GLA 2009 Round Ethnic Group Population Projections.

⁷ 2001 Census

England. At a London level, direction is provided by the Mayor of London through the London Plan.

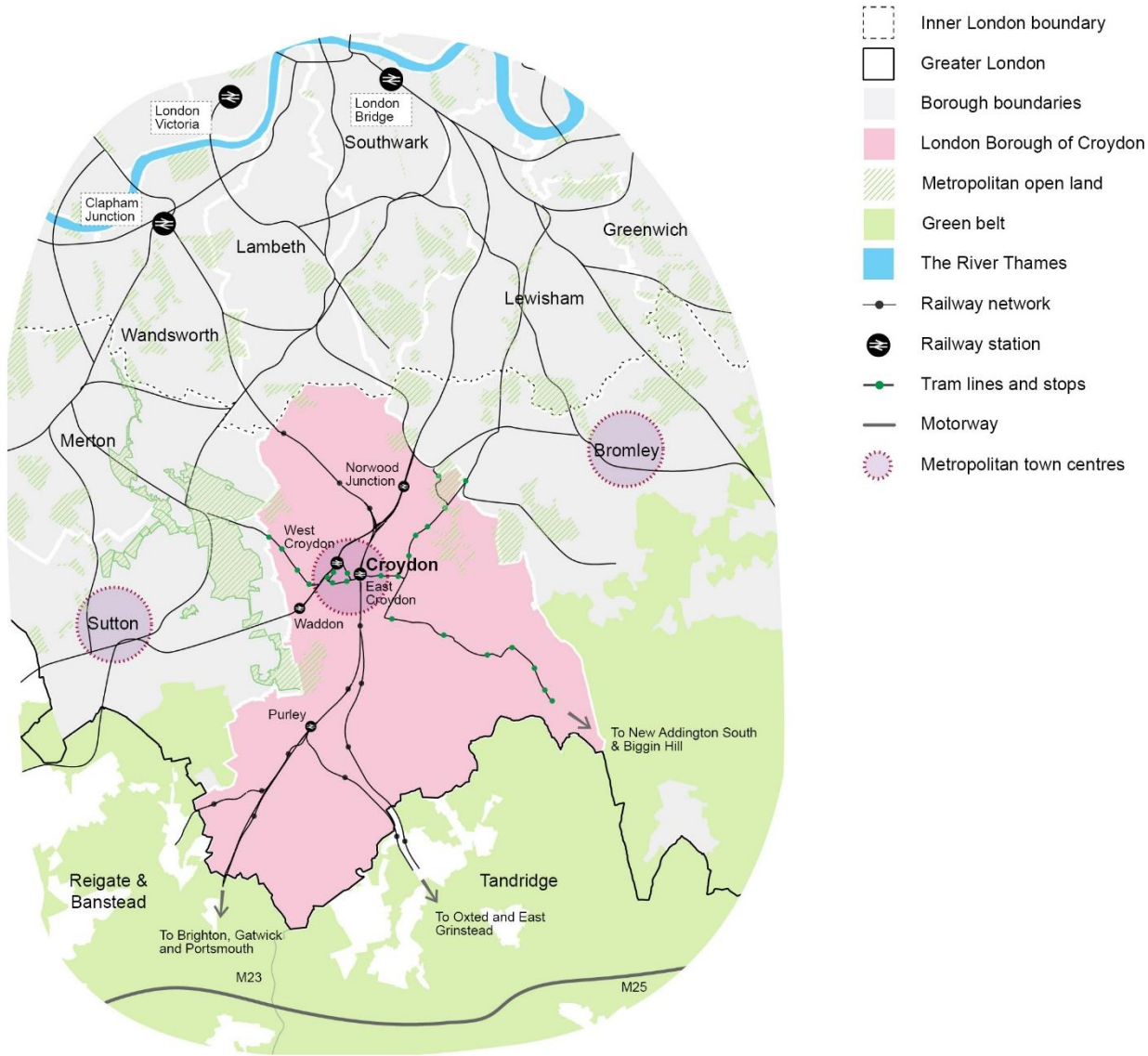
2.14 Croydon has responded to the London Mayor's policy direction in the London Plan to work with neighbouring local authorities and cross borough issues have been considered by the Croydon Local Plan. Looking ahead it will be important for Croydon to build positive relationships with the Wandle Valley

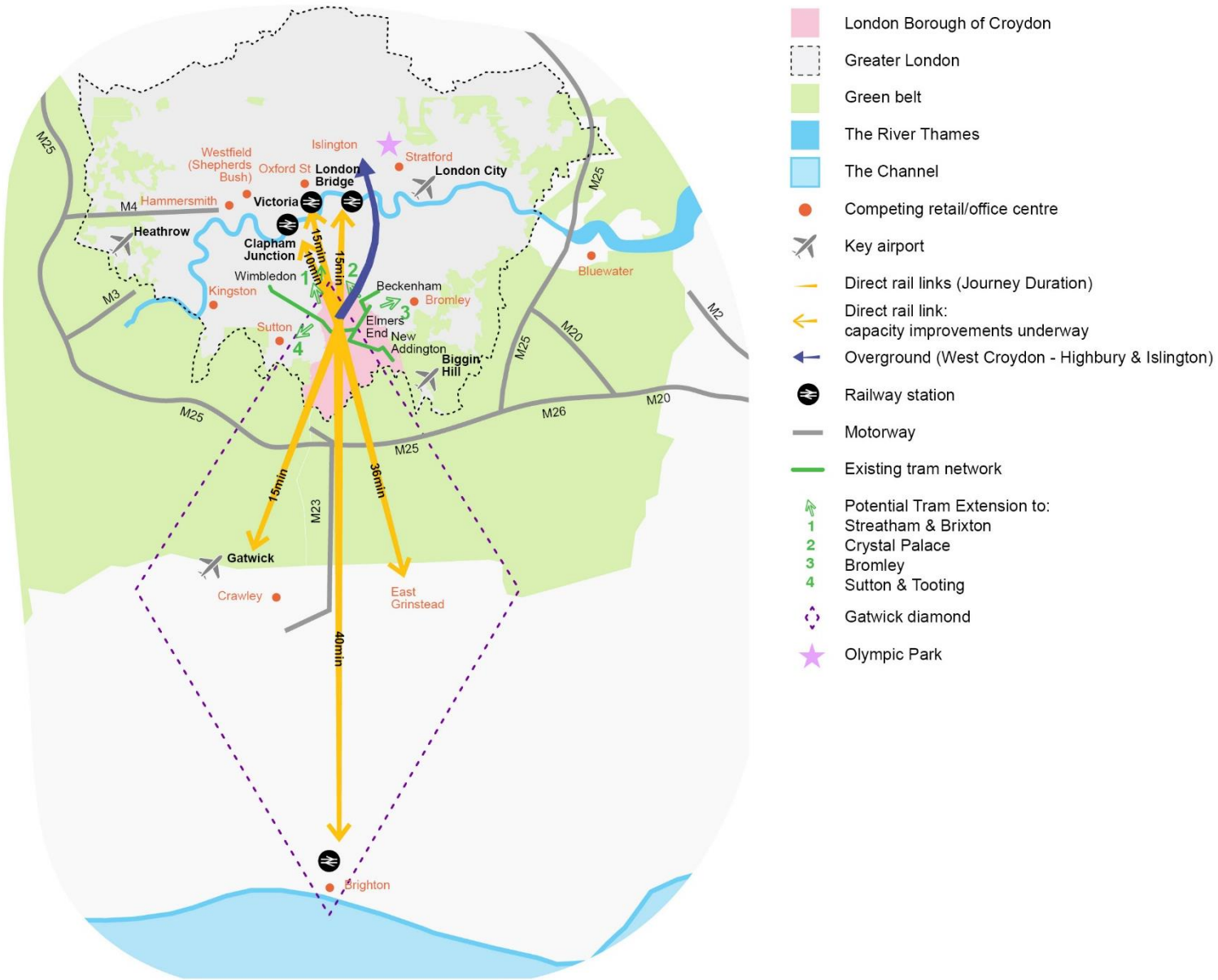
regional co-ordination corridor (through south London and outwards towards Gatwick Airport) and the Brighton to London corridor, which includes working closely with the Coast to Capital Local Enterprise Partnership of which Croydon is a member.

2.15 A summary of how Croydon relates to the wider sub-region is shown in Figure 2.3 below.

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Figure 2.2 Croydon and its sub-regional context -2 graphics replaced this





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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 **Plan period** 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.

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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 :
Enterprising: A place renowned for its enterprise and innovation with a highly adaptable and skilled workforce and diverse and thriving local economy
Learning : 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
Creative: A place that draws people to its culture and creativity —an inspiration and enabler— of new artistic and sporting talent in the country
Connected: A place that is well connected, easy to get to and around, and supported by infrastructure that enables people to easily come together, with one of the best digital, communications and transport networks in the country
Sustainable: A place that sets the pace amongst London boroughs on promoting environmental sustainability and where the natural environment forms the arteries and veins of the city

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 ~~below high level spatial vision and the detailed strategy (made up from the thematic policies and the Places of Croydon section)~~ **are referenced in the Strategic Policies in the following chapters.** 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 2019-2039⁴⁰

SP1.0A Growth in homes, jobs and services that respects the existing character, will be supported, 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:

- a) A minimum of 33,985 new homes will be delivered (2019-2040) to address future demographic and economic needs. Of these, 13,301 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 14,500 new homes and 10,500 jobs up to 2040, supported by upgrades to the Brighton mainline and provision new/enhanced supporting infrastructure.
- c) Ensure 50% of all additional housing delivered is affordable to low income groups during the life of the Plan
- d) The local economy will be supported through the retention and intensification of employment land, primarily in the borough's SIL and local industrial land, 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.

- a) 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.
- b) 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.
- 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.
- d) 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.

Sustainable Growth and Protection of Character

SP1.0C 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.
- c) An enhanced Green Grid with creating a biodiversity network contributing towards better health and well-being of the residents and help address climate change.
- d) A welcoming place that is designed inclusively to meet the needs of the residents and visitors.

Sustainable development

SP1.1 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:

- a) 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
- b) Specific policies in that Framework indicate that development should be restricted.

Allocations

SP1.2A Development is allocated on sites as set out in appendix 6 and 7.

Place making

SP1.2 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:

- a) Development proposals should respond to and enhance local character, the heritage assets and identity of the Places of Croydon; and
- b) 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

SP1.3 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~~

Housing Land Supply – London Plan Housing Targets

3.15 A The Croydon Local Plan period started in 2019, to accord with the housing targets set through the London Plan. This Local Plan Review is anticipated to conclude in 2025 with the adoption of the Plan by the Council. As per the NPPF, the Plan is required to look forward for 15 years from adoption, and as such it extends to 2040.

3.15 B As such the Plan period runs from 1st April 2019 – 31st March 2040, a period of 21 Years. The total housing target for that period is 34,145 units, and consists of:

- 10 Years @ 2,079 units 2019-2029 (Policy H1)
- 11 Years @ 641 units 2029 – 2040 (London Plan Para 4.1.11)
- 6,304 units 2029-41* (GLA SHLAA 2017)

Table 3.1 Housing Target Components 2019-2040

Period	Source	Calculation	Total
2019 – 2029	H1 including H2	10 Years @ 2,079	20,790
2029 – 2040	H2	11 Years @ 641	7,051
	Para 4.1.11	SHLAA capacity 2019-40 (20,684) minus H1 larger site capacity 2019-29 (14,380)	6,304
2019- 2040 Total			34,145

3.15 C This equates to an annualised average of 2,079 units 2019-2029, and 1,214 units 2029-2040.

Completions

3.15 D Croydon has recorded completions of 8,505 units over the 4-year period 2019/20-2022/23.

Extant Supply

3.15 E At 1st April 2022, there was an extant supply of 2,665 units on unallocated sites. In Croydon 95% of residential planning permissions are built out. By applying a 95% non-implementation ratio, 2,532 units are expected to complete in the 3-year period 2023/24-2025/26.

Windfall

3.15 F Windfall completions on non-allocated sites have occurred at a rate of 1,051 units per annum over the 7-year period 2016/17 – 2022/23. The long-term windfall trend is used to “fill in” the 4th & 5th Years of the 5 Year Housing Land Supply in 2026/27-2027/28.

3.15 G From 2027/28 onwards, windfall development is estimated to be 641 units per annum, in line with London Plan Policy H2.

Table 3.2 Windfall Supply 2022-2040

Year	2023/24 – 2025/26 (3 Yrs)	2026/27 – 2027/28 (2 Yrs)	2028/29 – 2039/40 (11 Yrs)	Total
Windfall	2,532	2,102	7,692	12,326

Allocations

3.15 H Sites are allocated in the 16 places of Croydon in this document. Together they total 19,489 new homes expected to come forward 2022-2040.

Aggregated sources of Supply

3.15 I Aggregating the sources of supply shows a total land supply over the Local Plan period of 40,320 net additional residential units.

Version Control

3.15 J The Publication version of this Local Plan is being prepared in 2023, with Submission modifications expected to be proposed in 2024. With adoption scheduled for 2025, there are three years of housing data that will materially affect the housing land supply during the Plan Review's Submission-Examination in Public-Adoption process.

3.15 K The latest completions data is from 1st April 2023, and the latest permissions data is from 1st April 2024. Ad-hoc permissions and site progression information up to summer 2023 is also available. Forecasts for windfall completions and extant permissions are only based on full year data.

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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.

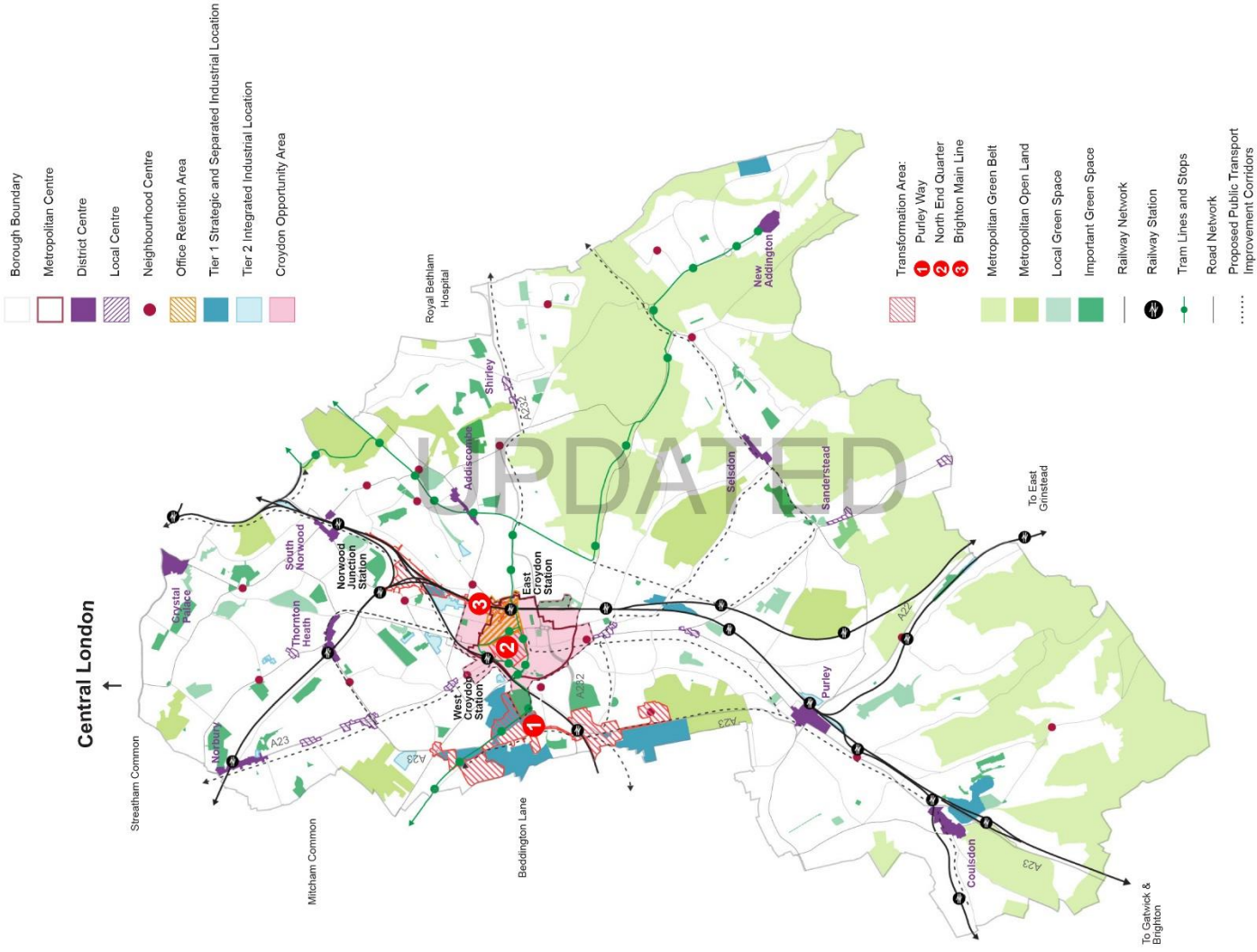
3.18 The overarching thematic policies put forward in the Croydon Local Plan's Strategic Policies have developed and are based on the distinctive character and unique places of Croydon; whilst also encouraging and creating a collective policy environment for the borough's development needs to be delivered. 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 Place **Policies** are frameworks that help to steer those involved in shaping the built environment, in order to assist in creating sustainable neighbourhoods. Each Place **Policy** 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



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 44,149⁸ 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.
- According to the 2021 census, the borough of Croydon has the largest population in London. The borough is an attractive employment location, which has a high demand for housing. This has created an imbalance in the housing market. A quarter of the population is under 17 years old, but the population of the borough overall is ageing. 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 family sized (three bed+) homes to cater for families, as well as a range of different sized housing. A mix of housing types will need to be 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.

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.

⁸ Croydon's Strategic Housing Market Assessment – 2015 and Addendum Report 2015

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.

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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 borough~~ requirements of Policy SP2, SP3.14 and other applicable policies of the development plan.

SP2.2 Quantities and Locations

In order to provide a choice of housing for people in Croydon, the Council will seek to deliver ~~a minimum of 32,890⁹ homes~~ **which are safe and well designed to meet the future needs of the borough** ~~between 2016 and 2036.~~ 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 homes in the Croydon Local Plan's Detailed Policies and Proposals beyond the Croydon Opportunity Area;~~
Clause deleted
- 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 sites for at least 10,760 net additional homes; and~~ **Clause deleted**
- d) ~~10,060 homes being delivered across the borough on windfall sites; and~~ **Clause deleted**
- e) ~~Seeking to return at least 190 vacant homes back into use by 2026; and~~ **Clause deleted**
- 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;

⁹ Of which 4,890 are either completed or under construction

- h) Supporting a range of housing delivery methods, including self-build, custom-build and community-led housing.

Affordable Homes

SP2.3 The Council will seek to ensure that a choice of homes is available in the borough that will contribute to addressing the borough's need for affordable homes. ~~On sites of 10 or more dwellings the strategic target of 50% of all homes should be provided as affordable housing. This will be achieved by delivering a range of affordable housing products, with the recommended tenure split of: This will be achieved by a strategic policy target of:~~

- a) ~~25~~70% of all new **affordable** homes developed in the borough over the plan period ~~to be either affordable will be low-cost rented homes. With this percentage broken down as; a minimum of 40% delivered as Social Rent with the remaining 30% delivered as London Affordable Rent.~~ ~~rented homes (homes which are up to 80% market rent) or homes for social rent to meet the borough's need; and~~
- b) ~~15~~30% of all new **affordable** homes in the borough developed over the plan period to be intermediate affordable housing ~~for starter homes, low cost shared or 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 viable¹⁰;~~
- c) ~~Require a minimum provision of affordable housing as set out in SP2.5.~~ **Policy deleted**

SP2.5 The Council will require a minimum provision of affordable housing to be provided either:

¹⁰ 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.

- a) Preferably as a minimum level of ~~3~~50% affordable housing on the same site as the proposed development or, if ~~3~~50% 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 ~~4~~25% affordable housing on the same site as the proposed development plus the simultaneous delivery of the equivalent of ~~4~~25% 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.~~
- c) In order to meet the London Mayor's fast-track route: Applications must demonstrate that a minimum of 35% affordable housing provision will be provided without public subsidy, provide affordable housing on-site and accord with the tenures outlined in SP2.3(a) and SP2.3(b).
- d) Where development proposes a higher level of affordable housing than 75%, a different tenure mix may be supported without the need for a viability assessment, where this is agreed with a Registered Provider;
- e) 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 implemented¹¹; will take account of features which appear to seek to exclude affordable housing by design or by incurring upper quartile construction costs¹²; and will take account of abnormal costs incurred.
- 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.~~

¹¹ 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.

¹² By reference to Building Cost Information Service (BCIS) or similar indices for similar development types in London.

SP2.6 Affordable housing should be delivered on site to support the development of mixed and inclusive communities. In exceptional circumstances:

- a) Where it is not practical to provide affordable housing on site, alternative provision may be accepted in the form of off-site affordable housing on a donor site. Any offsite affordable housing requirement will be calculated in relation to the total provision on the main site plus any donor sites. The donor site should be in an area with a similar land value to the main site or otherwise provide a significant additional benefit in terms of the overall level or type of affordable housing
- (b) Where all options have been explored and it is not possible to provide the affordable housing onsite or on an alternative site, and evidence is provided to justify this, a commuted sum payment towards the cost of providing additional affordable housing in the borough will be required instead.

SP2.6A Where development is for build to rent³⁸ 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. Affordable housing contributions for large purpose-built shared living schemes will be in the form of a single upfront payment in line with London Plan Policy H16.

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, **care leavers**, and vulnerable people.

Quality and Standards

SP2.8 ~~The Council will seek~~ **All housing developments should be designed** 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 **design and space standards for different sized dwellings** set out in the ~~Mayor of London's Housing Supplementary Planning Guidance and National Technical Standards (2015) or equivalent;~~ **table 3.1 of the London Plan**
- b) Ensuring that all new homes designed for ~~families~~ **future residents** meeting minimum design and amenity standards set out in the Croydon Local Plan's Detailed Policies and Proposals, **nationally prescribed space standards** and other relevant London Plan and National Technical Standards (2015) or equivalent.
- c) **Development will need to demonstrate the design of both private and communally shared spaces contribute positively to resident's health and wellbeing, whilst offering places for activity, shared experiences and retreat;**
- d) **Ensure the design and layout will support independent living;**
- e) **Be designed to a the highest quality; be functional, accessible, adaptable, sustainable, in compliance with all relevant standards and applied neutrally across all tenures and**
- f) **At least 10% of all new homes will be built to meet M4 (3) 'wheelchair user dwellings and the remainder should meet M4 (2) accessible and adaptable dwellings standards in line with London Plan Policy D7. In exceptional circumstances, site specific factors may be considered to assess whether meeting the above requirement is achievable within development.**

Gypsies and Travellers

SP2.9 The Council will deliver a minimum of 36 additional Gypsy and Travellers pitches in the borough by ~~2036~~**2040** 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~~ **Site Allocations**. 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.

draft confidential

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**

draft confidential

Why we have taken this approach

Quantities and Locations

4.2 There is a need for over ~~41,580~~ ~~42,930~~ new homes in Croydon by ~~2040~~ ~~2036~~ and evidence indicates that ~~approximately 40%~~ half of these need to be larger homes¹³. ~~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 33,985~~ ~~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 Croydon¹⁴. 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. ~~Deliverable sites with planning permission have been included in the first five years of the Plan.~~ 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. ~~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.~~

Affordable Homes

4.4 Of the overall number of homes needed in Croydon, ~~about 91%~~ almost ~~all of these would have to be built as~~ affordable homes for residents on lower incomes ~~to meet our needs~~. 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 and will continue to meet a significant proportion of the need for affordable housing. For this reason the strategic target is ~~40%~~ ~~50%~~ of overall supply, which reflects the findings of the Strategic Housing Market Assessment (SHMA) (2023), has regard development viability and the need to deliver balanced communities with a mixture of tenures and dwelling types. ~~The SHMA identifies a considerable need for new affordable housing in the borough (1,817 dwellings per annum) compared to the overall housing need (1,586 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. The SHMA findings recognise that there is a need to maximise the delivery of affordable housing in the borough.~~

¹⁴ 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.

However, this will be dependent on viability; the London Plan strategic target is 50% and this would be a reasonable starting point to consider viability and the need to deliver balanced communities with a mixture of tenures and dwelling types.

4.5 ~~An appraisal of development sites in the borough~~ **The Whole Plan Viability Assessment** has found that a requirement for ~~30% 35%~~ on site affordable homes housing will be viable for the majority of the major residential development types. 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~~ **Affordable housing requirements will be calculated using** 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). **In order to follow the GLA's fast-track approach, development is expected to maximise the provision of affordable housing and provide a mix of low cost rented housing and intermediate housing. A target tenure mix of 70% low cost rented housing and 30% intermediate housing has been set, based on the findings of the Strategic Housing Market Assessment and viability evidence from the Whole Plan Viability Assessment.**

4.5A A different tenure mix may be acceptable in certain circumstances, for example, where a development is proposing more than 75% affordable housing or where an increased level of low cost rented housing is proposed on a development providing at least 35% affordable housing where this will continue to support the delivery of mixed and inclusive communities. This will be

decided on a case-by-case basis having regard to the housing need that will be met by the scheme and the additional benefit provided. In other circumstances where an applicant is proposing a lower proportion of low cost rented homes for viability reasons, they will have to submit a viability assessment for review and to demonstrate that they are meeting local housing needs.

4.5B 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 for meeting the definition of First Homes are; first a minimum discount of 30% must be applied against the market value to be protected in perpetuity to ensure the housing remains affordable for future buyers. Secondly Local Authorities do have the discretion to require a higher minimum discount of either 40% or 50% (if there is a demonstrable need). The SHMA findings found that even with a percentage discount of 40% or 50%, it is possible in some locations or for some types of property, even after applying the discount, the housing will be more expensive than that typically available in the open market. It should be noted that providing a higher discount on First Homes may have an impact on viability, as it may not be possible to provide as many homes in other tenures (such as rented affordable housing which is likely to be needed by those with more acute needs and fewer choices in the housing market. 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% of all affordable housing contributions in new housing schemes will need to be First Homes. Local and up to date evidence will be used to establish

the percentage of First Homes that will contribute to affordable housing contributions within the borough.

4.5C The housing needs of students in London, whether in Purpose Built Student Accommodation (PBSA) or shared conventional housing is an element of the overall housing need for London determined in the GLA's 2017 SHMA and the completion of new PBSA contributes to meeting London's overall housing need. The London Mayor has established an overall strategic requirement of 3,500 PBSA bed spaces to be provided annually over the plan period. However, this target is not broken down into specific Borough level targets. The SHMA 2023 findings have concluded that there is a clear current and future demand for student accommodation in the Borough, the provision of which will help to meet an identified need and contribute towards meeting the Borough's London Plan housing target.

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. In line with the Ministerial Statement (24th May 2021), the Council will consider the need to provide First Homes within major housing developments, as part of the overall housing affordable housing contributions. The Council will maintain a First

Homes register, to enable potential first-time buyers to declare their interest and demonstrate they meet the local and national eligibility criteria. This will form a key evidence base of the type, size and location homes may be required and address the needs of those individuals/households considered a priority. Developers of First homes will be required to refer to this register and address the needs of first-time buyers included on this. If the units remain unsold, evidence will be required to demonstrate that the First Homes units have been actively and extensively marketed, prior the removal any legal restrictions to enable them to be sold on the open market. Compensation will need to be paid to the Council to the value of the final sale price of the units in the open market (less the 30% discount) to enable the Council to deliver First Homes on another site and provide compensation.

4.7 All viability assessments will be reviewed by comparing the Residual Land Value with the Existing Use Value (plus a premium) 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. 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 In exceptional circumstances where it is not possible to provide affordable housing on site or off site, for example if 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 **may be acceptable** 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. Three registered Providers should provide evidence to demonstrate that onsite affordable housing cannot be practically delivered. The calculation of the commuted sum payment will be based on the uplift in the gross development value that results from the replacement of onsite affordable housing with market housing and index-linked to reflect the value at the point of sale.~~

~~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. Affordable housing should be genuinely affordable and respond to local housing needs and income levels. Social rent and London Affordable Rented homes are considered to meet the needs and income levels of the majority of lower income households.~~

~~4.9A Affordable rented homes at rents up to 80% of market rent will only be affordable for a minority of households on the housing register and will only be considered in exceptional circumstances or where the rents are significantly lower than 80%. Intermediate housing should contribute towards a mix of rented and low-cost home ownership tenures which meet the full range of need.~~

~~4.9B Intermediate housing products such as shared ownership, discounted market sale and intermediate and discounted market rent, including London Living Rent, will be supported where they are genuinely affordable, and targeted at local residents with incomes that are insufficient to afford decent housing that meets~~

their needs in the market. From time to time, updated non-statutory guidance will be issued setting out the preferred forms of affordable housing, the local definition of genuinely affordable and any local eligibility requirements. This will take account of the changes in affordable housing products and funding priorities over the plan period and the availability of updated data sources and evidence on housing need.

Mix of Homes by Size

~~4.10 Analysis of the Strategic Housing Market Assessment suggests that approximately 50% 60% 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 2021 and 2031 2040 the number of older people in Croydon over the age of who are aged 565+ is projected to increase by 6358%, while the population aged under 65 is expected to increase by 5%, from a 2013 base. Due to the ageing population older peoples' wellbeing must be at the forefront, with the physical and mental needs of older people and their carers varying greatly. Housing should respond to these needs, providing a variety of homes and environments that meet the changing needs of older people, allowing them to live independently for longer. In addition there is a growing and significant number of care leavers in the borough, which the Council must legally support, requiring appropriate and suitable accommodation. Therefore the Council will need to work with partners to facilitate the provision of specialist and supported housing for the elderly older and disabled people, care leavers and the vulnerable.~~

~~4.11A The SHMA population projections between 2021 – 2040 show an increase in the population aged 65 and over of 30,800~~

people. This is against a backdrop of an overall increase of 49,200 – population growth of people aged 65 and over therefore accounts 63% of the total projected population change. The proportion of people who are disabled under the Equality Act drawn from 2021 Census data indicates that 28% of households in Croydon contain someone with a disability. This figure is slightly higher than seen across London but below the national average. All new housing will need to be built to accessible and adaptable design standards, to ensure people are able to independently live within their properties longer, feel safe and do not face any discrimination, as well as enjoying a good quality of life.

4.11B Flatted development will need to incorporate design solutions both inside and out so that living and private amenity spaces meet the needs of individuals and families. The layout and design of these spaces will need to be inherently flexible and be usable child play, family activities and needs of multiple age groups.

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 ~~London Plan space standards National Technical Standards (2015), Mayor of London's Housing Supplementary Planning Guidance (2016)~~ will be applied to all new residential developments 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 ~~Local Plan-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. Older peoples' wellbeing must be designed in, with the physical and mental needs of older people and their carers varying greatly. Housing should respond to these needs, providing a variety of homes and environments that meet the changing needs of older people, allowing them to live independently for longer. A variety of housing types will be encouraged, including those between traditional market housing and nursing homes such as downsizer living with shared amenities (e.g. communal gardens), supported or sheltered housing including support or care services, and older people's co-housing with an informal care offer. This could include bungalows where it is demonstrated that this is an appropriate development typology to free up other housing stock in the borough. 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 users¹⁵. All buildings should be positioned to maximise access, mitigating the need for unsightly ramps, external lifts, stairs or terraces, whilst working sympathetically with the existing landscape conditions and character. In exceptional circumstances, the Council will take into site specific factors (.i.e. topography, small infill sites, type of scheme such as flats, maisonettes) to determine whether it is achievable for the developments to meet the accessible adaptable housing requirements. 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 development¹⁶.~~

¹⁵ London Plan Policy 3.8

¹⁶ London Plan Policy 3.6

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 The London Plan's design led approach seeks to optimise the best use of land for delivering high quality homes. Good design of homes forms a basis for a good quality of life. 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~~ **2040** providing for the English Gypsy and Irish Traveller communities¹⁷. 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 life¹⁸. The Croydon Local Plan's Detailed Policies and Proposals allocates land to help meet this need for additional pitches.

¹⁷ London Borough's Gypsy and Traveller Accommodation Needs Assessment (2014)

¹⁸ 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 2 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 63 of the National Planning Policy Framework (2023).

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. **It will be important that the right size, type of homes are delivered to address future needs and ensure the efficient use of the existing housing stock.**

4.20 **The Strategic Housing Market Assessment 2023 identifies that over 60% of the future requirement for market housing is for larger homes. 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. The loss of 3-bedroom homes particularly through sub-division or conversion of existing homes can result in poor housing.**

4.21 Three bedroom (or more) residential units are needed to house families and the existing stock retained to assist provision. The London Plan defines family housing as 'a dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally having three, four, five or more bedrooms'. In line with London Plan Policy 3.14-H10, the retention of residential units originally designed with three or more bedrooms is supported by the Council.

4.22 **There has been a steady decline in the number of new homes being delivered with 3 or more bedrooms, from April 2021 to March, 17% of homes had 3 or more bedrooms. From April 2020 to March 2022, 16% of homes had 3 or more bedrooms. The recent delivery of many 1 and 2-bedroom homes, with uptake particularly strong from younger households, does not match the Strategic Housing Assessment's findings that 60% of new homes should be larger homes. To redress this imbalance in new supply there is a need for policy that both protects the existing supply of larger units, and promotes the delivery of more, new larger homes. 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.~~

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 Area¹⁹). 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.

¹⁹ Paragraph 9.12 of the Croydon Opportunity Area Planning Framework Jan 2013

Policy DM1: Housing choice for sustainable communities

~~DM1.1 The Council will seek to enable housing choice for sustainable communities by requiring the minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings as shown in Table 4.1, except:~~ **To maintain a supply of larger family homes to meet Croydon's housing need, the conversion of a larger home to smaller self-contained homes (Class C3) is only acceptable where:**

- a. The gross original internal floor space of the existing dwelling is greater than 130m²;
 - b. A family-sized unit of at least 130m² remains post-completion;
 - c. The proposal meets minimum internal space standards, the provision of satisfactory levels of amenity space, privacy, daylight, parking and access, and adequate and convenient refuse storage and collection;
 - d. The resulting units achieve internal configurations that are practical and fit for purpose, including vertical and horizontal stacking arrangements that minimise noise transfer between homes, including neighbouring homes;
 - e. The design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retains a single door to the front elevation of dwellings in residential areas;
 - f. The balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard-surfaced) does not detract from the appearance of the property or the street scene; and
 - g. The proposal provides for a mix of unit sizes in line with Table 4.1
- a. ~~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;~~
 - b. ~~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.~~

~~DM1.2 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 130m².~~ **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 not required to address their priority needs.**

Table 4.1 Minimum percentage of three bedroom or larger units on sites with ten or more dwellings

Setting ²⁰	PTAL ²¹ 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)

²⁰ The definition of each setting is the same as that in the London Plan, Table 3.2.

²¹ 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.

4.25 A 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 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 housing stock below 130m². This policy is intended to ensure that the redevelopment of larger homes, including 4 or 5 bedroom homes, incorporates a replacement unit of at least 130sqm² to retain existing stock of family homes.

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 be less compatible for accommodating larger units.**

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 matrix²². 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 **2023** 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.²³

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 130m² cannot be redeveloped, 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~~

²² London Plan Policy 3.4

²³ Table 34, para 9.22, Fig.68 Strategic Housing Market Assessment, June 2015

comply with the National Technical Housing Standards or equivalent. Paragraph deleted

Key supporting documents

- Croydon's Strategic Housing Market Assessment (2015- 2023)
- Borough Character Appraisal (2015)
- Character Typology (2015)
- Croydon Housing Typologies Study (2010)
- Croydon Opportunity Area Planning Framework (2013)
- Mayor of London's Housing Design Standards (LPG) Supplementary Planning Document (2016 2023)

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Estate Renewal

Why we need this policy

4.32 A The Borough contains a number of publicly owned housing estates which make an important contribution to meeting local housing need. In addition to owning these sites the Council has a responsibility for ensuring that they are maintained now and into the future.

4.32 B A number of these housing estates were developed in the early to mid 20th Century, and have been constructed using design and construction principals of different eras. While some assets perform their function well, and will continue to do so, some are starting to come to the end of their lifespan, and have a range of issues that need addressing.

4.32 C There is a particular issue with 1960s Large Panel System (LPS) tower blocks. In late 2022 the Council considered a desktop

assessment of the costs of refurbishing or redeveloping the LPS tower blocks on the Regina Road Estate. It was recommended that the site was not economical to refurbish, and as such redevelopment would be more appropriate. A ballot of residents on the site subsequently confirmed local support for the redevelopment of the estate, and the redevelopment is expected to come forward in the Plan period.

4.32 D Regina Road Estate is not the only LPS estate in the borough, and it is likely that further estates will face similar decisions over their future over the Plan period. This represents an issue that needs to be appropriately managed, in concert with the London Plan Policies on estate renewal.

Policy DM1A - Estate Renewal

DMX-Subject to meeting the requirements of the London Plan, including a successful ballot or residents to explore opportunities for estate renewal, the Council will support estate renewal proposals which are:

- a. Appropriately masterplanned to ensure the new site configuration makes the best use of public land, respects local character and delivers improved social and economic opportunities for residents of the estate as well as the local area;
- b. Opportunities to improve connections across the site and into neighbouring residential areas have been identified, including consideration of how the site can contribute to the borough's Green Grid;
- c. Demonstrate improvement to the standard of on-site community infrastructure

How the policy works

4.32 E Policy H8 of the London Plan regarding regeneration of housing estate sites is fairly comprehensive and this policy does not seek to repeat those requirements. Considering that the Council is likely to start seeing estate renewal developments coming forward, it is important that local benefits are secured when they do.

4.32 F Housing estates can vary greatly in size, including large sites which have a considerable opportunity to deliver local improvements through their design. These benefits stand to be maximised if estates are designed comprehensively. Proposals for estate renewal projects that are larger than a single road-facing block should be accompanied by a site-wide masterplan.

4.32 G Proposals for estate renewal offer an opportunity to improve connections for existing residents. This should include improving links to local transport, jobs and services, including open spaces. Where a new or improved public open space is included in the site, consideration of how neighbouring areas can access it should be included, to ensure that the all-borough Green Grid continues to be improved.

4.32 H Many housing estates have community infrastructure on site in the form of community centres, nurseries/ crèches, or other assets. The London Plan policy states that a net loss of residential capacity is not acceptable on sites of this type. As such community facilities should be replaced, enhanced and where possible, improved as part of estate renewal programmes

4.32 I Communal amenity space is defined as amenity space that is shared, accessible to all within the development and be used for their exclusive use.

4.32 J 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.

4.32 K 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.

4.32 L The GLA Population Yield Calculator should be used to calculate the expected number of children and young people likely to live in the development. Housing Design Standards LPG should be referred to for the allocation and design guidance for play space.

4.32 M All new housing developments should enhance the quality of local places, considering their 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.

Amenity standards for residential developments

- Strategic Objective 3
- Strategic Objective 7
- Policy SP2.1

- Policy SP2.7
- Policy SP2.8
- Policy SP4.1

Why we need this policy

4.32N One of the key aims of the Local Plan is to address local housing needs and the housing crisis. Alongside this, 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.

4.32 O It is important that private outdoor spaces should be useable not only for residents but also their visitors, so they should have standards such as level access as well as the minimum depth and width. Other good design requirements that communal open space should adhere to are that it should be; overlooked by surrounding development, accessible to wheelchair users and other disabled people, seeking to take advantage of direct sunlight, as well as have necessary management arrangements in place to provide suitable amenity for residents. This will ensure the outdoor space remains useful and welcoming to all its intended users. The only exception to this is the management arrangements which are a matter for residents and the body managing the building.

Policy DM 1A Amenity standards for residential developments

DM1A.1 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 a minimum amount of outdoor space of 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter; and it must achieve a minimum depth and width of 1.5m
- (c) Provides a functional space with a minimum width and depth of balconies of 1.5m
- (d) All flatted developments and major developments need to provide a minimum of 10m² per child of new play space, calculated using GLA's population yield calculator;
- (e) 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
- (f) 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 200m² (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.

DM1A.2 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.

How the policy works

4.32P 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 wellbeing 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.

4.32Q 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 the 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

4.32R Communal amenity space is defined as amenity space that is shared, accessible to all within the development and be used for their exclusive use.

4.32S 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.

4.32T 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.

4.32U The GLA Population Yield Calculator should be used to calculate the expected number of children and young people likely to live in the development. Housing Design Standards LPG should be referred to for the allocation and design guidance for play space.

4.32V All housing developments should enhance the quality of local places, considering their 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 older 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 Affordable Housing and Viability Supplementary Planning Guidance 2017.

Mayor of London's Housing Design Standards Document (2023)

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 2 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 63 of the National Planning Policy Framework (2023). The London Plan (2021) acknowledges that the population of London is ageing, with the number of older people households (aged 65 and over) experiencing a 37% increase by 2029. Similarly the number of older people households aged 75 and over, who are most likely to move into specialist older people housing, are expected to increase by 42%. Further, it has estimated that the future benchmark requirement for specialist older people housing for the Council area has increased to 225 units per annum (2017 -2029) from a figure of 195 units (2015-25) per annum in the previous Plan. To address the implications of this and assist in building sustainable communities, a mix and range of housing needs to be delivered as informed by the latest SHMA.

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 services which is not reflected in national funding formulae for central Government funding towards local services.

4.37 As of ~~September 2015~~ **March 2020** the ~~142~~ **126** care homes in Croydon have a total capacity of ~~2,796~~ **2,837** bed spaces. Between April ~~2014~~ **2019** and November ~~2014~~ **2019**, ~~764~~ **872** 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~~ **412** 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 **will seek to meet the** ~~has produced a Market Position Statement (2015) to ascertain the level of future needs of households with complex and dual care housing needs. This includes family members and individuals with~~ ~~As need changes,~~ it is projected that 1,118 bed spaces will be needed by 2020 and 1,450 by 2030 across learning disability**ies**, mental health **illnesses**, ~~elder people~~ **and** physical disability**ies** 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 (**2023**) (paragraphs **61 and 63**), 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~~ **Table 4.3: Specialist Housing for Older People.**

Policy DM2: Residential care and nursing homes

DM2.1 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.

DM2.2 Proposals for supported living and sheltered accommodation will generally be supported in the borough in accordance with the London Plan, Annex A5 Table 4.3, Specialist Housing for Older People.

DM2.3 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~~ **Table 4.3: 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)
- **Strategic Housing Market Assessment (2023)**

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 (LSPBSL) 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 the housing needs among single-person households by adding to the stock of rooms available for rent in the borough; as well as help 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.

Policy DM2A: Large scale purpose built shared living

DM2A. 1 Large scale purpose built shared living is categorised as a sui-generis non-self-contained market housing use. 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 the delivery of self-contained housing to meet the future needs of the borough during the life of the Plan
- b) Proposals should be sited within locations with excellent public transport accessibility levels (6b) and should be well served by local services;
- c) There should not be more than two large scale purpose built shared living schemes 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 Each private unit shall include or have exclusive access to the following;

- a) Units should not be less than 18 sqm and not more than 27 sqm to avoid being converted to substandard self-contained units. Accessible units are expected to be between 28 and 37 sqm to accommodate ease of access to amenities;
- b) At least 1 sqm of external communal amenity space should be provided per resident. This benchmark is relevant for up to 400 residents. For every additional resident over the 400 benchmark, 0.5 sqm of external communal amenity space should be provided.
- c) The provision of private balconies or terraces (for individual units) should not count towards the communal amenity space requirement.
- d) One of each of these communal kitchen facilities (hob, oven and sink) should be provided per 15 residents;
- e) Additional storage areas in the form of lockers or cupboards should be provided for each resident to store personal belongings;
- f) All applications must be accompanied by a management plan that, to the satisfaction of the Council, demonstrates how management practices will meet policy requirements, outlines how operations will be managed and how spaces will be maintained to ensure that the development continues to function as an LSPBSL scheme.

How the policy works

4.46C In Croydon, large-scale purpose-built shared living, also referred to as co-living, is a type of non-self contained housing which consists of at least 50 private individual rooms and communal spaces and facilities. Large scale purpose built shared living is generally used to meet the accommodation needs of single person households who are not capable or who choose not to live in self-contained homes or HMOs. It is generally suited for those who require accommodation on a transitional basis until longer term housing is acquired.

4.46D Proposals for large-scale purpose-built shared living should not compromise delivery of self-contained housing to meet the future housing needs of the borough. It is a unique form of accommodation which does not meet minimum housing standards and does not cater for the ongoing needs of London households. Therefore it is not considered to be an affordable housing product.

4.46E A minimum range of circa 18-27 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 the borough's residents. 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,

4.46F 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 range of amenities that facilitate health and well-being, support a diverse community and address their daily needs.

4.46G Given the very high-density nature of this type of accommodation, proposals should be located in parts of the borough with good or excellent public transport accessibility levels and well-served by local services. Proposals for this type of accommodation should be car-free and not contribute to car dependency.

4.46H To avoid an over concentration of large-scale purpose built shared living, 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. 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.

4.46I Large-scale purpose-built shared living schemes fall within a sui generis non-self-contained market housing use. Both the

functional private living areas, communal areas/facilities should be designed, planned to be used integrally by future residents at the outset and these schemes should not be used to provide a mass quantity of poor quality mini living units, as an alternative to providing well designed, high quality C3 residential dwellings. Any

applications for change of use to convert these schemes to C3 residential use at a later date will be very challenging. To effectively achieve this, it will need to ensure full compliance with the Housing Design Standards LPG as well as the minimum design and amenity standards of the Local Plan.

Policy DM2B: Houses in Multiple Occupation

DM2B.1 Proposals for the conversion of larger homes to Houses in Multiple Occupation (HMO), including small HMOs (3-6 unrelated people) within the area covered by the Article 4 Direction (whole of the borough), will only be permitted where:

- a. The gross original internal floor space of the existing dwelling is greater than 130m²;
- b. They do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood, including cumulative impacts arising from an overconcentration of HMOs within an area;
- c. They are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4 and are accessible by public transport, cycling and walking;
- d. They provide high quality accommodation that satisfies the relevant policies of the Local Plan, including internal space standards, provision of a satisfactory level of amenity space for occupants and adequate and convenient refuse storage and collection;
- e. Where non self-contained, have exclusive use of a kitchen or space within a shared kitchen for each household;
- f. Soft landscaping is incorporated to improve and enhance the site.

DM2B.2 Planning applications for the change of use from an HMO to self-contained accommodation will only be considered where the property does not meet the appropriate standards for an HMO (as set out in the Housing Act 2004 and the Management of HMOs (England) (Regulations) 2006) and has no realistic prospect of meeting the standards.

How the policy works

4.46J HMO accommodation plays an important role in meeting particular housing needs, especially for low income residents, young people and those needing temporary accommodation. However,

many HMOs in Croydon provide sub-standard living conditions, are clustered in areas resulting in adverse impacts on local character and amenity and also reduce the availability of smaller family housing, for which there is significant need. Additionally the introduction of large

scale purpose built shared living offer an alternative method of accommodating shared private rental needs.

4.46K In response to the many problems associated with poor quality HMOs in the Borough, an Article 4 Direction was introduced in January 2020, which removed permitted development rights for conversion of homes to HMO. The Article 4 Direction requires those wishing to change a single use dwelling unit to a HMO in the Borough to apply for planning permission. Therefore, the acceptability of proposals for HMOs are required to be assessed against the above policy criteria. HMOs will be required to satisfy the appropriate Croydon Environmental Health Standards.

draft Confidential

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 28th November 2014 introduced a vacant building credit for developers of vacant buildings such that a reduced provision of **National policy provides an incentive for brownfield development on sites containing vacant buildings, via a vacant building credit. This allows the developers of these to reduce their requirements for** affordable housing should be required **contributions based on the amount of vacant floor space being bought back into use or redeveloped.** 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

Policy DM3: Vacant building credit

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.

DM3.1 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:

- a. Vacant for a period of at least eighteen months prior to the granting of planning permission; and
- b. Marketed for their lawful use (or uses which could be lawful under the General Permitted Development Order) throughout the period they have been vacant.

DM3.2 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. 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
- b. 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~~ **Courts have set out circumstances for deciding whether a use has been abandoned and the relevant circumstances for consideration, such as the condition of the property, the period of non-use, whether there is an intervening use; and any evidence regarding the owner's intention.**

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~~

4. 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% of vacant office floor space in Croydon Metropolitan Centre, this is predominantly B grade office space while the area is experiencing an undersupply of A grade floor space. This 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 the Croydon Metropolitan Centre as well as the District and Local centres. This has led to an increase in vacant premises. In combination with poorly designed conversions to other uses, it 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

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 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 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.

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 the following '4-Tier' hierarchy approach for the retention and redevelopment of land and premises relating to industrial/employment activity. ~~as set out in Table 5.1.~~

- a) Tier 1 Strategic and Separated Industrial Locations are significant sized self-contained industrial locations that have separation from nearby residential properties, with strong protection for existing industrial and warehousing activities 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 are supported;
- b) Tier 2 Integrated Industrial Locations are smaller scale industrial estates, where residential development has grown up alongside the commercial buildings but there is strong protection for existing industrial and warehousing activities and support for new industrial and warehousing activity as well as employment generating Sui-Generis Uses and non-Town Centre community uses that support growth in the borough;
- c) Tier 3 Town Centre Employment Sites are locations where Industry, warehousing and employment generating Sui-Generis Uses are in Town Centre locations, with protection for existing for existing industrial and warehousing activities and support for new industrial and warehousing activity, with other uses supported as set out in Policy DM9 and;
- d) Tier 4 Scattered Employment Sites are isolated industry, warehousing as well as employment generating Sui-Generis Uses not in Tier 1, Tier 2 or Town Centre locations where there is protection for existing employment generating Sui-Generis Uses and industrial and warehousing activity, support for new Research and Development and Light Industrial or Warehousing uses, with other uses supported as set out in Policy DM9.

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 and act 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, **particularly focusing on the CEZ**;
- b) Purley District Centre;
- c) Crystal Palace District Centre; and
- d) South Norwood District Centre/Portland Road.

SP3.4 ~~The Council will promote the remodelling of the Fairfield Halls as a performance facility.~~ **Policy deleted**

SP3.5 ~~The Council will support~~ **Croydon is home to a diverse population known for its creative industries and unique culture so development for creative industry uses that promote culture and diversity will be supported alongside** the temporary occupation of empty buildings and cleared sites by creative industries, ~~and cultural organisations,~~ **and**. ~~Other meanwhile uses~~ **will be supported** where they contribute to regeneration and enhance the character and vitality of the area **as part of long term redevelopment or regeneration.**

Town Centres

SP3.6 The Council will apply the London Plan Town Centre hierarchy **as follows**:

- 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 and Valley Park**

Neighbourhood Centres

e) In addition, 18 Neighbourhood Centres have been identified as follows:

Ashburton Park, Bridgstock Road, Brighton Road/Downlands Road, Coulsdon Road/Court Road, Green Lane/Northwood Road, Godstone Road, Fieldway, London Road/Kidderminster Road, Lower Addiscombe Road/Cherry Orchard Road, Portland Road/Watcombe Road/Woodside Avenue, Shirley Road, Selsdon Park Road/Featherbed Lane, Selhurst Road, South End/Parker Road/St. Peter’s Church, Spring Park/Bridle Road, South Norwood Hill, Waddon Road/Abbey Road and 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 2034 by:

- a) Working with its partners through the process of regular town centre ‘health checks’ to highlight potential 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.~~ A focus on innovation and enterprise will be promoted through development that encourages opportunities for local business to start, grow and remain in Croydon. Local business and enterprise will be encouraged through promoting a healthy mix of uses at a variety of scales. Development of between 5,000m² and 7,000m² of net convenience retail floorspace up to 2029, primarily focussed in town centres, will be supported.

SP3.9 Croydon’s location lends it a number of strategic benefits and 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, education, research and development), retail, leisure (including a diverse evening/night-time economy), visitor accommodation, 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 that are intended to be located within walking or cycling distance for local residents providing multimodal access for communities' day-to-day service needs. A wide variety of smaller scale development that 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 retail²⁴ and office²⁵ premises, particularly in the Croydon Metropolitan Centre. Policy deleted~~

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 Policy deleted~~

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 follows²⁶: . Development should reflect the implications of a shifting work environment, supporting the flexible use of office space to reinforce the employment function of Croydon's network of centres. 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:~~

- a) ~~Up to 92,000~~30,500m² by 2034 to be located in Croydon Metropolitan Centre; ~~and~~
- b) ~~Retaining, or creating 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 7,000m² 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 1,000m²). The Council will seek to secure a~~

²⁴ ~~Para 10.3, Croydon Metropolitan Centre Retail Strategy, Dec 2009 (Drivers Jonas)~~

²⁵ ~~Para 7.7, L.B. Croydon Office, Industrial, Warehousing Land/Premises Market Assessment, August 2010 (URS & Stiles Harold Williams)~~

²⁶ ~~Employment Land Review 2014~~

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.

SP3.14A Each of Croydon's Metropolitan, Town, District and Local Centres collectively form the borough's town centre hierarchy 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 that serve the local community.

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Table 5.1 Four-tier approach to land and premises in industrial locations – *table moved to DM policy see table 5.13*

Tier	Designation	Locations	Approach	Permitted Uses	Other Uses
4	Strategic and Separated Industrial Locations	Marlpit Lane Purley Way ²⁷ Selsdon Road Gloucester Road (East) Vulcan Way	Strong protection for industrial and warehousing activities with no loss of Class B floor space ²⁸ permitted	Class B1b, B1c, B2 and B8 uses Employment generating sui generis uses ²⁹ Gypsy and Traveller pitches (for Gypsies and Travellers with a qualified connection to Croydon)	Not permitted

²⁷ Including both Purley Way North and Purley Way South

²⁸ Excluding Class B1a (Offices)

²⁹ 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 ³⁰	<ul style="list-style-type: none"> • 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: • 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 • Residential and Office use does not harm the site and wider location's industrial function. • Opportunities for employment and skills training will be considered via Section 106 where possible.

³⁰ 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 ³⁴	<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"> • 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 • residential use does not harm the wider location's business function; and • the development will increase the vitality viability and diversity of employment uses of the town centre. • Opportunities for employment and skills training will be considered via Section 106 where possible.

³⁴ 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 uses³²</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"> • there is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and • residential use does not harm the wider location's business function. • Opportunities for employment and skills training will be considered via Section 106 where possible.

³² 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 (Safeguarded Rail Aggregates Site)
	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
	New Local Centres
	Waddon Marsh
	Valley Park
Office Retention Area	New Town and East Croydon areas of the Croydon Opportunity Area

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What will it look like

Figure 5.1 Employment in Croydon (2011-2036)

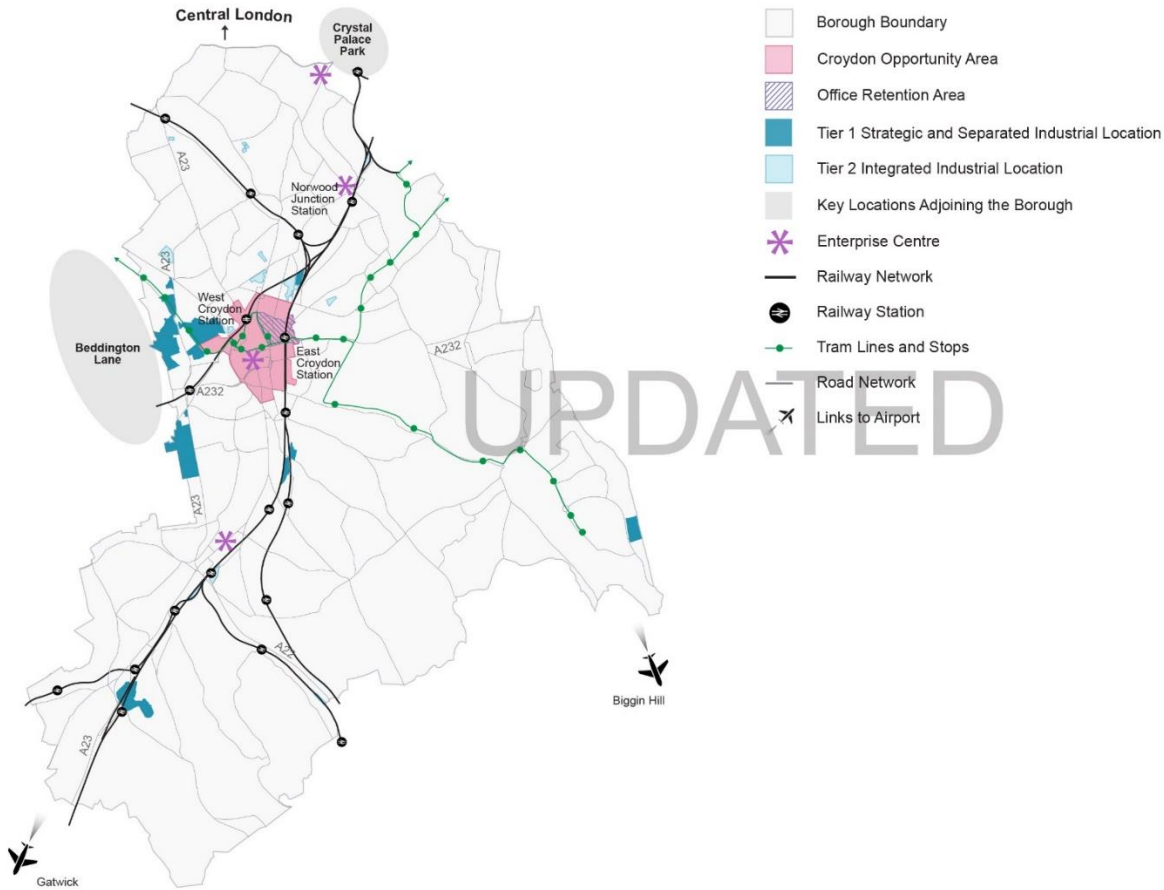


Figure 5.2 Employment in Croydon (2011-2036)

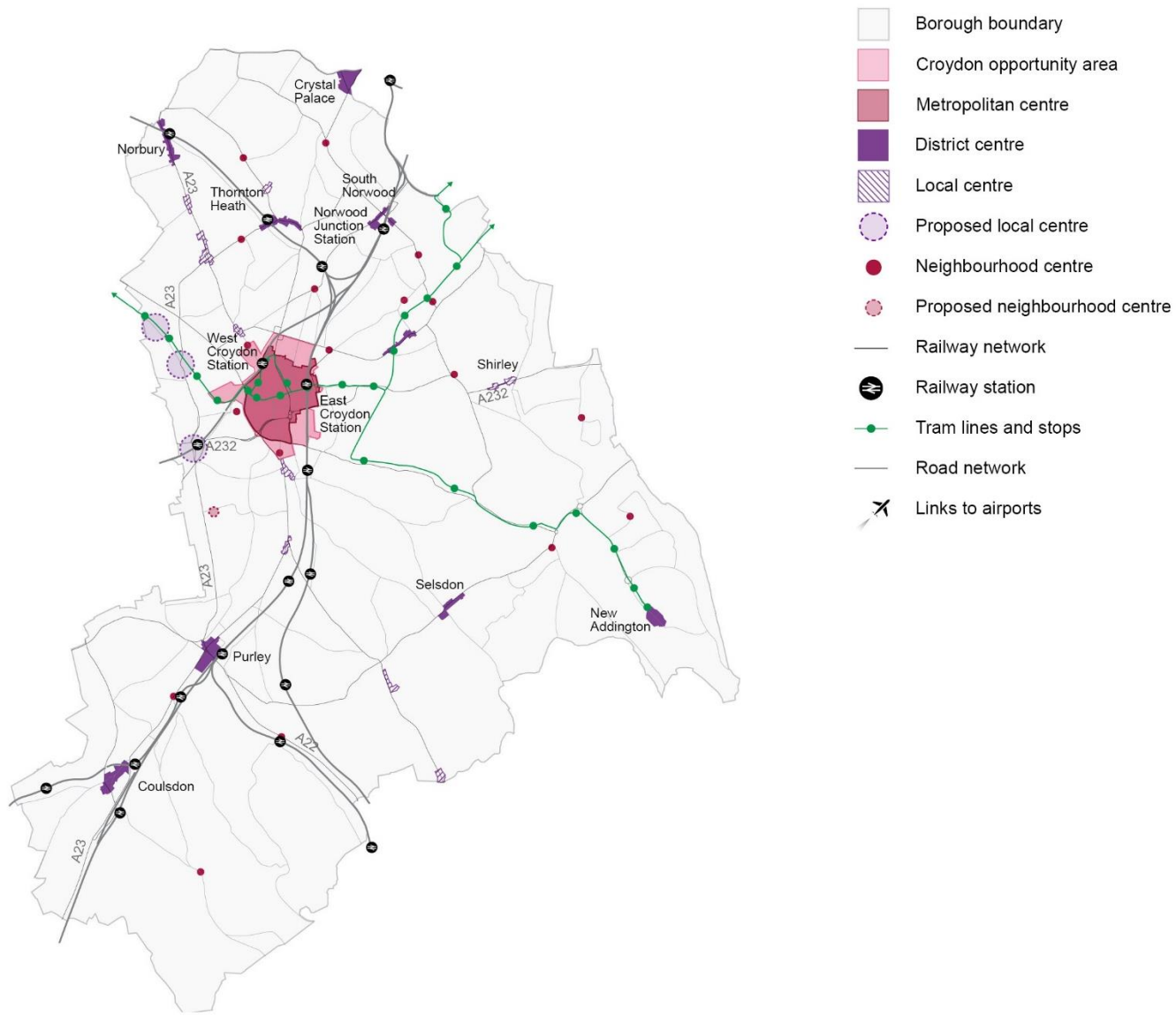
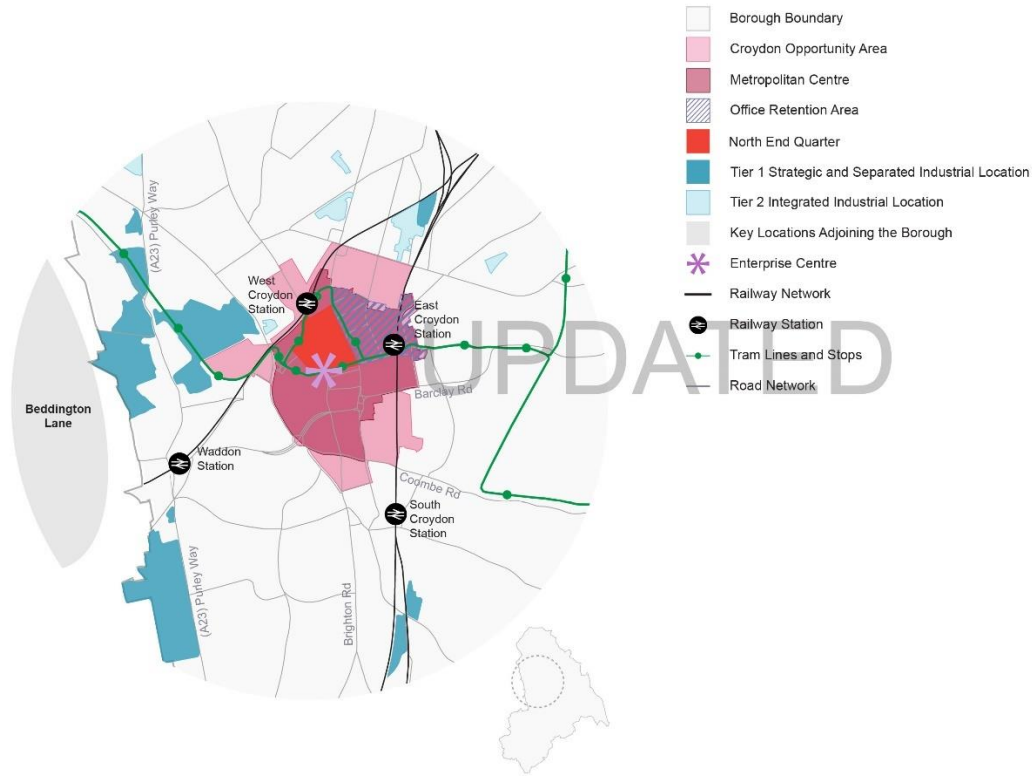


Figure 5.3 Employment in Croydon Town Centre (2011-2036) new graphic



Why we have taken this approach

Innovation, Investment & Enterprise

5.2 The Mayor’s Business Plan includes the objective to “Support the local economy and enable residents to upskill and access job opportunities.” ~~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.~~³³ Paragraph deleted

5.5 ~~To achieve our vision to ‘...be London’s most enterprising borough ...’~~ It is essential that Croydon has the floor space capacity to meet expected demand for **small and medium enterprise employment, as well as** industrial and warehousing activities. The **Employment Land Review** evidence base indicates that the current **employment land** 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 42,000m² **34,811m²** of Class B floor space in Croydon between 2011 and 2015~~8~~.

5.6 The ‘4-tier’ approach is a strong approach to the protection of industrial capacity (in line with Croydon’s ‘restrictive transfer’ status³⁴) 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 should therefore have the highest policy protection to ensure their economic importance (which have local and regional economic significance) is assured.**

5.8 ‘Tier 2’ Locations **perform an important economic function but are smaller scale** industrial estates where residential

supply for alternative uses. For Croydon, it means continuing with a more restrictive approach to the transfer of industrial sites to other uses.

³³ Table 7.3, p.107— LB Croydon Office, Industrial, Warehousing Land/Premises Market Assessment (August 2010)
³⁴ 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

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. The function of Tier 2 locations has a social benefit as well as being sustainable as the workforce does not generally travel as far, thereby encouraging sustainability of the location. Both Tier 1 & 2 sites, other than those designated as Strategic, Industrial Land (SIL) in the London Plan, are considered as Local Significant Industrial Sites (LSIS) under Policy E6 of the London Plan**

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. **Paragraph deleted**

5.13 In order to demonstrate that there is no demand for a scheme comprised solely of Class B4b and B4c, 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 borough³⁵. 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 image³⁶. **Paragraph deleted**~~

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 the Croydon Metropolitan Centre acts 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.~~ **Therefore, 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 with low social mobility, which has constrained the sector's 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 various 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 for businesses to grow and expand within the borough.**

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**

³⁵ 'Understanding and Shaping the Cultural Sector in L.B. Croydon (Draft Final Report)' (Sept 2010)

³⁶ 'Understanding and Shaping the Cultural Sector in L.B. Croydon (Draft Final Report)' (Sept 2010)

Cultural Strategy. ~~Policy Action 2.1 of the London Mayor's Cultural Metropolis Strategy.~~

5.18A The Council's strategic approach to development of cultural and creative infrastructure will be informed by the legacy of the London Borough of Culture programme, delivered 2023-24. The strategic aims of this programme include: developing cultural leadership and skills within the creative sector; creating opportunities for young people to participate in culture and follow creative career pathways; engaging new audiences and activating places and spaces around the borough with cultural programming; and using culture to improve people's health and wellbeing in Croydon. The delivery of the Mayor of London's Cultural Strategy and the Council's cultural strategy will be relevant for decision making and development management in regards to cultural infrastructure and should be considered alongside the Local Plan.

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. Improvements should incorporate good design that supports economic conditions and encourages investment. 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 a 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 NPPF ~~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~~ 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. 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 Communications **Chapter** 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. **Given the higher levels of accessibility to residents by active transport, these well connected areas are key to improving the health of the local population 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, **but** to do so successfully, the stock of commercial premises needs to be improved. Policy SP4 (Urban Design, **Heritage** & 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 15,500m² 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 16,000m² 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 29,440 **30,500** m²91,840. It is estimated that there is potential for 60,010m² 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. It is this figure that is taken forward as the floor space target in the Local Plan. The majority of this office space demand (90%), is projected to be for Grade A accommodation in prime locations within the Croydon Metropolitan Centre in the vicinity of East Croydon station, and 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 the Croydon Metropolitan Centre, support its urban renewal and contribute to the Croydon Local Plan's spatial vision of being London's most enterprising borough.

5.28A 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 in the borough are supported. Provision of higher education uses should

encourage the full range of associated activities in 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 deleted
- ~~Policy SP3.12~~ Policy deleted
- Policy SP3.13

Why we need this policy

5.29 Retailing 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~~ ~~The policies in this section~~ sets out the approach to uses by location within a centre ~~the borough's town centres~~. 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~~ ~~Secondary shopping~~ Frontages.; ~~and~~
- d) ~~Secondary Retail~~ Frontages.

5.30 ~~These boundaries have been reviewed during the preparation of this Plan to ensure they meet the needs of the borough. The review 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).~~ ~~Paragraph deleted~~

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.

~~promote 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 23-90 of the National Planning Policy Framework states 'Planning policies should be positive,

Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres

DM4.1 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 **in accordance with Table 5.3** which would result in a net loss of ground floor³⁷ ~~Class A uses within Main Retail frontages (unless it relates to the expansion of an existing 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~~ **Primary** and Secondary ~~Retail~~ **shopping** 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 Primary Shopping Frontages	A1Shops (Class E and F2)	Acceptable in principle

Part of the town centre	Use	Expansion of existing uses or newly proposed uses
	A2-A4 Class E	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 shop use (Classes E & F2) ³⁸
	Pub or drinking establishment, Hot food takeaway A5 (Sui Generis)	Acceptable in principle as long as it does not result in more than 60% of the ground floor of units falling outside of the A1 use class shop use (Classes E & F2) ³⁸ and does not result in two or more adjoining A5-takeaway units ³⁸
	All Other Uses	Not acceptable 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
Secondary Retail Shopping Frontage	A1—A4 and Community Uses Commercial, business and service (Class E)	Acceptable in principle with a ground floor limit on Community Uses in these locations of 250m ² (gross)
	Pubs and drinking establishments A5 (Sui Generis)	Acceptable in principle as long as it does not result in two or more adjoining A5 units at ground floor
	Hot food takeaways (Sui Generis)	Acceptable in principle as long as it does not result in two or more adjoining Hot food takeaway units at ground floor
	B1-Class C1 Hotels, boarding and guest houses	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	Not acceptable unless it relates to a Community Use proposals involving an increase of existing non E or F2 A Class ground floor space within Secondary Retail Frontage will be refused

³⁸ 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
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 Class E and Class F2	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

Designation	Locations
	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
	Hamsey Green Local Centre
	Pollards Hill Local Centre
	Sanderstead Local Centre
	Shirley Local Centre
	Thornton Heath Pond Local Centre

Designation	Locations
Primary Main Retail Shopping Frontage	See Appendix 3 for locations
Secondary Retail Shopping 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 of 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 ~~Furthermore,~~ sStudies 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 obese³⁹. 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 above and behind main town centre uses in the Primary Shopping Area in Secondary Retail 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. Paragraph deleted~~

5.36 ~~The reason why 250m² 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

³⁹ Building the foundations: Tackling obesity through planning and development (Town and Country Planning Association, March 2016)

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~~ **Primary** 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 **and MA** 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~~ **Primary** 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)~~
- **Croydon Town Centre and Retail Study (2023)**
- Office, Industrial & Warehousing Land/Premises Market Assessment (2010)
- Employment Land Review Update (**2020** ~~2013~~)
- 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
- **Understanding and Shaping the Cultural Sector in London Borough of Croydon (Draft Final Report) (Sept 2010)**
- **Building the foundations: Tackling obesity through planning and development (Town and Country Planning Association, March 2016)**

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. Paragraph deleted.~~

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	A1—A5, B1 m Main town centre Class E uses (Commercial, business and service); Pubs and drinking establishments; Hot food takeaways and town centre community uses	Acceptable in principle with a limit of floor space of 280m ² (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.
	Non-main town centre Class E uses (Commercial, business and services)	Acceptable in principle
	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 main town centre Class E uses (Commercial, business and services), Pubs and drinking establishments, Hot food takeaways and town centre community uses with more than 280m ² (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)

Designation	Location
Neighbourhood Centre	London Road/Kidderminster Road
	Lower Addiscombe Road/Cherry Orchard Road
	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

Designation	Location
	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 ~~NPPF 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.

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~~ **main town centre uses** 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 280m² will still be subject to a sequential test in accordance with Policy DM8: Development in Edge of Centre and ~~Out of Centre~~ locations. **Main town centre uses are defined in the glossary of the NPPF (under Main town centre uses) and in Appendix 1 of this Plan.**

5.58 For the purposes of Part 3 Class M **and MA** 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)~~
- **Croydon Town Centre and Retail Study (2023)**
- 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'. Paragraph deleted~~

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 units or newly proposed units
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 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
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) falling outside the A1 Use Class allows for a range of shop use (Classes E and F2 uses) A2-A4 uses as well as A5 and does not result in two or more adjoining hot food takeaway units. It must provides an active frontage, provides adequate arrangements for dealing with waste (including customers' waste) and for any delivery service intended and must be accredited in accordance with the Council's Eat Well Croydon scheme.
B1 (Change of use only)	Changes of use to office, research & 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
All Other Uses (including new development of B1)	Unless it relates to a Class F2 Community Use or change of use to B1 a use, proposals involving an increase of non-Class A E 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 use (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. Paragraph deleted~~

- Assessments of boundaries and designations for Shopping Parades (2012 and 2015)
- Appendix 3 – Designated shopping frontages
- **Croydon Town Centre and Retail Study (2023)**

Key supporting documents

- Croydon’s Monitoring Report (annual)

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 deleted
- ~~Policy SP3.11~~ Policy deleted
- ~~Policy SP3.12~~ Policy deleted
- ~~Policy SP3.12~~ Policy deleted

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 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 hot food takeaway A5 -uses or extensions to existing hot food takeaway A5 -uses will be refused
All Other Uses	Unless it relates to a Community Use (up to 250m ² gross), proposals involving an increase of non A3 – A4 Class uses other than restaurants, cafes, pubs and drinking establishments on ground floors space 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~~ **hot food takeaway** 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
- **Croydon Town Centre and Retail Study (2023)**

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 deleted
- ~~Policy SP3.11~~ Policy deleted
- ~~Policy SP3.12~~ Policy deleted
- 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 90(e) of the National Planning Policy Framework **NPPF** states

~~that local planning authorities should~~ 'where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre'. ~~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:

DM8.1 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

DM8.2 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 2,500m².</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 2,500m².</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>A5-Hot Food Takeaways</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 centre⁴⁰ 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 centre⁴¹ 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>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 2,500m².</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 2,500m².</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>

⁴⁰ Well connected" is defined as a location benefitting from a Public Transport Accessibility Level of 4 and above.

⁴¹ 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 **NPPF'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 **NPPF 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 **have the potential to** accommodate their proposal, **or a site providing a comparable service**. 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 hot food takeaway** 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 – graphic removed

5.79 As set out in the **NPPF 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 2,500m² 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 **NPPF National Planning Policy Framework** states the 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 2,500m².

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)~~
- **Croydon Town Centre and Retail Study (2023)**

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. A natural response to this situation could be to adopt a more restrictive approach to the loss of such premises than was previously the case. However, such an approach would not be consistent with the London Plan or the National Planning Policy Framework. Paragraph deleted~~

5.84A Croydon has extremely low industrial land vacancy rates and a high demand for industrial and warehousing spaces. 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.

~~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 storage or distribution (B8) space, the Employment Land Review pointed to a contraction in manufacturing

employment indicating a reduction in demand floor space for heavy industrial uses (B2). The decreased demand for heavy industrial uses is balanced with an increase in demand for light industrial (E class) 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. 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. Paragraph deleted~~

Policy DM9: Expansion of ~~i~~Industrial and ~~w~~Warehousing Premises in Strategic, Separated and Integrated Industrial Locations

DM9.1 ~~Within the Strategic, Separated and Integrated Industrial Locations (SIL) identified in Table 5.2 of Policy SP3.2, the Council will the development that enhances the function of the (SIL) and intensifies of low density industrial and warehousing premises land, particularly low density premises, will be supported. with higher density industrial and warehousing premises.~~

DM9.2 Schemes that improve the function of the overall SIL will be supported. These include:

- a) Making more efficient use of land for business, heavy industry and warehousing uses;
- b) Taking opportunities to support the integration of research and development of processes and products; and
- c) Taking opportunities to support uses related to education or training connected to industrial processes.

This approach must ensure no net loss of floor space for industrial or warehousing uses.

DM9.3 In Strategic, Separated and Integrated Industrial Locations, Town Centre and Scattered Employment Sites, development proposals and changes of use must accord with Table 5.13. All proposals for redevelopment of employment units should be designed to support a flexible range of unit sizes to enable small businesses to grow in the future.

Table 5.13 Development proposals and changes of use in Strategic, Separated and Integrated Industrial Locations and on Town Centre and Scattered Employment Sites

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
Research and development, light industry, including low-cost industrial, last mile distribution	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted 	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted 	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted 	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted
General industry, warehousing, storage, logistics & distribution, wholesale markets and employment generating Sui-Generis uses ⁴²	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted 	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted 	<ul style="list-style-type: none"> Existing uses protected in this location 	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted
Studio, managed workspace and small business space	<ul style="list-style-type: none"> New uses permitted 	<ul style="list-style-type: none"> New uses permitted 	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted 	<ul style="list-style-type: none"> Existing uses protected in this location New uses permitted

⁴² 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.

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"> • There is no demand for the existing premises or alternative industrial uses; • 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; • Residential does not harm the site and wider location's business function. 	<p>Residential development will be permitted if:</p> <ul style="list-style-type: none"> • There is no demand for the existing premises or alternative industrial uses; • It is provided as part of a mixed use scheme including permitted industrial uses and the new industrial space is designed to meet the needs of future occupiers.

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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	<p>Food and drink development will only be permitted as an ancillary function to industrial if:</p> <ul style="list-style-type: none"> • 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"> • There is no demand for the existing premises or alternative industrial uses; and • 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. 	Not permitted
Crèche or day nursery	<p>Crèches or day nurseries will only be permitted as an ancillary function to industrial if:</p> <ul style="list-style-type: none"> • They do not harm the site and wider location's industrial function; and • It is provided to meet the need of people working in the Strategic or Separated Industrial Location 	Permitted if they do not harm the site and wider location's industrial function	<p>Crèches or day nurseries will be permitted if:</p> <ul style="list-style-type: none"> • There is no demand for the existing premises or alternative industrial uses; and • 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. 	<p>Crèches or day nurseries will be permitted if:</p> <ul style="list-style-type: none"> • The site has a PTAL rating of 3 or above; • The existing use of the site is heavy industry or a Sui-Generis employment use; or • There is no demand for the existing premises or alternative industrial uses.

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
Community facilities	Not permitted	<p>Non-town centre community uses will be permitted if:</p> <ul style="list-style-type: none"> • It is provided as part of a mixed use scheme including permitted industrial/warehousing/employment generating Sui-Generis⁴³ uses; <ul style="list-style-type: none"> • The new industrial/warehousing space is designed to meet the needs of future occupiers; and • They do not harm the site and wider location's industrial function. 	<p>Other community facilities will be permitted if:</p> <ul style="list-style-type: none"> • There is no demand for the existing premises or for an alternative industrial use; and • 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. 	<p>Non-town centre community uses will be permitted if:</p> <ul style="list-style-type: none"> • The site has a PTAL rating of 3 or above; • The existing use of the site is heavy industry or a Sui-Generis employment generating use; or • There is no demand for the existing premises or for an alternative industrial use.
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.

⁴³ 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.

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"> • There is no demand for the existing premises or for alternative industrial uses; and • 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. 	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. Whilst higher densities are supported to strengthen the function of the Strategic, Industrial Land (SIL), designated by the London Plan, it is important that proposals incorporate good design. This will help improve image of industrial spaces which in turn will encourage investment into the area.

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 to safeguard 'Tier 1' premises 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 As outlined in table 5.13 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.

5.92 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.

5.93 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.

5.94 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 Employment Land Review suggests that these 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 the 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~~ 2020)
- Land for Industry and Transport Supplementary Planning Guidance (2012)
- GLA Industrial Land Supply Study (2023)

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.

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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~~ Developments ~~should will be~~ of a high quality, ~~which respecting~~ and ~~enhancing~~es Croydon's varied local character and ~~contributes~~ **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~~ dDevelopment to **will be required to:**

- a. Be informed by the distinctive qualities, **heritage, character,** identity, topography, **architectural diversity,** and opportunities of the relevant Places of Croydon;
- b. **Preserve and enhance Heritage Assets and their settings,** Protect Local Designated Views, Croydon Panoramas, the setting of Landmarks, other important vistas and skylines; ~~and~~
- c. Enhance social cohesion, **health** and well-being; ~~;and~~
- d. **Include well designed spaces for the proposed uses, ensuring any mixing of uses carefully integrates 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 **Tall buildings within Croydon are defined as buildings higher than 21m in height as measured from the ground to the top of the building.** Proposals for tall buildings will be encouraged only in the **Tall Building Zones identified on the Policies Map.** ~~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 buildings will be required to:~~

- a) ~~Respect and enhance local character, and heritage assets~~ **and their settings;**
- b) ~~Minimise the environmental impacts 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; and-~~
- e) **Comply with Policy D9 of the London Plan in terms of visual, functional, environmental and cumulative impacts.**

Public Realm

SP4.7 The Council will work with partners (including private land owners) to improve the public realm within the borough.

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, 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, including through high quality new development and public realm **improvements, will be supported where they** ~~that respects and enhance~~ ~~the historic environment~~ ~~local character~~ ~~and are~~ ~~is well integrated.~~

SP4.13 The Council and its partners will strengthen the protection of and ~~promote improvements~~ **enhancement of** ~~to~~ the following heritage assets and their settings⁴⁴:

- 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. **Non-designated** Local List of Buildings of Historic or Architectural Importance;
- h. **Non-designated** 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 **non-designated** locally listed heritage assets.

SP4.15 The Council and its partners will promote improvements **and enhance** to the accessibility of heritage assets to allow enjoyment of the historic environment for all.

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 Heritage Asset	New Location
Archaeological Priority Areas	Addington and Addington Park Addington Hills Ampere Way Ashburton Park Cane Hill Central Croydon

Name Heritage Asset	New Location
	<p>Croham Hurst</p> <p>Croham Hurst Round Barrow</p> <p>Croydon 19th 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>

Name Heritage Asset	New Location
	Park Lane Anglo-Saxon Cemetery Pollards Hill RAF Kenley Riddlesdown Road Russell Hill Sanderstead Waddon Watendone
Local Heritage Areas	Addiscombe College Estate Auckland Road Beatrice Avenue Bingham Road Birdhurst Road Bishops Walk Brighton Road (Purley) Campden Road and Spencer Road

Name Heritage Asset	New Location
	<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> <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>

Name Heritage Asset	New Location
	Upper Shirley Road

Local List of Historic Parks and Gardens	<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> <p>Coulsdon Memorial Ground</p> <p>Croham Hurst</p> <p>Croydon Airport, Purley Way West</p>
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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

	<p>Whitgift Almhouses</p> <p>Woodcote Village Green</p> <p>Woodside Green</p>
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Croydon Panoramas	<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>
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	<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 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>
Local Designated Landmarks	<ol style="list-style-type: none"> (1) Addington Palace (2) All Saints Church, Sanderstead (3) Cane Hill Water Tower (4) Clock Tower, High Street, Thornton Heath (5) Clock Tower, Station Road, South Norwood (6) Croydon Minster (7) Ikea Towers, part of former power station

	<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>(12) St. Andrew's Church, Woodmansterne Road, Coulsdon</p> <p>(13) St. Peter's Church, South Croydon</p> <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>
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- (LV5) From George Street of No.1 Croydon, George Street
- (LV6) From Heathfield of Selsdon and New Addington (unique view of the collection of buildings of New Addington)
- (LV7) From High Street north east, of the Clock Tower, South Norwood
- (LV8) From High Street of the Clock Tower, Thornton Heath
- (LV9) From High Street south west, of the Clock Tower, South Norwood
- (LV10) From Limpsfield Road, near Wentworth Way of All Saints' Church
- (LV11) From North End of the Town Hall Clock Tower
- (LV12) From Oliver Grove of the Clock Tower, South Norwood
- (LV13) From Park Hill of Croydon Metropolitan Centre (unique collection of buildings, no landmarks)
- (LV14) From Roman Way north of Croydon Minster
- (LV15) From Roman Way south of Croydon Minster

(LV16) From Selsdon Road of St Peter's Church

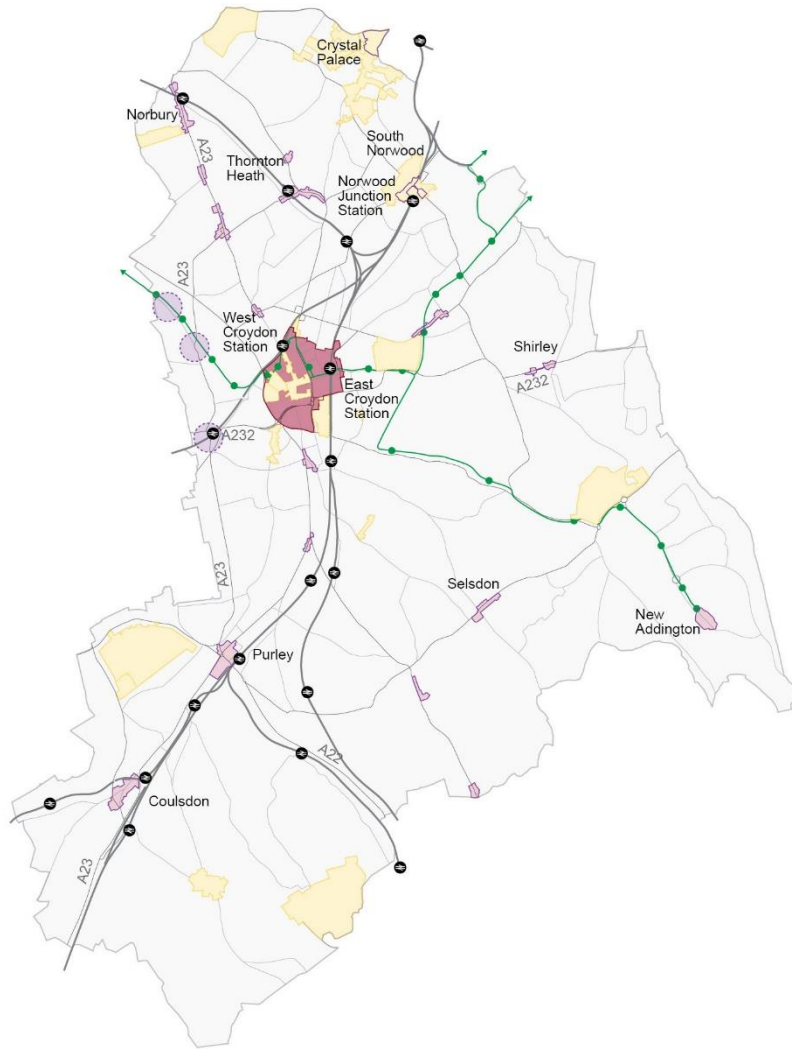
(LV17) From South Norwood Hill of the Shirley Windmill

(LV18) 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)

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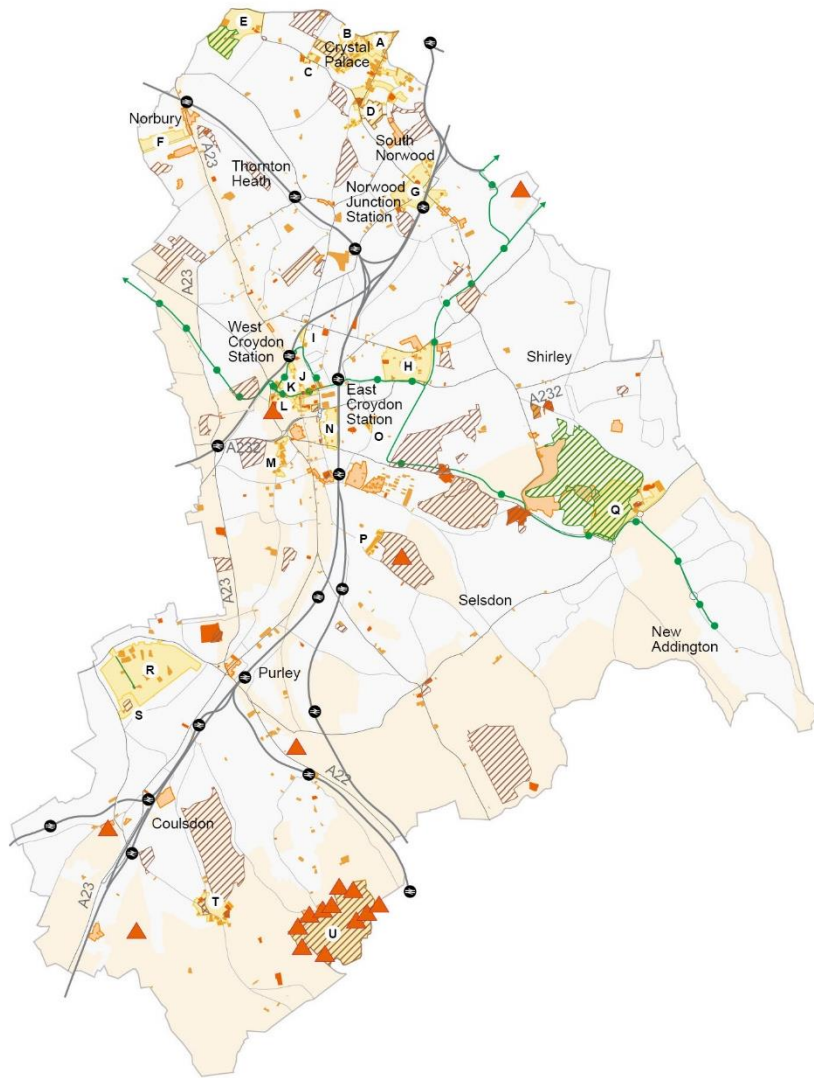
What it will look like














Figure 6.1 Policy SP4 (Public Realm) map



- Borough boundary
- Metropolitan centre
- Conservation areas
- Public realm improvements in local and district centres
- Proposed local centre
- Railway network
- Railway station
- Tram lines and stops
- Road network

Figure 6.2 Policy SP4 (Heritage) map



-  Borough boundary
-  Statutory listed buildings
-  Locally listed buildings
-  Conservation areas
 - A. Upper Norwood Triangle
 - B. Harold Road
 - C. Beulah Hill
 - D. Church Road
 - E. Norwood Grove
 - F. Norbury Estate
 - G. South Norwood
 - H. East India Estate
 - I. Wellesley Road
 - J. Central Croydon
 - K. Church Street
 - L. Croydon Minster
 - M. The Waldrons
 - N. Chatsworth Road
 - O. St Bernards
 - P. Croham Manor Road
 - Q. Addington Village
 - R. Webb Estate
 - S. Upper Woodcote Village
 - T. Bradmore Green
 - U. Kenley Aerodrome
-  Local heritage areas
-  Registered Historic Parks and Gardens
-  Locally listed Historic Parks and Gardens
-  Scheduled monument
-  Archaeological priority areas
-  Railway network
-  Railway station
-  Tram lines and stops
-  Road network

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. Paragraph deleted~~

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 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 **number** 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.

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 buildings is one way of increasing an area's density and that Local Plans should identify where tall buildings should be located. In line with the London Plan policy D9, areas within the borough suitable for tall buildings~~

have been identified through the Croydon Tall Building Study. The tall building locations were identified on the basis of sensitivity analysis, suitability analysis and townscape assessment.

6.9 In the context of this policy informed by the Tall building Study, a tall building is one that is significantly taller than most of the surrounding buildings or in excess of six storeys or 25m not less than 21m in height as measured from the ground to the top of the building. 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 is set out in the 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. To ensure a positive change, the design of tall 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 as informed by the Borough Character Appraisal.

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 LVMF protected views, Local Views, Croydon Panoramas, the setting of Landmarks and other important vistas and skylines. All views are accessible and are indicated in

6.12 Figure 6.2, on the Places maps and on the Policies Map.

6.13 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.

6.14 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. Paragraph deleted

Public Realm

6.15 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.

6.16 ~~The public realm policies are in conformity with local, regional and National Planning Policy. Paragraph deleted~~

6.17 ~~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. Paragraph deleted~~

6.18 The public realm needs to be well maintained if it is to ensure civic pride, sense of belonging, encourage regeneration and **deter crime and** reduce the perception of crime. ~~The London Plan and SPD No. 3: Designing for Community Safety endorses this policy.~~

6.19 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. ~~In areas where land availability minimises the opportunity to address this, the priority will be for public realm enhancements that improve connectivity to existing green open spaces and soft landscaped areas in locations such as the Croydon Metropolitan Centre, District and Local Centres. Additional Green Grid policies provide further support to meet this aim. The NCA Report particularly notes a discrepancy between access to open space in the north of the borough, where there is a greater deficiency in access compared to the south. Public realm deficiency should be addressed through development 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.

6.20 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.**

6.21 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.

6.22 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.

6.23 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**

6.24 ~~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.

6.25 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

6.26 Figure 6.2 and the *Policies Map*. Paragraph deleted

6.27 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 that climate change, inclusivity and accessibility can present.

6.28 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. Paragraph deleted

6.29 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.

6.30 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 create a develop a greater understanding and sense of belonging. 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.

draft confidential

Design and character

~~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

6.31 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.

6.32 A fundamental part of achieving high quality built environments is through understanding the local character and the qualities which contribute to local distinctiveness.

6.33 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.

6.34 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.

6.35 ~~The Place-specific policies in Section 0 (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

6.36 ~~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

6.37 ~~Paragraph 56 of the~~ 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.

6.38 ~~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.

6.39 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.

6.40 ~~Paragraph 57 of the~~ 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.'

6.41 ~~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

6.42 ~~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.~~ **Paragraph deleted**

6.43 ~~The National Planning Policy Framework in paragraph 50 encourages location 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 recognise in the National Planning Policy Framework, which states that the cumulative impact of standards and polices should not put the implementation of the plan at serious risk (paragraph 174).~~ **Paragraph deleted**

6.44 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.

6.45 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.

6.46 ~~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.~~

6.47 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.

6.48 ~~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.~~

6.49 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.

6.50 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.

6.51 ~~The London Plan's Policy 3.2D introduces an additional requirement for new development to be mindful of health issues. New development should be designed, contracted and managed in ways that improve health and healthy lifestyles to help to reduce health inequalities. The provision of communal outdoor amenity will provide opportunities for outdoor activities and social interaction.~~

6.52 ~~The London Plan (in Policy 3.5B) also requires that 'all new housing d~~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, 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

6.53 ~~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 homes chapter**

6.54 ~~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 5m² of private outdoor space for 1-2 person dwellings and an extra 1m² to be provided for each additional occupant.~~ **Paragraph deleted**

6.55 ~~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.~~ **Paragraph deleted**

6.56 ~~The minimum standard of 10m² 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 10m² of dedicated play space per child.~~ **Paragraph deleted**

6.57 ~~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 homes chapter**

6.58 ~~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'. Privacy can be safeguarded by achieving adequate window to window, or window to balcony distances between buildings (both existing

and proposed). In new residential development there should be a minimum distance of 18-21m between facing homes to ensure that adequate privacy is achieved.

Policy DM10: Design and character

The following policies DM10.1 to DM10.10 apply in circumstances other than those where intensification policies (0) 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.

DM10.1 ~~Proposals~~ All 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 and having regard to:

- a) The development pattern, layout and siting;
- ~~b) The scale, height, massing and density; line deleted~~
- c) The appearance, existing materials and roofscapes, 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.
- d) Landscape character and features of the surrounding area and the Place of Croydon in which it is located.
- e) The council will take into account cumulative impact.

~~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. (Policy moved to homes)~~

In the case of development in the grounds of an existing building which is retained, development shall be subservient to that the existing building.

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 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter;~~
- ~~d) ——— All flatted development and developments of 10 or more houses must provide a minimum of 10m² 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 200m² (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.~~ **(Moved to Homes chapter)**

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.~~

~~Moved to Homes chapter~~

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~~
- ~~c) — 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 envelope⁴⁵; 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. (DM 10.2 – 10.7 rewritten or moved to Homes chapter)~~

~~Development will be required to:~~

- ~~(a) Make an efficient use of land whilst respecting the character of the surrounding area by reinforcing and promoting local distinctiveness;~~

⁴⁵ The building envelope (also known as the building shell) refers to the outer structure of a building.

- (b) Ensure that it is designed to avoid unacceptable harm to the amenity of existing neighbours and future occupants, including by way of overlooking and loss of privacy, overbearance, obtrusiveness and overshadowing;
- (c) 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.
- (d) Provide adequate daylight and sunlight for future occupants;
- (e) Use high quality, durable and sustainable materials that respond to the local character of an area;
- (f) When working with existing buildings, retrofitting will be encouraged to retain original architectural features where possible;
- (g) Incorporate the principles of designing out crime or equivalent crime prevention standards;
- (h) Makes adequate provision for access, servicing, communal storage, circulation, turning space and parking taking account of the impact on the character of the area;
- (i) Where appropriate, proposals should restore historic street furniture and provide additional street furniture, trees and public art to enhance the public realm and sense of place; and
- (j) Explore opportunities to retrofit energy efficiency infrastructure and renewables into existing stock.

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 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;

- d) Retain existing trees and vegetation including natural habitats⁴⁶;
- 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.

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;~~ **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:~~

- ~~a) Be up to double the predominant height of buildings in the area;~~

⁴⁶ Natural Habitats are defined as the natural home or environment of an animal, plant or other living organism.

- 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.

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.**

Table 6.2: Private amenity and play space standards in all flatted developments and all schemes of ten or more units

Unit size	Minimum private amenity space	Minimum play space (for affordable or social rented housing)	Minimum play space (for private market or intermediate shared ownership housing)
1 bedroom house or flat	5m ²	0.8m ² per unit (based on 0.08 children per unit)	0.3m ² per unit (based on 0.03 children per unit)
2 bedroom houses or flats	6m ² or 7m ² (depending on size of second bedroom)	8.1m ² per unit (based on 0.81 children per unit)	1.2m ² per unit (based on 0.12 children per unit)
3 bed houses or flats	Between 7m ² and 9m ² (depending on sizes of second and third bedrooms)	18.5m ² per unit (based on 1.85 children per unit)	4.6m ² per unit (based on 0.46 children per unit)
4 bed houses or flats	Between 8m ² and 11m ² (depending on sizes of second, third and fourth bedrooms)	19.0m ² per unit (based on 1.9 children per unit)	10.4m ² 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 shown on the Policies Map

Designation	Location
Areas of focussed intensification	Area around Kenley station 1. Around Forestdale Neighbourhood Centre 2. Brighton Road (Sanderstead Road) Local Centre with its setting Settings of Shirley Local Centre and Shirley Road Neighbourhood Centre

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 representation of the five character management options **Figure deleted**

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 and overleaf.

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

Method of accommodating growth and improving Croydon	How it works	Applicable policies
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
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 0

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** which 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 Redevelopment
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	✓	✓	✓	✓	✓

Local character types	Conversion	Additions	In-fill and Plot Subdivision	Rear garden development	Regeneration Redevelopment
Scattered Houses On Large Plots	✓	✓	✓	✓	✓
Terraced Houses And Cottages	✓		✓	✓	✓
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					

Local character types	Conversion	Additions	In-fill and Plot Subdivision	Rear garden development	Regeneration Redevelopment
Shopping Centres Precincts & Town Centres					
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.**

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. **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 or directly affects 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 utmost 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. Paragraph deleted~~

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 10m² 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. ~~Paragraph deleted~~

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. ~~Paragraph deleted~~

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. Paragraph deleted~~

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 realm⁴⁷ plays an important role in reinforcing the perception of Croydon 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, **milestones**, 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

⁴⁷ 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.

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 local heritage assets such as rural village and garden suburb 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 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 Focussed Intensification is an area with no one predominant character type. As each area of Focussed 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)~~
- ~~● Residential Alterations and Extensions Supplementary Planning Document~~
- ~~● 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 (2012⁹)
- 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)
- The Mayor of London's Characterisation and Growth Strategy (2023), London Plan Guidance
- The Mayor of London's Housing Design Standards (2023), London Plan Guidance
- The Mayor of London's Optimising Site Capacity: A design-led Approach,(2023), London Plan Guidance
- The Mayor of London's Small Site Design Codes, (2023), London Plan Guidance

draft confidential

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 fascias, 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 a 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. Paragraph deleted~~

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 impacts⁴⁸. 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.

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:

⁴⁸ 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 increasing 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. Paragraph deleted~~

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 **Design Standards** Supplementary Planning **London Plan** Guidance (**LPG**), provides some general guidance, however, it states that it should be used in conjunction with local guidance. The Mayor's **Housing Design Standards (LPG)** 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. Paragraph deleted~~

Policy DM14: Public art

To enhance and express local character, the Council will support the inclusion of public art and require all major⁴⁹ 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)

⁴⁹ Major schemes are defined as being over 0.5 hectares or residential schemes over 10 units or developments over 1000m²

Tall and large buildings

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 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.**

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 residential **building** 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. 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 **Tall Building Study** identifies locations within the Croydon Opportunity Area **and other parts of the borough** that are suitable for tall buildings. It provides guidance on **The study informs** indicative tall building heights, form and typologies. This approach reflects the Mayor's aspirations for new **the planned** residential **growth** 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,
PTAL⁵⁰ ratings and open space deficiency mapping.~~

draft confidential

⁵⁰ Public Transport Accessibility Level – a rating of accessibility provided by Transport for London

Policy DM15: Tall and large buildings

To ensure tall or large buildings facilitate growth and regeneration whilst respecting and enhancing local character, and do not avoid harm to the setting of heritage assets and their settings, development 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 exemplar 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 preserves or and enhances the significance and setting of the assets or within 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 buildings are well integrated with the local area, they should include at least an active ground floor and inclusive public realm;
- g) Where tall buildings are acceptable in principle, their design must avoid harmful impacts, including those caused by wind, daylight/sunlight penetration and temperature conditions.
- h) They account for functional requirements, with consideration for maintenance, safety and comfort and avoid harm to the surrounding public realm and transport and communications networks and
- i) They take account of the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in the area.

How the policy works

6.152 Tall and large 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. These should not be less than 21m in height as measured from ground to the top of the building. Place specific development policies set out appropriate height ranges for tall buildings within the Tall Building Zones in

Croydon. Within those areas, not all individual sites will be suitable for tall buildings and the acceptable maximum height will not be appropriate for all sites or development in those areas. Appropriate heights will depend on factors including their siting, size, cumulative impacts and wider regeneration opportunities.

6.153 When assessing whether a development can be considered to be a tall or large building, 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 block⁵¹ comprises of buildings with narrow frontages, a proposal 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. Paragraph deleted

6.156 This policy in conjunction with the policies for the Areas of Transformation 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 area. 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 locations⁵² 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. Paragraph deleted

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

⁵¹ An urban block is a rectangular area in a city surrounded by streets and usually containing several buildings.

⁵² 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.,

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 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

6.161A Potential impacts of tall building development includes but are not limited to wind, sunlight and wider microclimate. Wind and wider microclimate studies should assess the suitability of options and at key milestones as a scheme develops. The scope of the studies should include but not be limited to streets and public spaces including both habitable, walking and cycling environments and communal and private amenity spaces. All reasonable wind mitigation measures in the buildings layout, form and design should be incorporated into a proposed development to achieve acceptable wind conditions.

- Mid Croydon Masterplan (2012)
- Infrastructure Delivery Plan (annually updated)
- Borough Character Appraisal (2015)
- Character Typology (2015)
- Tall Buildings: Historic England Advice Note (2022)

Key supporting documents

- Croydon Tall Building Study (2023)
- Croydon Opportunity Area Planning Framework (2013)
- East Croydon Masterplan (2011)
- West Croydon Masterplan (2011)

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.
- DM17.4** Have regard to the setting of heritage, design and conservation designations adjoining the borough boundary in neighbouring boroughs.

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)

draft confidential

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 which lends 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 ~~undesigned~~-non designated: 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 **preserve and** 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 **or structure** 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 **and enhanced**.

~~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 **preserve and** 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~~ **preserving** 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 of 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 **heritage statement with** 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 **preserves and 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 **heritage asset** area.

6.192 Development will be encouraged to **preserve and 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~~ **maintain** in their original use wherever possible unless **a change of use is** fully justified by demonstration that this is necessary to secure ~~its~~ **a building's** 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 and enhanced**.

6.194 Historic landscapes, including Registered and Locally Listed Historic Parks and Gardens may have interest ~~from~~ **arising 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 preserved and enhanced so as to** not **be** 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, m~~ 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** ~~to~~ historic buildings **and sites**. ~~but~~ It 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 **in the borough** where possible. If deemed appropriate, the Council will exercise its legal powers to ensure that essential maintenance of designated heritage assets is undertaken **to ensure their long-term future**. 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.~~ **Paragraph deleted**

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)
- 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)
- Croydon Public Realm Design Guide (2012~~9~~)
- **Old Town Masterplan (2014)**
- **Fairfield Masterplan (2013)**
- **Sport England’s Active Design Guidance**
- **The Mayor of London’s Characterisation and Growth Strategy (2023), London Plan Guidance**
- **The Mayor of London’s Housing Design Standards (2023), London Plan Guidance**
- **The Mayor of London’s Optimising Site Capacity: A design-led Approach, (2023), London Plan Guidance**

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 **facilities over the plan period**.
- 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~~ **6,000 interments** in the borough.

Where we want to be

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.

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.

How we are going to get there

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 **and expanding** 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 ~~education and skills~~ training to increase the opportunities for local residents to help meet the needs of local employers.

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 **Legislation** has enabled Councils to raise resources in support of social and cultural 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 **outcomes**. The creation of opportunities requires local action jointly between the health, care and local planning authorities. ~~Croydon's Sustainable Community Strategy~~ **The Mayor's Business Plan** endorses the need **to improve resident health and reduce health inequalities**. ~~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~~ **regardless of any** social, economic or physical characteristics limiting their mobility. **Inclusive design principles need to be applied to make it accessible to communities with protected characteristics.** 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 ~~6,000 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 should include meeting environmental and legislative requirements as part of meeting the technical requirements.

Education and skills

7.15 The quality of educational facilities needs continual renewal and improvement to meet modern standards. Additionally, the educational estate might needs to be expanded to ensure sufficiency of school places to meet the future demand 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 at borough level and across most of the educational planning areas 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 and two sites have been allocated to meet this projected need.

7.15A. Currently, the growth in the Purley Way Transformation Area is not projected to create a need for additional primary school places due to surplus existing capacity within the 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 (Site 332) has been allocated in the Purley Way Transformation Area for a new 2FE primary school.

7.15B Pupil projections suggest that at borough level, currently there is enough secondary school places to meet the demand from the proposed housing numbers for the next 5-10 years. However, additional places may be needed in the south of the borough if demand increases above the predicted level, but no site has been allocated to meet this projected need. 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.

Paragraph deleted

7.17 The needs of Facilities for children with special educational needs and disabilities 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. Needs will be kept under review, with any sites identified based on an updated Special Education Needs Estate strategy.

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 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.

draft confidential

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 **cultural and 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~~ **Primary** 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 ~~D1 class~~ **community** uses in industrial locations as set out in Table 5.13;
- 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 **main** 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 280m² 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, **and the Nominating body wishes to proceed**, 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 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. **The applicant shall contact the Council's Community and Voluntary Sector for details of alternative community uses that can be considered in the location.**

7.28 Policy DM19.1(b) removes the protection of community facilities located in ~~Main~~ **Primary-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 DM4, DM6 and DM7 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 locations 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 DM4, DM6 and DM7 ~~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.~~ **High footfall community uses will generally be more suitable in the borough's network of centres.**

7.28A 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

social and economic benefits that they offer to residents, workers and visitors.

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,

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

7.37 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.

7.38 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.**

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;

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
- c. 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

7.39 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.

7.40 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.

7.41 The Council will resist the loss of these facilities unless it can be demonstrated that it 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)

draft confidential

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

~~7.42 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.~~

~~7.43 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 6,000~~

~~interments was required for the period up to 2031. The Greenlawns Memorial Park, a council owned cemetery will cover the requirements until 2031.~~

~~7.44 Therefore, Croydon needs to find an alternative new site for a new burial ground over the next decade and a policy is proposed to guide the search for a site and to help determine any subsequent planning application.~~

~~7.45 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:

- Have good means of access from roads and are near bus routes or other transport nodes;
- Are located in areas of with no risk of flooding from all potential sources of flooding;
- Are not located in a Groundwater Source Protection Zone; and
- 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

7.46 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.

7.47 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.

7.48 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.

7.49 ~~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

7.50 ~~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)

draft confidential

8. Environment and Climate Change

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 for Croydon to become carbon neutral of a 34% reduction in carbon emissions by 203025.
- 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 20260.
- 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

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 (CO₂) 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 CO₂ reduction targets. The Council will promote **zero carbon developments and encourage** the development of district energy networks where opportunities exist due to high heat density⁵³ or an increase in heat density brought about by new development. This will be achieved by:

- a) Requiring high density⁵⁴ residential developments of 20 or more units to incorporate site wide communal heating systems
- b) Requiring major development⁵⁵ to be enabled for district energy connection⁵⁶ 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 CO₂ reduction targets. This will be achieved by:

- a) Requiring new-build residential development of fewer than 10 units to achieve the **London Plan requirements or national technical standard Building Regulations Part L (2021), whichever is higher**, for energy efficiency in new homes (2015). ~~This is set at a minimum of 19% CO₂ reduction beyond the Building Regulations Part L (2013);~~

⁵³ 55 residential units or 1,000m² commercial development per hectare

⁵⁴ 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

⁵⁵ 10 or more residential units, a site of 0.5 hectares or more or 1,000m² commercial development

⁵⁶ 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.

- b) Requiring **all major residential developments** ~~new-build residential development of 10 units or more to achieve the London Plan requirements or National Technical Standards (2015)~~ **Building Regulations Part L (2021)** for energy performance and **CO₂ reduction targets**, whichever the higher standard. **The London Plan 'Be Seen' energy performance guidance should be used for monitoring post construction.**
- 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~~ **Excellent** rating or equivalent, **unless it can be demonstrated that it is not technically feasible**;
- e) Requiring new build non-residential development, **conversions and changes of use** of 500m² and above to achieve a minimum of BREEAM Excellent standard or equivalent, **unless it can be demonstrated that it is not technically feasible**;
- f) ~~Requiring conversions and changes of use to non-residential uses with an internal floor area of 500m² and above to achieve a minimum of BREEAM Very Good standard or equivalent;~~ *policy deleted*
- g) Requiring new build, non-residential development of 1000m² and above to achieve **the London Plan Standards [i.e., a minimum of 35% CO₂ reduction beyond the Building Regulations Part L (2021)];** and
- h) Requiring development to positively contribute to improving air, land, noise, and water quality by ~~minimising~~ **mitigating any effects of pollution,** ~~with detailed policies to be included in the Croydon Local Plan's Detailed Policies and Proposals;~~
- i) **Taking a bespoke approach to the sustainability of historic buildings and heritage assets, giving consideration to their particular construction, embodied materials, building fabric and character without undermining their historic importance and**
- j) **Requiring all major applications to submit Energy Assessments following the London Plan Energy Assessment Guidance.**

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, **developments in areas identified at risk from other sources of flooding** 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~~ **demonstrate** sustainable drainage systems (SuDs) **preferably nature based** to reduce surface water run-off and provide water treatment on site; and
- d) Requiring development proposals to account for **and mitigate any** possible groundwater contamination in Source Protection Zones 1 and 2.

SP6.5 The Council and its partners will promote the implementation of 'Urban **Green Blue Spaces and 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:

- a) Supporting schemes that make space for water in flood events;
- b) Supporting schemes to de-culvert sections of the River Wandle, Norbury Brook and Caterham Bourne;
- c) Preserving and enhancing landscape, heritage and culture through protection and access improvements to the borough's ponds, open water and water heritage sites; and
- d) 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

SP6.6 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.

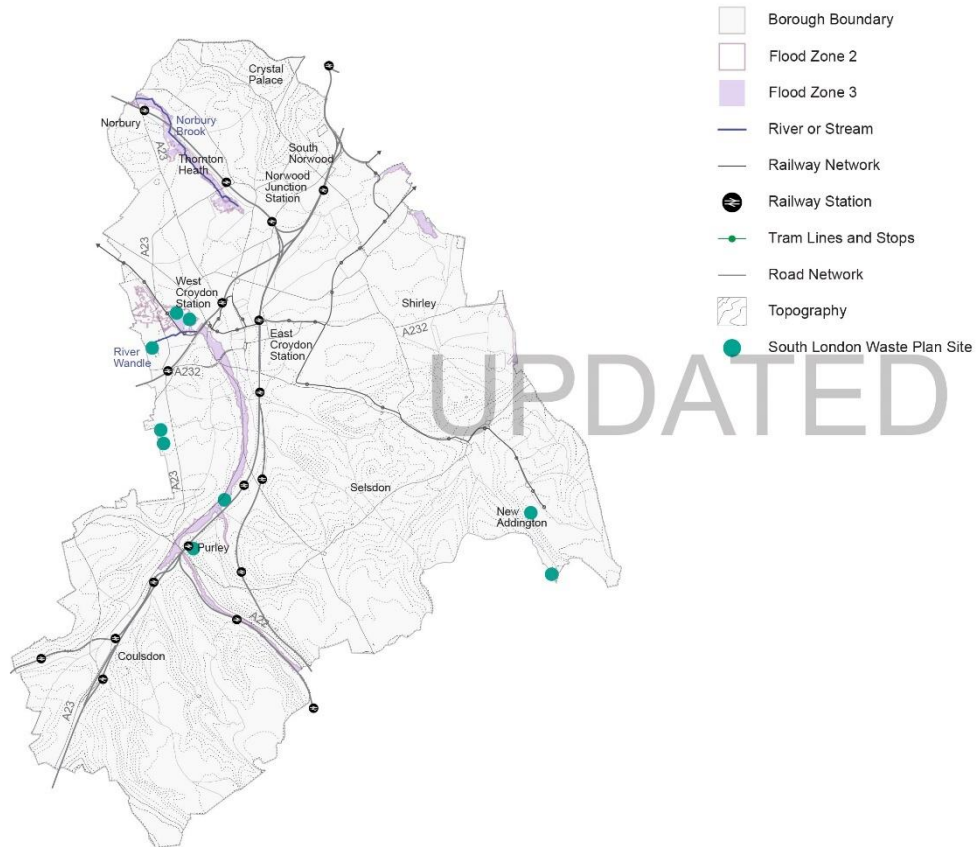
Minerals

SP6.7 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)

draft confidential

What it will look like

Figure 8.1 Map of Policy SP6 Environment and Climate Change



Why we have taken this approach

Energy and carbon dioxide (CO₂) reduction

8.2 In 2021~~2~~, the London Borough of Croydon was responsible for ~~1,124~~ **1,065** ~~1,544~~ kilo tonnes of carbon dioxide (CO₂) emissions⁵⁷. While this level of emissions is ~~eight~~ **fifth** 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 CO₂ emissions by 60% by 2025** and the Climate Change Act sets out that emissions will be reduced by **at least 80% 100%** 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)⁵⁸ sets out targets for reducing borough wide CO₂ emissions. A key part of this action plan is the minimisation of CO₂ 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'⁵⁹.

8.3 The Sustainable Design and Construction Evidence Base⁶⁰ and District Energy Feasibility Study⁶¹ 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

⁵⁷ Department of Energy & Climate Change, UK local authority and regional carbon dioxide emissions national statistics: 2005-2012

⁵⁸ Croydon Council "Croydon Climate Change Mitigation Action Plan" 2010

National Technical standards (2015) **Building Regulations Part L (2021)** for new housing and the London Plan set minimum levels for CO₂ reduction. The London Plan also allows for the offsetting of residual CO₂ emissions where it can be demonstrated that it is not feasible to achieve the required CO₂ 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

8.4 Adoption of the National Technical Standards (2015) **Building Regulations Part L (2021)** and London Plan requirements will ensure that new developments achieve high standards of environmental performance which address: energy/water consumption, environmental impact of materials, waste, surface water run-off, pollution, construction management, ecology and occupant health and wellbeing. The **policies seek to ensure that from the start, the** design of developments should maximise the potential to use innovative construction technologies, pre-fabrication elements and sustainable materials alongside the use of recycled materials as referred to in the Mayor's SPG on 'Sustainable Design and Construction' (2014). A requirement for major refurbishments and conversions to meet the National Technical Standards (2015) and London Plan requirements will ensure that o

⁵⁹ We Are Croydon vision (page 45)

⁶⁰ LBC Sustainable Design and Construction Evidence Base 2010 (page 58-61)

⁶¹ AECOM District Energy Feasibility Study 2009

8.4A Opportunities to modernise and improve Croydon's existing buildings through development, including refurbishment, should be maximised. These opportunities extend to historic buildings and heritage assets; however, the nature of their construction and the need to preserve their character and setting demand special consideration. The borough has numerous listed buildings, historic buildings and townscapes. Before any measures are taken to improve the sustainability and energy efficiency of historic buildings, the construction of the building should be understood. Evidence should set out the current and future energy performance of interventions and take an iterative approach to interventions, starting with the least invasive. The beneficial reuse of existing buildings by retaining the embodied carbon is a sustainable approach in its own right. The proposals for retrofitting listed buildings without harming the character of the building will be supported. Historic England's 'Energy Efficiency and Historic Buildings' should be followed for guidance on retrofitting historic buildings to improve their energy efficiency without impacting their character. Overall, this approach will help meet the objectives set out in Croydon's Climate Change Mitigation Strategy and Climate Change Adaptation Strategy.

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

⁶² SFRA Appendix A Figure 2.1

⁶³ National Rank Order of Settlements Susceptible to Surface Water Flooding, DEFRA 2009

around the culverted River Wandle⁶². Croydon has been ranked the 4th settlement in England most susceptible to surface water flooding⁶³. The Surface Water Management Plan (SWMP) identifies parts of the borough to be particularly susceptible to surface water flooding, including the Brighton Road through Purley up to Central Croydon and the A22 Godstone Road⁶⁴. There have been SFRA identifies significant episodes of surface water flooding at Purley Cross, Kenley Station, Brighton Road Coulsdon, Hamsey Green, Mitchley Avenue Sanderstead, Purley Oaks Road, Norbury and Thornton Heath⁶⁵. The Strategic Flood Risk Assessment (SFRA) also identifies areas in the borough where groundwater may occur and where groundwater may come close to the ground surface⁶⁶. 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) are recommended by the SFRA 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

⁶⁴ London Borough of Croydon Surface Water Management Plan, Phase 1 Scoping Study – Final Draft (page 23)

⁶⁵ SFRA Appendix A Figure 2.3

⁶⁶ SFRA Appendix A Figure 2.4

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.

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 water⁶⁷. 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. **The Local Plan will support development that results in the creation of new ponds and ecological improvements to ponds and open water sites such as South Norwood Lake and Waddon Ponds. The approach is supported by policy within the London Plan⁶⁸. The Croydon Local Plan's Detailed Policies and Proposals will set detailed policies for establishing Urban Blue Corridors in Croydon.**~~

8.8 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 **the south of the borough**. 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. **In the north of the borough clay is the predominant soil formation.** 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 water **courses** such as the River Wandle, Norbury Brook and Caterham Bourne.

Waste management

8.9 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**~~34~~ and creating positive environmental and economic impacts from waste processing

⁶⁷ URS Scott Wilson, Kingston University and Croydon Council. 'Developing Urban Blue Corridors Scoping Study Final Report' (March 2011). Report for DEFRA.

⁶⁸ London Plan Policies 5.10, 5.11, 5.12, 5.13, 7.27, 7.28, 7.30

working towards zero biodegradable or recyclable waste to landfill by 2026~~34~~. 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.

8.10 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

8.11 An aggregates company has access to a rail head at Purley; **this site is allocated as a safeguarded waste site in the South London Waste Plan, as 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

8.12 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;

- e) 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;
- e) **Aiming to achieve net zero waste by applying circular economy principles and**
- f) **Ensuring that a whole-building approach is adopted with regard to the sustainability of historic buildings and heritage assets.**

Why we are proposing this approach

8.13 In Croydon, developments of 10 or more new homes or 500m² or more of non-residential floor space are expected to meet high sustainable construction standards in accordance with the Croydon Local Plan.

8.14 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; and
- g) **Reducing waste by following London Plan circular economy principles.**

8.15 ~~Solid wall insulation will also be encouraged in existing developments where planning permission may be required.~~ **All major development proposals are expected to incorporate London Plan circular economy principles and submit a whole life cycle assessment.**

Air quality

8.16 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.

8.17 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 quality~~ **positive principles** pollution at the design stage and should incorporate best practice in the design, construction and operation of the development. **Development proposals should have regard to London Plan Air Quality Neutral and Air Quality Positive guidance.** 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.

8.18 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.

Noise

8.19 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 London Plan Agent of Change Principle.**

8.20 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 **and Delivery and Servicing Plans** required for major developments and the assessment of traffic movements.

8.21 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

- ~~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)

draft confidential

Land contamination

Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Policy SP6.3

Why we need this policy

~~8.22 Whilst a site may contain elevated levels of ‘contaminants’, it may or may not be defined in legislation as contaminated land. Paragraph deleted~~

8.23 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:

- Significant harm is being **caused**, or there is a significant possibility of such harm being caused; or
- Significant** pollution of controlled waters is being or is likely to be caused.’

8.24 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.

~~8.25 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.~~

~~8.26 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. Paragraph deleted~~

~~8.27 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

8.28 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

8.29 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.

8.30 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, **where feasible**;
- 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 a sustainable drainage system management train; and
- f) Be designed with consideration of future maintenance.

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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: Not applicable for minor developments.	Not applicable	All major ⁶⁹ 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

⁶⁹ Developments of 10 or more residential units, 1,000m² 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

8.31 When preparing Flood Risk Assessments regard should be had to the Council's Strategic Flood Risk Assessment, Surface Water Management Plan, Local Flood

Risk Management Strategy, other local flood history, relevant flood defence asset information, Section 19 reports 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.

8.32 The Sequential Test and Exception Test are **is** not required for sites **within Flood Zone 1**, allocated in this Plan, for minor development⁷⁰ or change of use⁷⁴. For all other development in Flood Zones 2 and 3 the Sequential Test and Exception Test should form part of the Flood Risk Assessment **as given in Table 8.1**, having regard to the guidance in the **Council's** Strategic Flood Risk Assessment. A Sequential Test is required for development (**not minor**) in Flood Zone 1, if the area has been identified at risk from other sources of flooding.

8.33 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.

8.34 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 **basement 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**. In

addition, any new basement development connected to the sewerage network shall be fitted with a positive pumped device to protect the basement from the risk of sewer flooding.

8.35 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 flooding⁷². The Local Flood Risk Management Strategy identifies up to 33,614 residential properties at risk from surface water in the borough⁷³. 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 Heath⁷⁴. 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, **where feasible**. 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 hectare⁷⁵. 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

⁷⁰ 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.

⁷⁴ This excludes change of use to a caravan, camping or chalet site or to a mobile home or park home site.

⁷² National Rank Order of Settlements Susceptible to Surface Water Flooding, DEFRA 2009

⁷³ London Borough of Croydon Local Flood Risk Management Strategy

⁷⁴ London Borough of Croydon, Merton, Wandsworth Strategic Flood Risk Assessment Level 4

⁷⁵ London Plan Sustainable Design and Construction Supplementary Planning Guidance

greenfield runoff rates should be achieved as a minimum in line with the London Plan.

8.36 Sustainable drainage systems should always be considered as early in the design process **in synergy with the green infrastructure objectives** 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 management train identifies the different stages of movement of water through and across a site, identifying suitable sustainable drainage techniques **and opportunities for ecological improvements** at 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.

8.37 Sustainable drainage systems, **especially Nature Based solutions**, 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 through **green infrastructure** 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. **However, care should be taken to avoid contamination of ground water protection zones while incorporating SuDS involving infiltration.** The contribution of trees in reducing flood risk should be recognised in developing sustainable drainage systems and the wider benefits that can be realised. **Any SuDS designed should also be long lasting and resilient to future climate change.** Detailed guidance on sustainable drainage systems will be produced by the Lead Local Flood Authority. **When Schedule 3 to The Flood and Water Management Act 2010 is implemented, construction cannot commence until the SuDS scheme is approved by the SuDS Approval Body (SAB) and the approval process will run alongside the planning process.**

8.38 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 2021)
- 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.
- Croydon’s ecological health and resilience should be improved to mitigate the effects of climate change.
- 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.
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.
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 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~~ **T**he extent of the borough's Metropolitan Green Belt, Metropolitan Open Land, ~~and~~ Local Green Spaces **and Important Green Spaces will be protected and safeguarded.**

SP7.3 ~~The Council will establish a~~ **A** network of **interlinked** multi-functional open spaces, a 'Green Grid', comprising those parts of the All London Green Grid together with other green **and blue** spaces **will be established and developed further** within the borough as shown in Figure 9.1 **through the following:** ~~The Council and its partners will:~~

- a) **Seeking the provision and creation of** new green **and blue** spaces. ~~W~~with particular focus for areas deficient in access to nature, play areas, and publicly accessible recreational open space;
- b) **Improv**ing 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 Downslands and Wandle Valley Area Frameworks~~ **Identifying and providing Green Grid connections between open spaces across the borough ensuring interconnectivity with adjacent borough's green spaces using corridors as given in Table 9.0a;**
- d) **Maintain**ing and **improve**ing the quality, function and offer of open spaces across the borough for all users; ~~and~~
- e) **Maximise**ing opportunities for street tree planting, green roofs, green walls and green landscaping, **including the use of locally sourced native species** to assist urban cooling in a changing climate;-
- f) **Enabling the Green Grid to be established in areas at risk from flooding;**
- g) **Enabling and prioritising where the Green Grid can include Geological and Geomorphological Sites and**

- h) Identifying 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 Nature Conservation (SINCs), Local Nature Reserves (LNRs), National Nature Reserve (NNRs), Sites of Special Scientific Interest (SSSIs), Regionally and Locally Important Geological Sites (RIGS) ~~sites of importance for biological and geological diversity;~~
- b) Improving the quality of current sites through habitat management and biodiversity net gain;
- 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 exploring opportunities to de-culvert the River Wandle and the enhancement of Croydon's natural landscape signatures.;
- g) Incorporating 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 and biodiversity net gain;
- h) Conserving and enhancing existing habitats, migratory routes and other biodiversity and geodiversity features, 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;
- i) Protecting the existing trees and enhancing the diversity of the street scene by establishing tree planting;

- j) Responding to climate change – through carbon sequestration and storage, temperature regulation, storm water regulation and air purification and
- k) Making a 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 developments⁷⁶ 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 9.0a 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"> • Norwood Park • Convent Wood • St John’s Memorial Gardens • Stoats Nest Allotments • Cane Hill • Farthing Downs 	Purley Way London Road Wandle Trail River Wandle	<ul style="list-style-type: none"> • West Croydon – Sutton Rail line • London to Brighton Road and Railway Corridor • A23 road

⁷⁶ 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)	<ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • Covington Way • Biggin Way • Waddington Way • Kingslyn Crescent & Spa Close
West/East Corridor	Wandle Park to Three Half Penny Wood	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • Selsdon Wood • Kings Wood • Hamsey Green Pond • Riddlesdown Common • Whiteleaf Recreation Ground (TDC) • Kenley Aerodrome • Coulsdon Common • Happy Valley • Farthing Downs • Cane Hill • Rickman Hill 	Kenley Aerodrome Atwood School	<ul style="list-style-type: none"> • Lime Meadow Avenue • Whyteleafe Hill • Hornchurch Hill • Woodplace Lane • Holyme oak Road
The Downlands Link	Three Corner Grove to Purley Playing Fields/Roundshaw Park	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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

Designation	Location
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~~ **Natural Environment & Signature Areas**

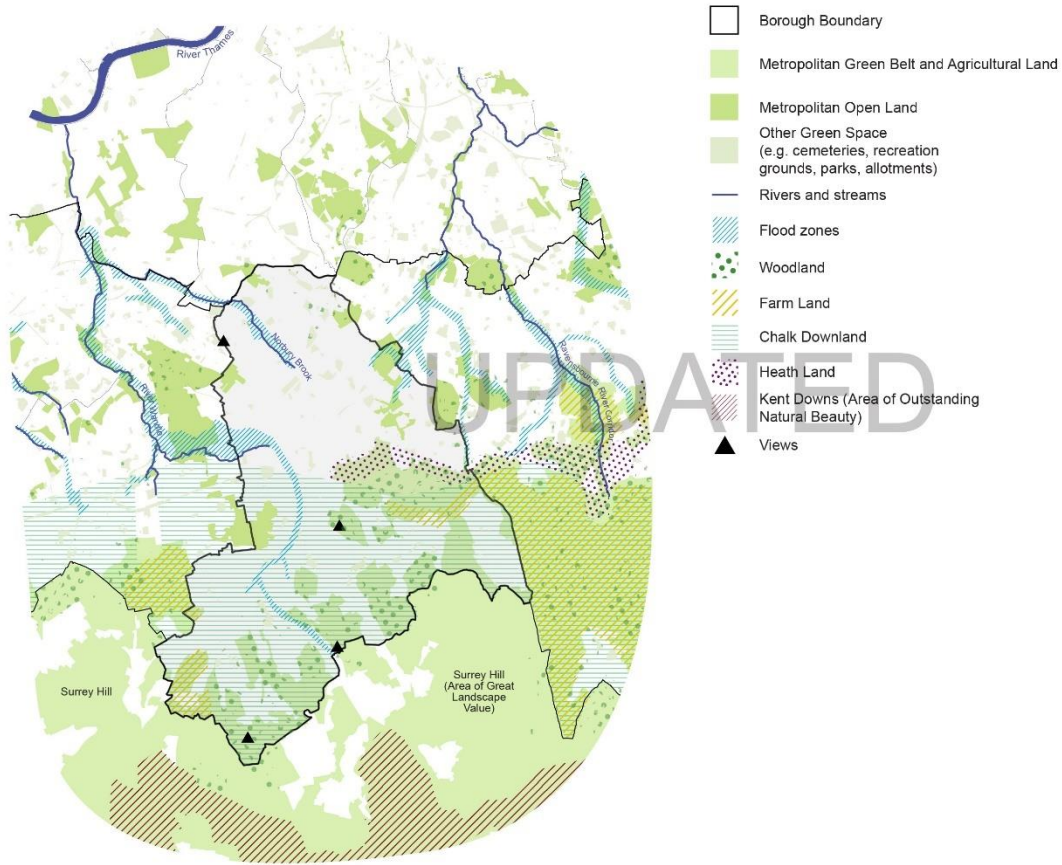
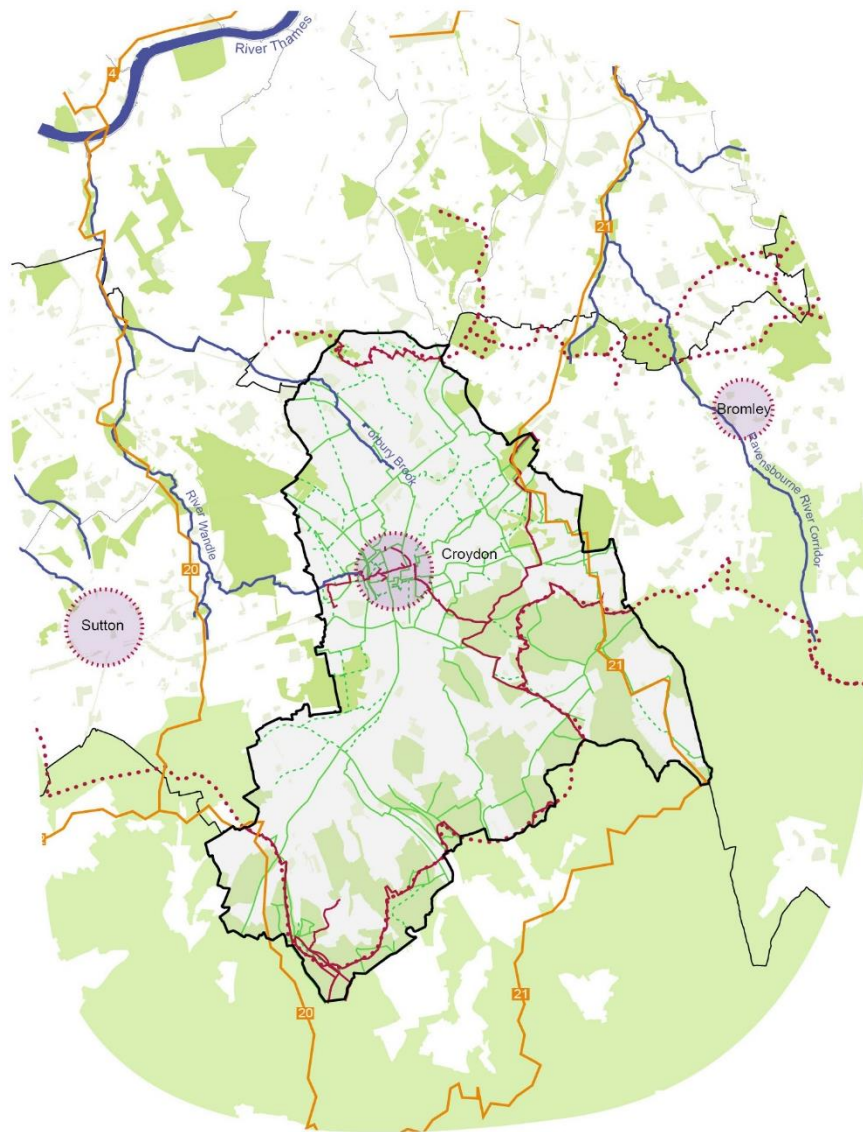
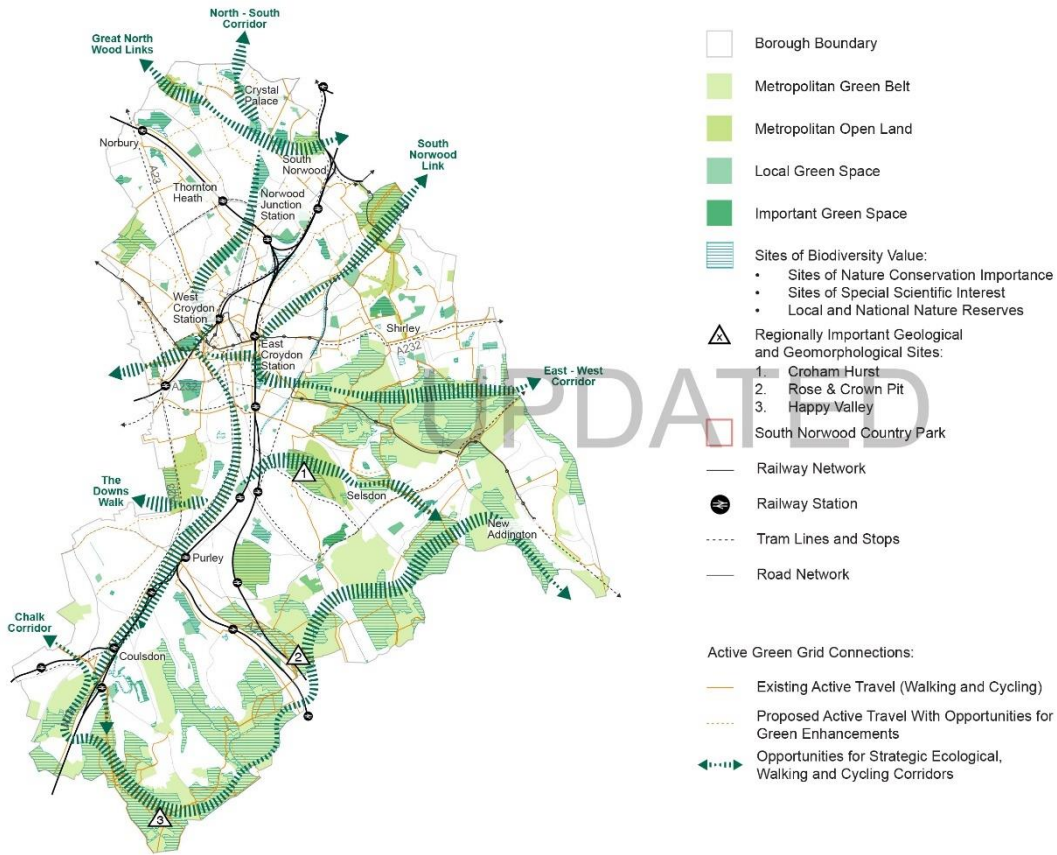


Figure 9.2 Green Grid Map Active Travel



- Croydon built environment
 - Croydon borough boundary
 - Metropolitan green belt + agricultural land
 - Metropolitan open land
 - Other important green spaces (e.g. cemeteries, recreation grounds, parks, allotments)
 - Metropolitan town centres
 - Rivers and streams
- Active green grid connections:
- National cycle network
 - Existing cycle routes
 - Proposed cycle routes
 - Walking routes and public rights of way
 - Strategic walking routes - London green & blue grid

Figure 9.3 Green Grid map



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 a 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 Cycleways. 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.' To enhance the natural character of the River Wandle, the de-culverting and re-establishing the riparian zones in line with the 'Rivers by Design' guidance published by the Environment Agency will be encouraged.

9.2A In 2019, the 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.

9.3 The Council will protect and safeguard Metropolitan Green Belt and Metropolitan Open Land, and Local Green Spaces and Important Green Spaces as per national policy and the policies of the London Plan. ~~Local green Important open green 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 A review of the Borough's Local Green Spaces (2023) has been undertaken, to identify the level of protection afforded to the borough's open spaces. This started with community nomination of spaces, alongside evidence of how they are demonstrably special locally. The Council has then reviewed this evidence alongside the other NPPF criteria to arrive at the list of Local Green Spaces. ~~In 2009 an 'Open Space~~

Assessment⁷⁷ 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 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.

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 **should be used in developments** to contribute to cooling in urban areas. **Diverse and climate resilient tree species can be more effective in mitigating the impacts of climate change.**

Biodiversity

⁷⁷ Open Space Needs Assessment and Open Spaces Assessment Standards Report (2009)

⁷⁸ Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., & Wynne, G.R. (September 2010) Making Space for Nature: a review of England's wildlife sites and

9.6 The policy approach to biodiversity is informed by 'Climate Change Adaptation Manual' 'Making Space for Nature'⁷⁸ and is consistent with national planning policy for biodiversity and geological conservation and guidance from Natural England the Department for Environment, Food and Rural Affairs⁷⁹. 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. **The north of the borough is less green compared to the south of the borough. Improvement of biodiversity in the north needs to be achieved through various ways, including but not restricted to the enhancement of existing green spaces.**

Productive landscapes

9.7 The London Plan includes several strategic policies promoting productive landscapes⁸⁰ 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,

ecological network. Report to DEFRA.

⁷⁹ DEFRA Guidance for Local Authorities on Implementing the Biodiversity Duty (March 2011)

⁸⁰ London Plan (Policies 2.18, 5.10, 5.11 and 7.22)

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 produce⁸¹.

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⁸¹ 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 Local 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

9.8 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 The 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 protecting Local Green Spaces are consistent with those for Metropolitan Green Belt. To be designated as a Local 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 and
- c) Local in character and is not an extensive tract of land.

Policy DM26: Metropolitan Green Belt, and Metropolitan Open Land and Local Green Spaces

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 original⁸² floor space or volume, or 100m² (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 100m² 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.

Local Green Spaces

DM26.4 The Council will protect and safeguard the extent of the borough's Local Green Spaces. Development on Local Green Spaces will be inappropriate except for:

⁸² The original floor space and volume is as built, or as existed in 1948 for all buildings built prior to this date.

- a) The provision of facilities (in connection with the existing use of the Local 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 Local Green Space and do not undermine the reasons why the green space was designated as a Local 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.

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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 9.1a below:

Table 9.1a Designations set by Policy DM26.4 shown on the Policies Map

No.	Local Green Space	Place
1	Addiscombe Railway Park	Addiscombe
2	Ashburton Park	Addiscombe
3	Biggin Wood	Norbury
4	Coulsdon Memorial Ground	Kenley and Old Coulsdon
5	Foxley Wood and Sherwood Oaks	Kenley and Old Coulsdon/Purley
6	Grangewood Park	Thornton Heath
7	Haling Grove	South Croydon
8	Higher Drive Recreation Ground	Kenley and Old Coulsdon
9	Millers Pond	Shirley
10	Park Hill Recreation Ground	Addiscombe
11	Purley Beeches	Sanderstead
12	Rotary Field Recreation Ground	Purley
13	Sanderstead Pond	Sanderstead
14	Sanderstead Recreation Ground	Sanderstead
15	Shirley Recreation Ground	Shirley
16	South Croydon Recreation Ground	South Croydon
17	South Norwood Recreation Ground	South Norwood and Woodside
18	Spring Park Road	Shirley
19	Stambourne Woodland Walk	Crystal Palace and Upper Norwood

No.	Local Green Space	Place
20	Temple Avenue Copse	Shirley
21	The Lawns	Crystal Palace and Upper Norwood
22	The Queen's Gardens	Croydon Opportunity Area
23	Westow Park	Crystal Palace and upper Norwood
24	Wettern Tree Garden	Sanderstead
25	Whitehorse Road Recreation Ground	Broad Green and Selhurst
26	Woodcote Village Green	Purley

How the policy works

Metropolitan Green Belt

9.9 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

9.10 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

9.11 ~~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.~~
Paragraph deleted

National planning policy

9.12 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.

9.13 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.

9.14 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)

9.15 ~~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

9.16 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 100m² in extent (whichever is smaller) of an existing building will be considered disproportionate.

9.17 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.

9.18 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.

9.19 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 permitted development rights and legal agreements may be sought to achieve these aims.

Local Green Spaces

9.19a Croydon's Local Green Spaces will need to be preserved for how they are valued and the way they are used by the community. Some development may be allowed such as sport or community facilities provided that they support the further use and enjoyment of these Local Green Spaces.

Important 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

9.19c 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.

9.19d Other green spaces in Croydon are still important even if they are not designated as Metropolitan Green Belt, Metropolitan Open Land or Local Green Spaces. Access to high quality open spaces and opportunities for sport and physical activity are important for the health and well-being of communities in Croydon.

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Policy DM26A: Important Green Space

DM26A.1 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 Important Green Space;
- b. The existing Important Green Space is no longer used by the local community and has ceased to perform the function of an important open space and
- c. A minimum acceptable quantum of green space is available for the local community to continue all existing uses of the Important Green Space within the distances set out in Table 9.1b.

Table 9.1b Maximum distance to Important Open Space for the purpose of assessing equivalent open space

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Type of Important Green Space	Function	Minimum size	Maximum walking distance to Other Important Open Space for the purposes of assessing equivalent open space
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Town parks and natural open spaces	<p>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.</p>	20Ha	1.2km
Local parks and natural open spaces	<p>Providing for court games, children's play, sitting out areas and nature conservation areas; or they are slightly larger</p>	2Ha	400m

Type of Important Green Space	Function	Minimum size	Maximum walking distance to Other Important Open Space for the purposes of assessing equivalent open space
	<p>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.</p>		

Type of Important Green Space	Function	Minimum size	Maximum walking distance to Other Important Open Space for the purposes of assessing equivalent open space
<p>Neighbourhood parks and natural open spaces</p>	<p>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.</p>	<p>0.5Ha</p>	<p>400m</p>

Type of Important Green Space	Function	Minimum size	Maximum walking distance to Other Important Open Space for the purposes of assessing equivalent open space
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.	N/A	400m

Type of Important Green Space	Function	Minimum size	Maximum walking distance to Other Important Open Space for the purposes of assessing equivalent open space
Linear open spaces	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.	N/A	400m

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 9.1c below:

Table 9.1c Designations set by Policy DM26a shown on the Policies Map

No.	Important Green Space	Place
1	Addiscombe Recreation Ground	Addiscombe
2	All Saints Churchyard	Sanderstead
3	All Saints Graveyard	Sanderstead
4	All Saints with St Margaret's Churchyard	Crystal Palace and Upper Norwood
5	Allder Way Playground	Purley
6	Apsley Road Playground	South Norwood and Woodside
7	Ashen Grove	Selsdon
8	Auckland Rise Children's Playground	Crystal Palace and Upper Norwood
9	Balancing Pond and land to the r/o Honeysuckle garden	Shirley
10	Beaulieu Heights	Crystal Palace and Upper Norwood
11	Beulah Hill Pond	Crystal Palace and Upper Norwood
12	Boulogne Road Playground	Broad Green and Selhurst
13	Bourne Park	Kenley and Old Coulsdon
14	Brickfields Meadow	South Norwood and Woodside
15	Canterbury Road Recreation Ground	Broad Green and Selhurst
16	Castle Hill Avenue Playground	Addington

No.	Important Green Space	Place
17	Chaldon Way Gardens	Kenley and Old Coulsdon
18	College Green	Croydon Opportunity Area
19	Convent Wood	Crystal Palace and Upper Norwood
20	Copse Hill Spinney	Purley
21	Coulsdon Coppice (Bleakfield Shaw)	Kenley and Old Coulsdon
22	Coulsdon Coppice (North)	Kenley and Old Coulsdon
23	Coulsdon Coppice (Stoneyfield Shaw)	Kenley and Old Coulsdon
24	Crescent Playground	Addiscombe
25	Dartnell Road Recreation Ground	Addiscombe
26	Duppas Hill	Waddon
27	Former Godstone Road allotments	Kenley and Old Coulsdon
28	Freelands Avenue on junction with Tedder Road	Selsdon
29	Glade Wood	Shirley
30	Gordon Crescent Playground	Addiscombe
31	Green Lane Sports Ground	Norbury
32	Green on Broom Road	Shirley
33	Green outside post office, Elmfield Way	Sanderstead
34	Heavers Meadow & allotments	South Norwood and Woodside
35	King Georges Field Recreation Ground	Broad Green and Selhurst
36	Land rear of Hilliards Heath Road	Coulsdon
37	Layton Crescent	Waddon

No.	Important Green Space	Place
38	Little Road Playground	Addiscombe
39	Lower Barn Road Green	Purley
40	Norbury Hall	Norbury
41	Norbury Park	Norbury
42	Normanton Meadow	South Croydon
43	Northwood Road Recreation Ground (Playground)	Norbury
44	Oakland Wood	Crystal Palace and Upper Norwood
45	Palace Green	Selsdon
46	Parkfields Recreation Ground	Shirley
47	Peabody Close playing field	Shirley
48	Pollards Hill	Norbury
49	Pollards Hill Triangle	Norbury
50	Promenade du Verdun	Purley
51	Queen's Road Cemetery	Broad Green and Selhurst
52	Roffey Close/ Wontford Road Green	Kenley and Old Coulsdon
53	Roke Playspace	Purley
54	Sanderstead Plantation	Sanderstead
55	Scrub Shaw	Coulsdon
56	Selsdon Recreation Ground	Selsdon
57	Shirley Oaks Village Playing Field and Wood	Shirley
58	St James Church Garden	Croydon Opportunity Area
59	St John's Church Memorial Garden	Croydon Opportunity Area
60	St John's Church/ Shirley Church Recreation Ground	Shirley
61	St John's Memorial Garden (east)	Croydon Opportunity Area

No.	Important Green Space	Place
62	St John's Memorial Garden (north)	Croydon Opportunity Area
63	St Peter's Churchyard	South Croydon
64	The Green on Shrubslands	Shirley
65	The Green, Covington Way/ Crescent Way	Norbury
66	The Green, Semley Road	Norbury
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	Waddon
73	Whitehorse Meadow	Thornton Heath
74	Whitgift Pond	Addiscombe
75	Wilford Road Playground	Broad Green and Selhurst
76	Woodside Green	South Norwood and Woodside

How the policy works

9.19e The presumption when considering development proposals that would result in the loss of Important Green Spaces is that they are not appropriate unless there is evidence that indicates otherwise. To comply with DM26A.1a, any equivalent space reprovided should be comparable in size, accessibility, biodiversity and quality.

9.19f Evidence to support the loss of any 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 to the maximum distances set out in Table 9.1b. These are measured as walking distances and may include Local Green Spaces, as well as undesignated open spaces and new open spaces created by the development. The Council will need to be satisfied that the survey made all reasonable attempts to establish who uses the Important Green Space and how they use the space.

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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

9.20 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.

9.21 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 further contribute 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. It is recognised that development can achieve multiple benefits from incorporating green infrastructure, taking opportunities to achieve biodiversity net gain and enhancing the borough's green grid.

Policy DM27: Protecting and enhancing our biodiversity and Urban Greening

DM27.1 To enhance biodiversity across the borough and improve access to nature, development proposals should:

- a) Incorporate **Achieve maximum biodiversity net gain** on **all** development sites **proportionate to the scale**, to enhance local flora and fauna and aid pollination locally;
- b) Incorporate **urban greening and biodiversity measures** within **the grounds** and on **the** 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 developments⁸³;
- 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~~ **priority** animal or plant **species** 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 on site and**
- g) **Have plans for long term maintenance and management of new habitats.**

DM27.2 To secure urban greening a borough specific Urban Greening Factor (UGF) set out in Table 9.1d 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 - minimum 0.4
- b) For commercial business and service uses - minimum 0.3 and
- c) For general industrial and storage or distribution - minimum 0.2

Table 9.1d Urban Greening Factor

Greening Type	Value
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1

⁸³ Developments of 10 or more residential units, 1,000m² or more of non-residential floor space or sites more than 0.5ha in extent.

Greening Type	Value
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm – see livingroofs.org for descriptions. (a)	0.9
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)	0.8
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)	0.8
Flower-rich perennial planting – see RHS perennial plants for guidance. (d)	0.7
Rain gardens and other vegetated sustainable drainage elements – See CIRIA for case-studies. (e)	0.8
Hedges (line of mature shrubs one or two shrubs wide) – see RHS for guidance. (f)	0.6
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6
Green wall –modular system or climbers rooted in soil – see NBS Guide to Façade Greening for overview. (g)	0.6
Groundcover planting – see RHS Groundcover Plants for overview. (h)	0.5
Amenity grassland (species-poor, regularly mown lawn).	0.4
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014. (i)	0.3
Water features (chlorinated) or unplanted detention basins.	0.2
Permeable paving - see CIRIA for overview. (j)	0.1
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0

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 below:

Table 9.2 Designations set by Policy DM27 shown on the Policies Map

Designation	Location
Site of Nature Conservation Importance	Addington Court Golf Course (Grade I)
	Addington Golf Course and Shirley Heath (including land surrounding 170 Shirley Church Road) (Grade I)
	Addington Hills
	Addiscombe Railway Park & Selsdon & Addiscombe railsides
	Addiscombe, Woodside and Shirley Leisure Gardens
	Ashen Grove (Grade II)
	Bear's Wood (Grade I)
	Beaulieu Heights (Grade II)
	Beulah Hill Pond (Grade I)
	Biggin Wood (Grade I)
	Bradmore Green Pond (Grade I)
	Bramley Bank (Grade I)

Designation	Location
	Brickfields Meadow Doorstep Green (Grade I)
	Cane Hill Hospital (Grade II)
	Chipstead Chalk Pasture (Grade II)
	Convent Wood (Grade II)
	Copse Hill Spinney (Local)
	Coulsdon Common (Grade I)
	Coulsdon Court Wood & Betts Mead (Grade I)
	Coulsdon Quarry & Wood
	Croham Hurst (Metropolitan)
	Croydon Cemetery Complex (Local)
	Duppas Hill (Local)
	Falconwood Meadow (Grade II)
	Farthing Downs, Devilsden Wood and Happy Valley (Metropolitan)
	Foxley Wood (Grade I)
	Grangewood Park (Grade II)

Designation	Location
	Grounds of Heathfield House (Grade II)
	Haling Grove Park (Local)
	Hall Grange
	Hamsey Green Pond (Grade II)
	Heavers Meadow and Norbury Brook (Grade II)
	Hooley Farm Pastures
	Hutchinson's Bank, Frylands Wood and Chapel Hill (Metropolitan)
	Kenley Aerodrome (Local)
	Kenley Common
	Kenley House Pastures
	Kings Wood
	Kingswood Shaw, Mossy Hill & Beech Way Woodland (Grade I)
	Ladygrove (Local)
	Land at Kent Gateway
	Littleheath Woods (Grade II)
	Lloyd Park & Coombe Farm (Grade II)

Designation	Location
	Long Lane Wood (Grade II)
	Mitchley Wood (Grade I)
	Norbury Hall (Local)
	Norbury Park and Norbury Brook (Local)
	Norwood Grove and Nettlefold Field (Local)
	Oakland Wood (Grade II)
	Oaklands, Kenley (Local)
	Park Hill (Local)
	Parkfields Woodland (Local)
	Pinewoods (Grade II)
	Pollards Hill (Grade I)
	Purley Beeches (Grade I)
	Purley Downs Golf Course (Grade I)
	Riddlesdown and The Rose and Crown Chalk Pit (Metropolitan)
	Roundshaw Park (Metropolitan)
	Rowdown and Birch Wood (Grade I)
	Royal Russell School and Ballards

Designation	Location
	(Grade II)
	Sanderstead Plantation (Grade I)
	Sanderstead Pond (Grade II)
	Selhurst Railway Triangle
	Selsdon Wood (Metropolitan)
	Shirley Triangle (Grade II)
	Southeastern tip of Croham Hurst Golf Course (Grade II)
	South Norwood Country Park (Metropolitan)
	South Norwood Lake and Surrounds (Grade I)
	Spices Yard Tree Belt (Local)
	Spring Park Ponds (Grade I)
	Spring Park Wood (Grade II)
	Spring Wood and Threehalfpenny Woods
	Stonefield and Bleakfield Shaws (Grade I)
	Stream and Pond at Shirley Park Golf Course (Grade II)
	Temple Avenue Copse (Grade II)
	The Glade (Grade I)

Designation	Location
	The Lawns (Grade II)
	The Ruffet (Grade I)
	Upper Norwood Recreation Ground (Local)
	Waddon Ponds (Local)
	Wandle Park (Local)
	Westow Park (Local)
	Whitehorse Meadow (Local)
	Whitgift Pond (Grade II)
	Whitgift School Wood (Grade II)

How the policy works

9.22 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.

9.23 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.

9.24 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.

9.25 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.

9.26 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.

9.27 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.

9.28 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).

9.29 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.

9.30 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.

9.31 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.

9.32 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.

9.33 Some **Priority** 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.

9.34 An ecological assessment will be required for developments which will impact land with biodiversity or geo-diversity 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.

9.34a With the exception of small sites, developments should achieve biodiversity net gain by at least 10% calculated using

DEFRA's Biodiversity Metric. The DEFRA metric should be used to assess the biodiversity value pre-development. The on-site biodiversity for major development should be managed and maintained for at least 30 years. For minor development, net loss of biodiversity will not be permitted.

9.34b All development proposals should contribute to the greening of Croydon by including urban greening as a fundamental element of site and building design and demonstrate how these elements are designed in, at the start of the process. Particular care must be taken for a proposal that impacts heritage assets.

9.34c A borough specific Urban Greening Factor (UGF) supports the GLA Methodology with revisions to factors related to Intensive green roof, extensive green roof and rain gardens to reflect local priorities.

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

9.35 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.

9.36 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.

9.37 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 DM28: Trees

The Council will seek to protect and enhance the borough's woodlands, trees and hedgerows by:

- Ensuring that all development proposals accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent;
- ~~Not~~ permitting developments that **do not** results in the avoidable loss, **future avoidable loss** or the excessive pruning of preserved trees or retained trees where they make a contribution to the character **and local environment** 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~~ **that do not result** in the avoidable loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees. **Where development is close to ancient woodland, hedgerows or veteran trees, an appropriate woodland buffer or root protection area for individual trees, will be specified;** 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

9.38 ~~The London Plan and the London Tree and Woodland Framework outline~~ **favours** 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.

9.39 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. **Mature trees that contribute to local ecology and environment should be protected and any impact on such trees should be avoided or mitigated.**

9.40 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.

9.41 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 (2013)~~
- BS5837 Trees in relation to design, demolition and construction (2012) or any successor British Standard
- Residential Development and Trees (2015~~9~~)
- Trees in the Hard Landscape (2014)
- **The Woodland Trust Guidance**
-

10. Transport and Communication

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.
- **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 the pattern of urban growth and make the fullest use of public transport.**

- 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 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~~ **a location where there is a high potential for a switch to cycling by office employees and also by customers/visitors for short stay journeys to retail and other town centre uses.**
- 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.
- **With the shift towards a more integrated global economy and the shift to home based working, demand for improved telecommunications connectivity and the necessary upgrades to infrastructure including new telecoms** ~~Demand for telecommunications equipment will increase.~~

Where we want to be

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.

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 transport and telecommunications network should support the community, environmental, and economic health of the borough. The Healthy Streets for London approach will help to deliver this by connecting communities, promoting physical activity through transport initiatives, 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 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. This enhancement should support the establishment of cycle hubs, pedestrian, bus and tram connections at East Croydon Station, including safeguarding land, to foster improved intermodal connectivity.**

Pattern of development and accessibility

SP8.3 ~~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 which enhances the urban realm and the green grid will be supported if it improves conditions for active travel and encourages modal shift by:**

- a) **Adopting the Healthy Streets Approach;**
- b) **Reducing the need to own a private car or reduces the number of cars owned in a household; and**

c) Encourages 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. 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 the metroisation of rail services.

Sustainable travel choice and urban realm improvements

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.

SP8.6 The Council and its partners will improve conditions for walking and enhance the pedestrian experience by:

- 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 **in accordance with London Plan standards**, to encourage multi-modal journeys and reduce the need for car use.
 - i) **Incorporating sustainable transport infrastructure and technology within developments, to include but not restricted to, cycle parking racks and charging points.**

SP8.8 ~~The Council and its partners will prioritise tram infrastructure provision and network improvements that~~ **The tram network supports good growth, helps tackle the climate emergency and enables sustainable movement within the borough. Development that encourages and supports the provision of tram infrastructure, network improvements and tram extensions will be supported, including:**

- a) ~~Provide~~ **Provision of** extra capacity to the existing network which serves ~~Croydon Opportunity Area~~ **the borough** 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; and~~
Support the potential development of a tram depot in New Addington or other locations in the borough;
- e) ~~Subject to funding, promote extensions to 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 adjacent authorities; and
- f) Support the improvement to the quality, accessibility and safety of tram stops and tram facilities to make the network easier to use and more attractive for all.

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;
- 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 under served areas in the south of the borough, including Kenley, Selsdon and Sanderstead including demand responsive services where appropriate;
- b) Seek priority and capacity improvements to all orbital bus routes services by resolving problems along key bus corridors leading to serving 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 **for all bus services**.

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 **and other sustainable transport measures and infrastructure**.

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 Town Centres** where there are high levels of PTAL⁸⁴ and **within controlled parking zones** ~~when a critical mass of development enables viable alternatives, such as car clubs (while still providing for disabled people blue badge holders).~~ 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.

SP8.17 ~~Outside high PTAL areas the Council will apply the standards as set out in the London Plan⁸⁵. 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:~~

⁸⁵ London Plan Policy 6.13

- 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
- c) Requiring major developments to include transport emission reduction **projects or initiatives** ~~plans~~ to encourage the use of less polluting forms of transport.

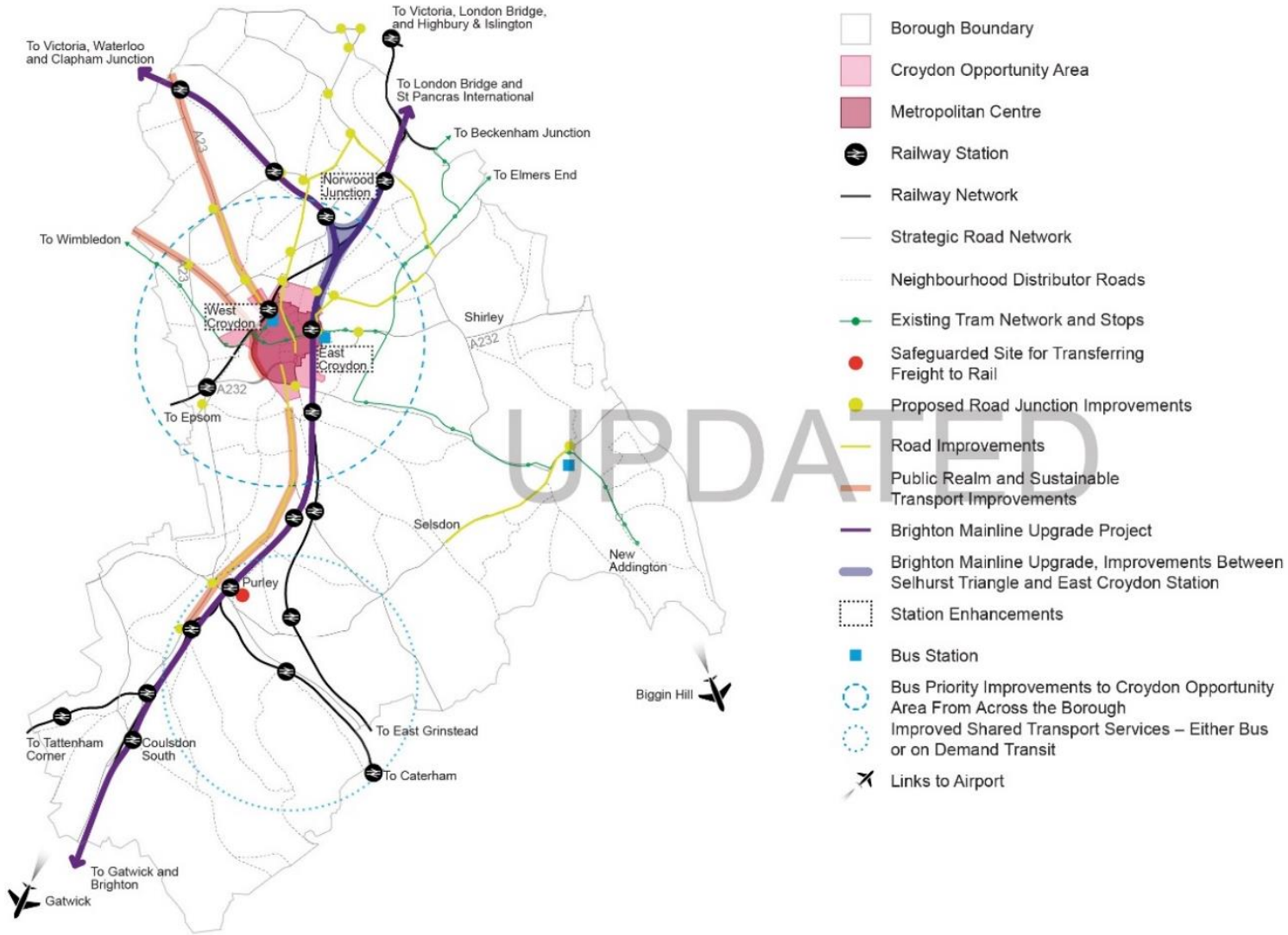
SP8.19A Croydon Opportunity Area is a key business centre and main transport hub in London. Ensuring businesses are able to function as usual despite development is important to support the continued prosperity of the borough. Development should seek to avoid disruption to

the successful function of the Croydon Metropolitan Centre, Town Centres, District Centres and the borough's employment areas, taking into account peak business hours. Where appropriate, development should be phased and co-ordinated with other development schemes to ensure the uninterrupted movement of the transportation network and any risk to existing infrastructure should be actively managed.

draft confidential

What it will look like

Figure 10.1 Policy SP8 map



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 region⁸⁶. 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 is to improve the community, environmental and economic health of the borough while allowing for growth. Sustainable transport and telecommunications provision supports these objectives by:**

- Delivering the "Healthy Streets Approach", which promotes public transport use and walking, with the commensurate health benefits to the local community;
- Delivering "Healthy Streets", which improves the environment including air quality, as a result of reduced private car use;
- Delivering a shift in travel modes, which is key for sustainable growth in homes, jobs and associated facilities;
- Delivering a shift in travel modes, which addresses congestion issues on the network and is essential for enabling sustainable growth; and

- Delivering through telecoms provision a reduced need for travel to work, providing for home working and greater flexibility for the local community.

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 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

⁸⁶ We are Croydon Vision (pages 15-19)

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. **Paragraph deleted**

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 teleconferencing⁸⁷. This is the borough's main activity centre and also the main transport node, with 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.**

⁸⁷ South Sub-regional transport plan (page 28)

Sustainable travel choice and urban realm improvements

10.5 Urban realm improvements to increase active travel through walking, and cycling and access to buses, trams and rail are priorities within the London Plan South sub-regional transport plan. The Mayor of London's Transport Strategy includes the Healthy Streets Approach, which provides a framework for improving the conditions for active travel. In many cases the provision of well thought through design and infrastructure provision will facilitate delivery of the Healthy Streets Approach, such as the provision of e-bike/e-scooters racks and charging points. Enabling the use of e-bike/e-scooters could encourage a shift to active travel which helps to improve the population's health. This also helps to decrease the number of private vehicles on the network, reducing congestion and improving air quality. The provision of sustainable infrastructure in developments and micro-mobility hubs/docking stations are important ways to reduce the need for the private car and encourage active travel across the borough. It should be noted that only rental e-scooters (and not those privately owned) are legally permitted on public roads and other public places in London. Issues related to walking include concerns about safety, crossing busy roads, and indirect/incomplete walking routes to local amenities⁸⁸. Promoting high quality places is aided by a complementary public realm policy (see Policy SP4).

10.6 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. Paragraph deleted

10.7 Centred in Croydon, London Trams is currently the city's only tram network. It supports good growth, enables sustainable movement within the borough and as a result helps to address the climate emergency. Parts of the TFL's London Tram network Tramlink is congested and over-crowded during peak times, with the network unable to accommodate additional trams during peak passenger times. network currently have passenger congestion. Planned additional trams are predicted to facilitate continued growth in use. If an extended Tramlink network extensions could were to come forward, this would enable a further mode shift on a number of corridors in between Croydon and elsewhere. Bromley, Tooting, Streatham, Brixton, South Wimbledon⁸⁹ and possibly Sutton and Crystal Palace if these extensions were to come forward. Further improvements that would enhance the trams service, would be as a priority replacing the existing tram fleet, followed by investing in more trams, upgrades to power systems and increasing the stabling and maintenance capacity for the trams.

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. The borough has an extensive bus network including the Superloop TfL service. Further improvements that would enhance bus services include better bus stops and bus access. Working with TfL to develop these enhancements and improvements is a priority.

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, Tramlink is currently developing a number of other improvements to support frequency and capacity increases on the network. 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 to connect to the Northern Line at 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 eastbound journey times, increase network resiliency and enable Tramlink to run a more flexible timetable. There is also potential for a Tramlink extension beyond New Addington tram stop and twin tracking as part of the redevelopment and regeneration of New Addington District Centre.

Paragraph deleted

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 **through metroisation**. 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 and taxi interchange at East and West Croydon and other District Centre railways stations, such as Purley and Norbury, will be important in encouraging the reduction of private transportation.

Parking

10.19 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. Controlled parking zones (CPZs) may be introduced in areas of the borough to protect street character and enhance safe travel. Parking in the Croydon Opportunity Area requires rationalisation⁹⁰; 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 may be used to protect street character in areas where parking accommodated on the street would impede the safe use of the public highway. Where this is necessary due to development, 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. The green grid supports sustainable transport objectives by improving routes and widening the options for walking and cycling. Cycle parking standards are included in the London Plan. Croydon Metropolitan Centre (CMC) is designated as a location where higher cycle parking standards apply to a number of non-residential uses, as TfL has identified high potential for a switch to cycling. 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.

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 times⁹⁴.

Croydon is strategically positioned between the Gatwick Diamond/south coast and central London. The Council'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 and is necessary to furthering the borough's strategic role as the premier business location in South London. This includes delivering the transformation of East Croydon Station and corridor through the Brighton Main Line Upgrade Programme.

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. Paragraph deleted

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. Delivering growth within the borough necessitates the delivery of construction materials and the movement of construction vehicles. It is therefore important to ensure that businesses can function as usual despite the borough's growth objectives, with account taken of peak business hours. Where appropriate developments should be phased and co-ordinated in order to mitigate the potential impacts on the highway network. This will also mitigate the impact on local amenity, air quality and the environment. The management of construction vehicles should also seek to limit the risk of damage to existing infrastructure such as tram and rail tracks. Where developments

⁹⁴ Borough Wide Transport Study (final draft) (page 53)

are located close to tram/train lines, further measures should be taken to ensure development does not pose any safety issues on the network leading to disruption of service, with reference to TfL/operators.

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 suppliers⁹². The sidings at Purley, currently occupied by an aggregates company, is an active rail freight site. **The Council will support opportunities to better manage deliveries and servicing including freight deliveries, to include but not limited to consolidation/break bulk facilities and the use of less polluting forms of transport.**

draft confidential

⁹² Borough Wide Transport Study (final draft) (page 267)

Ensuring a safe and effective highway network during development construction

Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 8
- Policy SP11.20

Why we need this policy

10.24A The borough has a strategic objective to improve accessibility, sustainability and ease of movement to, from and within the borough.

10.24B Transport policies set out the framework for ensuring businesses are able to operate as usual, in the context of the level of growth proposed within the borough. This is achieved by

identifying the approach to take to ensure a continued safe and effective highway network, during the construction phase.

10.24C This policy provides additional requirements for growth within the borough's Transformation Areas and major development schemes in the borough.

Policy DM 28A: Ensuring a safe and effective highway network during development construction

DM28A.1 To ensure the continued movement on the road network while enabling growth, development must:

- a) Take into account all development within the local area;
- b) Take into account any proposed phasing;
- c) Deliver innovative solutions to ensure the least amount of disruption during construction.

DM28A.2 The amount of construction associated with growth in the Croydon Opportunity Area, the Purley Way Transformation Area and where appropriate on major sites across the Borough, will be delivered through the careful management and reduction in the number of construction related traffic movements. To support this, development should:

- a) Minimise servicing and construction related vehicle movements on an area-wide basis;
- b) Provide for consolidation hubs to better manage the delivery of construction materials; and
- c) Adopt new technologies to enable efficient servicing and delivery to construction sites.

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 highway network. Development construction deliveries and movement of construction vehicles often contribute to congestion.

10.24F With large amounts of development ongoing in the borough, appropriate management of construction vehicle movement across an area is necessary, to ensure the ongoing safe and secure movement on the highway network.

10.24G Where appropriate, site phasing should be undertaken in order to manage the impact of heavy construction vehicles on the road network. 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, achieved through the implementation of Construction Logistics Plans. This requires development to be sensitive to the context in which it is taking place, giving consideration to nearby schemes coming forward at similar times.

10.24H During construction, development can mitigate disruption to existing residents and businesses by providing off street servicing space in tandem with the management of construction vehicle movements. Innovative solutions include, but would not be limited to, deliveries of construction materials by zero emission vehicles and the use of consolidation hubs.

10.24I In the Croydon Opportunity Area, the Purley Way Transformation Area and where appropriate on major sites across

the borough, development will need to be carefully managed. The Council will support opportunities to better manage construction deliveries through the provision of hubs. These would function as consolidation centres prior to local deliveries, ideally using new technologies such as zero emission delivery vehicles.

draft confidential

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 annually⁹³. Congestion and use of private transport also leads to increased carbon emissions in the borough. Croydon produces 1,660kt of CO₂ a year which puts it at seventh highest out of 33 London boroughs. The London Plan includes a target to reduce CO₂ emissions by 60% by 2025. The Climate Change Act (as amended) sets out that emissions will be reduced by at least 100% 80% by 2050 (based on 1990 levels). The London Plan includes a target for London to become a zero-carbon city by 2050.

⁹³ <http://www.portofportland.com/PDFPOP/Trade-Trans-Studies-CoC-Report1128Final.pdf>

Policy DM29: Promoting sustainable travel and reducing congestion

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, public transport use and reduce the need to make private vehicle trips;
- b) Have a positive impact and ~~must not have a detrimental impact~~ effect 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 development in low PTAL areas (PTAL 2 and below) by integrating and providing for enhanced active travel measures within the development, subject to Table 10.1 Parking standards in 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; and
- g) The impact of servicing and delivery requirements resulting from new development are expected to be minimised.

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.

10.30 Some development would result in a severe 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 proposals⁹⁴ that require a Transport Assessment should demonstrate through a ~~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 ~~may~~ include the routes from the development site to the wider borough/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 as well as other sustainable transport choices such as cycle and walking routes should be considered in the any Transport Statement/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. It is important that new routes are publicly accessible to enhance walking networks within the borough.

10.34A Servicing and deliveries contribute to the already high volumes of congestion in the borough. Additional growth within the borough is likely to further impact and as a result needs to be actively managed. Innovative solutions such as the

implementation of last mile deliveries by foot, cycle or zero emission vehicles will be supported. Where appropriate, development is encouraged to identify opportunities for last mile logistics hubs. This is particularly important for high density residential or commercial developments in the Croydon Opportunity Area or town centres, that are forecast to generate significant servicing and delivery movements.

⁹⁴ Residential development of 10 or more units, 1,000m² 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 Table 10.1 sets out the basic car parking standards for the borough in accordance with~~ by referring to pan-London standards set by the London Plan. These are ~~necessary~~ 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.~~ ~~Provision of Blue Badge Parking Bays should also be in accordance with the London Plan for both residential and non-residential development. The cycle parking standards applied in the borough are those contained within the London Plan.~~

10.37 This policy provides further requirements in terms of the quality of provision and how the **car and cycle** 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. Paragraph deleted~~

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 climate change, development should 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 accessibility⁹⁵ 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
- f) 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
- g) Provide car parking for affordable homes at an average rate not less than $\frac{2}{3}$ that of other tenures.

DM30.2 Development in PTAL 2+ locations should 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 parking survey catchment of a residential development site and within a 500m parking survey catchment for commercial uses. On street parking stress in the borough is assessed as being at capacity when 85% of parking stress is reached.

DM30.3 Where motorcycle parking is provided, it should be in a dedicated area for motorcycle parking with ground anchors (in any location in the borough).

⁹⁵ Public Transport Accessibility Level (PTAL) rating of 4 or more

DM30.4 Development should ensure that there is not a detrimental impact on, walking, cycling, public transport and emergency services due to the provision of car parking.

DM30.5 In order to maintain the effective operation of the highway, entrances or vehicle crossovers provided for new developments must not have any detrimental impact on highway safety or the functioning of bus and cycle routes.

DM30.6 In areas of PTAL 4 or less car club membership will be sought for residents for 3 years at cost to the developer.

DM30.7 Cycle parking provision will be in accordance with the London Plan standards, ensuring the provision is secure, waterproof, enclosed with charging provision for electric bikes and mobility scooters and space for cargo bikes and adapted bikes.

Table 10.1 Car parking in new development

Development type	On-site car club/Pool car parking spaces	Electric charging points and parking bays	Disabled car parking	Overall number of car parking spaces	Overall number of cycle parking spaces including motor cycles and mobility scooters
Minor Residential ⁹⁶	1 space unless otherwise agreed by the Council and car club providers that the site is not suitable for a car club/pool car space	Enable the future provision of electric charging points and parking bays for electric vehicles with 20% of spaces to have an actual charging point	n/a	As per London Plan Table 6.2 with no provision for higher levels of car parking in areas with low Public Transport Accessibility Levels	As per London Plan Table 6.3 with cycle parking in major development to include charging for electric

⁹⁶ Nine or fewer residential units on a site less than 0.5ha in extent

Development type	On-site car club/Pool car parking spaces	Electric charging points and parking bays	Disabled car parking	Overall number of car parking spaces	Overall number of cycle parking spaces including motor cycles and mobility scooters
Major Residential ⁹⁷	At least 5% of the total number of spaces with a minimum of 1 parking space plus additional spaces at a rate of 1 space for every 20 spaces below the maximum overall number of car parking spaces set out in Table 6.2 of the London Plan	Enable the future provision of electric charging points and parking bays for electric vehicles with half of car club bays to have an actual charging point and the free installation of a charging point to be provided for other spaces should a future occupier require a charging point	10% of visitor parking with a minimum of 1 space plus 1 disabled car parking space for each new dwelling designed to be wheelchair accessible or adaptable with half of bays to have electric vehicle charging		bicycles and mobility scooters
Minor Non-residential ⁹⁸	1 space unless otherwise agreed by the Council and car club providers that the site is not suitable for a car club/pool car space or where the development does not provide any car parking	n/a	As per London Plan Table 6.2	As per London Plan Table 6.2	

⁹⁷ 10 or more residential units or a site of more than 0.5ha

⁹⁸ Less than 1,000m² of non-residential floor space on a site less than 0.5ha in extent

Development type	On-site car club/Pool car parking spaces	Electric charging points and parking bays	Disabled car parking	Overall number of car parking spaces	Overall number of cycle parking spaces including motor cycles and mobility scooters
Major Non-residential ⁹⁹	5% of spaces with a minimum of 2 parking spaces	As per London Plan Table 6.2	As per London Plan Table 6.2		

(table updated for clarity reproduced below)

Table 10.1 Parking standards in development

Residential Car Parking Standards *

Public Transport Accessibility Level	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 with no rights for a parking permit (with the exception of blue badge holders)	Car free with no rights for a parking permit (with the exception of blue badge holders)	Car free (with the exception of blue badge holders) subject to parking stress surveys

⁹⁹ A site of more than 0.5ha or more than 1,000m² of non-residential floor space

Public Transport Accessibility Level	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	Car free with no rights for a parking permit (with the exception of blue badge holders)	<ul style="list-style-type: none"> • Up to 0.4 space per unit • In areas within 400m of a bus stop and/or 800m of a train station or tram stop lower levels of car parking will be expected • All rights for parking permits will be removed (with the exception of blue badge holders) 	<ul style="list-style-type: none"> • Up to 0.5 space per unit for 1 and 2 bedroom homes subject to parking stress surveys • Up to 0.75 space per unit for homes with 3 or more bedrooms subject to parking stress surveys • In areas within 400m of a bus stop and/or 800m of a train station or tram stop lower levels of car parking may be appropriate subject to parking stress surveys
3	All rights for parking permits will be removed (with the exception of blue badge holders)	<ul style="list-style-type: none"> • Up to 0.5 space per unit • In areas within 400m of a bus stop and/or 800m of a train station or tram stop lower levels of car parking will be expected • All rights for parking permits will be removed (with the exception of blue badge holders) 	<ul style="list-style-type: none"> • Up to 0.75 space per unit for 1 and 2 bedroom homes subject to parking stress surveys • Up to 1 space per unit for homes with 3 or more bedrooms subject to parking stress surveys • In areas within 400m of a bus stop and/or 800m of a train station or tram stop lower levels of car parking may be appropriate subject to parking stress surveys

Public Transport Accessibility Level	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	<ul style="list-style-type: none"> Up to 0.5 space per unit could be provided All rights for parking permits will be removed (with the exception of blue badge holders) 	<ul style="list-style-type: none"> In areas more than 800m from a train station or tram stop up to 1 space per unit could be provided <ul style="list-style-type: none"> In areas within 400m of a bus stop and/or 800m of a train station or tram stop up to 0.5 space per unit could be provided All rights for parking permits will be removed (with the exception of blue badge holders) 	<ul style="list-style-type: none"> Up to 0.75 space per unit for 1 and 2 bedroom homes subject to parking stress surveys <ul style="list-style-type: none"> Up to 1 space per unit for homes with 3 or more bedrooms subject to parking stress surveys
0, 1A or 1B	1.5 space per unit	1.5 space per unit	1.5 space per unit
<u>Non-residential Car Parking Standards *</u>			
Non-residential parking provision is as per the London Plan			

*Car parking numbers should be rounded up if the calculation of car parking provision includes 0.5 of a space and above

How the policy works

10.38A Parking provision must be managed to ensure sustainable travel is promoted. 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, overspill parking is limited to a maximum of 5% of the on-street parked cars. In line with industry best practice, parking stress surveys should be undertaken in line with a methodology agreed with the Council. 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 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 more remote and hilly nature of these low PTAL areas makes it more difficult to walk or cycle to the nearest bus stop or railway station and the current 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 Also there is no less interest from car clubs in these locations operating from the location at the time planning permission is sought; Therefore, higher parking provision in PTALS of 0, 1a or 1b as per Table 10.1 will be sought but still in accordance with the London Plan.**

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 proposed,** 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. **Where car club or pool car spaces are provided as a result of major developments, this may include on street spaces subject to assessment by the Council; or use by the new residents of existing local car clubs where operators confirm available capacity.**

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. **These developments will not be given access to the street parking permit system.**

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. **Such surveys must be scoped with the Council.**

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 **and if appropriate, subsidise the car club for an agreed time period.** 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.~~ **Paragraph deleted**

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.~~ **Paragraph deleted**

10.50A **Cycle parking provision will be provided in accordance with London Plan standards. This includes the requirement for cycle parking minimum standards to be doubled in the Croydon Metropolitan Centre for short-stay Town Centre uses, such as retail and cafes/restaurants (for visitors/customers) and doubled for long-stay cycle parking provision for offices (for employees). Cycle parking should be designed and located so that it is easily accessible to all potential users. It should be provided in**

accordance with the latest published cycle parking design standards, using Sheffield stands and two tier racks,

Key supporting documents

- Croydon Opportunity Area Planning Framework
- London Mayor's Transport Strategy
- London Borough of Croydon Third Local Implementation Plan

draft confidential

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.

Policy DM31: 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~~ **Transport for London Trams** is currently developing **and the Council have ambitions to bring forward** 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; ~~and~~
- **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 Centre.

Policy DM32: Facilitating rail and tram improvements

Development will not be supported where it might prejudice¹⁰⁰ 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.

¹⁰⁰ 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.

Policy DM33: Telecommunications

DM33.1 When planning permission is required, proposals for telecommunications development will be permitted provided that:

- a. 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;
- b. 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;
- c. 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
- d. The siting of the proposed apparatus and associated structures minimises the impact on the operation of other electronic devices within the surrounding area.

DM33.2 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.

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

draft confidential

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

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.

11.4C 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.

11.4D 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, New Addington and Fieldway will be a location for growth, capitalising on good links to and its strategic position between Croydon Metropolitan Centre and Biggin Hill Airport and their concentration of supporting infrastructure. It will continue to comprise interwar and late 20th Century housing surrounded by Green Belt. The Place 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. The Fieldway Neighbourhood Centre will be supporting 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 and 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.

11.8A New Addington is identified as a location considered potentially appropriate for tall buildings.

Environment and Climate Change

11.8B 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 the 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). 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

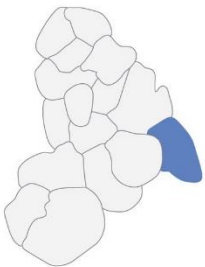
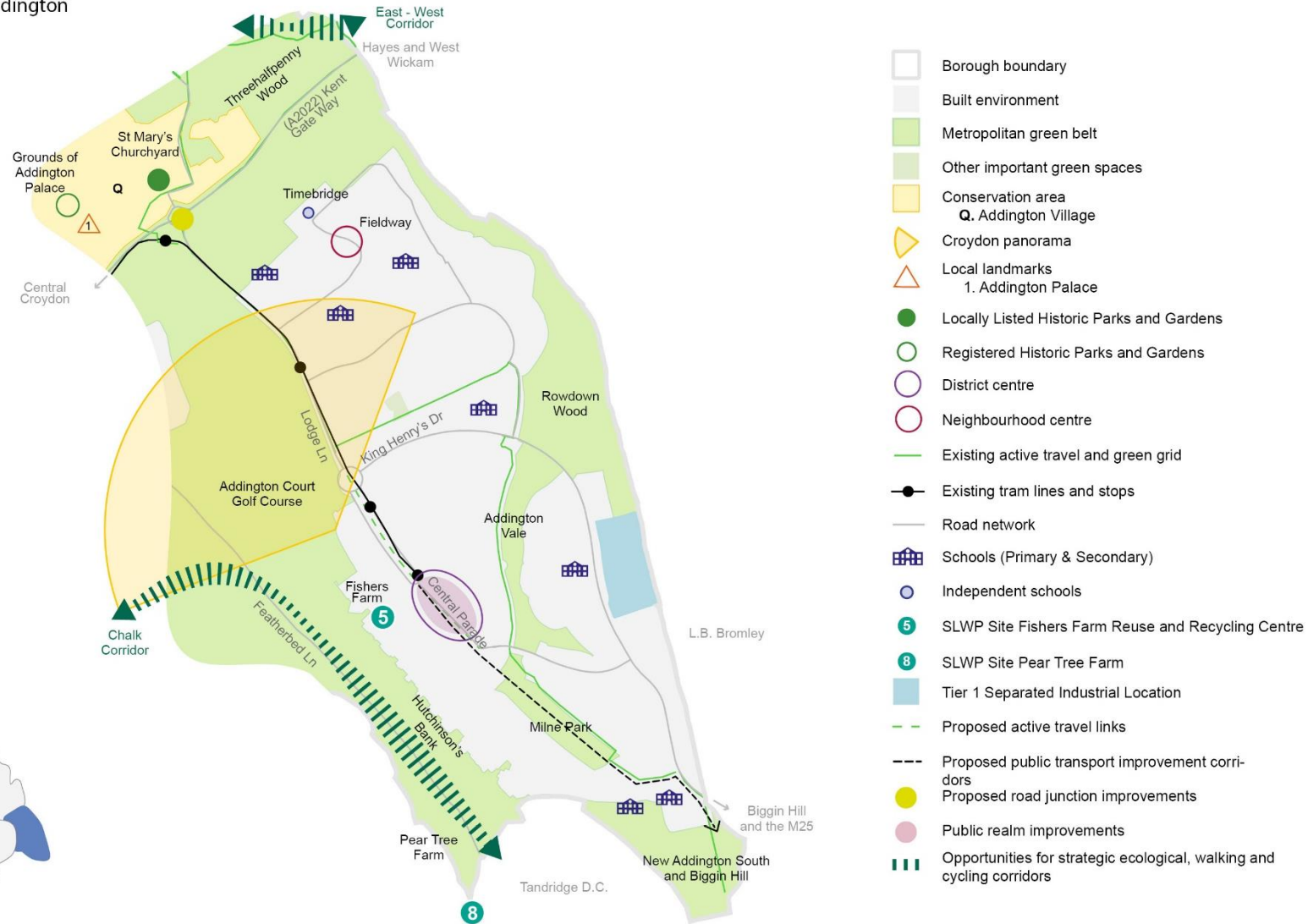
11.10 The tram, with improved services and investment in rolling stock, will continue to provide a valued link to the Croydon Metropolitan Centre and connections to Central London and Gatwick Airport. The tram line is one of the key assets of Addington. This enables easy access to the Croydon Metropolitan 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.

draft confidential

Figure 11.2 Addington- graphic updated

Figure 11.1: Addington



General character

~~11.11 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 updated and moved to before vision~~

~~11.12 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 updated and moved to before vision~~

~~11.13 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 updated and moved to before vision

~~11.14 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 updated and moved to before vision

Policy DM34: Addington

DM34.1 Development should take account of the two characteristic areas of Addington; firstly extensive areas green spaces which provide the setting for the historical Addington Village and secondly the 20th century housing estates

DM34.2 Within the New Addington District Centre, to ensure that the District Centre characteristics are respected and enhanced proposals should:

- a) Make use of opportunities to create buildings with a larger footprint to the west of Central Parade; or
- b) Create buildings with smaller footprints that complement existing predominant building heights of ~~3 storeys up to 12 storeys~~ within Central Parade **in areas outside the tall building zone.**

DM34.2A Within the Tall Building Zone identified in the policies map, tall buildings of height ranging from 21 to 33 metres (approximately 6-10 storeys) measured from the ground to the top of the building are considered appropriate.

DM34.3 Within Addington allocate sites for development as set out in Table 11.2.

How the policy works

New Addington District Centre

11.15 The area in which DM 34 applies is shown on the Policies Map.

11.16 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

11.17 The 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
44.	Central Parade West, Central Parade	Mixed development including residential, community, healthcare facility, leisure, retail and open space

Ref no	Site name	Proposed use
120	Timebridge Community Centre, Field Way	Secondary School buildings (with playing fields in adjacent Green Belt)

draft confidential

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. Addiscombe 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 which 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.

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

11.18 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

11.19 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**.

Employment, Skills and Community Facilities

11.20 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 District Centre. **A new Integrated Industrial Area has been designated on Hastings Road to protect the local industrial and employment offer**

Character, Heritage and Design

11.21 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.

11.21A Addiscombe is identified as a location considered potentially appropriate for tall buildings. Therefore, Tall Building zones are identified in the policies within the area where buildings of height ranging from 21 to 39.6 metres (6-12 storeys) and 33 to 82.5metres (10-25 storeys) measured from the ground to the top of the building are considered appropriate in the outer zone and inner zone respectively. A core area is also identified within the inner zone where buildings taller than 82.5metres are acceptable based on the merit of the schemes.

Green Grid and Open Space

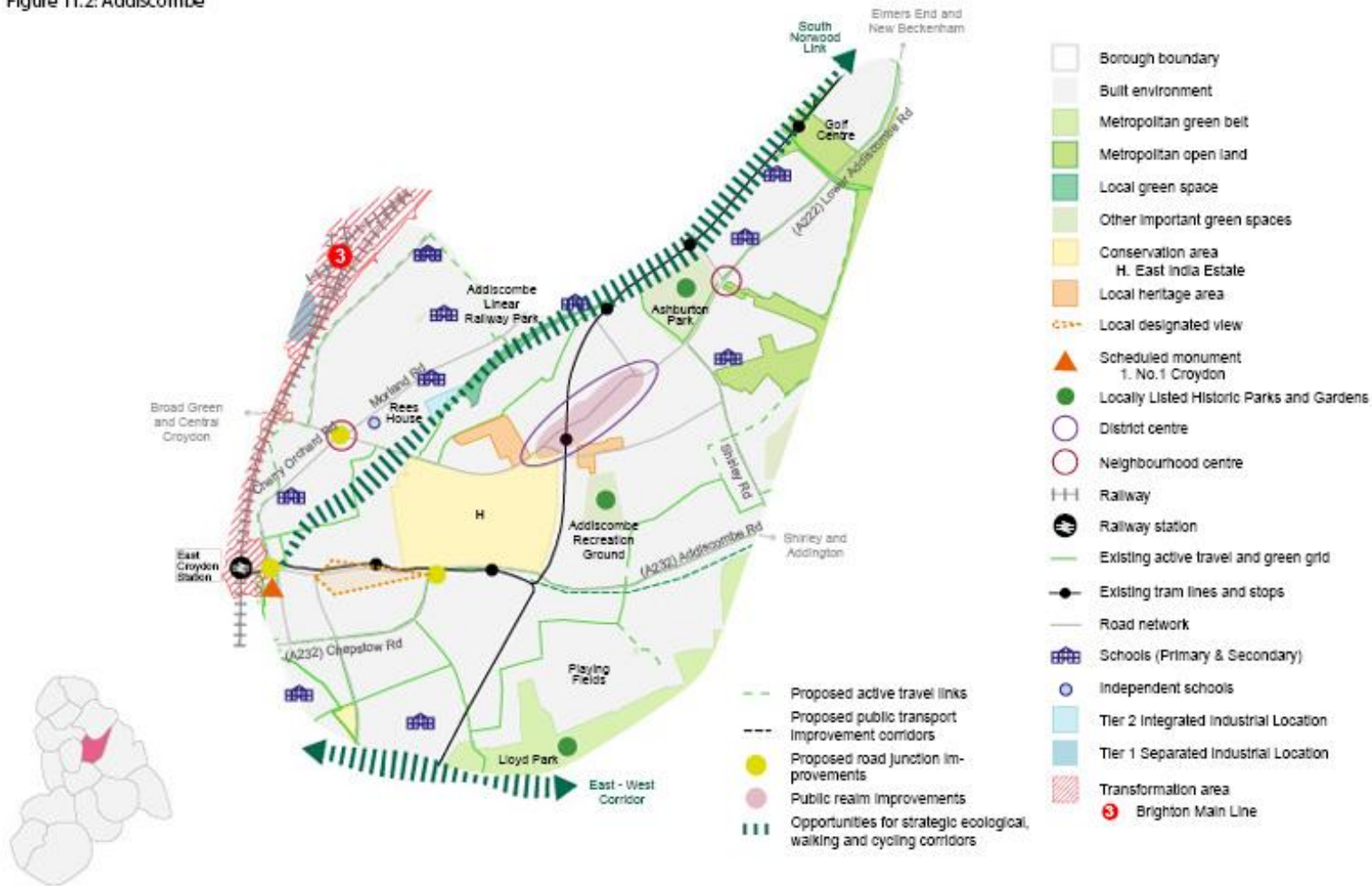
11.22 Improvements to, and expansion of the Green Grid will be sought to promote strategic east-west and north-south links through Addiscombe Linear Railway and Ashburton Parks. These will connect with the Croydon Metropolitan Centre, Wandle Valley Regional Park, Lloyd Park and South Norwood Country Park.

Transport

11.23 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.~~ There are opportunities for direct and safe cycle routes linking with Croydon Metropolitan Centre. The public realm around Cherry Orchard Road and Lower Addiscombe Road associated with the retail areas can be upgraded and the residential streets improved. This will be in line with the Healthy Streets Approach to encourage higher levels of active travel and reduce road danger in the local area.

Figure 11.3 Addiscombe- graphic updated

Figure 11.2: Addiscombe



General character

11.24 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 updated and moved to before vision**

11.25 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 updated and moved to before vision**

11.26 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 updated and moved to before vision**

11.27 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 updated and moved to before vision**

11.28 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 updated and moved to before vision**

11.29 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 updated and moved to before vision**

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 frontages¹⁰¹;
- 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 grain¹⁰² 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.

DM35.2A Within the Tall Building Zone identified in the policies map:

¹⁰¹ 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.

¹⁰² 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).

- a. tall buildings of height ranging from 21 to 48 metres (6-15 storeys) measured from the ground to the top of the building are considered appropriate in the outer zone;
- b. tall buildings of height ranging from 33 to 93 metres (10-30 storeys) measured from the ground to the top of the building are considered appropriate in the inner zone and
- c. buildings taller than 33-148 metres (10-45 storeys) are considered appropriate in the core area within the inner zone.

DM35.3 Within Addiscombe allocate sites for development as set out in Table 11.3

How the policy works

11.30 The areas in which Policy DM35 apply are shown on the Policies Map.

Addiscombe District Centre

11.31 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.**

11.32 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.

11.33 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.

11.34 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.**

11.35 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.

11.36 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.

11.37 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)

11.38 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’.

11.39 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

11.40 Table 11. 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

Ref no	Site name	Proposed use
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 lie 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

11.41 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

11.42 New residential growth, with opportunities for renewal, will focus on London Road with a possible a new Local Centre at Valley Park, Ampere Way, as part of the off-Purley Way Transformation Area. 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 help to address the high deprivation and inequality in this Place.

Employment, Skills and Community Facilities

11.43 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

11.43A 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 to reduce the risk of groundwater flooding. The Council will continue to work with Thames Water (the sewerage undertaker) 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

11.44 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 to enhance the quality of the built environment.**

11.44A Broad Green and Selhurst is identified as a location considered appropriate for tall buildings.

Green Grid and Open Space

11.45 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.**

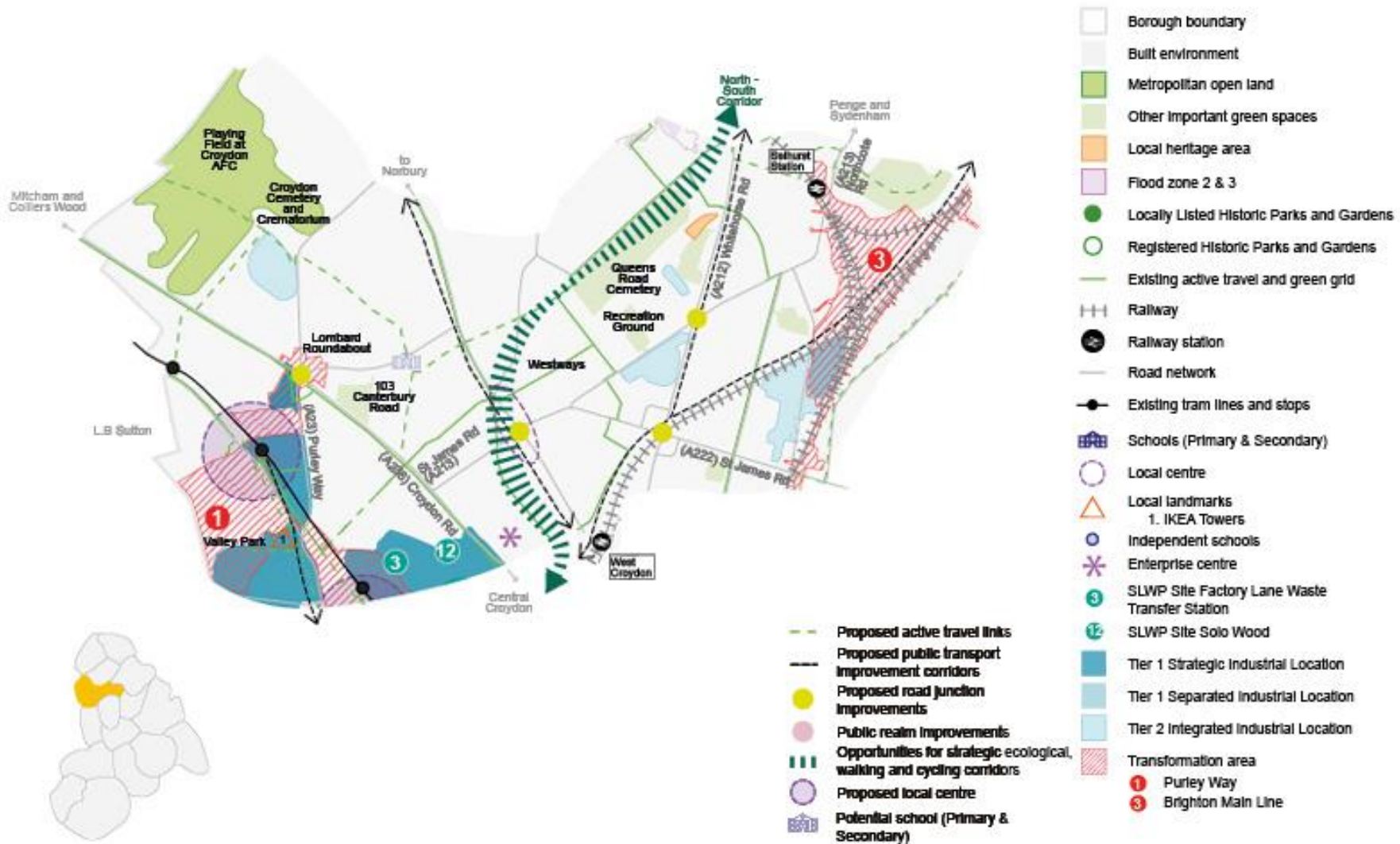
Transport

11.46 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, 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.~~

draft confidential

Figure 11.3 Broad Green and Selhurst -graphic updated



General character

11.47 ~~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 vicinity of Whitehorse~~

~~Road. 'Large Buildings With Continuous Frontage Line' and 'Large Buildings With Spacing' dominate along London Road. Paragraph updated and moved to before vision~~

11.48 ~~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 20th century. Paragraph updated and moved to before vision~~

11.49 ~~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 updated and moved to before vision~~

Policy DM36: Broad Green and Selhurst

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 **5** 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.

DM36.5A Within the Tall Building Zones identified in the policies map,

- a) Buildings of height ranging from 21 to 33 metres (6-10 storeys) from the ground to the top of the building are considered appropriate in the zones closer to Purley Way and along the London Road; and
- b) Buildings of height ranging from 21 to 48 metres (6 -15 storeys) measured from the ground to the top of the building are considered appropriate in the outer zones closer to Croydon Opportunity Area.

DM36.6 Within Broad Green and Selhurst allocate sites for development as set out in Table 11.4

How the policy works

11.50 The areas in which Policies DM36.1 to DM36.5A apply are shown on the Policies Map.

Broad Green Local Centre

11.51 Broad Green Local Centre is dominated by the London Road traffic. It is an area with potential for growth.

11.52 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.

11.53 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

11.54 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~~

11.55 ~~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~~

11.56 ~~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

11.57 ~~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~~

11.58 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

11.59 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

11.60 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’.

11.61 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

11.62 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	Residential development
22.	Whitehorse Road garages and parking area, Whitehorse Road estate (Johnson Road/Cromwell Road)	Residential development
78.	114-118 Whitehorse Road	Mixed use development comprising main town centre ground floor use with residential above.
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 Mixed use development comprising community use at ground floor with residential above.

Ref no	Site name	Proposed use
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 Residential development subject to the adequate re-provision of the existing 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	Milton House, 2-36 Milton Avenue	Residential and employment uses

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 the late 1930's.

Vision, opportunities, constraints and change up to 2036

Vision

11.63 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

11.64 An area of moderate 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. Residential development will respect the existing character and local distinctiveness of the area.

Employment, Skills and Community Facilities

11.65 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

11.66 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.**

11.66A Coulsdon is identified as a location considered potentially appropriate for tall buildings.

Environment and Climate Change

11.67 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

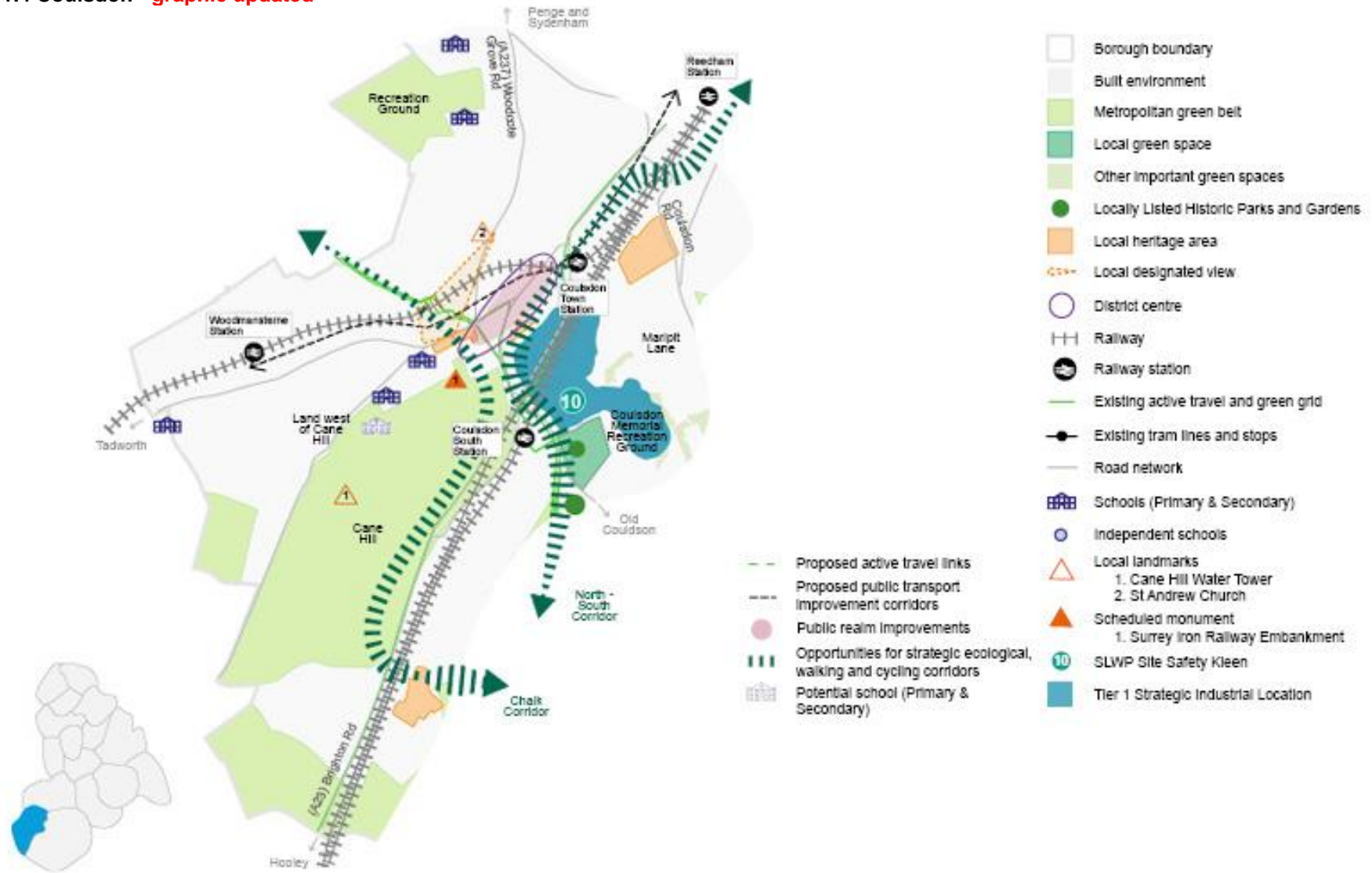
11.68 Opportunities for orbital movements for walking and cycling will be sought with way finding and provision of new links

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

11.69 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

11.70 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 updated and moved to before vision**

11.71 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 updated and moved to before vision**

Policy DM37: Coulsdon

DM37.1 Within the Tall Building Zones identified in the policies map, buildings of height ranging from 21 to 33 metres (6-10 storeys) measured from the ground to the top of the building are considered appropriate.

DM37.2-Within Coulsdon allocate sites for development as set out in Table 11.5.

How the policy works

11.75 Coulsdon has the potential for growth. Much of this is concentrated within the Cane Hill area. **Paragraph deleted**

11.76 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.

11.72 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 updated and moved to before vision**

11.73 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 updated and moved to before vision**

11.74 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 updated and moved to before vision**

11.77 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.

11.78 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

11.79 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) Mixed use development comprising main town centre ground floor use with residential above.

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 consists 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 will continue to be protected.

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

11.80 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 close to Gatwick Airport 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.

11.81 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, Fairfield, Mid Croydon and West Croydon. A future New Town Masterplan will consider the area between the East Croydon, Mid Croydon and Fairfield Masterplans. In addition, a Conservation Area Appraisal and Management Plan has been produced for each of these areas. The North End Quarter Transformation Area sets out vision and principles for how development and public realm improvements will be achieved.**

11.82 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

11.83 Residential growth of over ~~40,650~~ **14,500** 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

11.84 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 boroug. 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 92,000m² 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. **Of note is Box Park, a 'meanwhile' venue located immediately west of East Croydon station. It is a popular temporary food and recreational venue that generates linked trip benefits to the rest of the Croydon 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 expanding upon its existing uses for the ongoing resilience and prosperity of the Town Centre**

Character, Heritage and Design

11.85 **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**

11.85A Croydon Opportunity Area is identified as the main location considered appropriate for tall buildings. Therefore, Tall Building zones are identified in the policies within the area where buildings can have a range of heights as set out in the policy.

Environment and Climate Change

11.86 By enabling development, potential exists to implement flood mitigation and adaptation measures from 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.

Green Grid and Open Space

11.87 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

11.88 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.

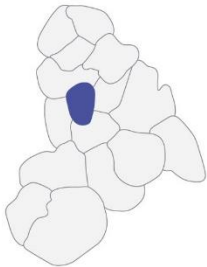
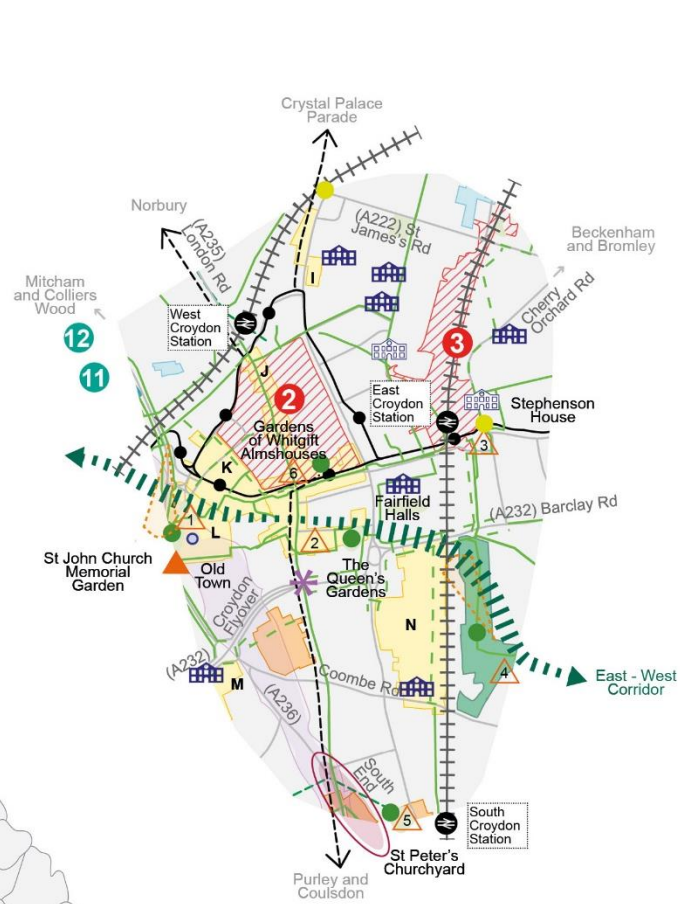
11.88B Pedestrians and cyclists should be able to easily traverse the town centre east to west from Wandle Park to East Croydon Station. There are barriers and severance created by Roman Way, Old Town, Croydon Flyover and Wellesley Road that need to be addressed to allow easy access by foot and cycle. Pedestrianisation is a key to lowering carbon emissions from this area and creating a pedestrian friendly, successful town centre.

11.88D A network of mobility hub centres will be created around the edge of the town centre 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..

draft confidential

Figure 11.5 Croydon Opportunity Area- graphic updated



General character

11.89 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 updated and moved to before vision**

11.90 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 updated and moved to before vision**

11.91 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 updated and moved to before vision**

11.92 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 updated and moved to before vision**

11.93 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 updated and moved to before vision**

11.94 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 updated and moved to before vision**

11.95 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 updated and moved to before vision**

11.96 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 updated and moved to before vision

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 Core¹⁰³.

~~**DM38.3** Within the Central area as shown on Figure 0.1 and on the Policies Map proposals for tall buildings 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 0.1 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. Within the Tall Building Zone identified in the policies map:~~

- ~~a. tall buildings of height ranging from 21 to 48 metres (6-15 storeys) measured from the ground to the top of the building are considered appropriate in the outer zone;~~
- ~~b. tall buildings of height ranging from 33 to 93 metres (10-30 storeys) measured from the ground to the top of the building are considered appropriate in the inner zone and~~
- ~~c. buildings taller than 33-138 metres (10-45 storeys) are considered appropriate in the core area within the inner zone.~~

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;

¹⁰³ As defined in the Croydon Opportunity Area Planning Framework, pg 167

- 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

How the policy works

11.97 The areas in which Policies DM38.2 to DM38.6 apply are shown on the Policies Map.

11.98 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

~~**11.99** Figure 0.1 below shows the extent of the Central and Edge areas referred to in Policies DM38.3 and DM38.4.~~

~~**Figure 0.1 Plan of the Central and Edge areas for tall buildings (Policies DM38.3 and DM38.4) **Graphic removed****~~

London Road area

11.100 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.

11.101 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.

11.102 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

11.103 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.

11.104 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

11.105 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
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.

Ref no	Site name	Proposed use
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	Potential conversion of Law Court Building, creation of new open space and mixed use development of the rest of the site, comprising town centre ground floor uses and residential above.
40.	West Croydon Bus Station	Retention and improvement of bus station alongside town centre uses at ground floor level with residential use above.
41.	Direct Line House, 3 Edridge Road	Residential and/or office development
42.	The Lansdowne, 2 Lansdowne Road	Mixed use development comprising ground floor town centre uses and improved pedestrian environment on the Lansdowne Road frontage, with office or residential above.
47.	3-9 Park Street	Mixed use development comprising ground floor main town centre uses with office or residential above.
50.	44-60 Cherry Orchard Road	Residential development

Ref no	Site name	Proposed use
404	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	Estate Renewal to increase and improve local housing stock.
138.	Cherry Orchard Gardens and site between railway line and Cherry Orchard Road, Cherry Orchard Road	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	Residential use to the rear of Canterbury House
155	St Anne's House & Cambridge House, 20-26 Wellesley Road	Conversion of building to residential and hotel

Ref no	Site name	Proposed use
462	St George's House, Park Lane	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.
172.	Ruskin Square and surface car park, 61 Dingwall Road and Lansdowne Road	Mixed use development comprising residential, offices, restaurant/café and fitness centre
173	28-30 Addiscombe Grove	Redevelopment to provide more homes

Ref no	Site name	Proposed use
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.
175.	Stephenson House and Knollys House, Cherry Orchard Road	Residential and/or office
178	Arcadia House, 5 Cairo New Road	Residential development
182.	St Mathews House, 98 George Street	Redevelopment for residential and/or offices and/or retail (on George Street frontage)

Ref no	Site name	Proposed use
184.	1-19 Derby Road	Residential development above, community uses on lower floors Mixed use development comprising main town centre ground floor use with residential above.
186	Jobcentre, 17-21 Dingwall Road	Offices and/or residential and/or hotel and/or replacement Class A2 (Finance) premises (with healthcare facility if required by the NHS)
187.	28 Dingwall Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)
189	Car parks, Drummond Road	Residential development
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 Mixed use development comprising main town centre ground floor use with residential and/or offices above.
193	100 George Street	Mixed use development with offices or residential dwellings above retail units at ground level
194.	St George's Walk, Katharine House, Segas House and Park House, Park Street	Residential with new civic space and a combination of retail, other Class A uses, leisure and/or office use. Conversion of Segas House for main town centre use. Conversion of St. George's house for main town centre use at ground floor with residential, office and/or hotel use above. Complementary development of the rest of the site to provide mixed use development consisting of ground centre main town centre uses with residential above, including a new east-west route through the site.

Ref no	Site name	Proposed use
195	Leon House, 233 High Street	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).
196	Stonewest House, 1 Lamberts Place	Residential development
197	Emerald House, 7-15 Lansdowne Road	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

Ref no	Site name	Proposed use
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. Improvements to West Croydon Station, with complementary main town centre ground floor uses, with residential above.
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.

Ref no	Site name	Proposed use
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. Retention and conversion to main town centre use with residential, office, healthcare facility and/or hotel above.
220.	9-11 Wellesley Road	Residential and/or hotel and/or retail and/or finance Conversion to main town centre use ground floor use, with employment or educational use above.
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).

Ref no	Site name	Proposed use
234.	Southern House, Wellesley Grove	Offices and residential and/or hotel (with healthcare facility if required by the NHS) Mixed use development comprising main town centre ground floor use with residential and/or office above.
236.	Apollo House, Wellesley Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS) Retention and conversion to main town centre use with residential, office, healthcare facility and/or hotel above.
242	Davis House, Robert Street	Residential development with limited retail to replace existing floor space Ground floor main town centre use with offices and residential and/ or hotel.
245.	Mondial House, 102 George Street	Office and/or residential development or offices or hotel and/or retail (on George Street frontage) Mixed use development comprising main town centre ground floor use with residential, hotel and/or office above.

Ref no	Site name	Proposed use
247	Norwich Union House, 96 George Street	Offices with residential development or hotel and/or retail (on George Street frontage)
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. Mixed use development comprising Cultural Industries Enterprises Centre ground floor use with residential and/or office above.
311.	Mott Macdonald House, 8 Sydenham Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS) Mixed use development comprising main town centre ground floor use with residential, hotel and/or office above.

Ref no	Site name	Proposed use
374.	Reeves Corner former buildings, 104-112 Church Street	<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>Mixed use development comprising main town centre ground floor use with residential above.</p>
375	Northern part of 5 Cairo New Road	<p>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.</p> <p>Residential development subject to the adequate re-provision of the existing community use.</p>

Ref no	Site name	Proposed use
392	Carolyn House, 22-26 Dingwall Road	Offices and residential and/or hotel (with healthcare facility if required by the NHS)
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	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.
417.	Stonemead House, 95 London Road	Residential development
488	Ganius House, 1 Scarbrook Road	Residential conversion
489.	Corinthian House, 17 Lansdowne Road	Retention of offices with residential conversion, and/or hotel (with healthcare facility if required by the NHS) Conversion to main town centre use with residential, office and/or hotel above.

Ref no	Site name	Proposed use
492	5 Bedford Park	Residential conversion
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 Mixed use development comprising employment ground floor use with residential and/or office above.

Ref no	Site name	Proposed use
522	Surface car park, Wandle Road	<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>
950.	Norfolk House, 1-28 Wellesley Road	<p>Mixed use development to include retail, residential, office and hotel uses.</p> <p>Mixed use development comprising conversion of Norfolk House to create main town centre ground floor use with residential, hotel and/or office above.</p>

Ref no	Site name	Proposed use
952	103-111A High Street, Croydon	Mixed use residential and commercial floor space
New 1	Citylink, George Street	Mixed use development with town centre ground floor use with residential and/or office above.
New 3	Croydon Park Hotel	Mixed use development with town centre ground floor use with residential and/or office above.
New 4	Centrale	Masterplanned redevelopment to create an improved primary shopping area for Croydon Metropolitan Centre

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 redevelopment 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

11.106 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 **relatively** good transport links, a unique creative atmosphere, its heritage and its links to Crystal Palace Park, will continue to attract many visitors.

Homes

11.107 Sustainable growth of the suburbs with some opportunity for windfall sites, and limited infilling, with dispersed integration of new homes will respect existing residential character and local distinctiveness.

Employment, Skills and Community Facilities

11.108 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

11.109 ~~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

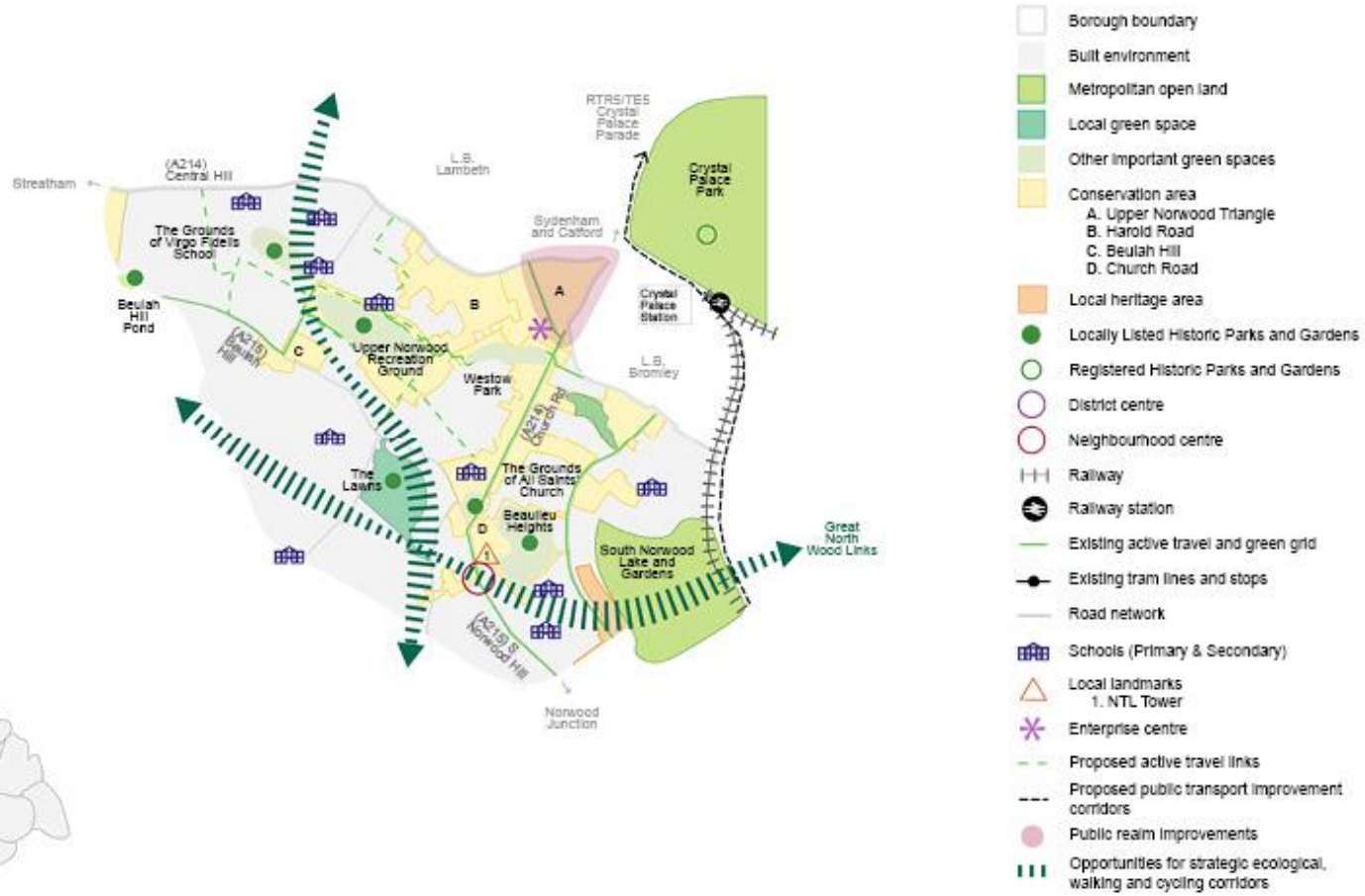
11.110 Opportunities for new planting will be sought to enhance the character of the wooded hillside. Introduction of a new east/west link will be supported with improvements to the links between green spaces and way finding connecting to the existing Capital Ring alongside drawing on the historic connection 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

11.111 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. The Council will investigate opportunities to improve the road network in this area. 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 and 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 11.6 Crystal Palace and Upper Norwood - graphic updated

Figure 11.6: Crystal Palace



General character

11.112 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 updated and moved to before vision**

11.113 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 updated and moved to before vision**

11.114 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 updated and moved to before vision**

11.115 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 updated and moved to before vision**

11.116 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 updated and moved to before vision**

11.117 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 updated and moved to before vision**

11.118 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 updated and moved to before vision**

Policy DM39: 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

11.119 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

11.120 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.

Table 11.7. Proposals for uses of land of specific sites in Crystal Palace and Upper Norwood

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	Residential development to enable improvement of education use.
357.	Norwood Heights Shopping Centre, Westow Street	Retail, replacement community use, and residential and office Mixed use development comprising main town centre use with residential and/or office above subject to the adequate reprovion of the existing community use.

Ref no	Site name	Proposed use
28.	Bowyers Yard, Bedwardine Road	Cultural and Creative Industries Enterprise Centre
58.	140 & 140a Hermitage Road	Residential development subject to the adequate reprovion of the existing community use.
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, Rydons 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 which 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 the 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. Old Coulsdon is framed by Coulsdon Common, Happy Valley and Farthing Downs.

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. A summary of the key issues identified by this are; 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

11.121 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

11.122 ~~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.~~ Development will need to be well designed to respect and help evolve the existing suburban residential character and local distinctiveness of the area.

Employment, Skills and Community Facilities

11.123 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

11.124 ~~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

11.125 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

11.126 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

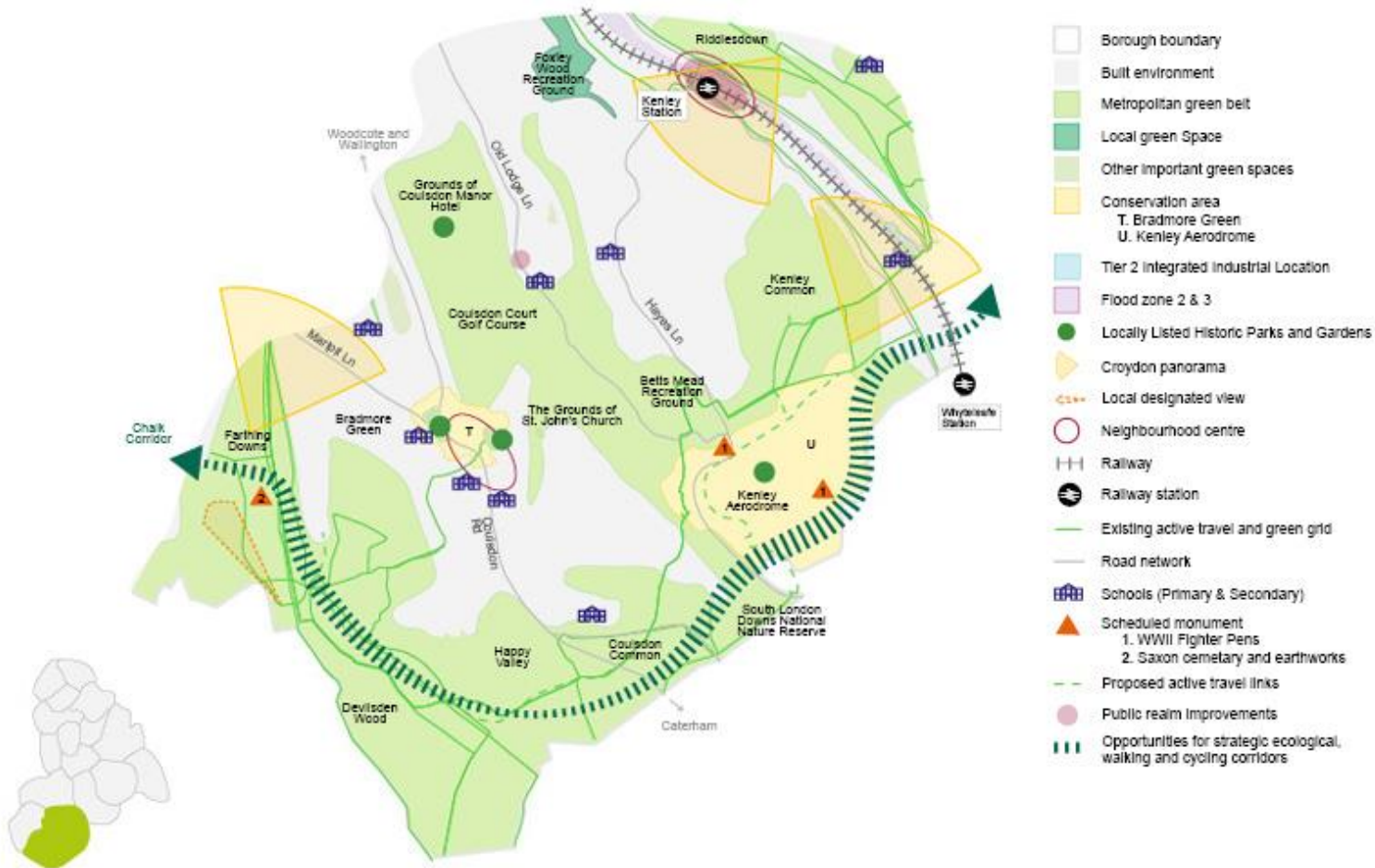
11.127 With its topography of steep hillsides the existing transport arteries are likely to remain, with local bus services, connections and levels of access maintained. Access will be improved where possible to an expanded Green Grid network with improved walking and cycling links to Kenley Reedham 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.

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Figure 11.7 Kenley and Old Coulsdon- **graphic updated**

Figure 11.7: Kenley & Old Coulsdon



General character

11.128 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 updated and moved to before vision**

11.129 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 updated and moved to before vision**

11.130 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 updated and moved to before vision**

11.131 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 updated and moved to before vision**

11.132 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 updated and moved to before vision**

11.133 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 18th century farmhouse and the 13th century Grade I Listed church of St John. **Paragraph updated and moved to before vision**

11.134 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 updated and moved to before vision**

Policy DM40: Kenley and Old Coulsdon

Within Kenley and Old Coulsdon allocate sites for development as set out in Table 11..

How the policy works

11.135 Kenley and Old Coulsdon has a predominantly consistent character with capacity for growth managed by other policies.

Allocating land for development

11.136 Table 11. 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

11.137 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 and draw on historic links to the Great North Wood.

Homes

11.138 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

11.139 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

11.140 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.

11.140A Norbury is identified as a location considered potentially appropriate for tall buildings.

Environment and Climate Change

11.141 **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 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.

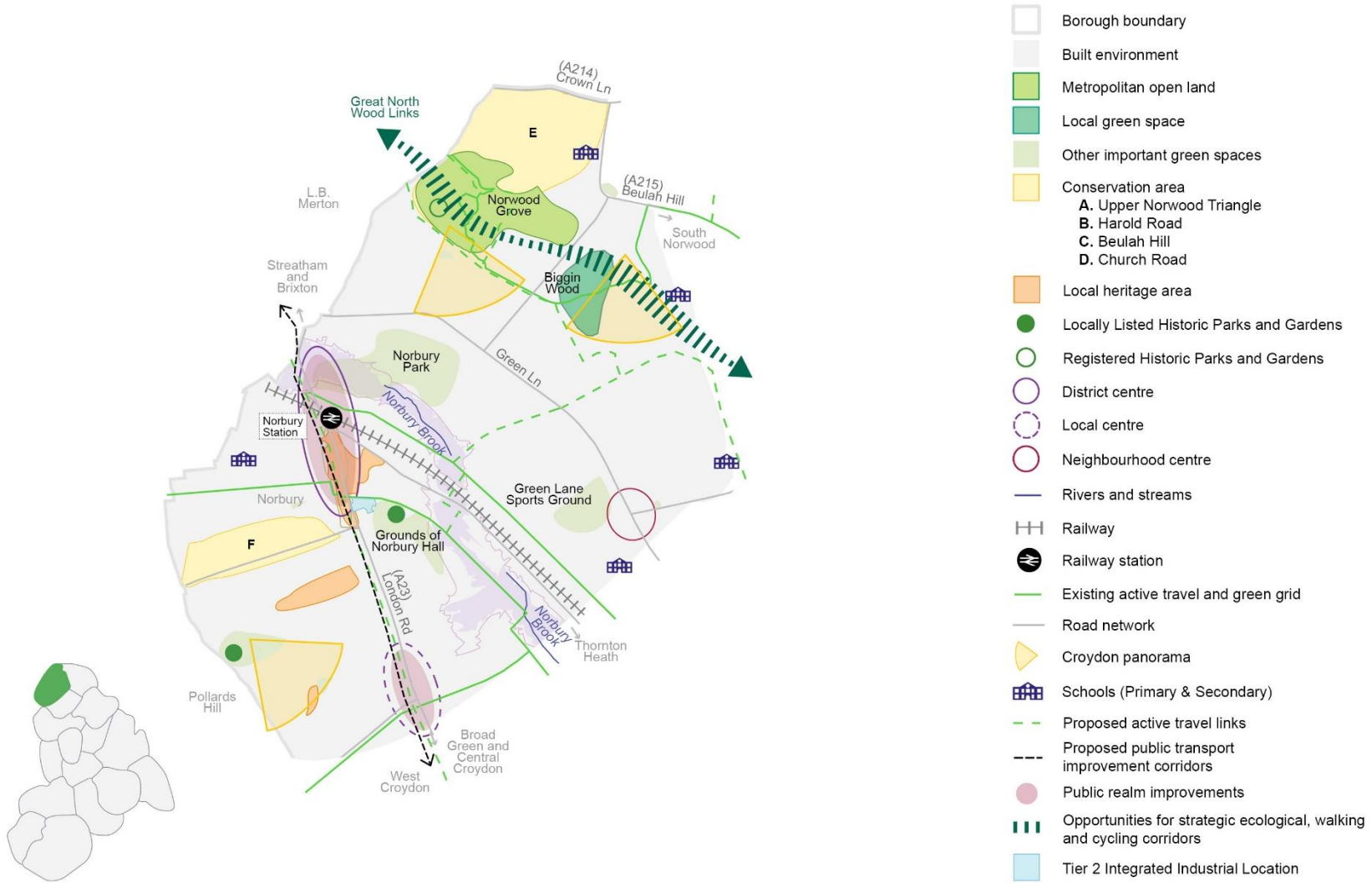
Green Grid and Open Space

11.142 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

11.143 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 11.8 Norbury - graphic updated



General character

11.144 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 updated and moved to before vision**

11.145 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 updated and moved to before vision**

11.146 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 updated and moved to before vision**

11.147 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 Policy DM41: Norbury

London County Council. **Paragraph updated and moved to before vision**

11.148 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 updated and moved to before vision**

11.149 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 updated and moved to before vision**

11.150 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 updated and moved to before vision**

DM41. Within Norbury District Centre, to facilitate growth and to enhance the distinctive character, developments should:

- a. Complement the existing predominant building heights of 2 storeys up to a maximum of 5 storeys;

- b. Ensure proposal for large buildings are visually consistent with the predominant urban grain; and
- c. Seek opportunity to provide direct access from the south of London Road to Norbury railway station.

DM41.2 Within Pollards Hill Local Centre, to ensure that proposals positively enhance and strengthen the character developments should:

- a. Retain the edge and separation of Pollards Hill Local Centre from other adjoining character areas by limiting the urban grain within its boundaries;
- b. Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;
- c. Incorporate multi-stock brick as the predominant facing materials of the whole building **or a material which complements multi-stock brick;** and
- d. Retain the extent and enhance the quality of the existing public realm within the development, including reinforcing a consistent building line.

DM41.2A Within the Tall Building Zones identified in the policies map, buildings of height ranging from 21 to 33 metres (6-10 storeys) measured from the ground to the top of the building are considered appropriate.

DM41.3 Within Norbury allocate sites for development as set out in Table 11.9

How the policy works

11.151 The areas in which Policies DM41.1 and to DM41.2A apply are shown on the Policies Map.

11.152 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.

11.153 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 DM41.1 and DM41.2 identify the maximum buildings heights along with key architectural features to enable growth and retain local distinctiveness.

Allocating land for development

11.154 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	Residential development subject to the adequate reprovision of the existing community use.
284.	Asharia House, 50 Northwood Road	Residential development including replacement community facility Residential development subject to the adequate reprovision of the existing community use.
951.	1485-1489 London Road	Redevelopment for residential and retail

draft confidential

Purley

11.154A Purley is located in 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 having 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 to 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

11.155 ~~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. Existing open spaces and the 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

11.156 ~~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 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. Developments will need to respect and evolve the existing suburban character and local distinctiveness.~~ **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 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. Developments will need to respect and evolve the existing suburban character and local distinctiveness.**

Employment, Skills and Community Facilities

11.157 ~~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.~~ **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 the 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

11.158 New development will respect the existing local character and distinctiveness of Purley. The quality of design will be informed by 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.

11.158A Purley is identified as a location considered potentially appropriate for tall buildings.

Environment and Climate Change

11.159 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 for 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 locations¹⁰⁴. Developers may need to liaise with the Council's Flood Risk Management team and the Environment 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 photovoltaics, air source heat pumps and other renewable energy technologies to be integrated with new development.

Green Grid and Open Space

11.160 Opportunities to improve links to existing open spaces, along with way finding around Purley, and to and from the District Centre will be sought.

Transport

11.161 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 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 5th busiest station in Croydon with over 3 million journeys made each year to or from the station¹⁰⁵. The

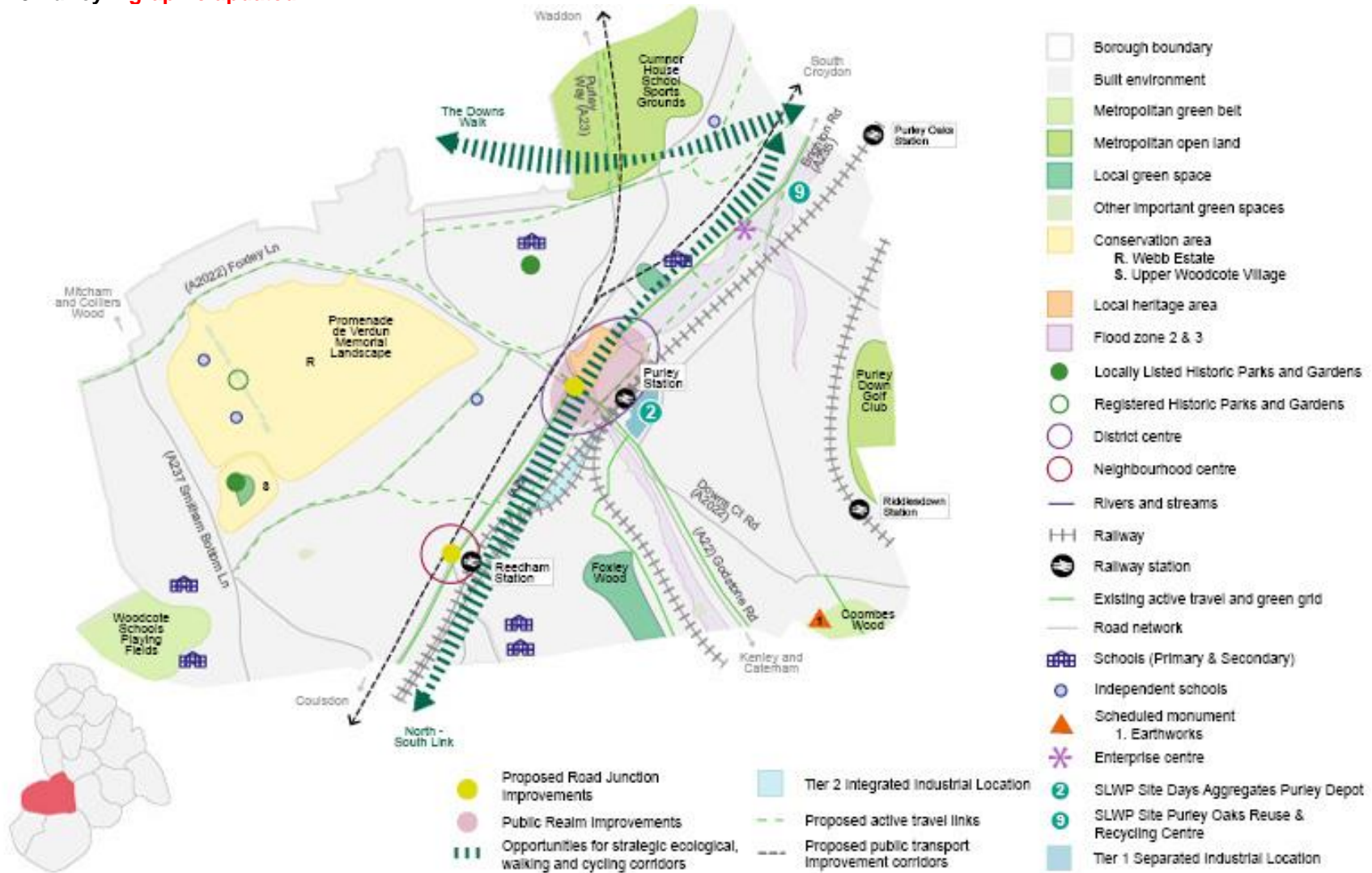
¹⁰⁴ London Borough of Croydon SFRA Level 1 (2020)

¹⁰⁵ Network Rail Estimates of Station Usage 2018-19

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

draft confidential

Figure 11.9 Purley - graphic updated



General character

11.162 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 updated and moved to before vision

11.163 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
Policy DM42: Purley

DM42. 1 Within Purley District Centre and its environs, to ensure that proposals positively enhance and strengthen the character and facilitate growth, developments should:

- a. Reinforce the continuous building line which responds to the street layout and include ground floor active frontages;
- b. 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
- c. Demonstrate innovative and sustainable design, with special attention given to the detailing of frontages-;
- d. 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;
- e. Facilitate works that reduce the dominance of the Purley Cross gyratory and better connect different part of the Purley District Centre and its environs;
- f. Facilitate the delivery of a network of mobility hubs for shared transport services around the edge of the District Centre and

houses on relatively small plots. Paragraph updated and moved to before vision

11.164 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 updated and moved to before vision

11.165 The Brighton Road (Purley) Local Heritage Area has an 'Urban Shopping Area' character. It contains collection of shopping parade buildings from the late 19th and 20th century, that demonstrate a variety of styles with well-preserved and distinctive architecture. Paragraph updated and moved to before vision

- g. 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;

DM42.1A Within the Tall Building Zones identified in the policies map, buildings of height ranging from 21-39 metres (6-12 storeys) measured from the ground to the top of the building are considered appropriate.

DM42.2 In the environs of Reedham station, to create the sense of place and facilitate growth proposals should:

- a) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys;
- b) Reinforce the predominant building lines and frontages which positively respond to the form of the Brighton Road/Old Lodge Lane junction;
- c) Improve pedestrian and cycle permeability, accessibility and connectivity across the railway between Brighton Road, Watney Close, Aveling Close and Fairbairn Close; and
- d) Enhance the suburban shopping area character of this section of Brighton Road; and
- e) **Preserve and enhance the listed Purley Town Hall and its setting**

DM42.3 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:

- a. Retain and create open glimpses and vistas between buildings;
- b. Introduce building with landscapes that respond and reflect the layout of the 1930s blocks of Lansdowne Court and Purley Court; and
- c. Complement the existing predominant building heights of 2 storeys up to a maximum of 5 storeys.

DM42.4 Within Purley allocate sites for development as set out in Table 11.1011.10.

How the policy works

11.166 The areas in which Policies DM42.1 to DM42.3~~4~~ apply are shown on the Policies Map.

Purley District Centre and its environs

11.167 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.

11.168 This area has a varied topography which presents opportunities for tall buildings and the availability of vacant land creates the potential for growth. Policy DM42.1A facilitates this growth by identifying Tall Building Zones in the area and identifies architectural features that should be referenced in the design of the development to enhance the distinctive character of Purley District Centre.

11.168 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.

11.168B 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

11.169 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.

11.170 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

11.171 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.

11.172 Detailed policies are required to strengthen the character of the Brighton Road and Purley Downs Road junction area.

Allocating land for development

11.173 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 accommodation. Mixed use development comprising a new public swimming pool and town centre uses with residential above.
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. Mixed use redevelopment comprising new church, community facility and residential
61.	Purley Station Car park, 54-58 Whytecliffe Road South	Residential use with retention of car parking spaces Residential use

Ref no	Site name	Proposed use
64.	100, 112a and 112b Brighton Road	Comprehensive development for new residential.
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
347.	Tesco, 2 Purley Road	Mixed use residential, healthcare facility (if required by the NHS) and retail development Mixed use development comprising main town centre ground floor use with residential above.
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 Residential development
409	Beech House, 840 Brighton Road	Conversion of the office building to residential uses.
410.	100 Brighton Road	Mixed use residential and retail development
411.	Palmerston House, 814 Brighton Road	Residential redevelopment

Ref no	Site name	Proposed use
490.	95-111 Brighton Road and 1-5, 9-15 and 19 Old Lodge Lane	Primary school New primary school and residential development.
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
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 Replacement industrial floorspace, a new public car park and residential development.

Sanderstead

11.173A 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.

11.173B 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.

11.173C 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

11.174 Sanderstead will continue to be a predominantly 1930s suburb, with a **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

11.175 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.**

Employment, Skills and Community Facilities

11.176 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

11.177 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, changing in character from local centre to rural, will continue to be defined through differences in character.**

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.

~~ease congestion at peak times in the Local Centre by encouraging walking, cycling or public transport especially for school journeys..~~

Green Grid and Open Space

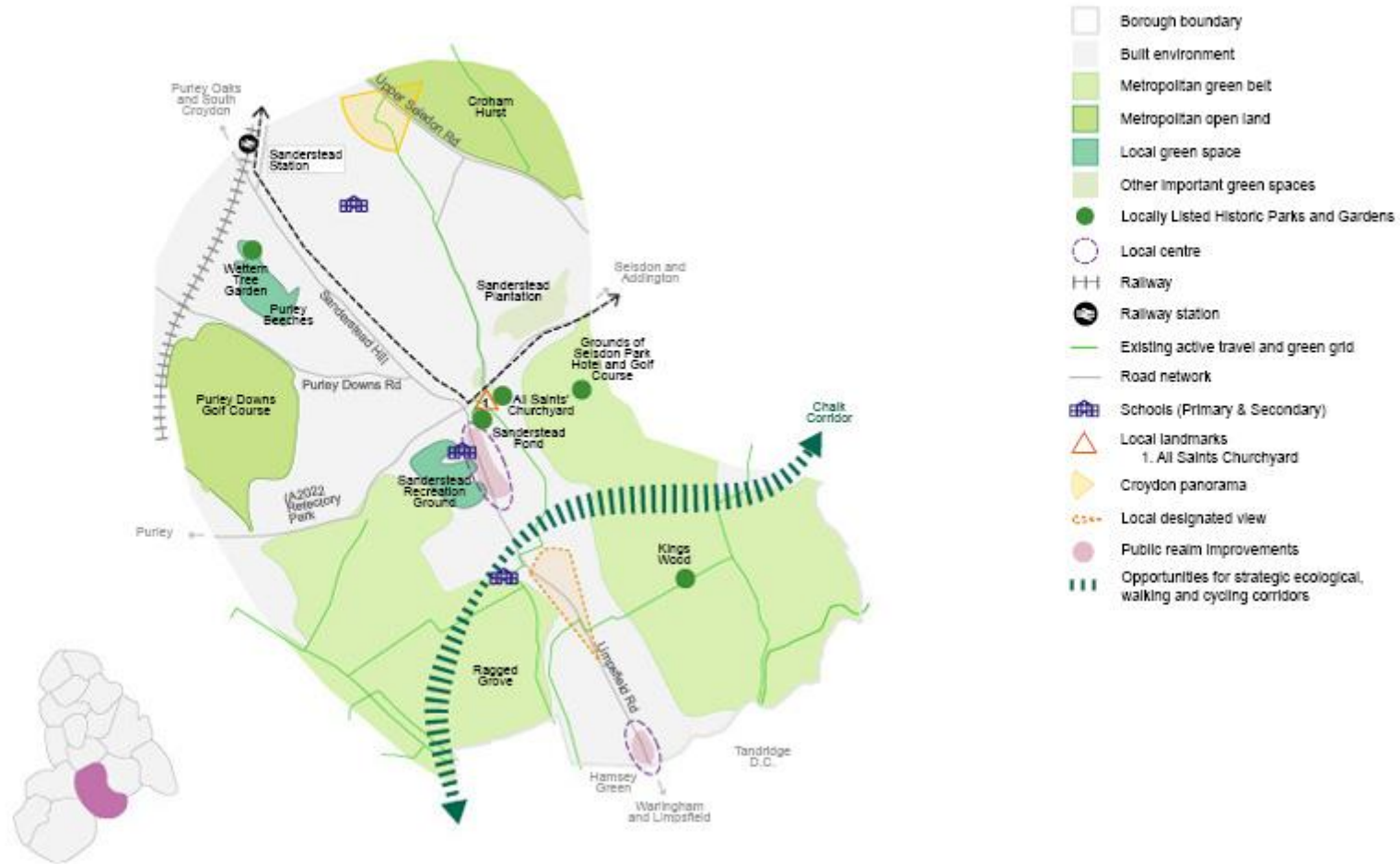
11.178 As a key link in the east part of the Green Grid network of the borough, links to existing green spaces from the residential areas will be improved with further connections added where possible. The additional green links, with way finding, will enable more opportunities for walking and cycling 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

11.179 ~~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~~

Figure 11.10 Sanderstead -graphic updated

Figure 11.10: Sanderstead



General character

11.180 ~~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 updated and moved to before vision

11.181 ~~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 updated and moved to before vision

Policy DM43: Sanderstead

DM43. Within Sanderstead Local Centre, to respect and enhance the distinctive qualities proposals should:

- a. Reinforce the suburban shopping area character;
- b. Reference, respect and enhance architectural features such as the consistent rhythm of pairs of buildings with identical frontages and the articulation of openings;
- c. Retain features such as the projecting bay windows;
- d. Retain wide vistas and strengthen visual connections to green open spaces; and including the village character of open spaces to the north;
- e. Improve walking and cycling connectivity and access to open space and
- f. Respect the setting of nationally and locally listed buildings.

DM43.2 Within Hamsey Green Local Centre, to respect and enhance the distinctive 'Suburban Shopping Area' character of Hamsey Green, proposals should:

- a. Reinforce the suburban shopping area character;
- b. Positively reference, respect and enhance architectural features such as the consistent rhythm and articulation of window and doors;
- c. Ensure the extent of the public realm within the vicinity of the development is retained and improved; and
- d. 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

DM43.3 Within Sanderstead allocate sites for development as set out in Table 11.11

How the policy works

11.182 The areas in which Policies DM43.1 and DM43.2 apply are shown on the Policies Map.

Sanderstead Local Centre

11.183 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'.

11.184 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

11.185 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

11.186 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.	Red Gables, 2 Beech Avenue	Residential development
79.	Waitrose, Sanderstead	Mixed use residential and retail development Mixed use development comprising main town centre ground floor use with residential above.
306.	The Good Companions Public House site, 251 Tithe Pit Shaw Lane	Mixed use of residential and retail Residential development
947	359-367 Limpsfield Road	Residential with 1 - 3 commercial units on ground floor.

Selsdon

11.187A 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.

11.187B 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.

11.187C The Selsdon Community Plan (2020) outlines the key economic, social and environmental issues facing the area; as well as setting 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 and promote use of green spaces (including children's play areas), a need for enhanced public transport and provision of bus shelters, increasing provision of parking near shopping areas, a need to provide new/enhanced community facilities for all ages including sports facilities, a need to limit fast food places and to increase the 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

11.187 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

11.188 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.~~

Employment, Skills and Community Facilities

11.189 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.

Character, Heritage and Design

11.190 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

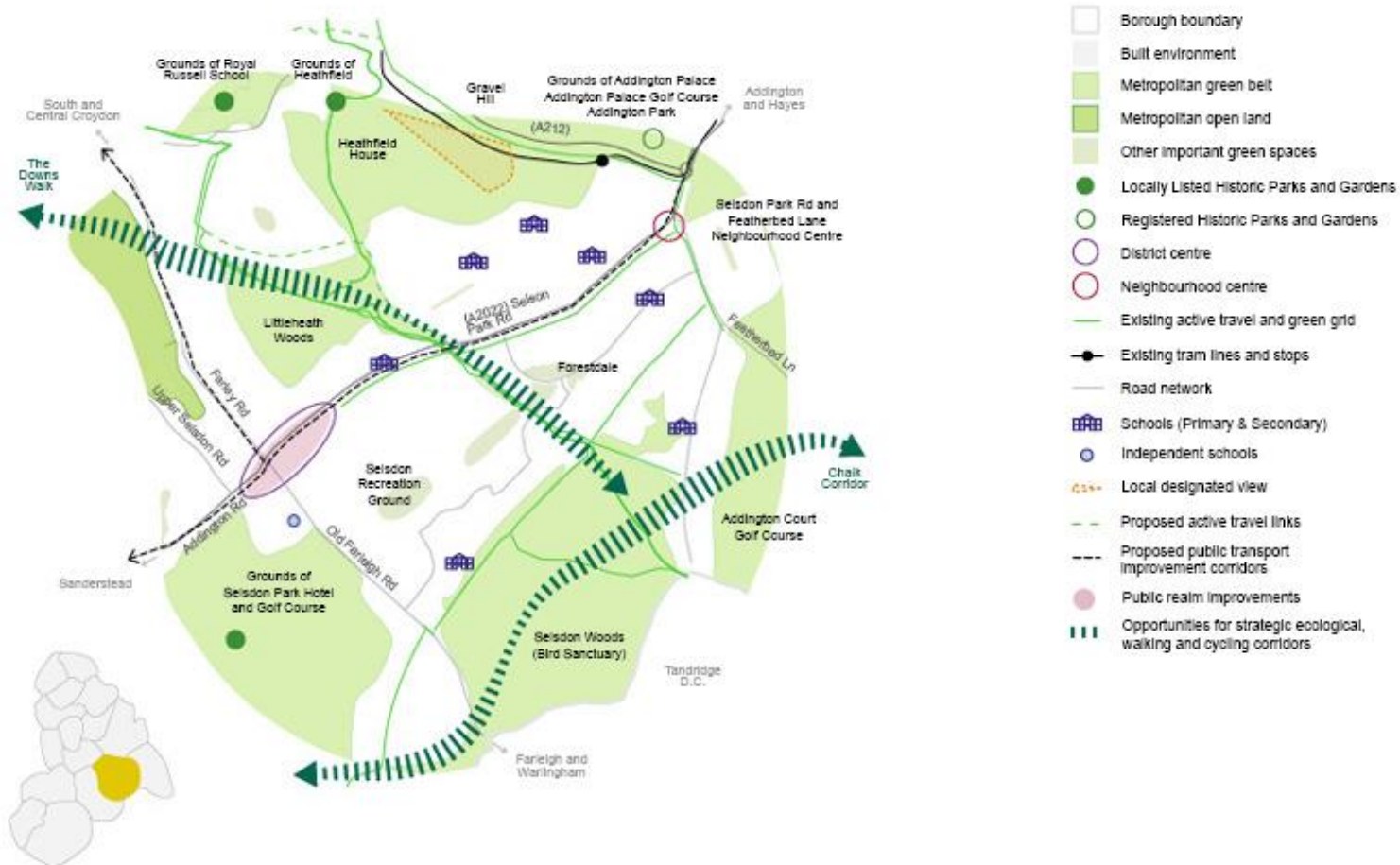
11.191 Links to existing green spaces from the residential areas will be improved where possible with additional connections to strategic green links enabling more opportunities for walking and cycling in the area.

Transport

11.192 ~~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 and cycling challenging together with generally poor public transport accessibility 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 combined with the uptake of new technology such as e-bikes are necessary to reduce car dependence in Selsdon

Figure 11.11 Selsdon –graphic updated

Figure 11.11: Selsdon



General character

11.193 ~~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 updated and moved to before vision~~

Policy DM44: Selsdon

DM44.1 Within Selsdon District Centre, to enhance the character of Selsdon District Centre proposals should:

- a. Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;
- b. Ensure large buildings are sensitively located and of a massing no larger than buildings within this area;
- c. Ensure that the front elevation of large buildings are broken down to respect the architectural rhythm of the existing street frontages;
and
- d. Should incorporate red multi-stock brick as the predominant facing material.

DM44.2 Within Selsdon allocate sites for development as set out in Table 11.12.

How the policy works

11.194 The area in which Policy DM44 applies is shown on the Policies Map.

Selsdon District Centre

11.195 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.

11.196 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.

11.197 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

11.198 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
948.	230 Addington Road	Residential with retail on ground floor (up to 3 units). Residential development

Shirley

11.198A 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.

11.198B 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.

11.198C 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.

11.198D 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

11.199 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

11.200 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

11.201 Some small scale employment will be provided in the Local Centre with predominantly independent shops supporting the local community.

Character, Heritage and Design

11.202 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**

Environment and Climate Change

11.203 ~~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

11.204 ~~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.**

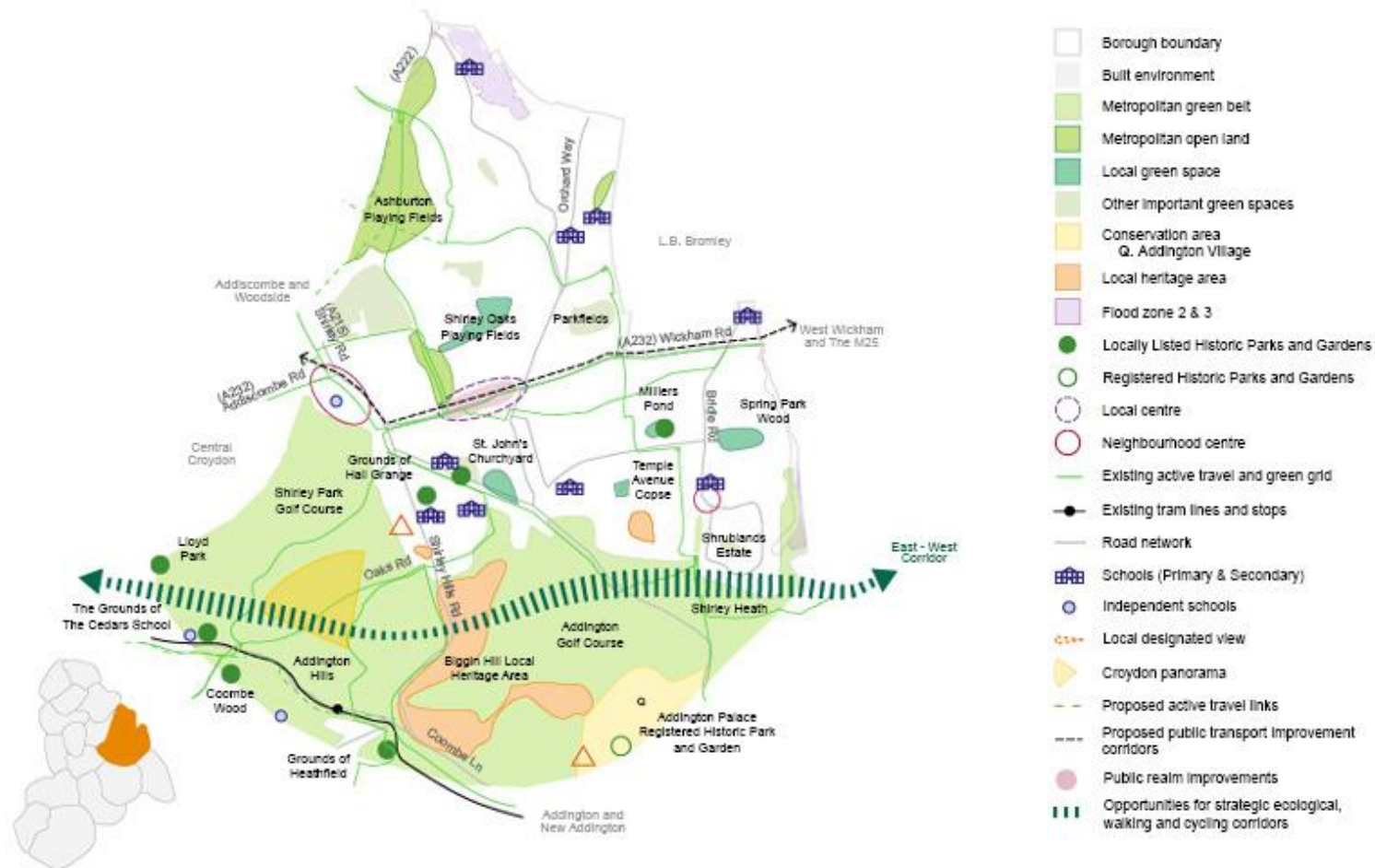
Transport

11.205 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 the Local Centres by encouraging walking, cycling or public transport especially for school journeys.

Figure 11.12 Shirley – graphic updated

Figure 11.12: Shirley



General character

11.206 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 updated and moved to before vision

11.207 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 updated and moved to before vision

11.208 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 updated and moved to before vision

11.209 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 18th 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 updated and moved to before vision

11.210 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 updated and moved to before vision

11.211 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 updated and moved to before vision

Policy DM45: Shirley

DM45.1 1 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.**

DM45.2 In the area between 518 and 568 Wickham Road, to improve the character proposals should reference the 'Suburban Shopping Area' character type.

DM45.3 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.

DM45.3A 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 11.133

How the policy works

11.212 The areas in which Policies DM45.1 to DM45.3A apply are shown on the Policies Map.

Shirley Local Centre

11.213 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

11.214 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

11.215 Table 11.133 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	Residential development subject to the adequate reversion of the existing community use.
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
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. Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed.allocations.

South Croydon

11.215A 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.

11.215B 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 century 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.

11.215C 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

11.216 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

11.217 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.

Employment, Skills and Community Facilities

11.218 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

11.219 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

11.220 ~~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

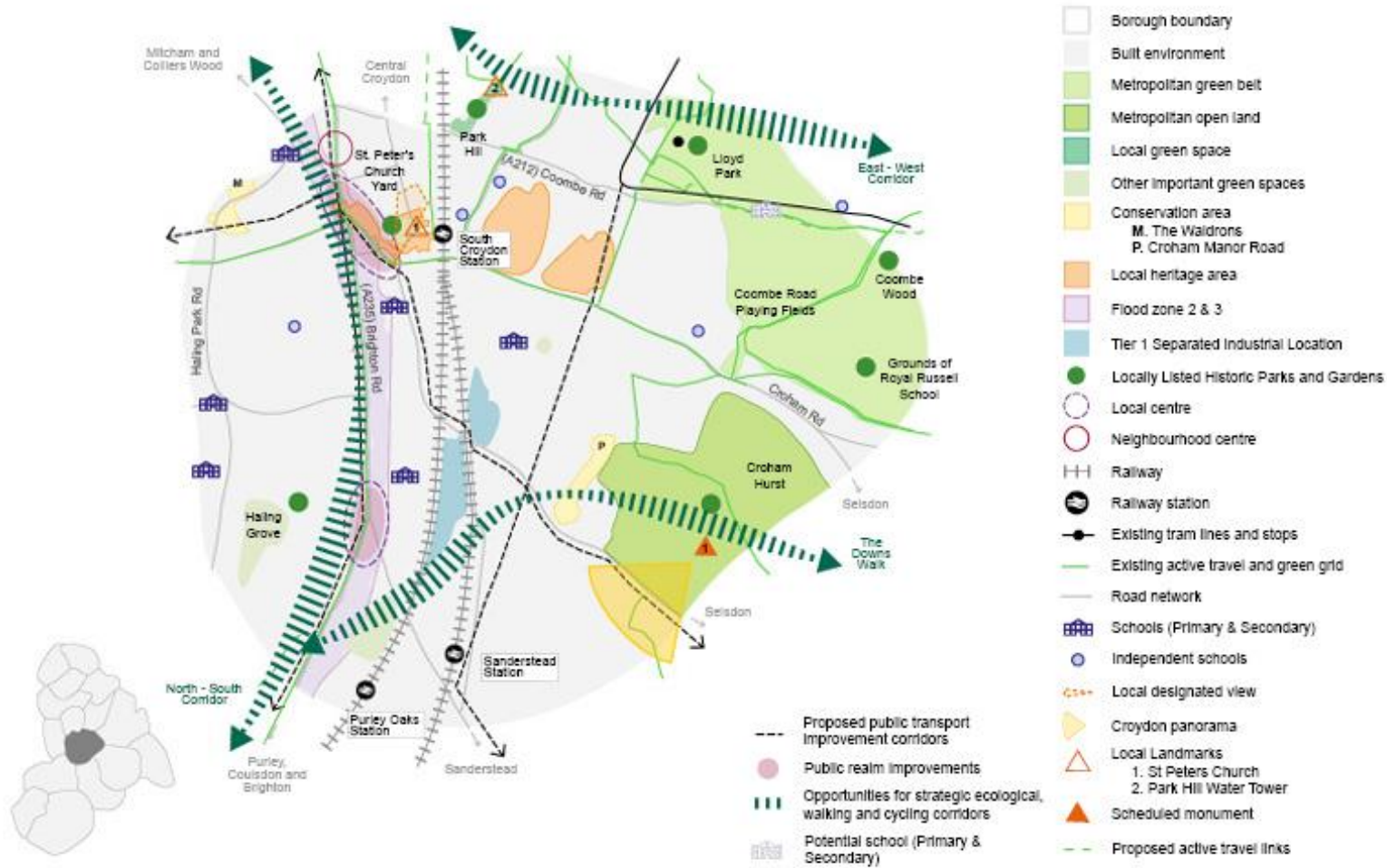
11.221 Improved connections to the Green Grid will be sought to increase opportunities for walking and cycling in the area. **St. Peter's Church, South Croydon – a key landmark, Local Heritage Area and Local Historic Park and Garden – will be integrated into this expanding network (where possible)**

Transport

11.222 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 together with Purley and Coulsdon. This will help to improve the reach and capacity of the tram network to support good growth.**

Figure 11.13 South Croydon – graphic updated

Figure 11.13: South Croydon



General character

11.223 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**

11.224 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 updated and moved to before vision**

11.225 The Croham Manor Road Conservation Area represents the 'Detached Houses On Relatively Large Plots' character type. It is a notable collection of early 20th century Locally Listed houses with a wealth of well-preserved arts and crafts features. **Paragraph updated and moved to before vision**

11.226 The South End Local Heritage Area has an 'Urban Shopping Area' character. It 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 former Swan and Sugarloaf building terminating vistas along Brighton Road. **Paragraph updated and moved to before vision**

11.227 The 'Urban Shopping Areas' of Ye Market Local Heritage Area is a distinctive early 20th century 'mock Tudor' style shopping parade with a range of preserved original decorative features and detailing. **Paragraph updated and moved to before vision**

11.228 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 updated and moved to before vision**

11.229 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 updated and moved to before vision**

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
- b) Incorporate multi-stock brick as the predominant facing material, or a material which is complementary to multi-stock brick.

DM46.2 Within South Croydon allocate sites for development as set out in Table.11.14.

How the policy works

11.230 The areas in which Policyies DM46.1 and DM46.1A applies is are shown on the Policies Map.

Brighton Road (Selsdon Road) Local Centre and Brighton Road (Sanderstead Road) Local Centre

11.231 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.

11.232 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.

11.233 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

11.234 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
345	Normanton Park Hotel, 34-36 Normanton Road	Residential development with primary school expansion if required (otherwise the whole site may be used for residential development).
662	Coombe Road Playing Fields, Coombe Road	Secondary school with retention of playing pitches

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.
401.	Toby Carvery, Brentwood Road	Residential development
114.	Garage courts at 18 Bramley Hill	Residential development

South Norwood and Woodside

Vision, opportunities, constraints and change up to 2036

11.234A South Norwood lies in 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.

11.234B 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.

11.234C 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.

11.234D 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 grow 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

11.235 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

11.236 Sustainable growth of the suburbs with predominantly windfall sites and dispersed integration of new homes will respect existing residential character and local distinctiveness. 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.

11.236A 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

11.237 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 primarily focus-on the South

Norwood District Centre, the South Norwood Conservation Area together with 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

11.237A 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

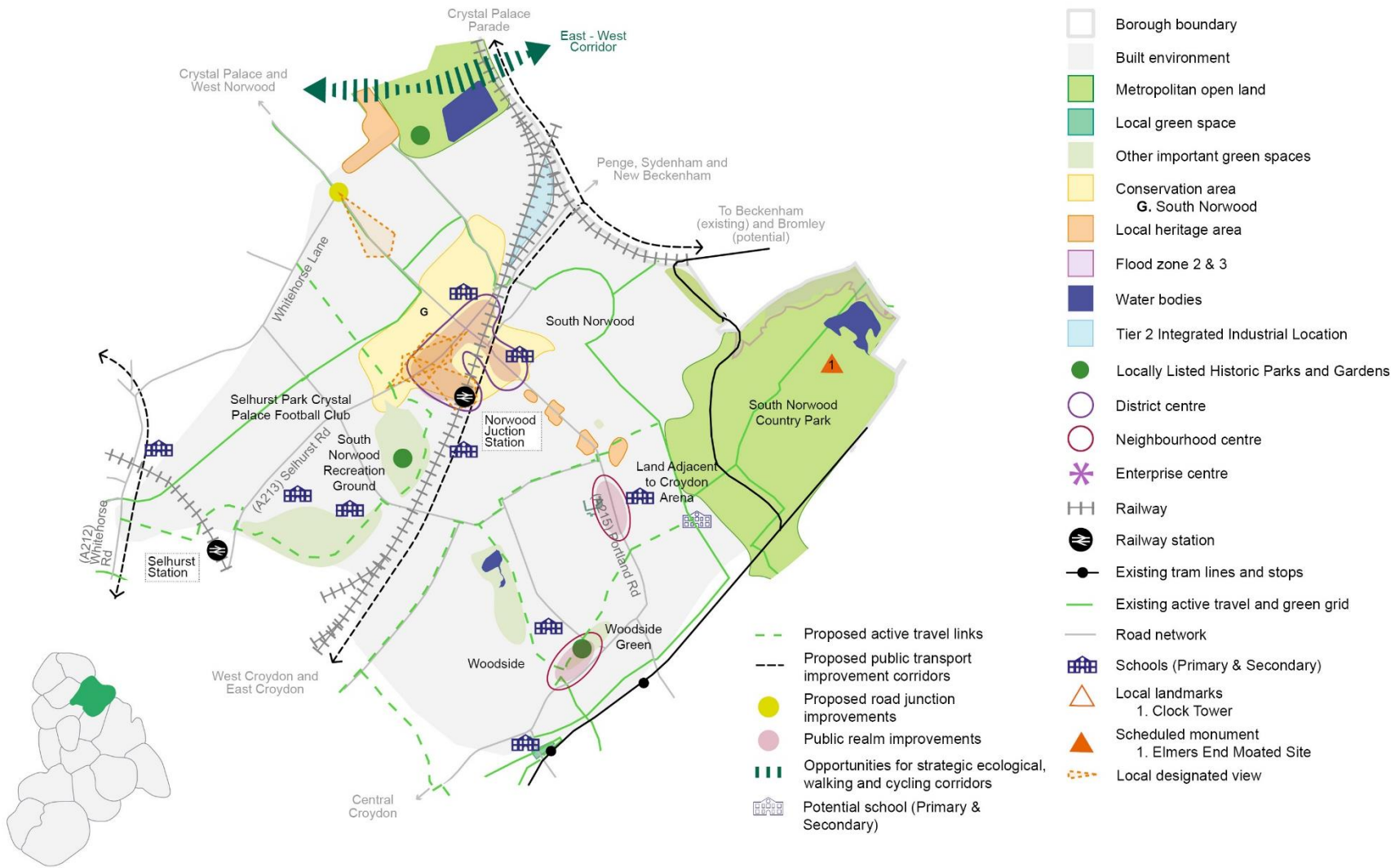
11.238 The Place's diverse open spaces include South Norwood Lake and Country Park. Links will be provided, where possible to the Croydon Metropolitan Centre and Waterlink Way as part of the National Cycle Network. New Green Grid links will improve connectivity with the Local Historic Parks and Gardens 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

11.239 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 11.14 South Norwood and Woodside- graphic updated



General character

11.240 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 updated and moved to before vision**

11.241 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 updated and moved to before vision**

11.242 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 updated and moved to before vision**

11.243 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 updated and moved to before vision**

11.244 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-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. **Paragraph updated and moved to before vision**

11.245 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 updated and moved to before vision**

Policy DM47: South Norwood and Woodside

DM47.1 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:

- a. Relate to the predominant character in adjacent residential areas;
- b. Complement the existing predominant height up to a maximum height of 3 storeys with accommodation in roof space;
- c. Incorporate main pedestrian entrances onto Portland Road; and
- d. Maintain the rhythm and size of ground floor windows and doors.

DM47.2 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.

DM47.2A Within the Tall Building Zones identified in the policies map, buildings of height ranging from 21-39 metres (6-12 storeys) measured from the ground to the top of the building are considered appropriate.

DM47.3 Within South Norwood and Woodside allocate sites for development as set out in Table 11.15

How the policy works

11.246 The areas in which Policies DM47.1 and DM47.2 apply are shown on the Policies Map.

Section of Portland Road between the South Norwood Conservation Area and Watcombe Road

11.247 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.

11.248 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

11.249 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'.

11.250 A Place-specific development management policy is required to create a cohesive sense of place.

Allocating land for development

11.251 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

Ref no	Site name	Proposed use
97	24 Station Road	Residential development with a retail unit
486	The Beehive, 45 Woodside Green	Residential development
NEW2	Regina Road Estate	Estate renewal for residential development with retention of community facilities.

draft confidential

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

11.252 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. **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

11.253 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. **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

11.254 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

11.255 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.

11.255A Thornton Heath is identified as a location considered potentially appropriate for tall buildings. Therefore, a Tall Building

zone is identified in the policies within the area where buildings of the height ranging from 21 to 39.6 metres (6-12 storeys) measured from the ground to the top of the building are considered appropriate.

Environment and Climate Change

11.256 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

11.257 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.

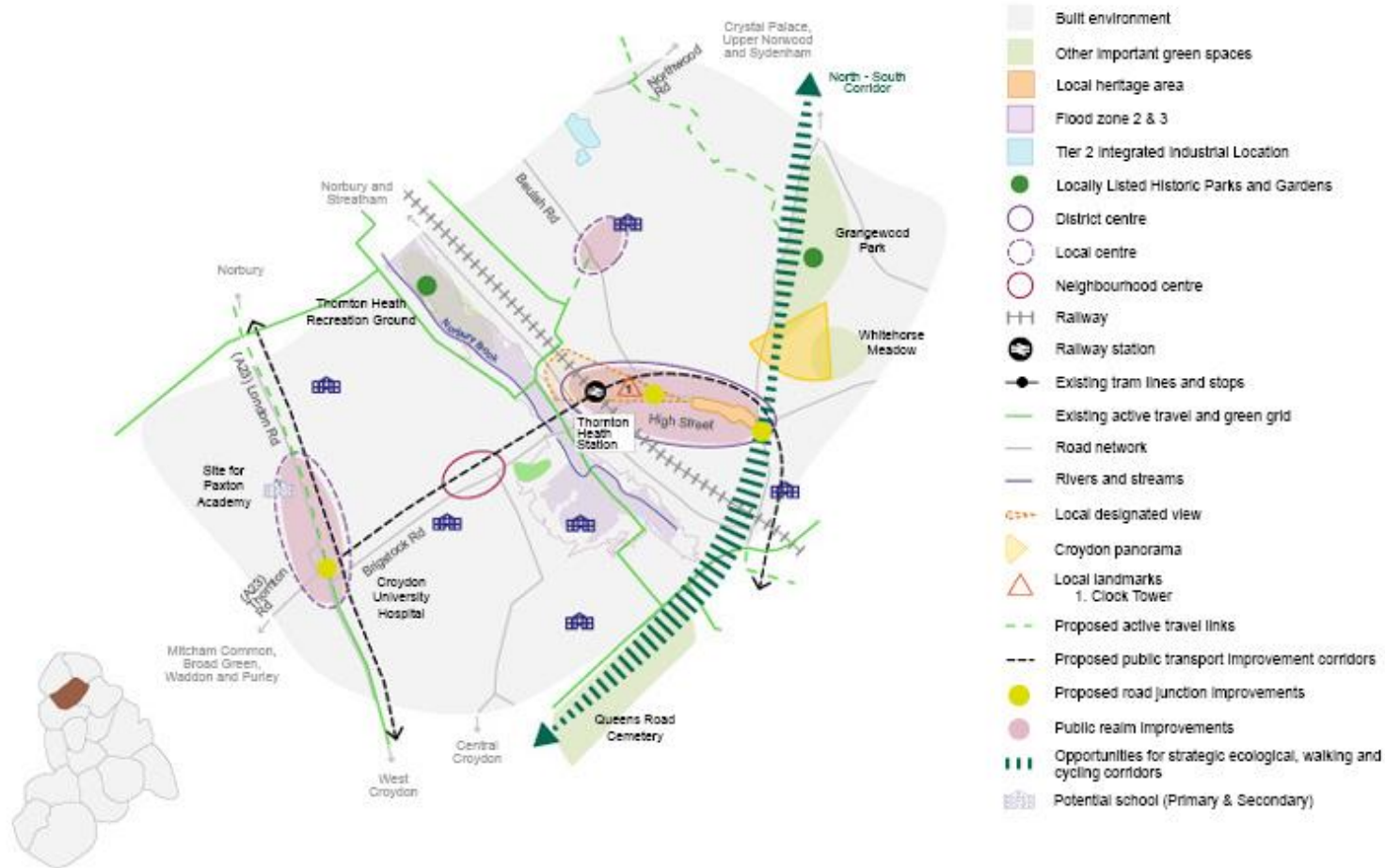
Transport

11.258 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.~~

draft confidential

Figure 11.15 Thornton Heath – graphic updated

Figure 11.15: Thornton Heath



General character

~~11.259 Thornton Heath is a densely built up settlement, with District and Local Centres that are spatially clearly defined.~~

~~Paragraph updated and moved to before vision~~

~~11.260 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 updated and moved to before vision~~

~~11.261 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 19th to 20th century with a wide range of well-preserved highly decorative historic features.~~ Paragraph updated and moved to before vision

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 the Tall Building Zone;
- 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.

DM48.1A Within the Tall Building Zones identified in the policies map, buildings of height ranging from 21 to 39 metres (6-12 storeys) measured from the ground to the top of the building are considered appropriate.

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

How the policy works

11.262 The areas in which these Policies DM48.1 and to DM48.2 apply are shown on the Policies Map.

Thornton Heath District Centre and environs

11.263 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.

11.264 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.

11.265 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

11.266 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.~~

11.267 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

11.268 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
103.	585-603 London Road	Mixed use development for residential and hotel (up to existing floor space). Mixed use development for residential and hotel
105.	Strand House, Zion Road	Residential development

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 Mixed use development comprising main town centre ground floor use with residential above.
400	Bensham 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

Ref no	Site name	Proposed use
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 Residential development subject to the adequate reprovision of the existing health care use.

Waddon

Vision, opportunities, constraints and change up to 2036

11.268A 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.

11.268B 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.

11.268C 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

11.269 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

11.270 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.

Employment, Skills and Community Facilities

11.271 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 such as the Waylands Leisure Centre and education and training facilities, within the new Local Centres and

Neighbourhood Centre, to meet the needs of the existing and new population.

Character, Heritage and Design

11.272 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.

11.272A Waddon is identified as a location considered potentially appropriate for tall buildings.

Environment and Climate Change

11.273 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

11.274 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

11.275 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.**

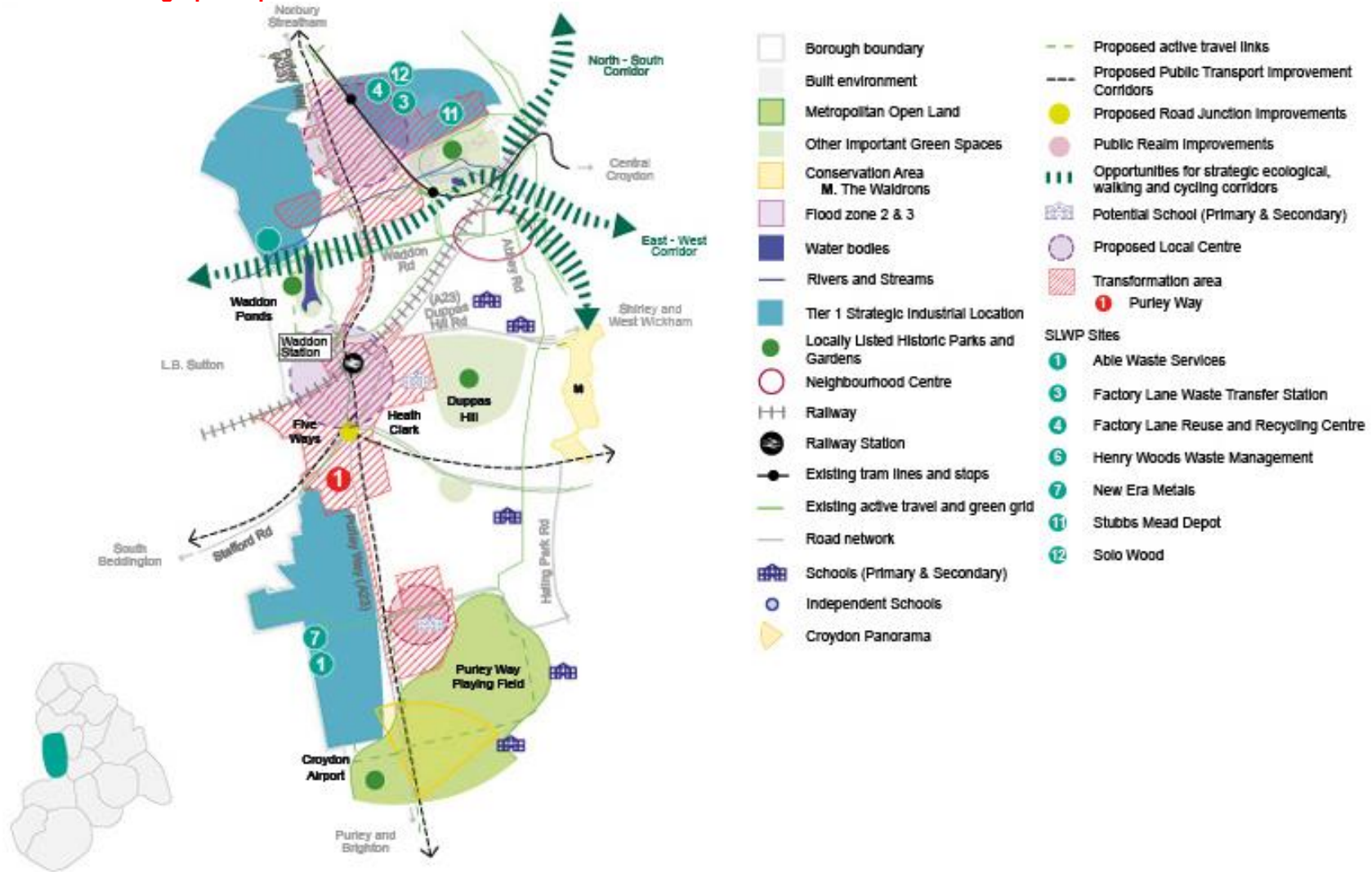
11.275A The industrial and commercial areas of Waddon are becoming an increasingly popular base for freight distribution, warehouses and delivery centres. Whilst there may be benefits in terms of new employment, there are potentially very significant cumulative impacts on the local road networks.

11.275B 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.

11.275C 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 developments..

draft confidential

Figure 11.16 Waddon – graphic updated



General character

~~11.276~~ 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 updated and moved to before vision

~~11.277~~ 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 updated and moved to before vision

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.

DM49.1A Within the Tall Building Zones identified in the policies map, buildings of height ranging from 21 to 33 metres (6-10 storeys) measured from the ground to the top of the building are considered appropriate.

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

~~11.278~~ The area in which 0 applies, is shown on the Policies Map.

~~11.279~~ 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.

~~11.280~~ 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.

~~11.281~~ 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

11.282 Table 11.17 below sets out the proposed use on specific sites in Waddon. **The proposed use on specific sites in Waddon are set out in chapter 14 Transforming the Purley Way.** 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
11	Groydon Garden Centre, 89 Waddon Way	Residential development
16	Heath Clark, Stafford Road	Secondary School and residential development subject to access from Stafford Road
25	Morrisons Supermarket, 500 Purley Way	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 likelihood of groundwater occurrence.
48	294-330 Purley Way	Mixed use development comprising retail store, commercial space and residential units

Ref no	Site name	Proposed use
301	Sea Cadet Training Centre, 34 The Waldrons	Residential use
316	PC World, 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
332	Superstores, Drury Crescent	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
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. 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.
350	Wing Yip, 544 Purley Way	Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community

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

Ref no	Site name	Proposed use
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)

Transformation Area

Brighton Main Line and East Croydon

Transforming East Croydon Station and corridor through the Brighton Main Line Upgrade Programme

Where we are now

12.1 The key issues that the borough faces in terms of the East Croydon Station and corridor through the Brighton Main Line Upgrade Programme are as follows;

- Prior to the COVID-19 Pandemic more than 300,000 passengers and 1,700 trains passed through the Croydon area each weekday, making it the busiest part of the country's rail network. East Croydon station is the 17th 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 2019¹⁰⁶.
- 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 2018/19¹⁰⁷. 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 require 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 and it is noted the Brighton Main Line Upgrade does not form part of the government's only current transport project, Network North – Transforming British Transport – October 2023. 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

¹⁰⁶ Office of Rail and Road passenger journeys by operator

¹⁰⁷ Office of Rail and Road estimates of station usage

securing a positive decision and move the project to the next stage of the Government's investment pipeline.

- 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.

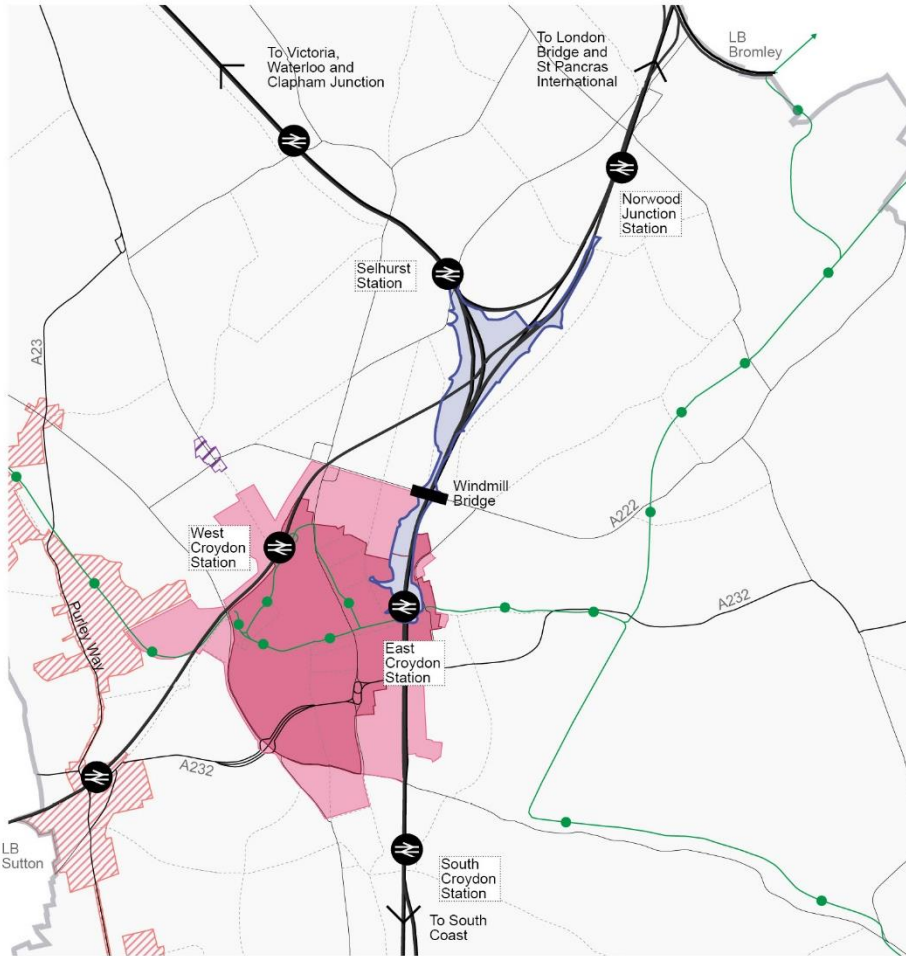
Vision - Croydon Area Remodelling Scheme (CARS)

- 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 approach in this chapter broadly reflects Network Rail's existing scheme designs and seeks to support delivery of CARS.
- However, given the current uncertainty over the final scheme and the constrained funding environment, the policies provide for a flexible approach to be applied to a future scheme.

- 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 delivery of 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 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.

Figure 12.1 - East Croydon Transformation Corridor (Indicative Figure)



-  Borough boundary
-  Croydon opportunity area
-  Metropolitan centre
-  Local centre
-  Purley Way transformation area
-  Brighton Mainline upgrade project
-  Railway station
-  Railway network
-  TfL road network (TLRN)
-  Borough distributor roads
-  Neighbourhood distributor roads
-  Existing tram network and stops



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.

draft confidential

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.

12.3 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.

12.4 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.

12.5 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?

12.6 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.

12.7 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.

12.8 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.

12.9 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.

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How we are going to get there

Policy SP9: Transforming East Croydon Station and corridor through the Brighton Main Line Upgrade Programme

SP9.1 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 Town Centre as a significant transport-oriented commercial centre alongside associated services and facilities and residential development.

SP9.2 To deliver an effective transport hub integrating all modes of transport the redevelopment will:

- 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.

SP9.3 Enhancements to public transport facilities will 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.

SP9.4 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 by 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.

SP9.5 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.

SP9.6 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.

SP9.7 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

Table 12.1 The allocations that fall directly under consideration of East Croydon Chapter are as follows:

Local Plan Allocation No.	Local Plan Allocation Address
37	45 Lansdowne Road
21	Former Royal Mail site, 1-5 Addiscombe Road
195	Stonewest House, 1 Lamberts PI
199	20 - 22 Lansdowne Road

draft confidential

What indicatively it could look like

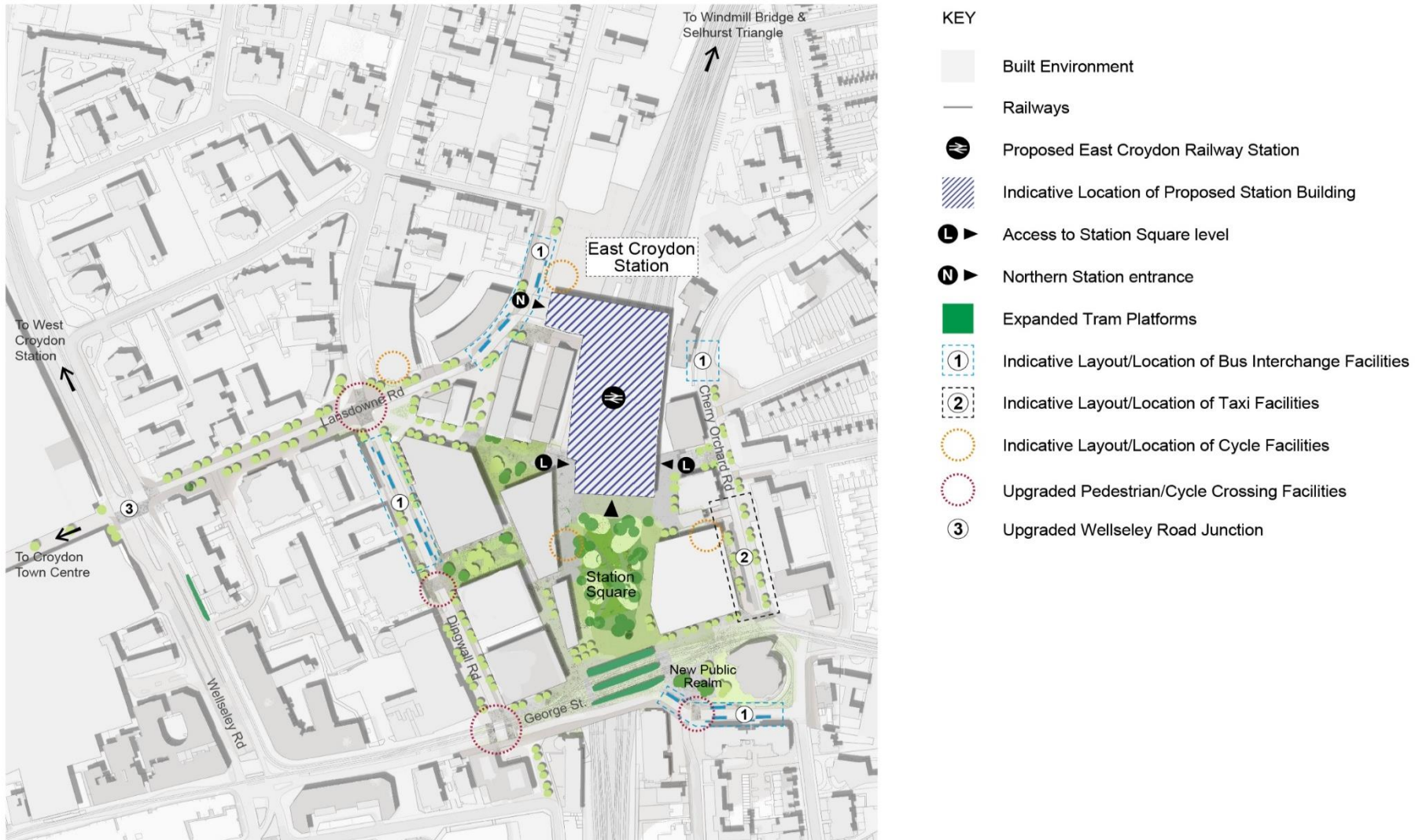


Figure 12.2 Indicative London Borough of Croydon Strategic Regeneration Framework (2020) East Croydon station and the new station square

Why we have taken this approach

12.10 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.

12.11 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.

12.12 Given the considerable change CARS could bring to Croydon it is critical the council has a Development Plan covering the project. This is to ensure that if in the future the business case is made, a statutory land use framework is in place to support the 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.

12.13 Notwithstanding the anticipated change, the project also presents significant growth and development opportunities for the Council.

12.14 The ambition is to create a high quality station and transport interchange at East Croydon, which responds to its new geographical context and spurs development linked to 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.

12.15 Central to achieving the vision of 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.

12.16 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 relocation 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.

12.17 An overarching urban design ambition for East Croydon is to deliver an environment where pedestrians are prioritised in the local 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 developments meet the public realm, care should be taken to improve the experience of being in the street.

12.18 Development around the new East Croydon Station and station square will be of exemplary quality, well integrated in alongside 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.

12.19 An upgraded pedestrian environment around the station will include 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 developments in the streets around the station.

12.20 As part of the Station Square proposals and the reconfiguration of bus stopping arrangements around the station, there is an opportunity to enhance the Tram/Rail interchange at East Croydon.

12.21 To enable increased capacity within the wider Tram network and in order to meet the service level increases set out in the London Mayor's Transport Strategy, an additional tram 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.

12.22 The provision of bus facilities, including a relocation of services to fully integrate the bus network with the new station, including 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.

12.23 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.

12.24 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.

12.25 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 contributing to an 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.

12.26 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.

12.27 The transformation provides a huge opportunity, but will cause significant disruption to existing residents, businesses and development proposals. The project 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 areas

12.28 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 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)

Policy **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 users of the rail, bus, tram and taxi services that pass through. To enable this both the new station building and the square should:

- a. Integrate built in digital infrastructure in the design and as a means to enable passengers of all mobility capabilities to efficiently move around and between the different transport modes;
- b. 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;
- c. 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:

- a. Produce 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;
- c. 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. 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 including nature based SuDS interventions and tree canopy cover;
- 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

12.29 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. A 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.

12.30 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.

12.31 The station building will shift approximately 150 metres along the rail tracks 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.

12.32 There will be a secondary entrance onto Lansdowne Road (north of Caithness Walk) which will unlock 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 to reduce impact.

12.33 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.

12.34 The station square will 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 building and Ruskin Square proposed developments to the west.

12.35 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.

12.36 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, re-prioritising

the area for pedestrians and cyclists and providing a focal point for this part of Croydon.

12.37 In addition to being an area for passenger transport movements the square will act as a notable gateway to the town 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 town centre.

12.38 The character of the area and sense of identity can be emphasised in the square through integrated public art. To be most effective this should be collaboratively designed delivered with the community.

12.39 The station square should be able to offer a rich variety of activity throughout the week providing multifunctional amenity opportunities and social infrastructure for a diverse range of communities and users of the square. These will need to be present in perpetuity and arrangements for this will need to be set out at the planning application stage..

Policy BML DM 2: Other improvement Areas along the Brighton Main Line

The 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 link the area into the wider Green Grid;

Windmill Bridge

BML DM 2.2 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.

BML DM 2.3 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

- e. Improvements and uplift in quality of playground provision at 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 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

12.40 Beyond the improvements around East Croydon station there are other improvements which contribute to the 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

12.41 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.

12.42 The policies seek to mitigate the impact of the infrastructure on surrounding properties, especially neighbouring residential areas and is a key policy requirement.

12.43 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

12.44 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

12.45 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.

12.46 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.

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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. North End runs along its central spine and includes a significant part of Croydon Town Centre's Primary Shopping Area. It sits within the Croydon Opportunity Area. Part of it also sits within the Central Croydon Conservation Area and has an array of listed and locally listed buildings. (See fig 13.1, Site Plan).

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:

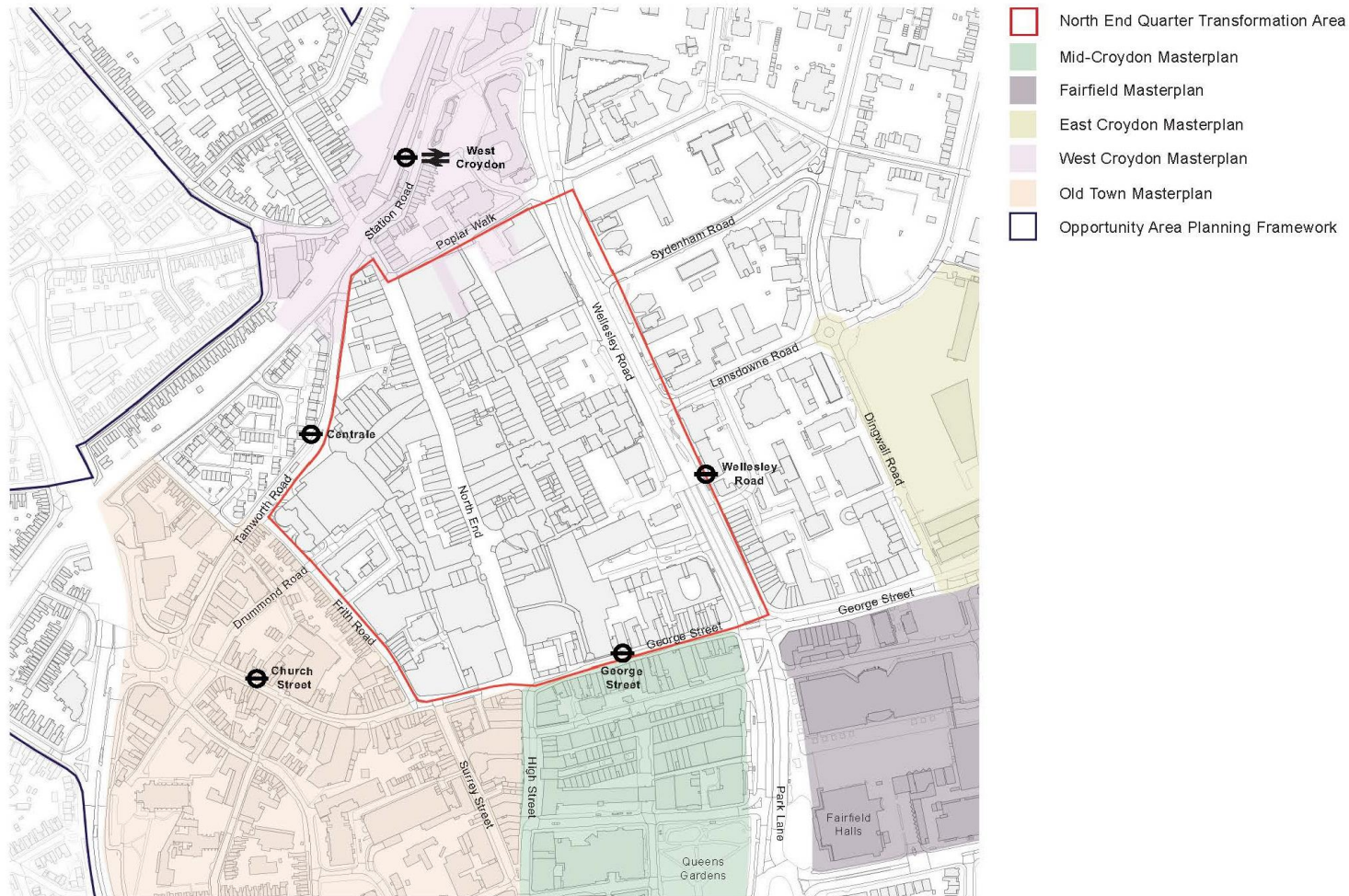
- Croydon town centre has a vibrant retail history. It grew swiftly during a post war boom. This saw significant redevelopment of its historic fabric, with the creation of new wide roads, the separation of pedestrians and vehicles and a large amount of commercial floor space built in the modernist and brutalist architectural styles. Fifty years on, the resulting fractured townscape, with many buildings suffering from a prolonged lack of investment, combined with an outdated and tired public realm, has created an environment that discourages people to spend time and linger.
- Competition from the development of other large retail centres such as Bluewater, Kingston and the development of the out of town big box retail centre in the Purley Way in the 1990's, has also contributed to this sustained period of decline for this previously thriving centre.
- The Whitgift Centre is an inward facing mall, lacking connectivity with its surrounding streets and public spaces. There are a series of historical passageways. This style of shopping, once drawing a clientele from across south London and the wider south east has undergone a sustained period of decline over recent decades and no longer suits modern retailers' needs or provides a strong leisure and food and drink offer.
- The once iconic anchor department stores in the distinctive buildings of Grants and Allders closed over 20 years ago.
- As a result of its historic land ownership and strong retailing heritage, Croydon town centre has more retail floor space than any other Metropolitan Centre in London, with 30,000m² more floor space than Stratford. Whilst Croydon town centre is in the top ten highest rates 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.
- Whilst many town centres in general have declined over the past 20 years, with the increase in online shopping and changing trends in the retail industry; COVID-19 accelerated these pre-existing challenges. Today, primary retail zone (Zone A) rents are now significantly reduced and in Croydon they are still declining.

- Centrale shopping centre, on the western side of North End, now provides the main retail offer. Opened in 2004, it offers relatively modern accommodation, however, the draw of Croydon shopping is no longer strong enough and even this shopping centre, which retains several major fashion brands and a department store is now challenged like many centres.
- North End and George Street retain many 19th and early 20th century buildings reflecting Croydon's past commercial prosperity. A number of frontages are of high quality and protected as part of Central Croydon Conservation Area. 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 around Wellesley Road is important to its character and represents an interesting challenge for redevelopment.
- Wellesley Road is a key barrier to pedestrian movement between East Croydon station and the Whitgift Centre. Development activity around the station has been strong in recent years, however this has not migrated down to the retail core. The severance caused by this major road requires addressing to improve east west connectivity of the town centre and to create an environment that is attractive for pedestrians.
- Currently Croydon town centre has in excess of 8,500 car parking spaces which is 2,000 more spaces more than the next closest Metropolitan Centre (Kingston) in London using valuable land and promoting car borne trips.
- 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, does not meet current expectations and has suffered from years of uncertainty and a lack of investment.
- 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 small and medium businesses.

- Redevelopment and regeneration of the Whitgift Centre is still the only way to deliver the changes that are needed, but it is recognised that this is likely to be a phased medium-term process reliant upon the timing and appetite of the development industry and wider economic and market conditions. Until this time, meanwhile and short-term solutions are necessary to bring improvements without impeding the future redevelopment or creating new problems of inappropriate uses and poor design, which accentuates existing issues and reinforces the cycle of decline.
- Developers continue to see the potential of the Whitgift redevelopment, evidenced by three comprehensive planning consents granted over the last ten years for new retail led mixed use schemes (which has involved the approval of the associated Compulsory Purchase Order), however the fast-changing nature of retail and town centre leisure has run ahead of the planning process and no permission has been implemented.

Figure 13.1. North End Quarter Transformation Area Boundary (with surrounding masterplan areas and partial OAPF boundary)



Vision for The North End Quarter

- The North End Quarter will build on its history as a residential, commercial and social hub, to be an attractive destination to live, work and visit with a vibrant public and cultural offer alongside retail, leisure and commercial development.
- It will continue to be an integral part of the Metropolitan Centre for the borough and a strategic commercial centre in South London.

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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 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, 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.
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

13.2 Town centres are increasingly becoming places where people live as well as work, shop, visit and socialise. Residential uses have the potential to supply activity for uses that extend into the evening, thereby keeping the centre active for longer. 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 with 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, 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.

13.3 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 Metropolitan Town Centre. A range of commercial, cultural, leisure,

(including evening and night time uses) will be needed to achieve a sustainable 'destination.'

13.4 Bricks and mortar retail will remain an important component of town centres in the future. 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. 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 including green infrastructure. This will create a much more pleasant environment in which to shop, an attractive destination to socialise and enhance the area to support its economy while having environmental benefits. A more diverse mix of uses and infrastructure will also be needed to support a growing residential community in the town centre.

13.5 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 with no activation or natural surveillance. Wellesley Road is a dual carriageway with tram lines and with limited pedestrian surface crossings. Redevelopment and regeneration 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 existing poor relationships of the shopping centres with the surrounding townscape, consisting of illegible public realm, inactive frontages, left over space, poorly designed car park entrances and highly visible service yards and rear entrances to the Whitgift Centre, will all be improved to create overlooked and attractive townscape. Wellesley Road will need to function as more than just a transport corridor segregating the Metropolitan Town Centre and contribute to a positive sense of place.

13.6 The significant heritage value of the area (within the Central Croydon Conservation Area with its Grade I listed Whitgift Almshouses, the Grade I listed St. Michael and All Angels Church and other listed and locally listed buildings) will need to inform future redevelopment proposals, resulting in an enhancement of their settings. Whilst acknowledging that future development is intended to transform the North End Quarter into a high density, mixed use and active heart of the town centre, development should use the area's rich heritage and evolving surrounding townscape as a positive foundation to build on and seek to further enhance its special history and character, while improving the setting of these heritage assets with a high quality public realm.

13.7 Post war development was predicated on car use and it has been a root cause of the poor pedestrian connectivity and accessibility, contributing to a lack of inclusivity in the public realm and built environment. As a result improved connectivity with the wider town centre and the principle of permeability needs to be placed at the heart of the revival of the North End Quarter.

13.8 Transformation is needed to create a diverse and resilient central neighbourhood with the area providing for a mix of commercial uses and social infrastructure to support a new notably increased residential community. The transformation will result in range of commercial and community spaces that help celebrate and showcase local organisations whilst supporting Croydon's diverse community. It will complement the rich and distinctive character of the adjacent Old Town and West Croydon areas.

13.9 Transformation of the North End Quarter will be led by a masterplanning process. The first proposal for substantial redevelopment of the area should be informed by a high-level analysis of how the policies of the Transformation Chapter and the Local Plan will be achieved. This masterplan should form part of a planning application and will cover the application site as well as the rest of the Transformation Area, or another reasonably defined surrounding area. The Council's Town Centre

Regeneration Strategy and Delivery Plan is underway separately and will inform the Croydon Opportunity Area regeneration.

How we are going to get there

NEQ SP 1 Transforming the North End Quarter

NEQ SP 1 The significant change and redevelopment of the North End Quarter will be led by an initial masterplan which will demonstrate how the policies of this Transformation Chapter are achieved which delivers the following outcomes:

- a. Deliver at least 1,250 new homes, town centre uses, including retail floorspace focussed along North End and commensurate to a Metropolitan Centre.
- b. Development will be appropriately sequenced, to ensure that the town centre remains active throughout the phases of redevelopment. This will include appropriate triggers to retain a minimum quantum of town centre floorspace within the Primary Shopping Area. Meanwhile uses will be encouraged as part of a proposal linked to the phasing of a larger development, and.
- c. The infrastructure requirements to deliver and mitigate the comprehensive development of the Transformation Area.

NEQ SP 2 The redevelopment of the North End Quarter should build upon its historical context creating attractive spaces suitable to a range of commercial and town centre uses, as well as residential uses through the following outcomes:

- a. The North End street frontage between George Street and Poplar Walk will serve as a primary frontage within the town centre's Primary Shopping Area;
- b. The areas behind North End street frontages will be new neighbourhoods.
- c. To deliver a more sustainable location and to support new town centre living, new routes through the town centre will be established, replacing the current enclosed shopping centres streets with permeable open active town centre streets, the routes joining the North End Quarter and the spine routes will have Secondary Frontage uses:
 - i. North-south to the east of the North End façade, linking George St with Poplar Walk.

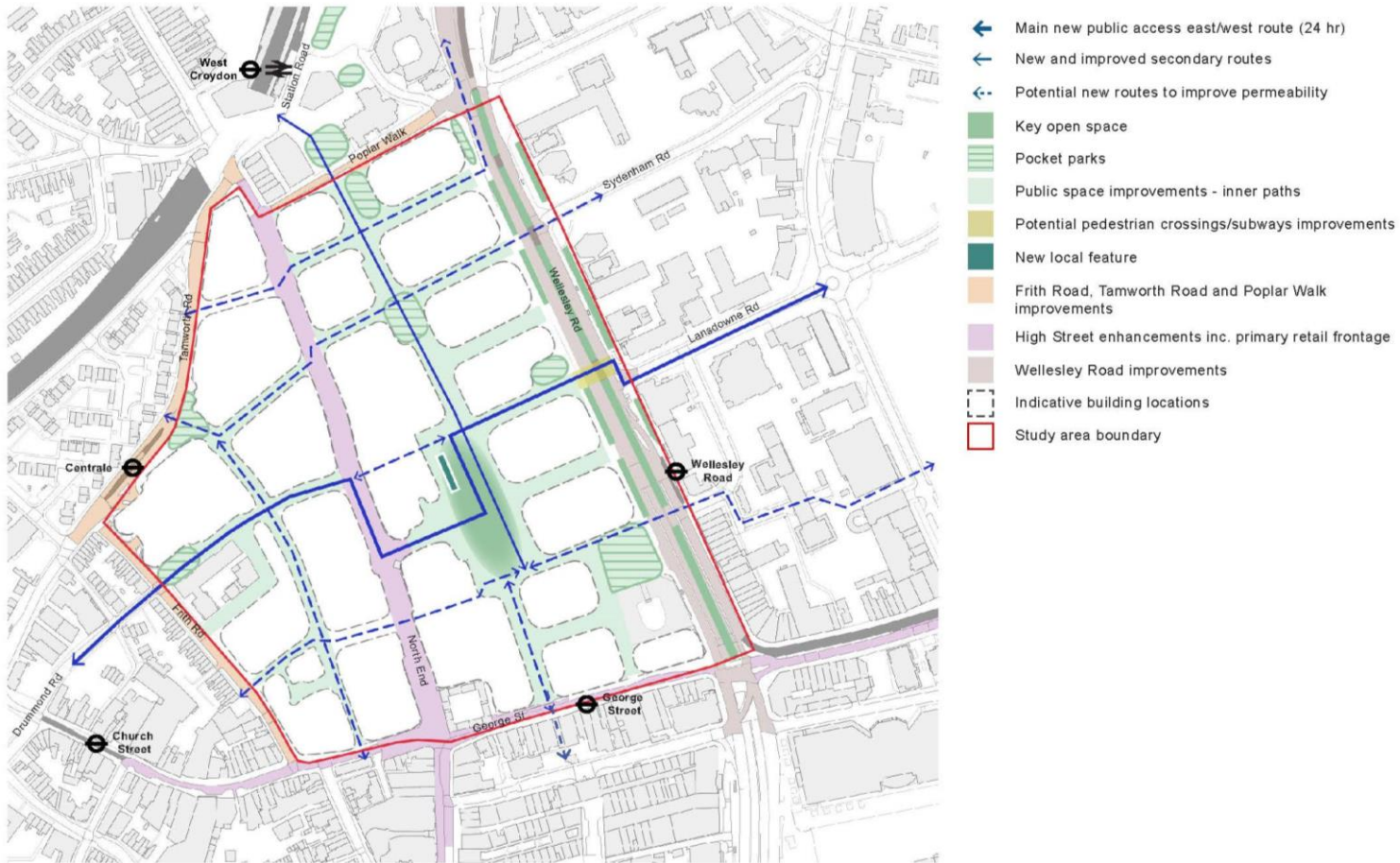
ii. East-West, potentially including creating improved at-grade connections across Wellesley Rd, linking Sydenham Rd with Centrale tram stop, Landsdowne Rd with Drummond Rd and Walpole Rd with Priddy's Yard.

- d. Facilitate connections with the rest of the Croydon Opportunity Area Place and the wider borough through improved pedestrian and cycle permeability.
- e. Improved connections to West Croydon Station and beyond to the local businesses on London Road.
- f. Capitalise on the proposed pedestrian crossings across Wellesley Road, with opportunities to improve walking and cycling infrastructure along Wellesley Road alongside urban greening without compromising the future creation of a two-way tram route and combining space for buses, cyclists and trams.
- g. Tall buildings and higher density development are supported to facilitate and deliver the scale of transformation required. Tall buildings should generally be focused towards the eastern side of the Whitgift centre. All tall buildings should respond to the setting of the Central Croydon Conservation Area and protect the most sensitive locations in terms of privacy, heritage assets, security, overshadowing and wind.
- h. An improved public realm network established. This will include new spaces at a range of scales to benefit both new occupants (commercial and residential) and visitors to the area and should be complementary to the town centre uses proposed.
- i. Existing Heritage Assets should be used as a key factor in the design of development, ensuring that development respects their collective and individual settings, balanced against the transformational change expected across the area.
- j. The area will be a location for higher education uses.
- k. Where development is of an insufficient scale to meet all of the objectives of this policy, supporting evidence will be required to justify not meeting the scale outlined in policy.

draft

What it will look like – Indicative Spatial Vision

Fig 13.3 Indicative Spatial Vision as informed by the Future Destination of Retailing Study



Why we have taken this approach

13.10 Since 1945 Croydon has relied heavily on large scale, comprehensive developments within the town centre to deliver change. These schemes are 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. Initially a simple spatial approach to the redevelopment of the town centre needs to be provided showing that the objectives and policies of this transformation chapter can be achieved.

13.11 The strategic spatial approach requires the delivery of an area wide Council supported masterplan, series of masterplans or equivalent document(s) that set out;

- a. How a joined up, coordinated spatial framework that guides the coordinated redevelopment and revival of the town centre across multiple sites and phases can be achieved.
- b. The identification of other developments and existing uses ensuring that meanwhile uses are not constrained.
- c. Phasing and process for gaining planning consent
- d. How the policies are to be interpreted
- e. Phasing and delivery principles across the NEQ area

13.12 .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.

13.13 Short term phases of development will also play an important role in the revival of the town centre as it undergoes transformation. These will help to hold off further 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. Interim uses where sites are

unlikely to be redeveloped in the short term will be welcomed and encouraged provided that they do not compromise the long term objectives of the area and contribute to the area's vitality and vibrancy.

13.14 A large proportion of the North End Quarter is located in the Central Croydon Conservation Area which retains significant heritage assets and a distinct local character. 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.

13.15 Many buildings within the North End Quarter 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 – where retention cannot be achieved due to the requirements for transformational change and benefits for the NEQ as new buildings, development will be supported recognising the overarching objectives of the regeneration of the town centre.

East-West routes and the Wellesley Road frontage

13.16 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.

Local character, townscape and public realm

13.17 Development 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 some 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.

13.18 Buildings in the town centre 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. Redevelopment needs to balance the need for growth and achieving transformational change, with a design approach which preserves or where possible enhances the setting of Central Croydon Conservation Area, surrounding heritage assets and other sensitive locations.

13.19 The flexibility to providing a range of sizes of public spaces will support a diversity of uses and enable the redevelopment of the town centre. Where the enhanced public realm includes new and improved green and blue framework where possible this 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.

Transport and servicing

13.20 The North End Quarter lies in the heart of Croydon town centre between East and West Croydon stations. Bus routes surround or converge on the area serving large roads leading to the rest of the borough. There are also tram stops serving the town and taking passengers to the rest of the borough and beyond.

13.21 As the North End Quarter lies in the most accessible location in the borough any transformation should seek to maximise the opportunity

NEQDM 1-North End: Town centre retail focal point

Serving as the central 'civic' spine of the North End Quarter and key pedestrian thoroughfare from West Croydon Station to the Mid-Croydon quarter, development on North End should:

for development to be supported by a range of transport options to reduce the carbon footprint of development and improve air quality in the town centre. However, a balance needs to be achieved to ensure a commercially successful town centre is created. This may result in an overall reduction in the level of car parking in the North End Quarter compared to the start of the plan period.

13.22 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.

Designations shown on the Policies Map

13.23 The designations used to address the policies are shown on the Policies Map. The designations are summarised in table 14.5 below:

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)
- Town Centre Health Check 2017
- Retail Study 2024

- a. Have primary frontages at ground floor level through design and land use.
- b. Provide for 24-hour presence; including outside food and beverage spaces, restaurants and cafes; experiential retail; civic, leisure, community, creative and cultural uses; and
- c. Integrate well-designed walking routes, cycle parking and consider the relationship with perpendicular pedestrian and cycle routes.
- d. Contribute positively to street frontages to ensure a high quality and coherent streetscape, whilst preserving and enhancing the setting of heritage assets.
- e. Complement the existing predominant building heights of 3 and 4 storeys along the North End frontage, respecting and responding appropriately to sensitive locations.
- f. Retaining and enhancing the existing façade of the former Alders Department Store.
- g. 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; and
- h. Ensure that development is designed to protect the retention and respect the setting of the Alms Houses.

How the policy works

13.24 North End is a key pedestrianised artery and civic space in the town centre requiring the provision of a recognisable Primary retail Frontage. Behind North End Quarter a mix of uses will be provided on a network of secondary streets that will become secondary retail frontages. Above the ground floor level, a new residential neighbourhood will evolve. To serve this neighbourhood there will need to be a series of 24-hour spaces off the North End Quarter. These might comprise of a series of small open spaces with a larger open space that will serve as a recreation space for residents and as a feature of the town centre.

13.25 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 Alders 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.

13.26 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, will provide a unique identity to the destination, contributing greatly to the attractiveness of the North End Quarter as a place to spend time.

13.27 Providing cycle routes to and cycle parking along North End will encourage active travel and its associated health and economic benefits.

Active travel will assist in creating vitality and help with surveillance along North End and allow increased use of this important link through to West Croydon Station.

Policy NEQ DM2 North End: Central Neighbourhood

An area bounded by North End, Poplar Walk, Wellesley Road and George Street to the east of North End Quarter (Whitgift) and the area bounded by North End, Tamworth Road, Frith Road and Church Street to the west of North End Quarter (Centrale) will be developed, in whole or part as a diverse residential led central neighbourhood with public life at its heart. It should;

- a. Provide a network of streets and spaces to create a new residential neighbourhood;
- b. Ensure that these are 24 hour to serve town centre living and supporting commercial uses;
- c. Be laid out to improve north – south and east – west permeability and connectivity throughout the quarter, including a key 24 hour east-west route
- d. Provide for a vibrant mixture of uses
- e. A public and sustainable green framework
- f. Include a network of public realm; and
- g. Between North End and Wellesley Road, include a new anchor public space that serves as an open space to serve residents, the North End Quarter area and wider Croydon Opportunity Area.

How the policy works

13.28 Behind North End a series of secondary streets will be created. Above the ground floor level, a new residential neighbourhood will evolve. To serve this neighbourhood there will need to be a series of streets that

will be 24-hour spaces. These will have a series of small open spaces with a larger open space that will serve as a recreation space for residents and as a feature of the town centre.

Policy NEQ DM 3: Northern Boundary - Poplar Walk

Reflecting that this is the northern boundary and northern entrance of the North End Quarter, development in this area should support and enhance current uses beyond its boundary and be designed to reflect the distinctive character to the north of the quarter by:

- a. Incorporating new active frontages.
- b. Work with land level changes in the area to ensure step free and active access of the public realm and into buildings.
- c. Ensuring the setting of heritage assets is respected and enhanced including, in particular St Michael and All Angels Church, within the context of surrounding built form;.
- d. 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.
- e. Integrating a strategic cycle route; and
- f. Building on the diverse character of the area at the edge of London Road.

How the policy works

13.29 Poplar Walk and Station Road are close to the West Croydon Station, the 'new doorway to Croydon' 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 the new St Michael's development and its enhanced public realm.

13.30 The area around Poplar Walk features a vibrant collection of uses and building scales which contributes to its distinctive character, varying from fine grain shopfronts to large office buildings, residential towers and carparks. Innovative new uses on Poplar Walk should be explored, building upon the existing range of uses and range of building sizes. 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.

13.31 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.

13.32 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, the new public space at the St Michaels creates an important alternative route, demonstrating permeability and place making. Public realm improvements with improved permeability between Station Road and Poplar Walk, will help improve pedestrian accessibility and also support active travel into the Quarter

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Policy NEQ DM 4: Wellesley Road

This is the main highly trafficked route into Croydon town centre through all modes of travel however the redevelopment of this transformation area should contribute to reducing the dominance of the road infrastructure by:

- a. Providing active frontages;
- b. Delivering a surface level crossing to create a strongly legible east west route at the junction of Lansdowne Road;
- c. Limiting the impacts of car parking and servicing;
- d. Address the limited level in sustainable green infrastructure within the area;
- e. Complement and enhance the historic modernist architecture of the area;
- f. Ensure tall buildings complement the existing surrounding townscape, respect and enhance the setting of heritage assets, address environmental impact and create a cohesive townscape; and
- g. Ensure buildings fronting the western sides of Wellesley Road enhance and connect to the public realm around them and appropriately announce themselves with activity integrated wayfinding and public access.

How the policy works

13.33 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.

13.34 Green infrastructure that is informed and supported by Green Grid and Healthy Streets principles will be essential to reducing the severance

Policy NEQ DM5: George Street (to the west of Wellesley Road) – Historic Southern Edge

Development in this area should be informed by its rich heritage assets and should form the southern boundary of the North End Quarter by:

- a. Creating a distinctive historical entrance on the southern edge of the quarter and along a key east-west route through the town centre and creating a strong building line; and
- b. Improve shopfronts and building facades along the George Street frontage, ensuring that continuous, attractive and active frontages are created and contribute to the distinctive offer of this key town centre arterial route.

How the policy works

13.36 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. The medieval street pattern is distinct to the area and includes a series of high quality Victorian commercial buildings with prominent dormers and gables. The Grade I Listed Whitgift Almshouses sited on the corner of George St and North End underpin Croydon's depth of history. Development should reflect and enhance this character with the aim of

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.

13.35 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.

preserving and strengthening a clear building line and the streetscape. 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.

13.37 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 connections to the historic

Thomas Turner Path and to enhance pedestrian access through to Park Street.

13.38 The internal arcade in the former Alders 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.

13.39 The provision of interim and short-term uses for existing buildings is supported provided that they do not compromise the long-term

aspirations and are limited as temporary uses. The former Alders 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 short and / or medium-term precursor phase that in turn informs longer term use and development proposal for the building.

13.40 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.

Policy NEQ DM6: Frith Road and Tamworth Road Western Edge

Development in this area should be of a scale and design to enable it to gradually integrate with the predominantly two storey residential development adjoining the western boundary of the Transformation Area by:

- a. Concentrate residential development on the Frith Road boundary with a transition through a network of streets to the commercial North End;
- b. There should be a legible entrance with high quality public realm into the west to east link to North End from Frith Road; and
- c. Improving the existing harsh environment where the service area to the rear of the shopping centre faces the street.

How the policy works

13.41 This part of the transformation area could go through the most significant change and improvement. The area is dominated by harsh commercial rear façade of the Centrale Shopping centre. It contrasts with the Frith Road Victorian residential terraces behind that are both domestic character and scale. Adjacent to this boundary of the transformation area is the Old Town Conservation Area. The boundary along Church Street has a continuous commercial frontage which is made up of a mixture of Georgian, Victorian and 20th century buildings. This is a successful lively

and active frontage that needs no change but could be better linked to the north.

13.42 As a result of the topography there is a significant height change from North End to Frith Road if considered in section. The trams run along Church Street and Tamworth Road bounding this area with the closest tram stop, Centrale immediately adjacent to the north west portion of the transformation area. The permeability of the area should be improved with the east to west link from North End. Frith Road should continue to be a key pedestrian route between Church Street and

Tamworth Street. However the servicing arrangements should avoid this street as it will eventually become residential on both sides of the road.

13.43 The redevelopment of the area to the west has the opportunity to create a more appropriate transition from the commercial to residential

areas. There will still need to be servicing and parking to support the commercial uses on North End but the access to this should use the redevelopment to allow this to be reconfigured. The significant additional residential development would need to be designed to enable the efficient functioning of the commercial uses alongside the new residential neighbourhood.

Table 13.5 Proposals for uses of land of specific sites in North End Quarter Transformation area

Ref no	Site name	Proposed use	Phasing
220.	9-11 Wellesley Road	Residential and/or hotel and/or retail and/or finance	76
393.	Whitgift Centre, North End	Masterplanned redevelopment to meet the requirements of the North End Quarter transformation chapter.	1080
NEW 4	Centrale	Masterplanned redevelopment to meet the requirements of the North End Quarter transformation chapter	636

Transforming the Purley Way

Where we are now

14.1 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 706,000m² of employment floor space and providing approximately 10,000 jobs. The key issues that the borough faces in terms of the area are as follows:

- The majority of businesses in the area are Small and Medium Enterprises (SMEs) comprising 0-9 employees. Given its strategic location relative to central London, airports and road connections, the number of logistics, storage and distribution businesses is growing.
- 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 and this is likely to affect future demand for the mainly 'big box' shops, leisure and cultural infrastructure in the area.
- The area includes established and a growing residential community, which has increased in population 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 and there is significant demand for warehousing space locally. Demand is also changing, as witnessed by the proposed Amazon distribution centre on a non-Strategic Industrial Land (SIL) designated site at Trojan Way.
- The Purley Way (A23) corridor itself currently dominates and divides the area. The road is heavily trafficked and public transport is limited along the corridor. It also has an unpleasant street environment which 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 nearby 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 former lido diving boards were operational in their original uses within living memory and as such hold a particular local significance amongst older residents.
- Local engagement has revealed that the retail and leisure parks 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 developments with important retail and industrial areas and existing communities in Broad Green and Selhurst and Waddon. Three new local centres and one neighbourhood centre will be delivered, with roles complementary to 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, together

with additional health, child care, education and other community facilities will support new homes in these centres. The important 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, linked by a network of high quality walking and cycling routes. Deculverted sections of the River Wandle will help to link 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.

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, improve skills and education and renew housing, community and environmental conditions.

Strategic Objective 5: Ensure that well designed, high quality 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, arts & culture, education, health & wellbeing, hospitality and leisure and entertainment facilities to meet the aspirations and needs of diverse and growing communities

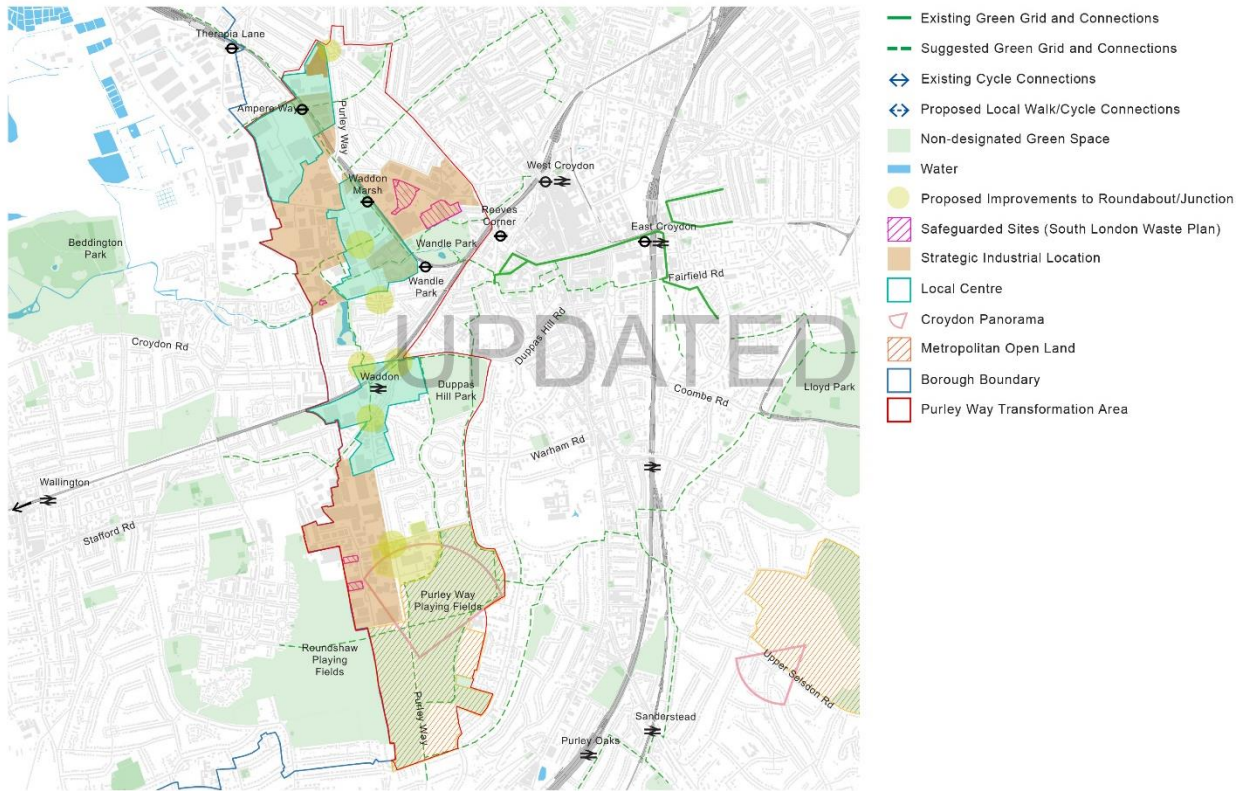
Strategic Objective 7: Conserve, enhance and create spaces and buildings that foster safe, healthy and cohesive communities.

Strategic Objective 8: Improve the public realm, smart city and social infrastructure including accessibility, inclusivity, permeability, sustainability and ease of movement to, from and within the borough; ensuring this enhances and integrates the borough's green and blue grids and in turn public health and wellbeing.

Strategic Objective 9: Ensure the responsible use of land, natural resources and management of waste to mitigate and adapt to climate change.

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Figure14.1 Areas for transformational change and areas of urban evolution



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Table 14.1: Areas for transformational change

Area of transformation	Strategic opportunities
1. Valley Park Local Centre and environs	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.
2. Waddon Marsh Local Centre and environs	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 replacing car parking with active frontages to accommodate new community uses, a high quality public realm and a variety of innovative housing models, co-located with retail, leisure and industrial uses.
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 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.
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.

How we are going to get there

Transforming the Purley Way

PW SP1.1 The Purley Way Transformation Area will make a significant contribution to the borough's Spatial Strategy, delivering 6,300 new homes alongside a substantially reconfigured set of local centres and an improved set of green spaces and active travel options. To support the Transformation Area, the following new centres will be created:

- a. Valley Park Local Centre
- b. Waddon Marsh Local Centre
- c. Fiveways Local Centre
- d. Waddon Way Neighbourhood Centre

PWSP1.2 Development will strengthen the important role that the area plays in terms of business and enterprise. This will be achieved by:

- a. Consolidating, intensifying and safeguarding Strategic Industrial Land (SIL) while ensuring that there is no net loss of industrial and warehousing/distribution floorspace (B2/B8) and non -Town Centre employment generating Class E uses within the Transformation Area;
- b. Protecting existing industrial and warehousing/distribution floorspace and facilities, ensuring that businesses can operate on a 24-hour basis and 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 offices 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, additional 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, such as workplace crèches and cafés; and
- g. Encouraging proposals that will deliver additional provision of convenience goods to support new neighbourhoods.

PWSP1.3 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. Safeguarding and revealing the significance of existing landmarks, views and heritage assets (and their settings) and drawing upon these assets to develop attractive development that responds to the character of Broad Green, Selhurst and Waddon, to enhance the identity of places along Purley Way (A23); and
- d. Ensuring that development has a positive relationship with and provides natural surveillance of streets, routes and spaces. High-quality tree planting and landscaping helps ensure an attractive walking and cycling environment along heavily trafficked routes.

PWSP1.4 Growth in the area incorporates sufficient additional social infrastructure to meet additional demands and facilitates integration between existing and new communities. New facilities should be located in the new Local and Neighbourhood Centres alongside enhanced active travel 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.

PWSP1.5 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 for 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); and

c) Ensure any green renewable energy technologies incorporated in developments are compatible with a future connection to the DEN

Green Grid & Open Space

PWSP1.6 Development that will improve access to green and blue spaces in the Transformation Area will be supported. Particular projects include:

a. The development of the Wandle Valley Regional Park;

b. De-culverting the River Wandle and integrating the open river with developments, routes and spaces;

c. The provision of additional green space and public realm, particularly in the area to the north of Mill Lane/Waddon Road;

d. Improvements to Canterbury Road Recreation Ground, Wandle Park, Duppas Hill Park, Waddon Ponds, Purley Playing Fields and Purley Way West are supported; and

e. Tree planting along Purley Way (A23) and other public highways.

Transport

PWSP1.7 The Purley Way (A23) corridor (as defined in Figure 14.1) will be improved to create 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. The scale and transport requirement to facilitate these improvements will be informed by Transport for London (TfL) transport modelling. The following design principles will be applied:

a. Provide a street-based frontage for new high-quality buildings;

b. Frame the street with buildings that establish a rhythm of rising and falling heights 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;

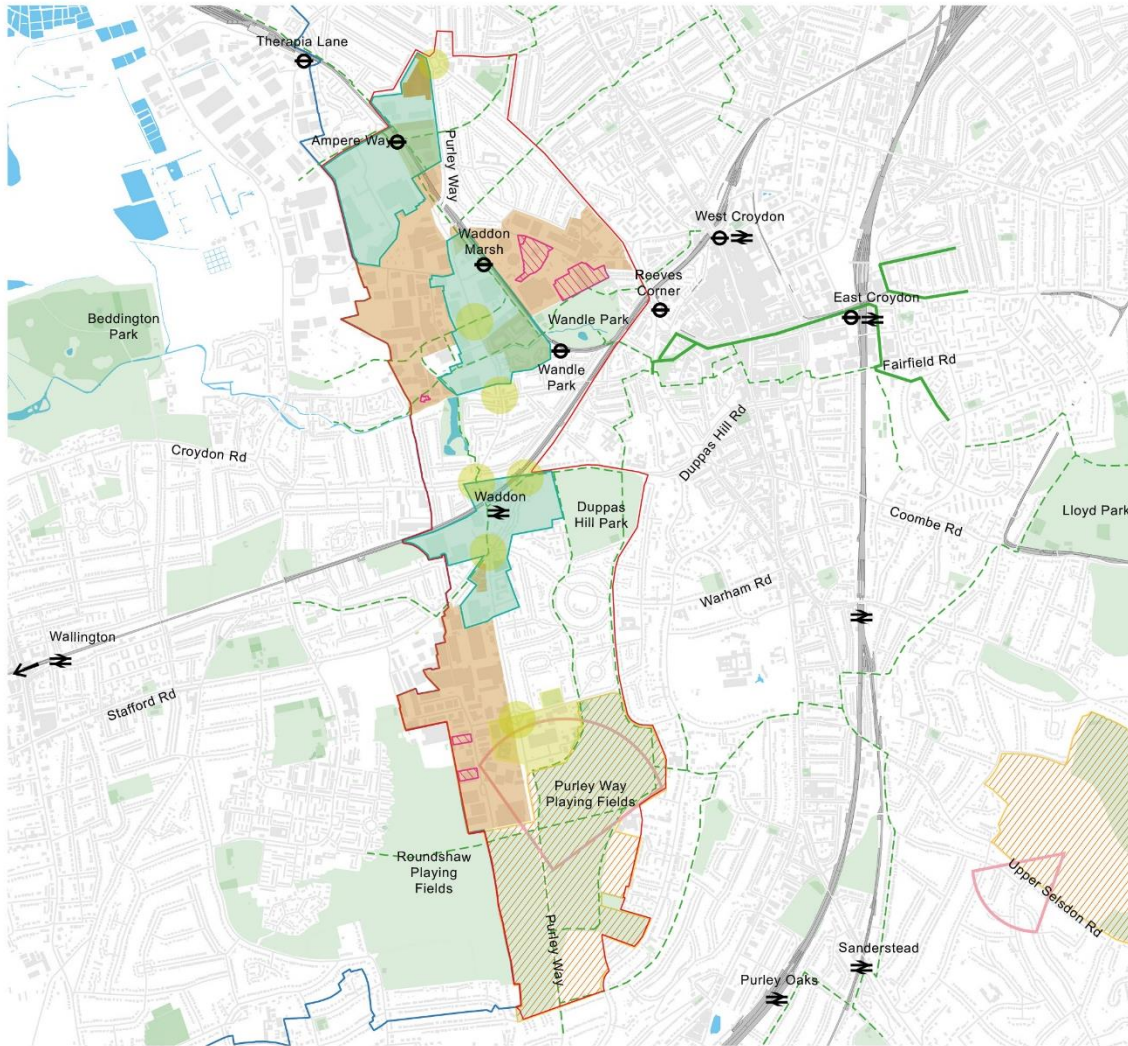
- d. Establish parallel routes that provide priority for pedestrians and cyclists, stitch together development with existing neighbourhoods and provide high-quality amenity space; and
- e. Create an overall reduction in parking across the Transformation Area, including through the consolidation of surface parking into multi-storey facilities where appropriate.

PWSP1.8 Working with landowners, developers, Transport for London, Network Rail and other stakeholders to secure 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 maximises the use of sustainable modes of transport. This will be achieved by:

- a. Creating a network of attractive walking and cycling routes that safely and conveniently connect developments 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 Tram branch;
- e. Establishing Purley Way (A23) as a sustainable transport corridor by reducing 'pinch points' to secure wider footways, improved cycle lanes, 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 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; and
- i. Improving and reducing the impact of deliveries and servicing to designate traffic routes for new industrial, warehousing/distribution and retail developments.

What it will look like

Figure 14.2 Purley Way transformation area



- Existing Green Grid and connections
- - - Suggested Green Grid and connections
- ↔ Existing cycle connections
- ↔ Proposed local walk/cycle connections
- Non designated green space
- Water
- Proposed improvements to roundabout/junction
- ▨ Safeguarded sites (South London Waste Plan, 2020)
- Strategic Industrial Location
- Local Centre environs
- △ Croydon panorama
- ▨ Metropolitan Open Land
- Metropolitan Open Land
- Purley Way Transformation Area

Why we have taken this approach

Homes

14.2 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 a significant number of homes over the plan period.

14.3 The expected level of growth is likely to increase the number of people living in the area over the plan period. The need to make additional provision of physical, social, cultural and green infrastructure to serve a bigger population and integrate with existing residential and business communities is addressed under a number of headings below.

14.4 The co-location of housing with other uses will help 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 enable delivery of the site.

14.5 The Agent of Change principle, as set out in London Plan Policy D13, will be applied to protect existing SIL and waste sites safeguarded in the South London Waste Plan (including those that are in LB Sutton) to ensure that new housing does not compromise the integrity and effectiveness of industrial and waste uses.

14.6 The detailed location and design of new housing will have to respond positively to the existing context. 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. Communal open space and play space will be expected to be carefully located in sheltered areas of developments.

14.7 Developments will need to 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.

14.8 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). 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.

14.9 Beyond this number and dependent on the outcome of TfL transport modelling, public transport and specifically capacity on the existing tram network will need to be increased, either by longer trams, increased frequency, or both.

Employment

14.10 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 160,000m² of 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 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.

14.11 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.

14.12 In order for the area to be successful and sustainable, a series of new Local Centres in the area will be the focus for main town centre uses, 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 live and work with good access to local services. The 'Town Centre and Retail Study' 2023 indicates that it is not appropriate to support further big box retail in the Purley Way area as it detracts from trade in the Croydon Opportunity Area. The study does however support for the provision of additional convenience goods. The wider environs of these centres will successfully link with their residential and industrial hinterlands. Here, appropriate and diverse business together with residential uses will be the primary uses. The creation of attractive streets will help integrate existing and new residential and business communities.

14.13 The new Neighbourhood Centre at Waddon Way will provide small-scale (less than 280m²) day-to-day shopping and services for the local business and residential communities, shift workers and users of the Purley Way Playing Fields.

14.14 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

14.15 Developments 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 and Ikea Towers. Opportunities will be sought to deculvert the River Wandle. Development 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).

14.16 New buildings and open and public realm spaces will draw on the positive characteristics of Broad Green, Selhurst and Waddon Places to 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.

14.17 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 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

14.18 The Purley Way Transformation Area includes the Harris Academy Croydon, Harris Primary Academy Haling Park, Harris Primary Academy Purley Way, Harris Academy Purley Secondary and just outside the area, the former St Andrews Secondary School. Planning permission has been granted for an additional 3-FE primary school at 91-93 Canterbury Road. The area also has a number of childrens' 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.

14.19 The expected level of demand for secondary school places should be capable of being absorbed by the existing secondary schools in the area, including the possible re-use of the site where St Andrews CE School is located just outside the area (subject to agreement from the Southwark Diocesan Board of Education).

14.20 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 sharing local facilities and experiences.

Environment and Climate Change

14.21 The orientation, layout and design of developments, 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 developments could respond to and improve existing air quality conditions including site orientation and ground floor uses/design.

14.22 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.

Green and Blue Grid & Open Space

14.23 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 and more biodiverse place.

14.24 The council supports the continued development of the Wandle River 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 deculvert stretches of the River Wandle as and when development opportunities arise to manage flood risk, secure connectivity and biodiversity net gain.

14.25 Canterbury Recreation Ground, Duppas Hill Park and Purley Way Playing Fields provide much needed open space within the Purley Way 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 Allocation 152).

14.26 The Council will seek to secure additional high-quality publicly accessible green open spaces and areas of public realm 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.

14.27 The Council will invest in public realm and lighting improvements across the Purley Way Transformation Area. These may include providing a network of high-quality pedestrian routes connecting Local and Neighbourhood Centres and using

Transport and communication

14.29 The Purley Way Masterplan SPD includes detailed strategies and guidance for improving walking and cycling infrastructure in the area. The Council will ensure that developments will provide natural surveillance of streets, routes and spaces and will require high-quality tree planting and landscaping to ensure provision of

deculverting and naturalised sections of the River Wandle to provide walking and cycling routes.

14.28 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; and
- 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.

attractive walking and cycling environments along heavily trafficked routes.

14.30 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, located to support efforts to create or strengthen Local/Neighbourhood Centres; and
- c) Reducing walking times from across the area to public transport nodes.

14.31 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.

14.32 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).

14.33 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.

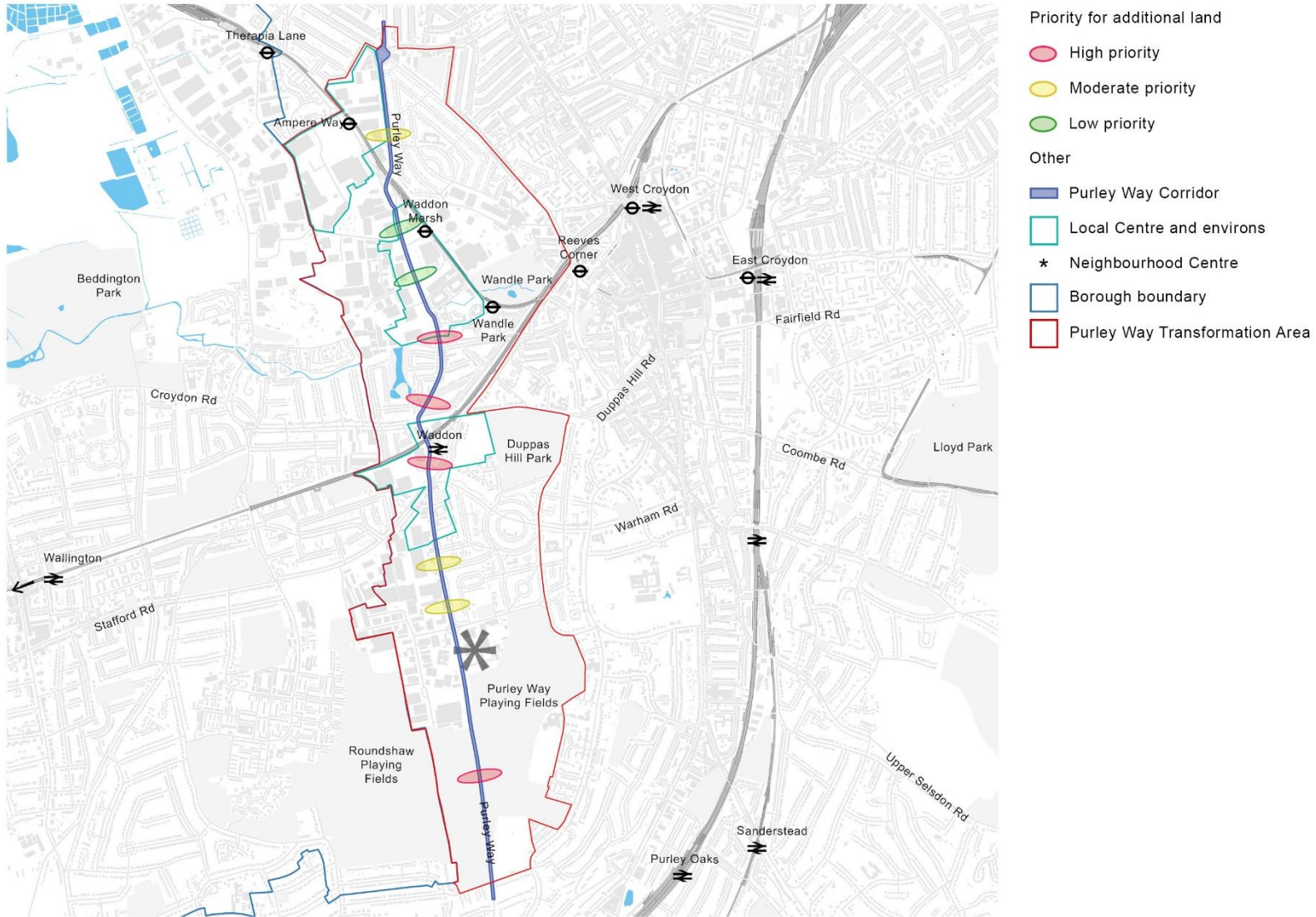
14.34 The Council will work with TfL and landowners/developers to turn Waddon Marsh in to a key public transport hub, including improving the link from Purley Way and interchange with buses, creating a sense of entrance and arrival at the tram stop with a public space, integrating micro mobility and 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.

14.35 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.

14.36 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 14.4 below.

14.37 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 lanes for cycling, bus lanes and/or space for a future 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.

Figure14.3 Purley Way Pinch Points



14.38 The Council will continue to work with TfL and other stakeholders to explore the aspiration and need for enhanced public transport and 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.

14.39 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 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.

14.40 Policies in this Plan 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 will be required on the following key junctions and links where capacity is most constrained:

- 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

14.41 The Council will 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.

Car parking standards

14.42 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 increasingly be restricted as PTAL improves. 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.

14.43 The Council will work with developers, TfL and other partners to secure funding to implement the walking and cycle route priorities, focusing in the short and medium term on improving connections to and from existing trams stops.

Designations shown on the Policies Map

14.44 Each of the designations set by PW SP11 and Policies PW DM1 to PW DM7 are shown on the Policies Map. The designations are summarised in Table 14.3 below.

Table 14.2 Phasing and review of infrastructure provision

Designation	Policy it relates to	Location
Future local centre	PW SP1	Valley Park Waddon Marsh Fiveways
Neighbourhood Centre	SP2 DM5	Waddon Way
Area around Lombard Roundabout	PW DM1	Area around Lombard Roundabout
Valley Park Local Centre and environs	PW DM2	Future Valley Park Local Centre and environs

Designation	Policy it relates to	Location
Waddon Marsh Local Centre and environs	PW DM3	Future Waddon Marsh Local Centre and environs
Fiveways Local Centre and environs	PW DM4	Future Fiveways Local Centre and environs
Purley Way corridor	PW SP1 PW DM6	Along the Purley Way

Key Supporting Documents

- Purley Way Masterplan Supplementary Planning Document (Draft)

Policy PW DM1: Potential new Local Centre at Valley Park

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. Proposals that promote the creation of a new Local Centre at Valley Park will be supported, if the following requirements are met:

- a) The new centre should straddle Ampere Road and provide access to and from Ampere Road tram stop;
- b) The new centre will consolidate, enhance existing retail and leisure uses with additional housing and the wider environs should provide scope for the 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 at gateway locations; and

d) Proposal should enhance the setting of the IKEA chimneys.

How the policy works

14.45 The mix of uses in the Valley Park area presents an opportunity to improve public realm connections, consolidate uses and create a new mixed use centre that benefits existing and new residents and visitors. The popularity of Ikea/Valley Park as a retail and leisure heart of the wider region should be preserved, but opportunities to decrease overall visitation by car to the area will be supported by the Council.

14.46 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.

14.47 Towards the south of this area, larger sites offer the opportunity to accommodate industrial employment uses adjacent to the SIL in Beddington and in the future plan 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.

Policy PW DM2: Potential new Local Centre at Waddon Marsh

Proposals that promote the potential creation of a new Local Centre at Waddon Marsh will be supported 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;
- 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 at gateway locations.

How the policy works

14.48 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.

14.49 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.

14.50 High-quality industrial zones with well-utilised land areas 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 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.

Policy PW DM3: Potential new Local Centre at Fiveways

In tandem with improvements to the road layout, which will alleviate congestion and encourage walking together with public realm enhancements, proposals to create a new Local Centre at Fiveways will be supported, 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;
- c. The new centre could consolidate and enhance existing local retail and leisure uses and include new housing, social infrastructure and green open space;

- d. Building heights of developments in the Centre and environs should generally be in the order of 3-8 storeys, with focal point accents 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

14.53 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. Attractive public realm, such as public furniture and an unobstructed station forecourt would form the basis for street activity.

14.54 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.

14.55 Developments must be stitched in with the public realm and existing green amenity, with attention to fostering community and forming a network of active and green spaces surrounding Fiveways.

14.56 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 DM4: 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 developments in the Centre and environs should generally be in the order of 3-8 storeys, with focal point accents 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

14.57 The convergence of multiple uses in the Waddon Way area presents an 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.

14.58 Improvements to the Imperial Way business district and re-provision of existing hotels will cement Waddon Way as a centre for business and a 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.

14.59 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.

14.60 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 DM5: Purley Way Corridor

The existing harsh and unattractive road corridor will be transformed by:

- a. Taking opportunities to remove pinch points (identified in Figure 14.4) 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 and promote air circulation around base buildings,
- e. locating sensitive uses away and upwind from emissions and sources of pollution ; and
- f. Building heights along the corridor, outside of Town and Neighbourhood Centres and their environs, should be 3 to 8 storeys.

How the policy works

14.61 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.

14.62 New pedestrian connections and public space improvements will reduce the severance between both sides 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.

14.63 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.

Policy PW DM6: Site allocations

PW DM6.1 Within the Purley Way Transformation Area allocate sites for development as set out in Table 14.3.

PW DM6.2 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 14.3 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

14.64 Table 14.3 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).

14.65 Table 14.3 also sets out the phasing for each sites. It is agreed 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 14.3.

14.66 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 14.3 is dependent, subject to modelling, on these additional improvements taking place before it can be developed.

14.67 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 14.3 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

Ref no	Site name	Proposed use	Phasing
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
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

Ref no	Site name	Proposed use	Phasing
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
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
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
153	Fiveways Triangle (516-540 Purley Way & 107-113 Stafford Road)	Redevelopment for mixed use residential and retail	Long-term

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Delivering and Monitoring the Croydon Local Plan 2018

How we are going to deliver the Croydon Local Plan 2018

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.

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.

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.

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

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.

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.

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

~~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.~~

Appendices

Picture break

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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.

Active Travel

This includes walking and cycling; supporting the value of physical exercise and the associated health benefits.

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.

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.

BREEAM

Building Research Establishment's Environmental Assessment Methodology (BREEAM) is used to measure the sustainability performance of commercial buildings.

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.

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 100,000m² 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 – 50,000m² 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.

Healthy Streets Approach

Includes 10 indicators in line with Transport for London guidance. Sets out how design and management of streets can support a wide range of activities in the public realm as well as encourage and facilitate a shift to walking and cycling (active travel).

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 2,000m²), 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.~~ A Local Green Space is an open area which is local in character and proximity, not excessively large, demonstrably special to the community it serves and holds a particular local significance; for one or more reasons such as beauty, history, ecology, recreational value or other quality of life value etc. A LGS is designated in a Local Plan (or Neighbourhood Development Plan) for long term protection capable of enduring beyond the end of the plan period and which is consistent with the principles of sustainable development. Within a LGS, inappropriate development should not be approved except in very special circumstances.

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.

Metroisation

This refers to the use of existing rail lines for the provision of additional services. It encompasses the integration of stopping services that operate within and beyond the London boundary into a single network.

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.

Parking Survey Catchment

For the purpose of car parking surveys, this includes all public roads within 200m for residential use (or 500m for commercial uses) walking distance of the site. The parking survey catchment is not a circle with a 200m/500m radius but a 200m/500m walking distance as measured along all roads up to a point 200m/500m from the site.

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 uses 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 runoff 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.~~

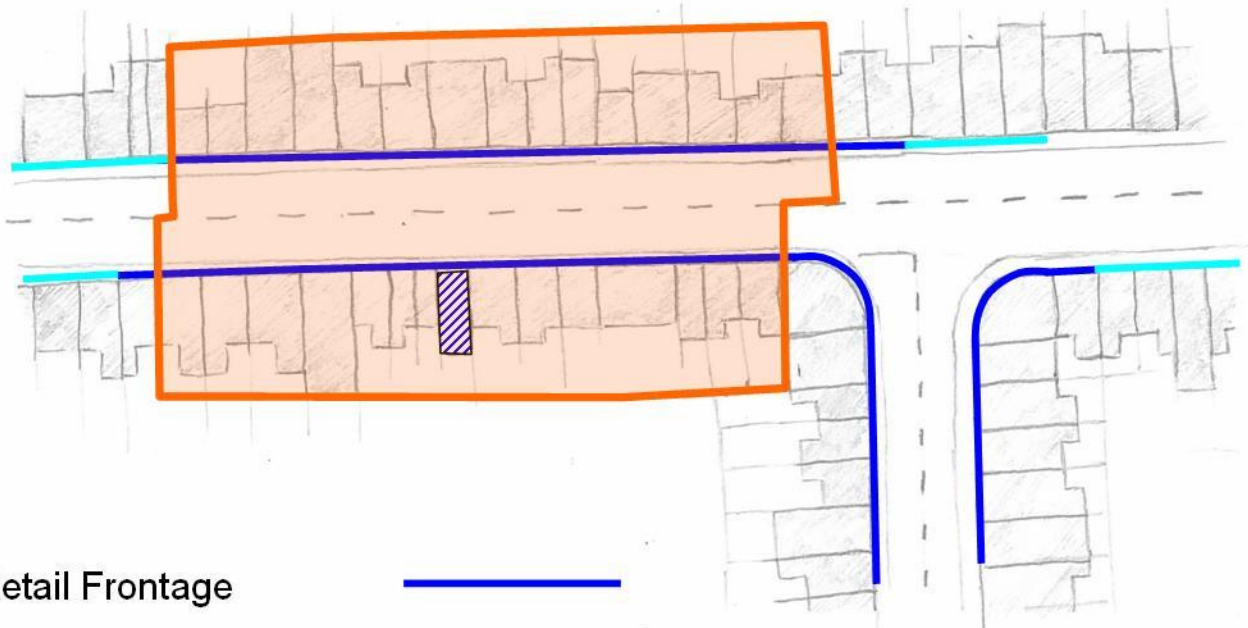
Windfall sites





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.

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Appendix 2 – Calculating the percentage of units within a ~~Main or Secondary~~ Retail Frontage

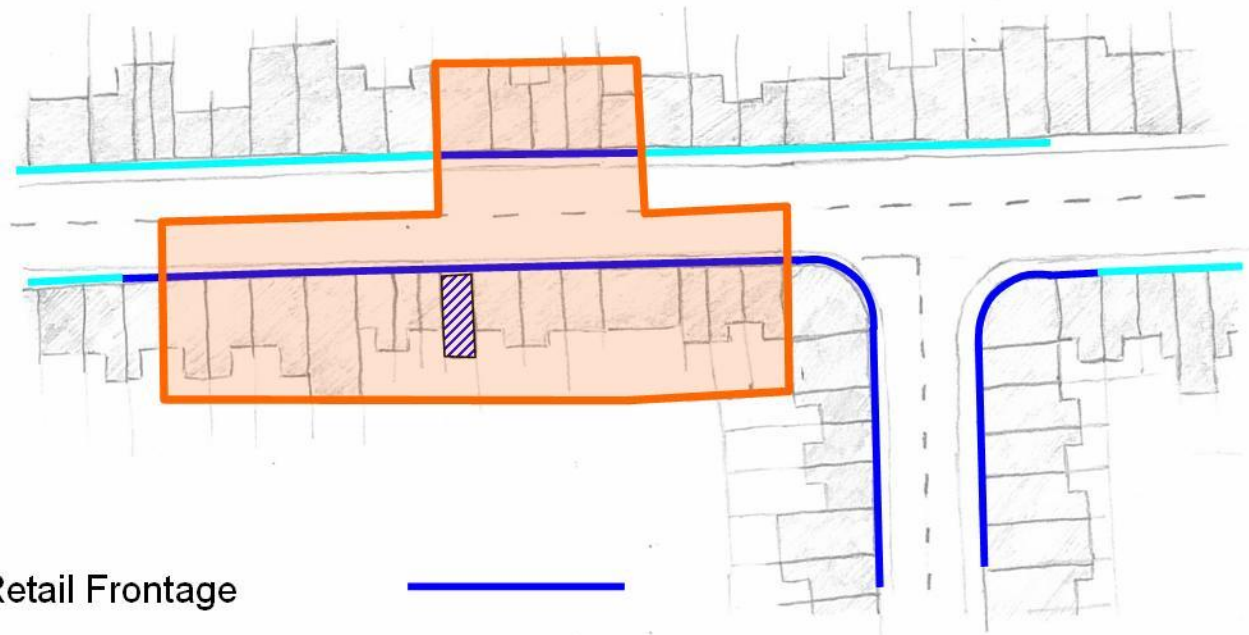
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- Main Retail Frontage 
- Secondary Retail Frontage 
- Application Premises 
- Extent of Main Retail Frontage for the purposes of calculating percentages 

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.



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Appendix 3 – Designated Shopping Frontages

Croydon Metropolitan Centre

Croydon Metropolitan Centre: Main Retail Frontage	
Whitgift Centre	Ground and first floor units, units 96 and 97, Chapel Walk
Centrale	Internal units
North End	1-151(odd); 2-142 (even)

Croydon Metropolitan Centre: Secondary Retail Frontage	
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

Addiscombe: Main Retail Frontage	
Lower Addiscombe Road	237-295 (odd)

Addiscombe: Secondary Retail Frontage	
Lower Addiscombe Road	185-205 & 207-227 & 229-231 (odd); 1-9 Bingham Corner (cons) 297-331 (odd); 272-284 & 286-308 (even);

Coulsdon: Main Retail Frontage	
Brighton Road	110-148 (even)
Chipstead Valley Road	2-40 (even); 3-39 (odd)

Coulsdon: Secondary Retail Frontage	
Brighton Road	96-108 & 150-234 (even); 129-159 & 165-185 (odd)
Chipstead Valley Road	41-55 (odd); 42-48 (even)

Crystal Palace: Main Retail Frontage	
Hollybush Terrace	1-4 (cons)
Westow Street	1-23 (odd); 2-64 (even)
Westow Hill	2-24 (even)

Crystal Palace: Secondary Retail Frontage	
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)

New Addington: Main Retail Frontage	
Central Parade	7-50 (cons)

New Addington: Secondary Retail Frontage	
Central Parade	51-54 (cons)

Norbury: Main Retail Frontage	
London Road	1384-1434 (even)

Norbury: Secondary Retail Frontage	
London Road	1327-1423 & 1433-1493 & 1495-1533 (odd); 1350-1374 & 1448-1468 (even)

Purley: Main Retail Frontage	
Brighton Road (A235)	908-934 (even); 909-921 (odd)
High Street	44-48 (even); 15-31 (odd)
Purley Parade	1-11 (cons)

Purley: Secondary Retail Frontage	
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)

Selsdon: Main Retail Frontage	
Addington Road	182-228 (even)

Selsdon: Secondary Retail Frontage	
Addington Road	119-137 (odd); 150-180 & 230-234 (even)

South Norwood: Main Retail Frontage	
High Street	1a-10(cons); 77-91(cons)
Selhurst Road	208-218 (even)
Station Road	2-22(even);1-9(odd)

South Norwood: Secondary Retail Frontage	
High Street	11-25 & 64-76 (cons)
Station Road	11-21 (odd)
Portland Road	1-47 (odd); 2-38 (even)

Thornton Heath: Main Retail Frontage	
High Street	2-46 (even); 97-123 (odd)

Thornton Heath: Main Retail Frontage	
Brigstock Road	32-54 (even); 3-17 (odd)
Ambassador House	1-7 (cons)
Cotford Parade	1-6 (cons)

Thornton Heath: Secondary Retail Frontage	
Brigstock Road	23-33 (odd); 66-98 (even) (excl. Nicholas House)
High Street	80-86 (even); 21-96 (odd)

Local Centres

Beulah Road: Main Retail Frontage	
Beulah Road	52-76 (even); 82-100 (even)

Beulah Road: Secondary Retail Frontage	
Beulah Road	55b-57 (odd)
Parchmore Road	105-117 (odd)

Brighton Road (Sanderstead Road) : Main Retail Frontage	
Brighton Road	244-292 (even); 285-333 (odd)

Brighton Road (Sanderstead Road): Secondary Retail Frontage	
Brighton Road	261-277 (odd)

Brighton Road (Selsdon Road): Main Retail Frontage	
Ruskin Parade	1-8 (cons)
Selsdon Road	2a-18c (even)

Brighton Road (Selsdon Road): Secondary Retail Frontage	
Brighton Road	2-40 (even)
South End	79-131 (odd)
Selsdon Road	20-20e (even); 1-15 (odd)

Broad Green: Main Retail Frontage	
London Road	282-332 (even); 227-271 (odd)
St James's Road	1-9 (odd)
Broad Green: Secondary Retail Frontage	
London Road	248-272 (even)
Hamsey Green: Main Retail Frontage	
Limpsfield Road	324-340 (even); 335-351 (odd)
Hamsey Green: Secondary Retail Frontage	
Limpsfield Road	316-322 & 342-350 (even); 333a-333d (odd)
Pollards Hill: Main Retail Frontage	
London Road	1050-1100 (even); 1023-1107 (odd)
Sanderstead: Main Retail Frontage	
Limpsfield Road	25-47 (odd)
Sanderstead: Secondary Retail Frontage	
Limpsfield Road	1-23 & 49-59 (odd)
Shirley: Main Retail Frontage	
Wickham Road	134-188 & 242-254 (even); 129-151 & 211-227 (odd)
Thornton Heath Pond: Main Retail Frontage	
London Road	778-840 (even)
Thornton Heath Pond: Secondary Retail Frontage	
London Road	722-728 & 842-892 (even)
Brigstock Parade, Brigstock Road	1-8 (cons)

Shopping Parades

Bensham Lane	
Bensham Lane	101-117 (odd); 102-128 (even)
Brighton Road/Biddulph Road	
Brighton Road	560-572 (even)
Brighton Road/Kingsdown Avenue	
Brighton Road	406-418 & 420-454 (even)
Brighton Road/Newark Road	
Brighton Road	171-201 (odd)
Brigstock Road	
Brigstock Road	216-246 (even)
Bywood Avenue	
Bywood Avenue	4-24 (even); 13-19 (odd)
Calley Down Crescent	
Calley Down Crescent	95-105 (odd)
Chapel View	
Chapel View	44-60 (even)
Cherry Orchard Road	
Cherry Orchard Road	140-168 (even)
Chipstead Valley Road	
Chipstead Valley Road	209-227 (odd); 318-330 (even)

Crossways Parade	
Crossways Parade	1-5 (cons)
Selsdon Park Road	169-179 (odd)
Crown Parade	
Crown Parade	1-16 (cons)
Beulah Hill	413-421 (odd)
Elmfield Way	
Elmfield Way	31-49 (odd)
Fiveways Corner	
Purley Way	443-449 (odd)
Central Parade, Denning Avenue	8-10 (cons)
Forestdale Centre	
Forestdale Centre	1-11 (cons)
Godstone Road, Kenley	
Godstone Road	8-30 (even)
Green Lane	
Green Lane	2A-42 (even)
Grovelands	
Brighton Road	102-122 (even))
Headley Drive	
Headley Drive	112-122 (even)
Kenley Station	
Godstone Road	64-84 (even)

Lacey Green	
Lacey Green Parade	1 and 2
Coulsdon Road	217-231 (odd)
London Road/Fairholme Road	
London Road	331-375 (odd)
London Road/Mead Place	
London Road	51-87 (odd)
Mead Place	1-6 (cons)
London Road/Nova Road	
London Road	222-238 (even)
Lower Addiscombe Road	
Lower Addiscombe Road	36-48 (even); 19-53 (odd)
Lower Addiscombe Road/Davidson Road	
Lower Addiscombe Road	7-17 (odd)
Lower Addiscombe Road/Warren Road	
Lower Addiscombe Road	85-99 (odd)
Lower Barn Road	
Lower Barn Road	100-108 (even)
Mayday	
London Road	474-514 (even)
Milne Park East	
Milne Park East	133-145 (odd)

Mitcham Road/Aurelia Road	
Mitcham Road	550-560 (even)
The Parade	1-6 (cons)
Mitcham Road/Wentworth Road	
Mitcham Road	216-244 (even)
Mitchley Avenue	71-79 (odd)
Monks Orchard	
Orchard Way	118-126 (even)
Norbury Road	
Norbury Road	39a-45 (odd)
Portland Road	
Market Parade, Portland Road	1-12 (cons)
Portland Road	149- 165 (odd)
Portland Road/Sandown Road	
Portland Road	245-293 (odd)
Purley Oaks	
Station Approach, Purley Oaks	1-6 (cons)
Purley Way	
Purley Way	335-347 (odd); 352-358 (even)
St James's Road	
St James's Road	185-197 (odd)
Sanderstead Station	
Station Parade, Sanderstead Road	1-12 (cons)
Station Approach	1-7 (cons)

Selhurst Road	
Northcote Road	76 and 78
Selhurst Road	Adj 2-22 (even); 11-17 (odd)
Sydenham Road	403-413 (odd)

Selsdon Road	
Selsdon Road	106-122 (even)

Shirley Poppy	
Wickham Road	572- 582 (even)

Shirley Road	
Shirley Road	151-177 (odd)

Shirley Road/Bingham Road	
Shirley Road	54-74 (odd)

Shrublands	
Broom Road	5-19b (odd)

Southbridge Road	
Southbridge Road	60-76 (even)

South Norwood Hill	
South Norwood Hill	261-285 (odd)

Stoats Nest Road	
Stoats Nest Road	73-85 (odd)

Taunton Lane	
Taunton Lane	13-25 (odd)

The Parade, Old Coulsdon	
The Parade, Coulsdon Road	1-12 (cons)
Placehouse Lane	1-1a (cons)
Thornton Road	
Thornton Road	42-54 (even)
Waddon Road	
Waddon Road	33-53 (odd)
Wayside, Fieldway	
Wayside	1-9 (cons)
West Croydon	
London Road	1-37 (odd); 12-42 (even)
Whitehorse Lane	
Whitehorse Lane	15-29 (odd)
Whitehorse Road	
Whitehorse Road	35-81A (odd)
Whitehorse Road/Pawsons Road	
Whitehorse Road	295-321 (odd); 322-346 (even)
Wickham Road	
Wickham Road	798-826 (even)
Windmill Road/St Saviour's Road	
Windmill Road	61a-73 (odd)
Windmill Road/Union Road	
Windmill Road	135-145 (odd)

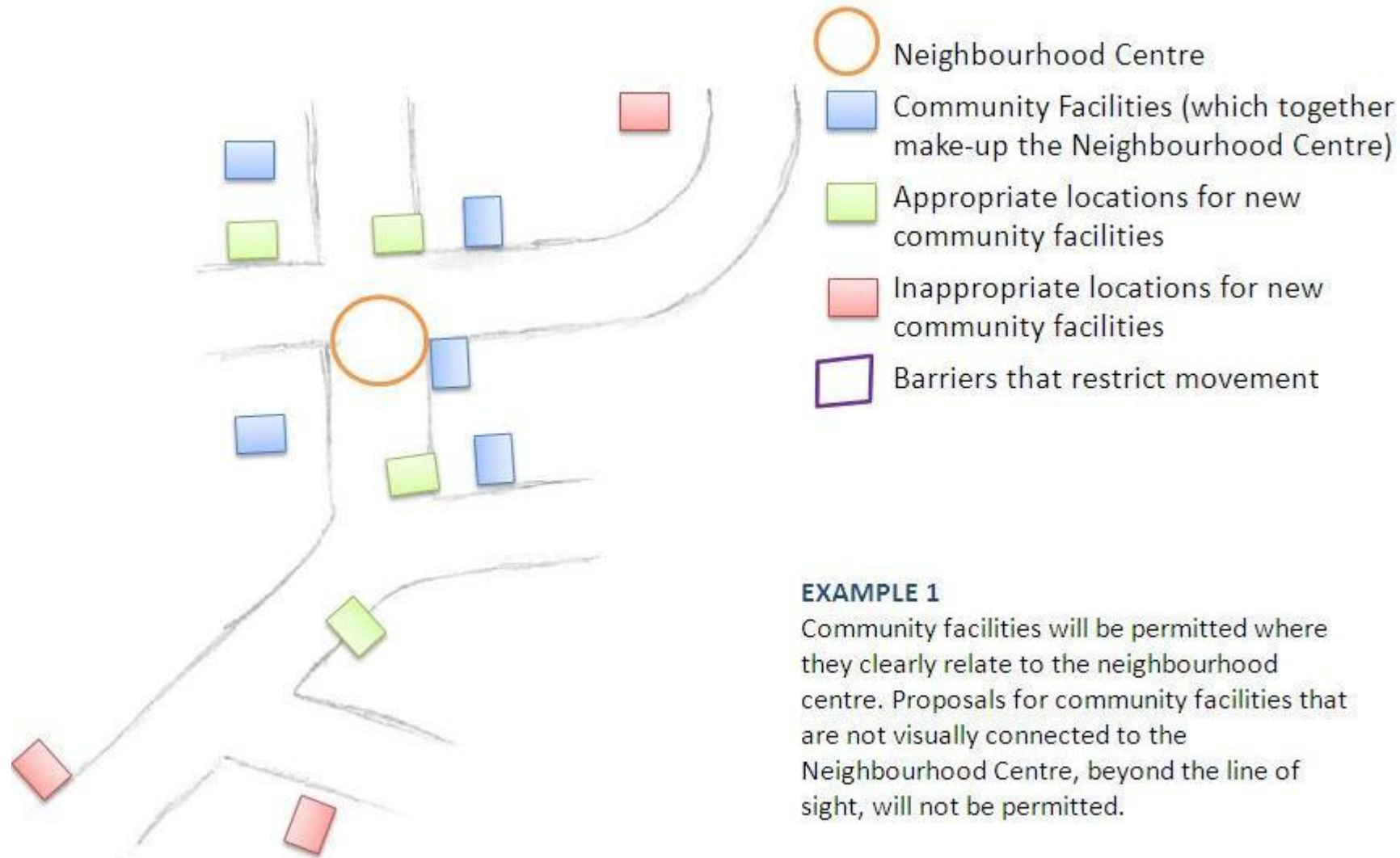
Woodside Green	
Woodside Green	49-59 (odd)

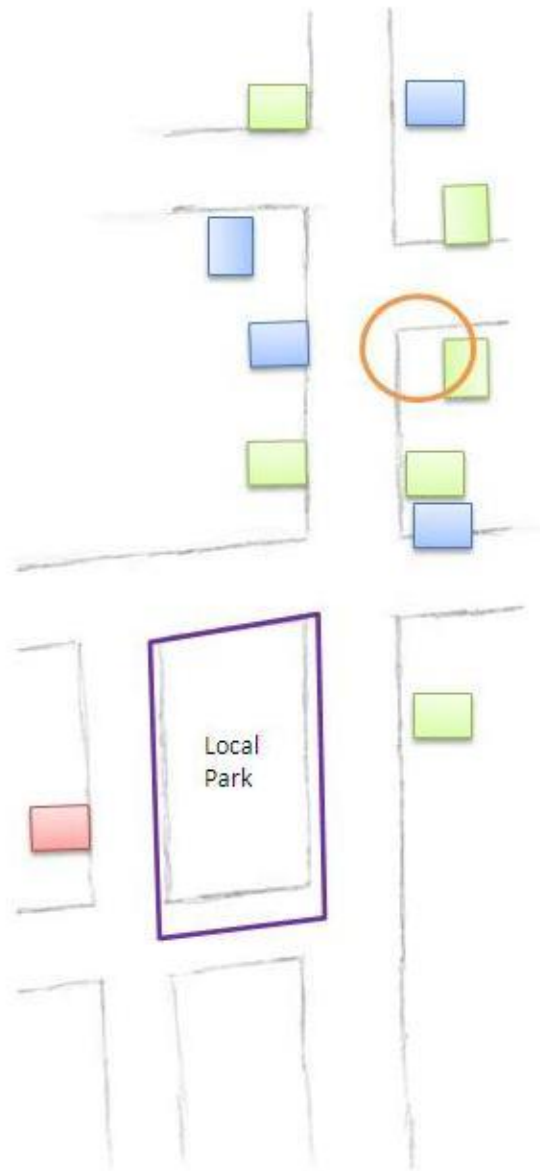
Restaurant Quarter Parades

Restaurant Quarter Parade	
South End	1-73 (odd); 6-78 (even)

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Appendix 4 – How to assess whether proposals demonstrably relate to a Neighbourhood Centre

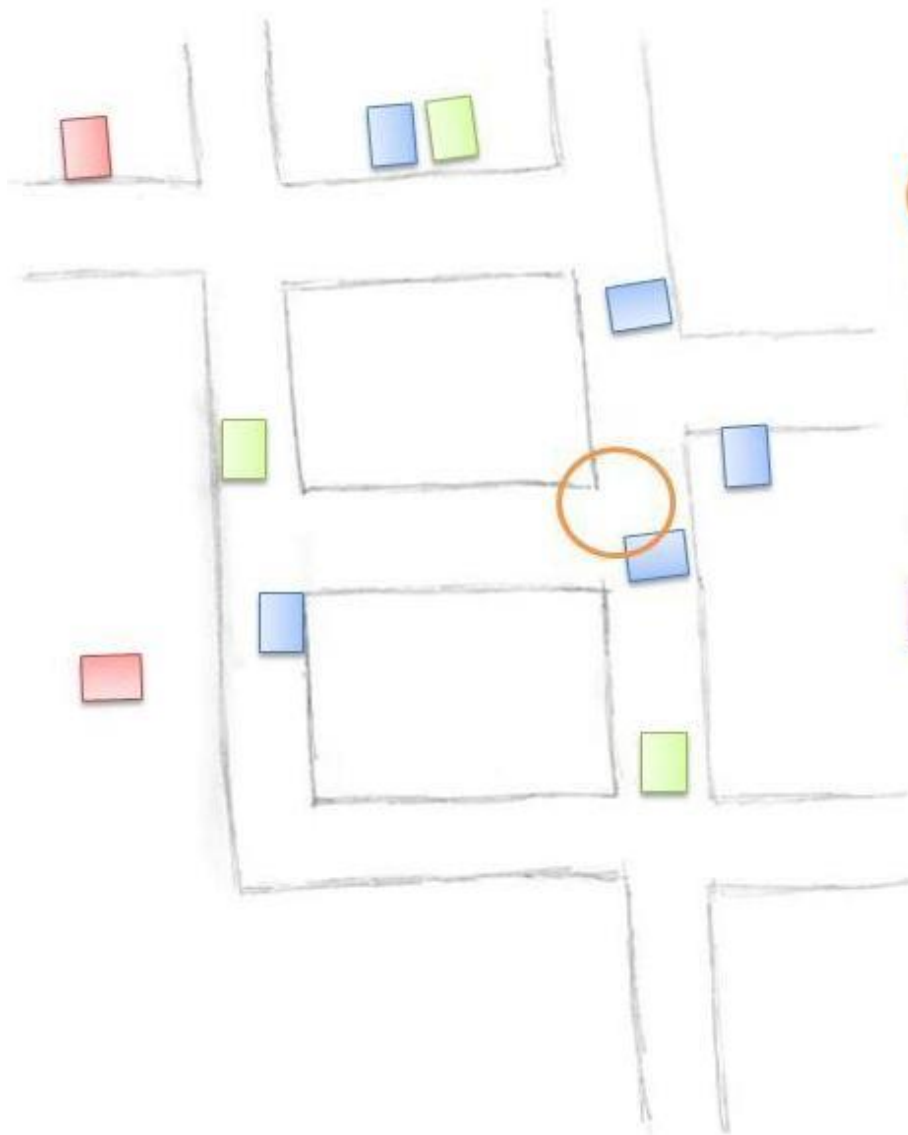




-  Neighbourhood Centre
-  Community Facilities (which together make-up the Neighbourhood Centre)
-  Appropriate locations for new community facilities
-  Inappropriate locations for new community facilities
-  Barriers that restrict movement

EXAMPLE 2

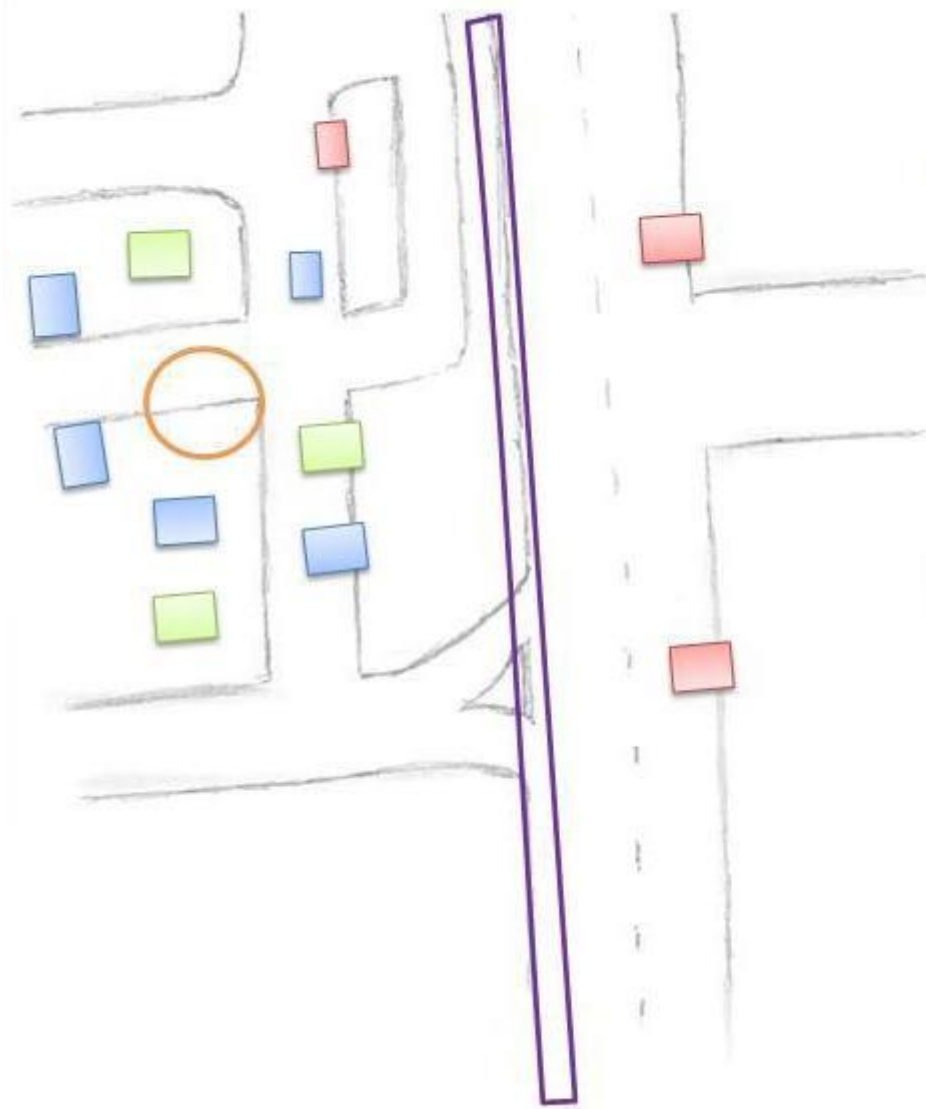
Community facilities will be permitted where they clearly relate to the neighbourhood centre. Proposals for community facilities that are not visually connected to the Neighbourhood Centre, beyond the line of sight, will not be permitted. A clear relationship cannot be demonstrated if there are barriers that restrict movement to the Neighbourhood Centre.



-  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 (Coulston)
- 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 including 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 19th 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

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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:

- Is the site big enough for 10 or more new homes;
- Are there any existing or proposed policy constraints that would prevent the development of the site altogether;
- 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);
- Are there any factors that would prevent the site being developed (such as legal covenants or viability issues); and
- 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:

- The site must be big enough (with 0.25ha being the smallest site a new primary school could be built on);
- The site must be in an area with an identified need for new primary school classes;
- The existing land use is not protected;
- 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

Site 5: AIG Building, 2-8 Altyre Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR9 2LG	0.236ha	Office building	Central	High	Large building in an urban setting	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Redevelopment including residential and non-retail town centre uses.		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.			Post 2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward.	76

Site 8: Motor Village Croydon, 121 Canterbury Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Broad Green & Selhurst)	CR0 3HF	0.36ha	Car showroom and garage	Urban	Medium	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 development comprising employment ground floor use with residential above.		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.			2024-2029	Site is subject to developer interest.	95

Site 11: Croydon Garden Centre, 89 Waddon Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4HY	0.994ha	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
<p>Residential development Mixed use development comprising main town centre ground floor use with residential above.</p>		<p>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. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</p>			<p>2021-2026 2024-2029</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>152 35 to 94</p>

Site 13: Boyden Tiles, Mayday Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR7 7GY	0.44ha	Vacant industrial site	Urban	Medium	Industrial estates	
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 employment use is a protected use and therefore need to be retained on the site.			2024-2029	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.	57

Site 16: Heath Clark, Stafford Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4NG	3.24	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.</p>			<p>2021-2026 2024-2029</p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p> <p>Site has planning permission</p>	<p>62 to 128 268</p>

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 and/or class A2-A5 uses</p> <p>Also retail so long as the current planning permission is extant.</p> <p>Mixed use development comprising town centre uses at ground floor with hotel, office or residential above.</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. The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</p> <p>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.</p>			<p>Post 2034</p> <p>2016 – 2021</p>	<p>Site has planning permission and there is nothing preventing the site from being developed</p> <p>Planning permission has expired and 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.</p>	<p>74 to</p> <p>2049</p>

Site 22: Whitehorse Road garages and parking area							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Broad Green & Selhurst	CR0 2JR	0.1ha	Garages and car park	Hybrid	Medium	Predominantly 2-storey terraced housing	
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 employment use is a protected use and therefore need to be retained on the site.			2029-2034	Site is subject to developer interest.	16

Site 25a: Morrisons Supermarket, 500 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4NZ	4.57ha 2.74ha	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, 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</p> <p>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.</p>		<p>Potential for a new Town Centre in the Fiveways area of Waddon is identified in the Purley Way Transformation Area and Croydon Local Plan's Strategic Policies.</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, community uses and retail alongside new community and leisure uses.</p> <p>Residential development will help to meet the need for new homes in the borough.</p> <p>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</p>			<p>Post 2026</p> <p>Post 2034</p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</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>251 to 1028</p> <p>529</p>

Site 25b: Porcelenosa, 468-472 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4NZ	0.83h ^a	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, 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.</p>		<p>Potential for a new Town Centre in the Fiveways area is identified in the Purley Way Transformation Area and Croydon Local Plan-</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, community uses and retail</p> <p>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</p>			Post 2034	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	233

Site 25c: Fiveways Retail Park, 500 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4NZ	1.84ha	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
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.		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.			Post 2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	272

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	0.02ha	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		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. The Sustainability Appraisal highlights the context of the Conservation Area which development proposals will need to consider			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 , 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.			2029-2034 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	179 30 to 171

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
Mixed use redevelopment comprising hotel & residential		<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>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.</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	159

Site 32: 4-20 Edridge Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 9WX	0.23ha	Car park	Central	High	Linear Infrastructure; Tower Buildings; 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. 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 2024-2029	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	180-220 230

Site 33: 26-28 Addiscombe Road (Go Ahead House)							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR9 5GA	0.13ha	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, office and/or hotel		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.			2029-2034	Site is subject to developer interest	76

Site 34: Land Bounded by George St, Park Lane, Barclay Road, And Main London To Brighton Railway Line

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1YL	1.61ha	Law court, cleared site and public realm	Central	High	Large buildings with surrounding space	
Description of option			Justification for option		Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Potential conversion of Law Court Building, creation of new open space and mixed use development of the rest of the site, comprising town centre ground floor uses and residential above.			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.		Post 2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	352

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
Mixed use redevelopment comprising new church, community facility and residential with development located outside Flood Zone 2 and 3a.		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.			2021-2026 2029-2034	<p>Site has planning permission</p> <p>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</p>	114 20 to 111

Site 40: West Croydon Bus Station							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2RD	0.32ha	Bus station	Central	High	Transport Nodes	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Retention and improvement of bus station alongside town centre uses at ground floor level with residential use above.		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.			Post 2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	76

Site 41: Direct Line House, 3 Edridge Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR9 1AG	0.27ha	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 and/or office development		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.			2029-2034	Site is subject to developer interest	158

Site 42: The Lansdowne, 2 Lansdowne Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR9 2ER	0.25ha	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
Mixed use development comprising ground floor town centre uses and improved pedestrian environment on the Lansdowne Road frontage, with office or residential above.		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.			Post 2034	Site is subject to developer interest	158

Site: 44: Central Parade West, Central Parade							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Addington	CR0 0JB	1.74ha 2.07ha	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

Site: 44: Central Parade West, Central Parade

<p>Mixed development including residential, community, healthcare facility, leisure, retail and open space</p> <p>Mixed use development comprising ground floor main town centre uses with office or residential above.</p>	<p>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.</p>	<p>Post 2034 2016 – 2021</p>	<p>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</p>	<p>179 50 to 290</p>
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Site 47: 3-9 Park Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1YD	0.07ha	Vacant building previously used as a nightclub	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
Mixed use residential and ground floor town centre use		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.			2029-2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	18

Site 48: 294-330 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4XJ	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
<p>Mixed use development comprising retail store, commercial space and residential units</p> <p>Mixed use development comprising main town centre ground floor use with residential above.</p>		<p>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.</p>			<p>2029-2034</p> <p>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</p> <p>331</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	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.			2024-2029	No known developer interest for this site. Site has planning permission	120 50 to 80

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	0.581ha	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
<p>Mixed use residential and supermarket</p> <p>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.</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. 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</p>			2016 - 2021	<p>Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves</p>	42

Site 58: 140 & 140a Hermitage Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Crystal Palace and Upper Norwood	SE19 3JU	0.43ha	Vacant former care home	Urban	Medium	Medium rise blocks with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development subject to the adequate re-provision of the existing community use.		Residential development will help to meet the need for new homes in the borough.			Post 2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	22

Site 60: Cane Hill Hospital Site, Farthing Way							
Place	Post	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Coulsdon	CR5 3YL	32.37ha	Former Hospital Site	Suburban	Low	Green Infrastructure; Planned estates of semi detached houses; Scattered houses on large plots	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
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	0.46ha	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. 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.</p>			2024-2029 Post 2026	<p>Site is subject to developer interest but there are a number of issues that need to be overcome before it can be developed</p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>139</p> <p>21 to 119</p>

Site 64: 100, 112a and 112b Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	CR8 4DB	0.28ha	Two vacant units at ground floor, previously used as a gym and bowling alley, with unit on first floor	Urban	Medium	Urban Shopping Areas	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Comprehensive development for new residential.		Residential development will help to meet the need for new homes in the borough.			Post 2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	52

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.			2029-2034 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.	12 10 to 57

Site 71: 2 Red Gables, Beech Avenue							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Sanderstead	CR2 0NL	0.63ha	Detached property and associated amenity land	Suburban	Low	Medium rise blocks with associated grounds	
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.			2024-2029	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	34

draft confidential

Site 78: 114-118 Whitehorse Road

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential conversion and extension Mixed use development comprising main town centre ground floor use with residential above.		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 2029-2034	Site is subject to developer interest	7 to 8

Site 79: Waitrose, Sanderstead							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Sanderstead	CR2 9LE	0.74ha	Superstore and car park	Urban	Low	Retail estates, business, leisure parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development comprising main town centre ground floor use with residential above.		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			Post 2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	Up to 62

Site 80: Victory Place							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Crystal Palace & Upper Norwood	SE19 3BD	0.27ha	Warehouses and office buildings at rear of Victory Place and Garberry Road in the centre of the Crystal Palace Triangle	Urban	High	Compact houses on relatively small plots; Industrial Estates; 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
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 – 2021	Site has planning permission and there is nothing preventing the site from being developed	33 to 70

Site 87: Shirley Community Centre

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Shirley	CR0 8JA	0.1ha	Community centre	Suburban	Medium	Institutions with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development subject to the adequate reprovision of the existing community use.		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.			Post 2034	Site is subject to developer interest	9

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Site 97: 24 Station Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
South Norwood & Woodside	SE25 5AG	0.05ha	Vacant plot adjacent to supermarket	Urban	High	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 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 103: 585-603 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development for residential and hotel.		Residential development will help to meet the need for new homes in the borough.			2024-2029	Site has planning permission	118

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Site 104: Former Taberner House site, Fell Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
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. 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

Site 105: Strand House, Zion Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR7 8RG	0.25ha	Former Adult Learning and Training Centre	Urban	High	Large buildings with surrounding space	
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.			2029-2034	In Council ownership	22

Site 106: CACFO, 40 Northwood Road

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Norbury	CR7 8HU	0.15ha	Community centre	Urban	Medium	Cottages, terraced houses & close knit semi-detached houses	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development subject to the adequate reversion of the existing community use.		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 .			2029-2034	Site is subject to developer interest	18

Site 110: Old Waddon Goods Yard, Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4NX	0.74ha	Various large retail units	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 development comprising main town centre ground floor use with residential above and station improvements to Waddon Station.		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.			Post 2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	168

Site 114: Garage courts at 18 Bramley Hill							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
South Croydon	CR0 1AP	0.09ha	Garages and amenity land	Suburban	Medium	Medium rise blocks with associated grounds	
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.			2029-2034	Site is subject to developer interest	8

Site 115: Cheriton House, 20 Chipstead Avenue							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	0.88ha 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.			Post 2026 -2034	<p>Site has planning permission and there is nothing preventing the site from being developed</p> <p>Site is subject to developer interest</p>	<p>291</p> <p>40 to 288</p>

Site 125: Sainsburys, Trafalgar Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4XT	2.75ha	Large supermarket and car park	Urban			
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development comprising main town centre ground floor use with residential above and the creation of a new Green Space.		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.			2029-2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	632

Site 126: Spurgeons College, 189 S Norwood Hill, South Norwood							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Crystal Palace & Upper Norwood	SE25 6DJ	2.4ha	Higher education facility and associated land	Urban	Medium	Institutions with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential development to enable improvement of education use.		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.			2029-2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	27

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>2024-2029 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>123 51 to 107</p>

Site 129: 843 London Road

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
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	0.88ha	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	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	77 to 100

Site 132: 550 and 550A Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4RF	0.45ha	Retail outlet 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
Mixed use development comprising main town centre ground floor use with residential above.		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.			2029-2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	111

Site 133: Woburn and Bedford Court							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2AE	0.92ha	Various low rise residential blocks and associated parking and amenity land	Central	High	Medium rise blocks with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Estate Renewal to increase and improve local housing stock.		Residential development will help to meet the need for new homes in the borough.			Post 2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	372

Site 135: Hilton Hotel car park, 101 Waddon Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR9 4HH	0.99ha	Hotel car park	Urban	Low	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development comprising main town centre ground floor use with residential and/or hotel use above to form part of a new Waddon Way Neighbourhood Centre.		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.			Post 2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	70

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	0.32ha 0.44ha	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
<p>Mixed use of residential with retail along Brigstock Road and employment use</p> <p>Mixed use development comprising main town centre ground floor use with residential above.</p>		<p>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).</p>			<p>2029-34 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>124 25 to 55</p>

Site 137: Colonnades							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4RS	3.51ha	Retail and leisure park with car park	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, leisure and community uses to form the basis of a new residential community and part of a Waddon Way Neighbourhood Centre.		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.			Post 2034	Site (owned by LBC) has no known developer interest and the Council will need to work with landowner to bring it forward	659

Site 138: Land adjacent to East Croydon Station and land at Cherry Orchard Gardens and site between railway line and Cherry Orchard Road, Cherry Orchard Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 6BQ	0.76ha 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 comprising main town centre ground floor use with residential and/or office above.		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 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. The site forms part of the Brighton Mainline and East Croydon station Transformation Area.			2024-2029 2022-2027	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed and landowner is likely to develop the site themselves	445 220 to 492

Site 142: ~~1 Lansdowne Road~~ 1-5 Lansdowne Road and Voyager House, 30-32 Wellesley Road

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2BX	0.48ha	Voyager House, 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.			2021-2027 2027-2032	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. Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	419 to 441 794

Site 143: South Croydon Ambulance Station and Youth Centre sites,							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4RQ	0.29ha	Ambulance station and youth centre with associated car park and amenity land	Urban	Low	Compact houses on small plots, Institutions with associated grounds	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Subject to suitable re-provision of the existing community use, mixed use development comprising main town centre ground floor use with residential above.		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 re-configuration 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.			Post 2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	84

Site 144: Sofology, 226 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4XG	0.34ha	Retail outlet 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
Mixed use development comprising main town centre ground floor use with residential above.		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.			2029-2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	74

Site 146: Currys PC World (Carphone Warehouse), 12 Trojan Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4XL	0.97ha	Retail outlet 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
Mixed use development comprising main town centre ground floor use with residential above.		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.			Post 2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	148

Site 148: Land Rear of Canterbury House							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 9XE	0.38ha	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 Use		Residential development will help to meet the need for new homes in the borough.			2024-2029	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	84

Site 153: Five Ways Triangle (516-540 Purley Way & 107-113 Stafford Road)							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way	CR0 4RE	1.1ha	Petrol station and industrial units	Urban	High	Industrial estates	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use development comprising main town centre ground floor use with residential above.		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.			Post 2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	91

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	
Croydon Opportunity Area	CR9 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
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

Site 172: North site, Ruskin Square							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2EW	0.43ha 2.7ha	Northern section of 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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Mixed use redevelopment with comprising residential, offices restaurant/café and fitness centre</p> <p>Mixed use development comprising main town centre ground floor use with residential, hotel and/or offices above.</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>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.</p>			<p>2021 – 2026</p> <p>2024-2029</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>550 to 625</p> <p>158</p>

Site 173: 28-30 Addiscombe Grove

-Place	-Postcode	Size	-Site description	Type of location	-Public Transport Accessibility	-Local character	
Groydon Opportunity Area	CR0 5LP	0.08ha	2 Edwardian houses	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
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

Site 174: 30-38 Addiscombe Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<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>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>49 to 141</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
Residential and/or office		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.			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	97 to 279

Site 178: Arcadia House, 5 Cairo New Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1XP	0.36ha	Existing church in Factory building, and two other buildings (46 and 47 Tamworth Road)	Central	High	Institutions with associated grounds; Linear Infrastructure; Terraced houses and cottages	
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. 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			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	0.05ha	Residential building and 2/3 storey brick-built residential block	Central	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
Redevelopment for residential and/or offices and/or retail (on George Street frontage)			Residential development will help to meet the need for new homes in the borough. Site lies within Croydon Metropolitan 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.		Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	7 to 20

Site 184: 1-19 Derby Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 3SE	0.34ha 0.31ha	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
Residential development above, community uses on lower floors Mixed use development comprising main town centre ground floor use with residential above.		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.			2021 – 2026 2029-2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	48 to 137 66

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>			<p>2024-2029 Post 2026</p>	<p>Site has planning permission</p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>181 49 to 141</p>

Site 187: 28 Dingwall Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2NE	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. 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	16 to 44

Site 189: Car parks, Drummond Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
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	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>Mixed use development comprising main town centre ground floor use with residential and/or office above.</p> <p>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.)</p>		<p>Residential development will help to meet the need for new homes in the borough. 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.</p>			<p>2024-2029 Post 2026</p>	<p>Site has planning permission and landowner is likely to develop the site themselves. Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>357</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	0.28ha 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
<p>Mixed use development comprising main town centre ground floor use with residential and/or offices above.</p> <p>Mixed use redevelopment with offices or residential dwellings above retail units at ground level</p>		<p>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.</p>			<p>Post 2034 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>54 35 to 101</p>

Site 193: 100 George Street

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1YE	2.03ha 1.94ha	Cleared site with previous use of office & retail (including financial and food & drink) buildings between Katharine Street and Park Street, and listed office building	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

<p>Residential with new civic space and a combination of retail, other Class A uses, leisure and office use.</p> <p>Conversion of Segas House for main town centre use. Conversion of St. George's house for main town centre use at ground floor with residential, office and/or hotel use above. Complementary development of the rest of the site to provide mixed use development consisting of ground centre main town centre uses with residential above, including a new east-west route through the site.</p>	<p>Existing office building is not protected from development.The site lies within the Primary Shopping Area of Croydon Town Centre so it is suited to retail. It is situated 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 partly within a the Central Croydon Conservation Area 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. The Council's relevant Conservation Area Guidance and Management Plans will need to be adhered to and proposals assessed against this. 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.</p>	<p>2021-2026</p> <p>2029-2034</p>	<p>Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission</p> <p>but there are a number of issues that need to be overcome before the site can be developed</p>	<p>88 to 504</p> <p>820</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. 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	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	26 to 145

Site 196: Stonewest House, 1 Lamberts Place							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon 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.			Post 2034 2016–2024	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	20 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 Lansdowne Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2BX	0.775ha	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
<p>Residential development with light industrial workshops and studio spaces</p> <p>Mixed use development comprising employment ground floor use with residential above.</p>		<p>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. The site forms part of the Brighton Mainline and East Croydon station Transformation Area.</p>			<p>Post 2026 2034</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 including consideration of the Brighton Mainline and East Croydon station</p>	<p>109 to 313</p> <p>107</p>

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	0.95ha	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.			Post 2022-2027	Site has no known developer interest and the Council will need to work with landowner to bring it forward	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	1.16ha 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 2034	Site is subject to developer interest Site has no known developer interest and the Council will need to work with landowner to bring it forward	216 51-293

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	1.86ha 4.75ha	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
<p>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.</p> <p>Improvements to West Croydon Station, with complementary main town centre ground floor uses, with residential above.</p>		<p>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.</p>			<p>Post 2026 2034</p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</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>109</p> <p>79 to 455</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	
Croydon Opportunity Area	CR0 2RB	0.35ha	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
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.		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.			2016 - 2021	Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves	Up to 50 to 232

Site 218: Lunar House, Wellesley Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 9YD	1.34ha	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
<p>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. Retention and conversion to main town centre use with residential, office, healthcare facility and/or hotel above.</p>		<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. 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.</p>			<p>Post 2026 2034</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>331 188 to 542</p>

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 Conversion to main town centre use ground floor use, with employment or educational use above.		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. The massing should be tested to ensure the settings of the Whitgift Almshouses and Electric House and the Central Croydon Conservation Area are preserved or enhanced.			Post 2026 2029-2034	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed. Site has no known developer interest and the Council will need to work with landowner to bring it forward	76 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 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	95 to 193

Site 231: Segas House, Park Lane

-Place	-Postcode	Size	-Site description	Type of location	-Public Transport Accessibility	-Local character	
Croydon Opportunity Area	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.			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	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) Mixed use development comprising main town centre ground floor use with residential and/or office above.		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 2034 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 Site has no known developer interest and the Council will need to work with landowner to bring it forward	199 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
<p>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.</p> <p>Retention and conversion to main town centre use with residential, office, healthcare facility and/or hotel above.</p>		<p>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. Conversion should be considered in the redevelopment to increase sustainability of the site and due to the notable architecture of the building</p>			<p>Post 2034 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>143</p> <p>82 to 234</p>

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) Ground floor main town centre use with offices and residential and/ or hotel.		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.			2021-2026 2024-2029	Site has no known developer interest and the Council will need to work with landowner to bring it forward Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	82 to 234 158

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
<p>Office and/or residential development or offices or hotel and/or retail (on George Street frontage)</p> <p>Mixed use development comprising main town centre ground floor use with residential, hotel and/or office above.</p>		<p>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.</p>			<p>Post 2036</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>133</p> <p>30 to 85</p>

Site 247: Norwich Union House, 96 George Street

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1PJ	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 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	0.20ha	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 2026-2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	11 9 to 34

Site 284: Asharia House, 50 Northwood Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Norbury	CR7 8HQ	0.14ha 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 subject to the adequate re-provision of the existing community use.		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 2026 2034	Site has no known developer interest and the Council will need to work with landowner to bring it forward	7 to 23 18

Site 286: 35-47 Osborne Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Thornton Heath	CR7 8PD	0.37ha	Disused warehouse and factory buildings	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		<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	0.14ha	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
<p>Residential redevelopment with community uses and Creative and Cultural Industries Enterprise Centre. There is one record of sewer flooding.</p> <p>Mixed use development comprising Cultural Industries Enterprises Centre ground floor use with residential and/or office above.</p>		<p>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.</p>			<p>2024-2029 2022-2027</p>	<p>Site is subject to developer interest and has permission Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>93 20 to 56</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

Site 301: Sea Cadet Training Centre, 34 The Waldrons							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Waddon	CR0 4AZ	0.14ha	Derelict building	Urban	Medium	Large buildings with surrounding space; Large houses on relatively small plots	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
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	0.30ha	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>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</p> <p>Residential development will help to meet the need for new homes in the borough.</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>2024-2029</p> <p>2022-2027</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>41</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
<p>Offices and residential and/or hotel (with healthcare facility if required by the NHS) Mixed use development comprising main town centre ground floor use with residential, hotel and/or office above.</p>		<p>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. 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. A community use could assist the sustainability of the site.</p>			<p>Post 2026 2034</p>	<p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>76 34 to 97</p>

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
(Broad Green & Selhurst)	CR0 4YJ	11.5ha	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.	<p>Potential for a new Town Centre in the Valley Park area is identified in the and Strategic Policies of the Local Plan 2018</p> <p>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. 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'</p>			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	403 to 1092

Site 316: PC World, 2 Trojan Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4XL	1.03ha	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
<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.</p> <p>Mixed use development comprising main town centre ground floor use, including a healthcare facility with residential above.</p>		<p>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. 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. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</p>			<p>2029-2034 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>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>184 47 to 175</p>

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	1.03ha	Council depot	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

draft confidential

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	0.56ha	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
<p>Mixed use conversion comprising residential, retail and community facilities</p> <p>Mixed use development comprising main town centre ground floor use with residential above.</p>		<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. 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>2024-2029</p> <p>Post 2026</p>	<p>Site has planning permission</p> <p>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>66</p> <p>26 to 145</p>

Site 332: Superstores, Drury Crescent							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (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 to form the basis of a new residential community.</p> <p>Mixed use development comprising main town centre ground floor use, including a healthcare facility and a primary school with residential above, to support the establishing of a new Local Centre at Waddon Marsh.</p>		<p>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 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'. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</p>			<p>2029-2034</p> <p>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>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>265</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	
Broad Green & Selhurst	CR0 4YA	0.95ha	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		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'			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	n/a

Site 337: Zodiac Court, 161-183 163 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 Mixed use development comprising community use at ground floor with residential above.		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'			2024-2029 Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	45 32 to 184

Site 345 Normanton Park Hotel, 34-36 Normanton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
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
<p>Mixed use residential, healthcare facility (if required by the NHS) and retail development Mixed use development comprising main town centre ground floor use with residential above.</p>		<p>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>			<p>Post 2034</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>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>420</p> <p>172 to 990</p>

Site 348: Homebase & Matalan stores, 60-66 Purley Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Broad Green & Selhurst)	CR0 3JP	2.84ha	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
<p>Mixed use residential and retail development</p> <p>Mixed use development comprising main town centre ground floor use with residential above.</p>		<p>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.</p> <p>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.</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>2024-2029</p> <p>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>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>685</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. 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>Mixed use development comprising main town centre ground floor use including a healthcare facility, with residential above.</p>		<p>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.</p>			<p>2029-2034</p> <p>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>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>146</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	
Waddon	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 Purley Way Transformation Area and 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 uses and leisure uses retail. The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.			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
<p>Mixed use development comprising main town centre ground floor use including a healthcare facility, with residential above.</p> <p>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>		<p>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 community uses. 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 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.</p> <p>The site is located within the boundary of the Purley Way Transformation Area and development proposals should broadly align with the detailed Masterplan.</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'</p>			<p>2029-2034</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>124</p> <p>32 to 120</p>

Site 355: Decathlon, 2 Trafalgar Way							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley Way (Waddon)	CR0 4XT	1.30ha	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
<p>Mixed use development comprising main town centre ground floor use including a healthcare facility, with residential above.</p> <p>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.</p>			<p>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. Residential development 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. 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.</p>		<p>2029-2034 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 Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>260 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
<p>Mixed use development comprising main town centre use with residential and/or office above subject to the adequate re-provision of the existing community use.</p> <p>Retail, replacement community use, residential and office</p>		<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>The Sustainability Appraisal recommends that the impact of the proposal on the conservation area is mitigated through the heritage and townscape assessment.</p> <p>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.</p>			<p>Post 2034 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>135 39 to 223</p>

Site 372: Car park, Lion Green Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Coulsdon	CR5 2NL	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
Mixed use development comprising leisure, community facilities and retention of car parking spaces. Also retail so long as the current planning permission is extant.		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.			2022-2027	Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	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 development comprising main town centre ground floor use with residential above.</p> <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>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 The site is in the Church Street Conservation Area. 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.</p> <p>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.</p>			<p>2029-2034 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>21 23 to 64</p>

Site 375: Northern part of, 5 Cairo New Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1XP	0.91ha	Church in former Factory building	Urban	High	Institutions with associated grounds; Linear Infrastructure	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential redevelopment subject to the adequate reprovision of the existing 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.			Post 2034 2021—2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	76 128 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	7.75ha 8.8ha	Shopping Centre, four office towers and two multi-storey car parks	Central	High	Shopping centres, precincts	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
<p>Masterplanned redevelopment to create an improved primary shopping area for Croydon Metropolitan Centre, as set out in Policy SP13.</p> <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 has been granted for this site has recently expired. However, the landowners and their delivery partners are working closely with the Council and other partners, to formulate a revised deliverable scheme for this strategic part of borough. This will which represents form 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>2016 – 2021</p> <p>2024-2029</p>	<p>The planning permission has recently expired. The landowner is working with a range of stakeholder to formulate a revised scheme</p> <p>Site has planning permission and landowner is likely to develop the site themselves</p>	<p>1080</p> <p>400 to 1,000</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
<p>Residential development subject to the adequate reprovision of the existing community use.</p> <p>Redevelopment for mixed use residential and community use</p>		<p>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.</p>			<p>2024-2029 Post 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>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>72 9 to 52</p>

Site 398: Coombe Cross, 2-4 South End						
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character
Croydon 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
Description of option	Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
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 Bensham 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			<p>2024-2029</p> <p>2021 to 2026</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>47</p> <p>12 to 42</p>

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	0.69ha	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
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.			2024-2029 2016—2021	Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves	79 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	<p>Single storey block with leisure and other uses</p> <p>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</p>	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
Residential development and health facility, and reconfiguration of existing uses and their floor space with no net loss of flood storage capacity		<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>			2029-2034 Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	50 59 to 224

Site 407: 797 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
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 2024-2029	Site has planning permission Site has no known developer interest and the Council will need to work with landowner to bring it forward	101 7 to 25

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	0.22ha	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.			2024-2029 Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed.	18 10 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
Residential redevelopment		<p>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.</p>			<p>2029-2034 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>4 to 18</p>

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			Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	36 to 136

Site 417: Stonemead House, 95 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 2RF	0.14ha 0.16ha	Vacant office building	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
Residential development		The redevelopment or conversion of the building could help to meet the need for new homes.			Post 2034 2021—2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	11 23 to 64

Site 430: Grafton Quarter, Grafton Road

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
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.			2016—2021	In-Council ownership	13 to 45

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
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	11 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 47 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	
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.			2024-2029 Post 2026	Site has no known developer interest and the Council will need to work with landowner to bring it forward	22 7 to 25

Site 488: Canius House, 1 Scarbrook Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
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	
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. 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
<p>Conversion to main town centre use with residential, office and/or hotel above.</p> <p>Retention of offices, with residential conversion, and/or hotel (with healthcare facility if required by the NHS). A locally listed building.</p>		<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. 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.</p>			<p>Post 2034</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>49</p> <p>30 to 85</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	1.07ha 0.40ha	Public car park, demolished houses, retail units with residential above Gym car park and derelict houses	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
Primary school and residential development		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. Residential development will help to meet the need for new homes in the borough.			Post 2034 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	52 n/a

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
<p>Mixed use development comprising employment ground floor use with residential and/or office above.</p> <p>Mixed use of residential with offices (or a healthcare facility if required by the NHS) on the ground floor</p>			<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. 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.</p>		<p>Post 2026 2029-2034</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>158 44 to 125</p>

Site 495: Dairy Crest dairy, 823-825 Brighton Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Purley	GR8 2BJ	0.45ha	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.			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	8.217ha	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
<p>Residential development subject to the adequate re-provision of the existing health care use.</p> <p>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,</p>		<p>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.</p>			<p>Post 2034 2027-2032</p>	<p>Site is part of a partners' Estate Strategy</p>	<p>345 77 to 290</p>

Site 502: Coombe Farm, Oaks Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Shirley	CR0 5HL	3.99ha	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
<p>Conversion of pumping house for residential development. 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</p>		<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 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. 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.</p>			<p>Post 2034 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>24 26 to 68</p>

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 SNGI.			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	CR8 2NE	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
<p>Replacement industrial floorspace, a new public car park and residential development. Residential development and public car park including new industrial units to replace those currently on the site</p>		<p>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.</p>			<p>Post 2034 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>60 Up to 94</p>

Site 937: Kempsfield House, 1 Reedham Park Avenue							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Kenley and Old Coulsdon	CR8 4BQ	0.48ha	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 with community use		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.			2024-2029 2016—2021	Site is subject to developer interest A planning application is likely soon with the landowner looking to develop the site themselves.	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
<p>Mixed use development comprising main town centre ground floor use with residential above.</p> <p>Residential, retail and car parking (and healthcare facility if required by the NHS)</p>		<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>Post 2039 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>Site has no known developer interest and the Council will need to work with landowner to bring it forward</p>	<p>39</p> <p>55 to 90</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'.			2021 – 2026	In Council ownership	157 to 440

Site 947: 359-367 Limpsfield Road

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Sanderstead	CR2 8BV	0.325ha	Car repair garage	Suburban	Low	Retail Estates & Business & Leisure Parks	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Residential with 1 – 3 commercial units on ground floor		Residential development will help to meet the need for new homes in the borough.			2016 – 2021	Site has planning permission and there is nothing preventing the site from being developed	10 to 22

draft confidential

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 development 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 Primary Retail Frontage designation.			2024-2029 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.	26 41

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	0.68ha 0.708ha	Retail/commercial and hotel uses of 2 - 11 storeys. Wellesley Road elevation is within a Main Main Primary 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
<p>Mixed use development comprising conversion of Norfolk House to create main town centre ground floor use with residential, hotel and/or office above.</p> <p>Mixed use development to include retail, residential, office and hotel uses.</p>		<p>The site is located in an area where mixed use development is acceptable and redevelopment of the site would rejuvenate this key site. The Locally Listed Building should be retained and converted. Development on the site should seek to respond to the special architectural and historic interest of the Locally Listed Building.</p>			<p>Post 2034 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>135 125 to 255</p>

Site 951: 1485-1489 London Road							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Norbury	SW16 4AE	0.17ha	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.			2016 - 2024	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	15 to 22

Site 952: 103 - 111A High Street

Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1QG	0.08ha	Three storey mixed use site comprising of town centre uses on ground floor (including retail) and commercial and residential on upper floors.	Central	High	Town centre uses, close to tall office buildings that are being converted to residential uses, adjacent to a flyover	
Description of option			Justification for option		Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Mixed use residential and commercial floor space			Located within a highly sustainable location and high developer interest in site, who are intending to formulate and submit a mixed use scheme for site.		2022-2027	Site is subject to developer interest	121

Site New 1: Citylink, George Street							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 5LR	0.25ha	Office building with hotel and 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 development with town centre ground floor use with residential and/or office above.		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 close to East Croydon station.			2024-2029	Site has planning permission.	361

Site New 2: Development Site, Regina Road Housing Estate							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
South Norwood & Woodside	SE25 4TW	2.5ha	Housing Estate	Suburban	Medium	Compact 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
Estate renewal for residential development with retention of community facilities.		Residential development will help to meet the need for new homes in the borough.			2024-2029	In Council ownership	260

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Site New 3: Croydon Park Hotel							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR9 5AA	0.67 ha	Croydon Park Hotel	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 town centre ground floor use with residential and/or office above.		Residential development will help to meet the need for new homes in the borough.			2024-2029	Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	447

Site New 4: Centrale							
Place	Postcode	Size	Site description	Type of location	Public Transport Accessibility	Local character	
Croydon Opportunity Area	CR0 1UB	5.30 ha	Shopping Centre with adjacent residential, commercial, hotel and retail buildings.	Central	High	Shopping centres, precincts	
Description of option		Justification for option			Anticipated phasing of development	Evidence of deliverability	Indicative number of homes
Masterplanned redevelopment to create an improved primary shopping area for Croydon Metropolitan Centre, as set out in Policy SP13.		This will form 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. Proposals should seek to include and improve ecological, cycling and pedestrian networks. Proposals should include nature-led SuDS schemes.			Post 2034	Site is subject to developer interest.	636

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.	2011-36 2019-2039	All Places	Review Croydon Local Plan within 5 years of adoption 2018 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	2011-36 2019-2040	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 37,736 new homes between 20169 and 20369	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	2011-36 2019-2040	All Places	Review policy in Croydon Local Plan 2018 Review Community Infrastructure Levy requirements Apply planning obligations requirements more flexibly
	6,970 11,384 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	2011-36 2019-2040	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
	10,760 14,500 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	2011-36 2019-2040	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 10,395 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 6237 new homes)	Developers and Croydon Council working in partnership with Registered Providers	Planning obligation agreements with developers Croydon Council New Build Programme Registered Providers build programmes	2011-36 2019-2040	All Places	Review policy in Croydon Local Plan 2018 and in particular the requirements for on-site provision of affordable homes Apply other planning obligations requirements more flexibly Work with Registered Providers to seek other funding sources for affordable homes
	Mechanism for calculating commuted sums for affordable housing	Croydon Council	Non-statutory guidance on Planning Obligations and Community Infrastructure Levy	2011-36 2019-2040	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	2011-36 2019-2040	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>	2011-36 2019-2040	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.	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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.	2011-36 2019-2040	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 2019-2040 (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	2011-36 2019-2040	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 ² . 30,500m ² of new and refurbished office floor space in Croydon Metropolitan Centre and up to 7,000m ² 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 2019-2040	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 2019-2040	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 2019-2040	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 2019-2040	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.	2011-36 2019-2040	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>2011-36 2019-2040</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.	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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)	2011-36 2019-2040	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 2019-2040		
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
			developers through the development management process to work towards provision of district energy networks in the borough Community Infrastructure Levy could part fund development of network	2011-36 2019-2040	Places with high heat density or areas where future development will increase heat density	

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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
	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-2021 (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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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>2011-36 2019-2040</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>2011-36 2019-2040</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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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>2011-36 2019-2040</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</p> <p>Promotion of extensions of Tramlink to Streatham, Brixton, Tooting, Bromley, Sutton, and Crystal Palace</p>	<p>Croydon Council</p> <p>GLA</p> <p>Transport for London</p> <p>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>2011-36</p> <p>2019-2040</p>	<p>Croydon Opportunity Area, Broad Green and Selhurst, Waddon, Addiscombe, South Norwood & 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 2019-2040	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>	Croydon Council Transport for London Network Rail	<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>2011-36 2019-2040</p>	<p>Croydon Opportunity Area, Broad Green & 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	2011-36 2019-2040	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	2011-36 2019-2040	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	2011-36 2019-2040	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
SP0.1	To deliver the strategy in accordance with SP0.1	Indicators as below for topic areas	33,985 homes, 10,500 jobs	All Places
SP1 - The Places of Croydon	Adopted DPDs covering Detailed Policies for development management and Proposals for site allocations	Adoption date of the Croydon Local Plan 2018	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%	

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
	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	
SP2 - Homes	32,890 41,580 new homes between 2016 and 2036	The number of new homes completed in the borough	Annual average of 1,600 2079 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 11,384 homes outside of Croydon Opportunity Area and 40,760 14,500 homes within the Opportunity Area	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
	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	xx25% of all new homes to be social or affordable rent	All Places
			xx45% of all new homes to be intermediate shared ownership, intermediate rent or starter homes	All Places
		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

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
		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
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

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
		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
	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 92,000m ² by 2031 new and refurbished floor space in Croydon Metropolitan Centre and 7,000m ² new and refurbished floor space in District Centres	

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
	Retail vitality and viability of Croydon Metropolitan Centre, District and Local Centres	Amount of vacant Class E A1 to A5 floor space within District and Local Centres	Vacancy level no greater than 14%	All Places except Kenley & Old Coulsdon and Waddon
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	

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
	Establishing guidelines for materials and layout for the public realm		Completion of guidelines on materials and layouts for public realm improvements	
	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 ₂ emissions	Development of a district heating network	Development of a district heating network in Croydon Metropolitan Centre	Croydon Opportunity Area

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
		% of major developments incorporating a site-wide communal heating system and network connection	100%	All Places
	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

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
	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
	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

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
	Enhanced biodiversity and geological diversity Expanded and improved wildlife areas and the creation of new wildlife areas	Percentage of borough designated as deficient in access to nature 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	Maintain baseline populations/coverage whilst seeking increases	All Places
	Enhanced allotments, community gardens, and woodland Increases in local food growing, tree planting and forestry Growing areas, edible planting and flexible landscaping designed into new developments to increase food production	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) Total of 198.65ha required over the plan period	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
SP8 - Transport and Communication	Reduction in travel by car and increase in travel by public transport, cycling and walking 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
	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
Number of improved crossings in Croydon Opportunity Area, District Centres and around schools			An increase year on year	

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
		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	London Mayor's objective of an 400% increase in cycle journeys	All Places
		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 routes and tram depots
		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	

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
	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	
	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	London Mayor's 60% CO ₂ 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 peaks 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.~~

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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

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
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	Cane 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		
SP21	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	

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
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

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
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	
GMC1	The Croydon Gateway Site	SP1 SP2 SP3 SP4 SP5 SP8		
GMC2	The Fairfield Site and Adjacent Area	"		
GMC3	The Park Place Site	"		
GMC4	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
GMC5	Randolph and Pembroke House site	SP1 SP2 SP3 SP8		
GMC6	11-16 Dingwall Road	SP1 SP3 SP8		
GMC7	The Porter and Sorter Public House, Cherry Orchard Road and 1-5 Addiscombe Road	SP1 SP2 SP3 SP8		
GMC8	Land at junction of College Road and George Street	"		
GMC9	Primary Shopping Area	SP3		
GMC 10	Retail Development in the Rest of Croydon Metropolitan Centre	SP3		
GMC 11	Croydon Metropolitan Centre Pedestrian Links	SP1 SP8		
GMC 12	Active Frontages for Pedestrian Links	SP4		
GMC 13	Improvements to Public Transport	SP1 SP8		
GMC 14	High Buildings	SP4		
GMC 15	Views and Landmarks	SP1 SP4		
GMC 16	Croydon Skyline	SP4 SP5		

Appendix 11 - Housing Trajectory

Housing Supply [To be factually updated at submission]

draft

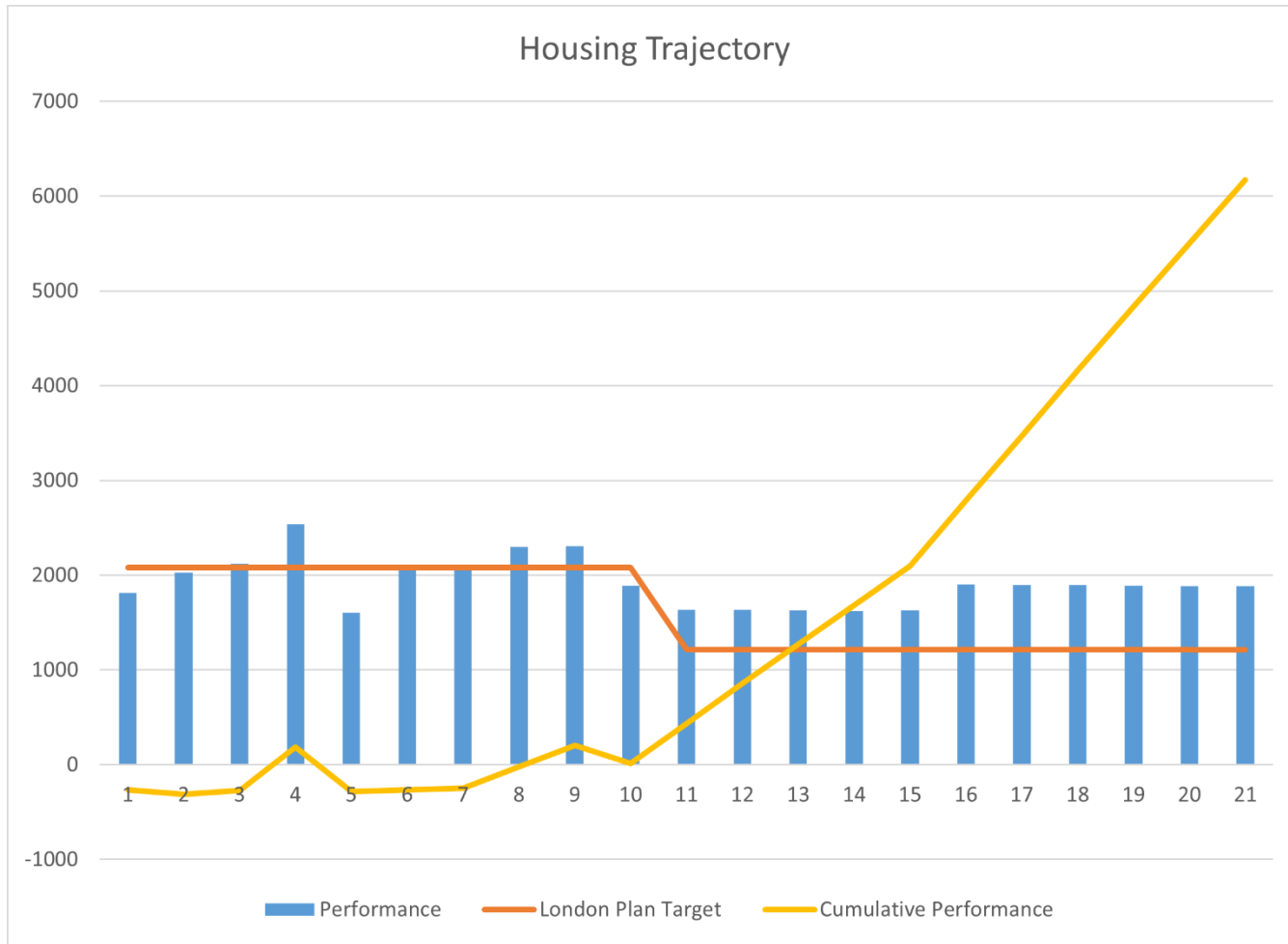
	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25 Yr 1	2025/26 Yr 2	2026/27 Yr 3	2027/28 Yr 4	2028/29 Yr 5	2029/30 Yr 6	2030/31 Yr 7	2031/32 Yr 8	2032/33 Yr 9	2033/34 Yr 10	2034/35 Yr 11	2035/36 Yr 12	2036/37 Yr 13	2037/38 Yr 14	2038/39 Yr 15	2039/40 Yr 16	Total
London Plan Target	2079	2079	2079	2079	2079	2079	2079	2079	2079	2079	1214	1214	1214	1214	1214	1214	1214	1214	1214	1214	1215	34145
Completions	1815	2029	2121	2540																		8505
Allocations					764	1253	1252	1252	1256	1250	992	992	990	985	989	1259	1258	1258	1251	1245	1243	19489
Unallocated, Extant Permissions					844	844	844															2532
Windfall								1051	1051	641	641	641	641	641	641	641	641	641	641	641	641	9794
Performance	1815	2029	2121	2540	1608	2097	2096	2303	2307	1891	1633	1633	1631	1626	1630	1900	1899	1899	1892	1886	1884	
Performance V Target	-264	-50	42	461	-471	18	17	224	228	-188	419	419	417	412	416	686	685	685	678	672	669	
Cumulative Performance	-264	-314	-272	189	-282	-264	-247	-23	205	17	436	855	1272	1684	2100	2786	3471	4156	4834	5506	6175	

Footnotes

1. This is based on provisional data provided of completions for the April 2019 to March 2022. This will be subject to an change at a future date, based on verified data from GLA.
3. Unallocated Sites with extant permissions has incurred a 5% discount for non-implementation, in line with our 5YHLS note. Total quantum has been split evenly over 3 years.
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.
5. No assumptions have been applied to take account of potential windfall sites above 0.25ha .
6. Further sites may be included into the future supply from a Brownfield Land Register.

draft

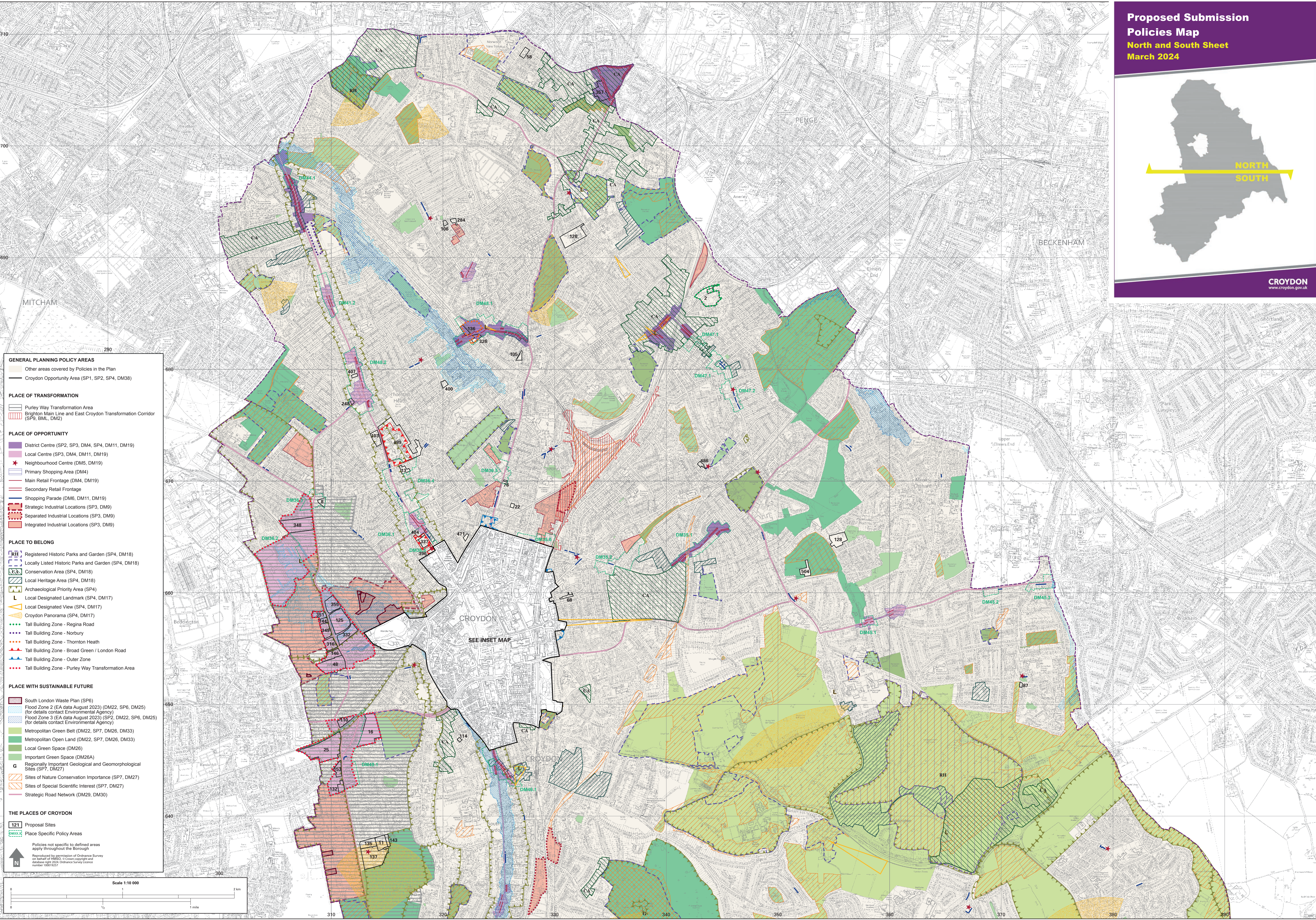
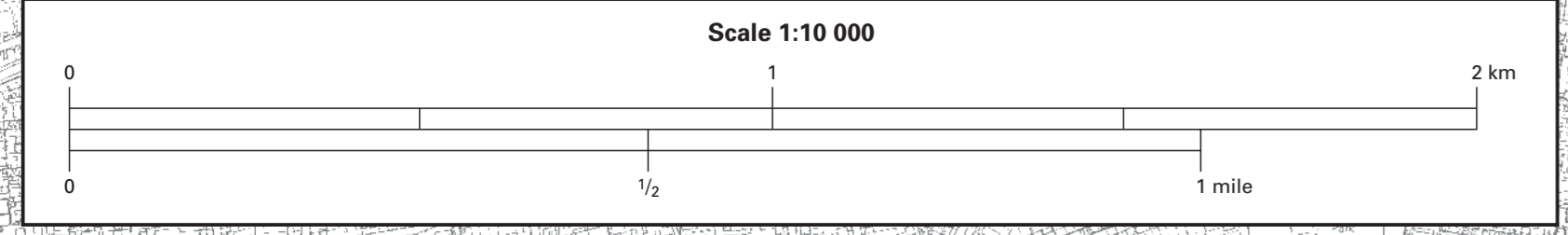
Housing Trajectory – Plan monitor manage



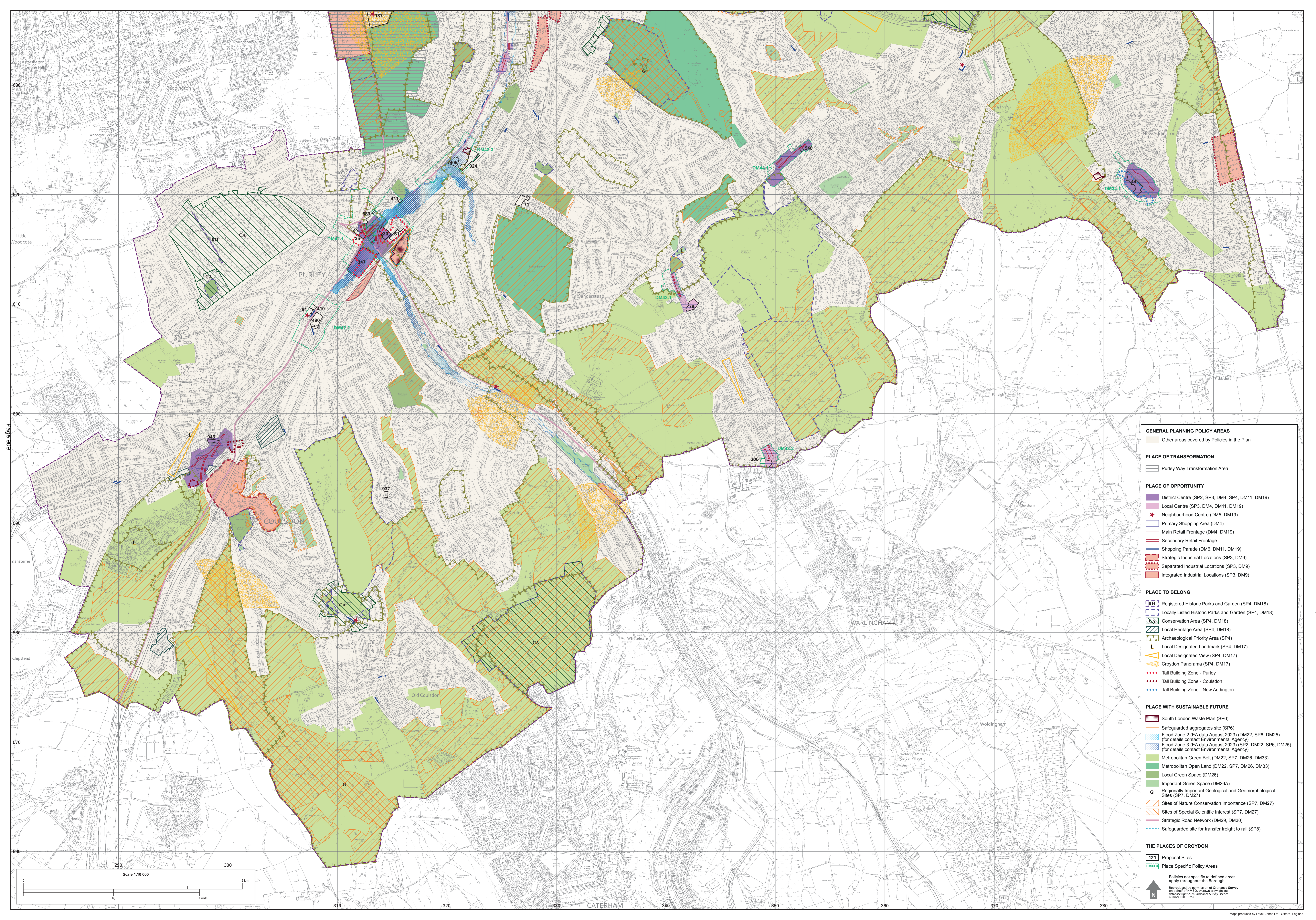
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- GENERAL PLANNING POLICY AREAS**
- Other areas covered by Policies in the Plan
 - Croydon Opportunity Area (SP1, SP2, SP4, DM38)
- PLACE OF TRANSFORMATION**
- Purley Way Transformation Area
 - Brighton Main Line and East Croydon Transformation Corridor (SP9, BML, DM2)
- PLACE OF OPPORTUNITY**
- District Centre (SP2, SP3, DM4, SP4, DM11, DM19)
 - Local Centre (SP3, DM4, DM11, DM19)
 - Neighbourhood Centre (DM5, DM19)
 - Primary Shopping Area (DM4)
 - Main Retail Frontage (DM4, DM19)
 - Secondary Retail Frontage
 - Shopping Parade (DM6, DM11, DM19)
 - Strategic Industrial Locations (SP3, DM9)
 - Separated Industrial Locations (SP3, DM9)
 - Integrated Industrial Locations (SP3, DM9)
- PLACE TO BELONG**
- Registered Historic Parks and Garden (SP4, DM18)
 - Locally Listed Historic Parks and Garden (SP4, DM18)
 - Conservation Area (SP4, DM18)
 - Local Heritage Area (SP4, DM18)
 - Archaeological Priority Area (SP4)
 - Local Designated Landmark (SP4, DM17)
 - Local Designated View (SP4, DM17)
 - Croydon Panorama (SP4, DM17)
 - Tall Building Zone - Regina Road
 - Tall Building Zone - Norbury
 - Tall Building Zone - Thornton Heath
 - Tall Building Zone - Broad Green / London Road
 - Tall Building Zone - Outer Zone
 - Tall Building Zone - Purley Way Transformation Area
- PLACE WITH SUSTAINABLE FUTURE**
- South London Waste Plan (SP6)
 - Flood Zone 2 (EA data August 2023) (DM22, SP6, DM25) (for details contact Environmental Agency)
 - Flood Zone 3 (EA data August 2023) (SP2, DM22, SP6, DM25) (for details contact Environmental Agency)
 - Metropolitan Green Belt (DM22, SP7, DM26, DM33)
 - Metropolitan Open Land (DM22, SP7, DM26, DM33)
 - Local Green Space (DM26)
 - Important Green Space (DM26A)
 - Regionally Important Geological and Geomorphological Sites (SP7, DM27)
 - Sites of Nature Conservation Importance (SP7, DM27)
 - Sites of Special Scientific Interest (SP7, DM27)
 - Strategic Road Network (DM29, DM30)
- THE PLACES OF CROYDON**
- 121 Proposal Sites
 - Place Specific Policy Areas
- Policies not specific to defined areas apply throughout the Borough.
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GENERAL PLANNING POLICY AREAS

- Other areas covered by Policies in the Plan

PLACE OF TRANSFORMATION

- Purley Way Transformation Area

PLACE OF OPPORTUNITY

- District Centre (SP2, SP3, DM4, SP4, DM11, DM19)
- Local Centre (SP3, DM4, DM11, DM19)
- Neighbourhood Centre (DM5, DM19)
- Primary Shopping Area (DM4)
- Main Retail Frontage (DM4, DM19)
- Secondary Retail Frontage
- Shopping Parade (DM6, DM11, DM19)
- Strategic Industrial Locations (SP3, DM9)
- Separated Industrial Locations (SP3, DM9)
- Integrated Industrial Locations (SP3, DM9)

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- Local Designated View (SP4, DM17)
- Croydon Panorama (SP4, DM17)
- Tall Building Zone - Purley
- Tall Building Zone - Coulsdon
- Tall Building Zone - New Addington

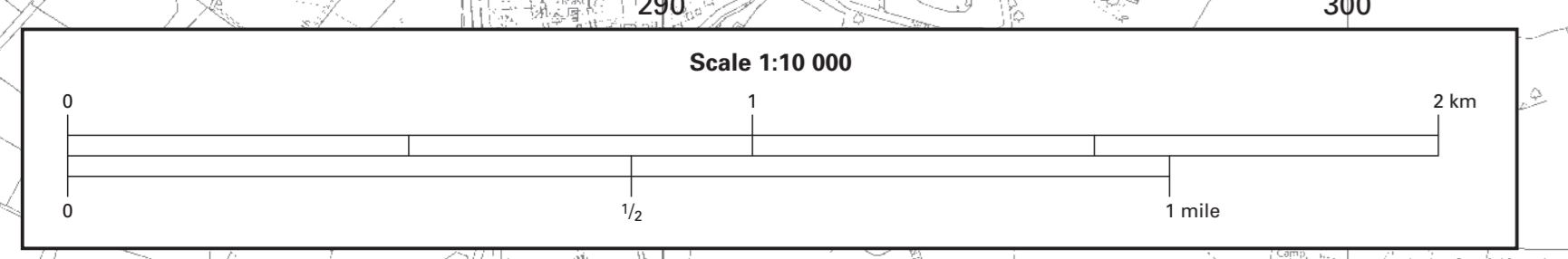
PLACE WITH SUSTAINABLE FUTURE

- South London Waste Plan (SP6)
- Safeguarded aggregates site (SP6)
- Flood Zone 2 (EA data August 2023) (DM22, SP6, DM25) (for details contact Environmental Agency)
- Flood Zone 3 (EA data August 2023) (SP2, DM22, SP6, DM25) (for details contact Environmental Agency)
- Metropolitan Green Belt (DM22, SP7, DM26, DM33)
- Metropolitan Open Land (DM22, SP7, DM26, DM33)
- Local Green Space (DM26)
- Important Green Space (DM26A)
- Regionally Important Geological and Geomorphological Sites (SP7, DM27)
- Sites of Nature Conservation Importance (SP7, DM27)
- Sites of Special Scientific Interest (SP7, DM27)
- Strategic Road Network (DM29, DM30)
- Safeguarded site for transfer freight to rail (SP8)

THE PLACES OF CROYDON

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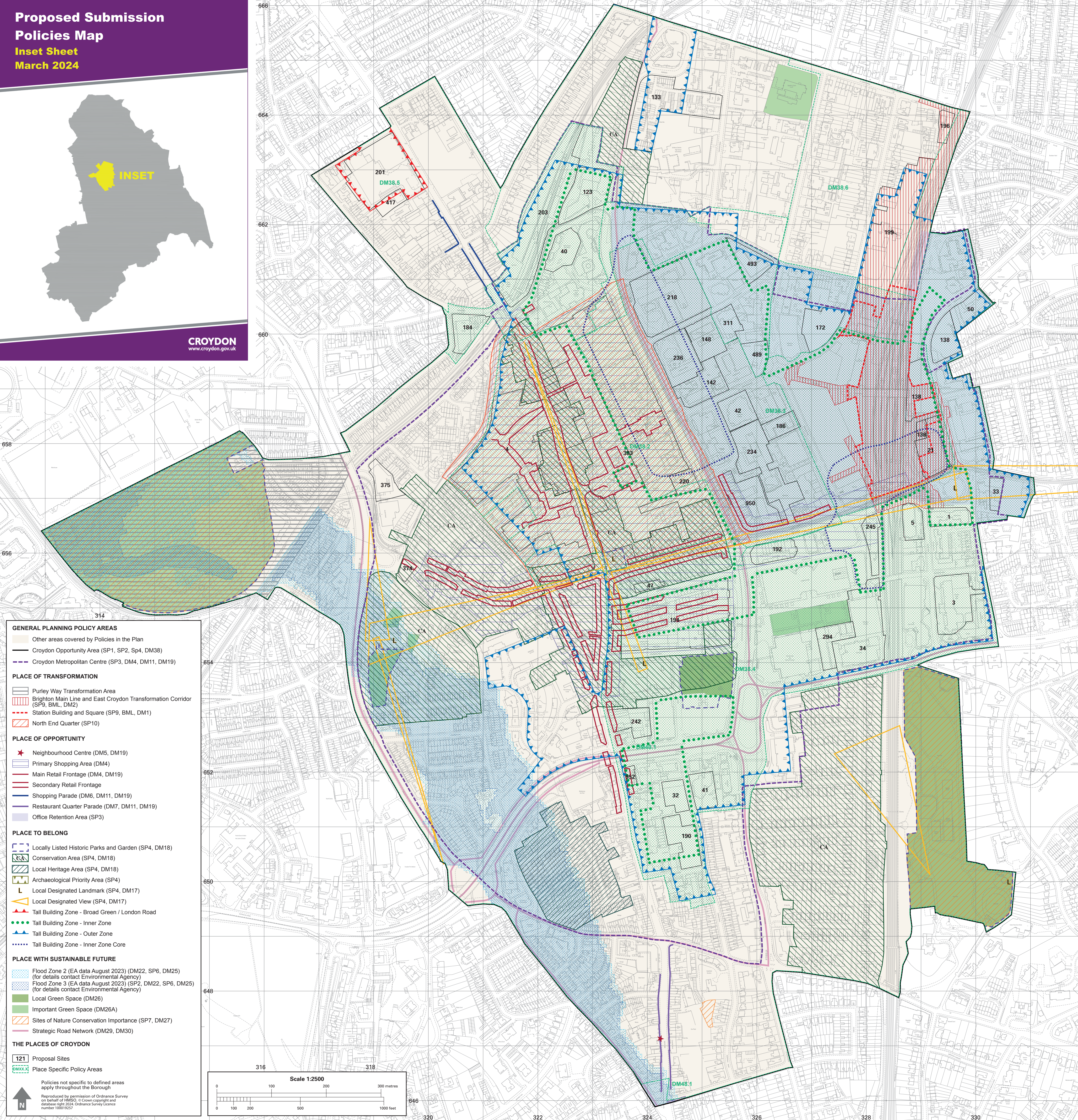
Proposed Submission Policies Map

Inset Sheet

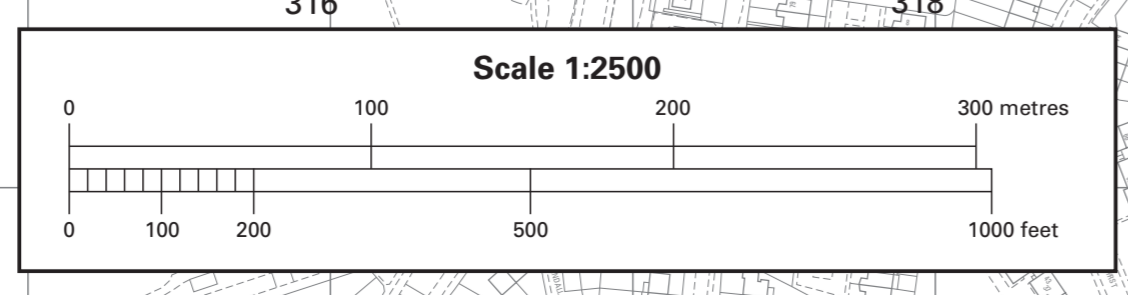
March 2024



CROYDON
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 - Croydon Metropolitan Centre (SP3, DM4, DM11, DM19)
- PLACE OF TRANSFORMATION**
- Purley Way Transformation Area
 - Brighton Main Line and East Croydon Transformation Corridor (SP9, BML, DM2)
 - Station Building and Square (SP9, BML, DM1)
 - North End Quarter (SP10)
- PLACE OF OPPORTUNITY**
- Neighbourhood Centre (DM5, DM19)
 - Primary Shopping Area (DM4)
 - Main Retail Frontage (DM4, DM19)
 - Secondary Retail Frontage
 - Shopping Parade (DM6, DM11, DM19)
 - Restaurant Quarter Parade (DM7, DM11, DM19)
 - Office Retention Area (SP3)
- PLACE TO BELONG**
- Locally Listed Historic Parks and Garden (SP4, DM18)
 - Conservation Area (SP4, DM18)
 - Local Heritage Area (SP4, DM18)
 - Archaeological Priority Area (SP4)
 - Local Designated Landmark (SP4, DM17)
 - Local Designated View (SP4, DM17)
 - Tall Building Zone - Broad Green / London Road
 - Tall Building Zone - Inner Zone
 - Tall Building Zone - Outer Zone
 - Tall Building Zone - Inner Zone Core
- PLACE WITH SUSTAINABLE FUTURE**
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Sustainability Appraisal (SA) of the Croydon Local Plan Partial Review

SA Report (Draft)

March 2024

Please note this is a draft version prepared to inform elected member deliberations ahead of a final decision to publish the Local Plan and SA Report under Regulation 19. The SA Report as published will need to be fully up-to-date and so there will likely be a need to make modest adjustments to this report ahead of publication.

Prepared for:

London Borough of Croydon

Prepared by:

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Croydon Local Plan Partial Review (“the Partial Review”) that is being prepared by the London Borough of Croydon.
- 1.1.2 Once in place, the Partial Review will serve to adjust the spatial strategy for growth and change set out within the adopted Croydon Local Plan (CLP, 2018), including by adjusting the package of sites allocated to deliver the strategy, and will also serve to adjust the suite of strategic and development management policies (i.e. policies against which planning applications are judged). The Partial Review will also extend the plan period to 2040 (from 2036 in the adopted Local Plan), such that the plan period is 2019 to 2040.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially appraises ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions** -
- What has Plan-making / SA involved up to this point?
 - including with regards to consideration of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are the next steps?

1.3 This SA Report

- 1.3.1 This is the formally required SA Report for the Partial Review, published under Regulation 19 of the Local Planning Regulations. This report is produced with the intention of informing representations on the Partial Review, which will then be submitted for consideration by an appointed Planning Inspector as part of a process of Examination in Public (see discussion of ‘next steps’ in Section Part 3 of this report).
- 1.3.2 This report superseded the equivalent SA Report published in early 2022. The Council is re-running the Regulation 19 stage at the current time, and hence a new SA Report is required.

Structure of this report

- 1.3.3 This report is structured according to the **three questions** set out above.² Before answering the first question, there is a need to further set the scene by setting out:
- the plan scope; and
 - the scope of the SA.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2 The plan scope

2.1 Introduction

- 2.1.1 The aim here is to explain more fully the context to plan preparation, introduce the plan area, explore the context provided by the CLP 2018 and discuss the plan objectives.

2.2 Legislative and policy context

- 2.2.1 The purpose of the Partial Review is to provide for development needs and ensure that the Borough continues to have robust and up-to-date planning policies that align with the Council's priorities. Also, the need to undertake a review of CLP 2018 stems from paragraph 33 of the NPPF, which states that local plan reviews *"should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy..."* The importance of an up-to-date local plan has been emphasised recently by the Government.
- 2.2.2 The Partial Review must reflect current Government policy as set out in the National Planning Policy Framework (NPPF, 2023) and Planning Policy for Traveller Sites (2015) and must also account for the Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that provides for development needs as far as is consistent with sustainable development.
- 2.2.3 The Partial Review is also being prepared in the context of the adopted **London Plan** (2021), which notably assigns LB Croydon a ten year (2019 to 2029) **housing target** of 20,790 homes (2,079 dwellings per annum, dpa). The London Plan also notably identifies much of the Borough as falling within the "Trams Triangle / London-Gatwick-Brighton mainline" strategic **growth corridor** and identifies Croydon itself as an **Opportunity Area** to deliver 14,500 new homes (2019 to 2041) and 10,500 new jobs (2016 to 2041).
- 2.2.4 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the **Duty to Cooperate** established by the Localism Act 2011. For example, context is provided by the strategic policies of the Greater London Authority (GLA), Transport for London, the Croydon Clinical Commissioning Group and Government's environmental agencies, namely the Environment Agency, Historic England and Natural England. LB Croydon must also cooperate with neighbouring areas, particularly the immediately adjacent authorities, namely Sutton, Merton, Lewisham, Bromley, Tandridge and Reigate and Banstead. LB Croydon also cooperates closely with other authorities within the Wandle Valley regional co-ordination corridor.

2.3 The plan area

- 2.3.1 Croydon is London's biggest borough and has the largest youth population in London. 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 and a 20 minute connection to Gatwick. Characteristics include (quotes taken from the plan document):
- Historic context – *"from historic market town... to dynamic Victorian County Borough and booming 1960s commercial centre, a strong sense of civic identity and ambition runs through Croydon's history";*
 - Modern history – *"From the 1970s...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 east-west links. A series of detailed masterplans have already been drawn up for Croydon Town Centre and support the current Croydon Local Plan 2018. These lie at the heart of a new wave of transformation across the Town Centre."*
 - Cultural offer – including fostering the birth of Punk, Dubstep and Grime, and with institutions such as The Fairfield Halls, Croydon Art College, and the Brits School;

- Croydon Town Centre – which has more shops in one location than anywhere else in London apart from the West End, but which faces major challenges, including dated office spaces from the 1950s - 1960s;
- Transport connectivity – Croydon enjoys some of the best transport connections in the UK, as discussed;
- Purley Way – home to two of the Borough’s three Strategic Industrial Locations (SILs) and extensive out of town shopping areas (following support for such schemes in the 1980s and 1990s);
- Variations in deprivation – with concentrations in the north of the Borough and in Addington and Shirley, as well as some of the least deprived areas of London in the south and east;
- Demographic trends – Croydon is a young borough, however, by 2031 the number of people in Croydon over the age of 65 will have increased by 41%; and
- Green Belt and open spaces – together cover over a third of the Borough, most extensively in the south.

2.4 The context provided by the CLP 2018

2.4.1 CLP 2018 Policy SP2 (Housing) provides key context for the Partial Review. It provides for 32,890 homes over the plan period (2016 to 2036; 1,645 pa) through: 10,760 homes within the Croydon Opportunity Area (OA); 6,970 homes through allocations elsewhere in the Borough; and 10,060 homes via windfall sites.

2.4.2 The CLP 2018 housing requirement of 32,890 homes exceeded the London Plan target, as it stood at that time, but fell short of the number of homes needed in order to meet objectively assessed housing needs. As explained by the supporting text to SP2:

“There is a need for over 41,580 new homes in Croydon by 2036 and evidence indicates that approximately 40% these need to be larger homes. The target of [32,890] 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...”

2.4.3 Further key context is provided Policy DM10 (Design and character) of CLP 2018. The supporting text to the policy explains that: *“The challenge for the... 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... as set out in Table 6.4...”*

2.4.4 From Table 6.4 of CLP 2018 it can be seen that the aim is a targeted approach to development outside of formal allocations, including within areas of ‘focused intensification’. The approach of supporting areas of focused intensification was then taken forward through the version of the Local Plan Partial Review published in early 2022. However, this approach is now proposed to be revised, as discussed below.

Table 2.1: Table 6.4 from the CLP 2018

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
Focused 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

2.4.5 The net effect of the various elements of the spatial strategy introduced above is summarised in Figure 4.1 of CLP 2018, which is reproduced below as Figure 2.1. In summary, the strategy involves:

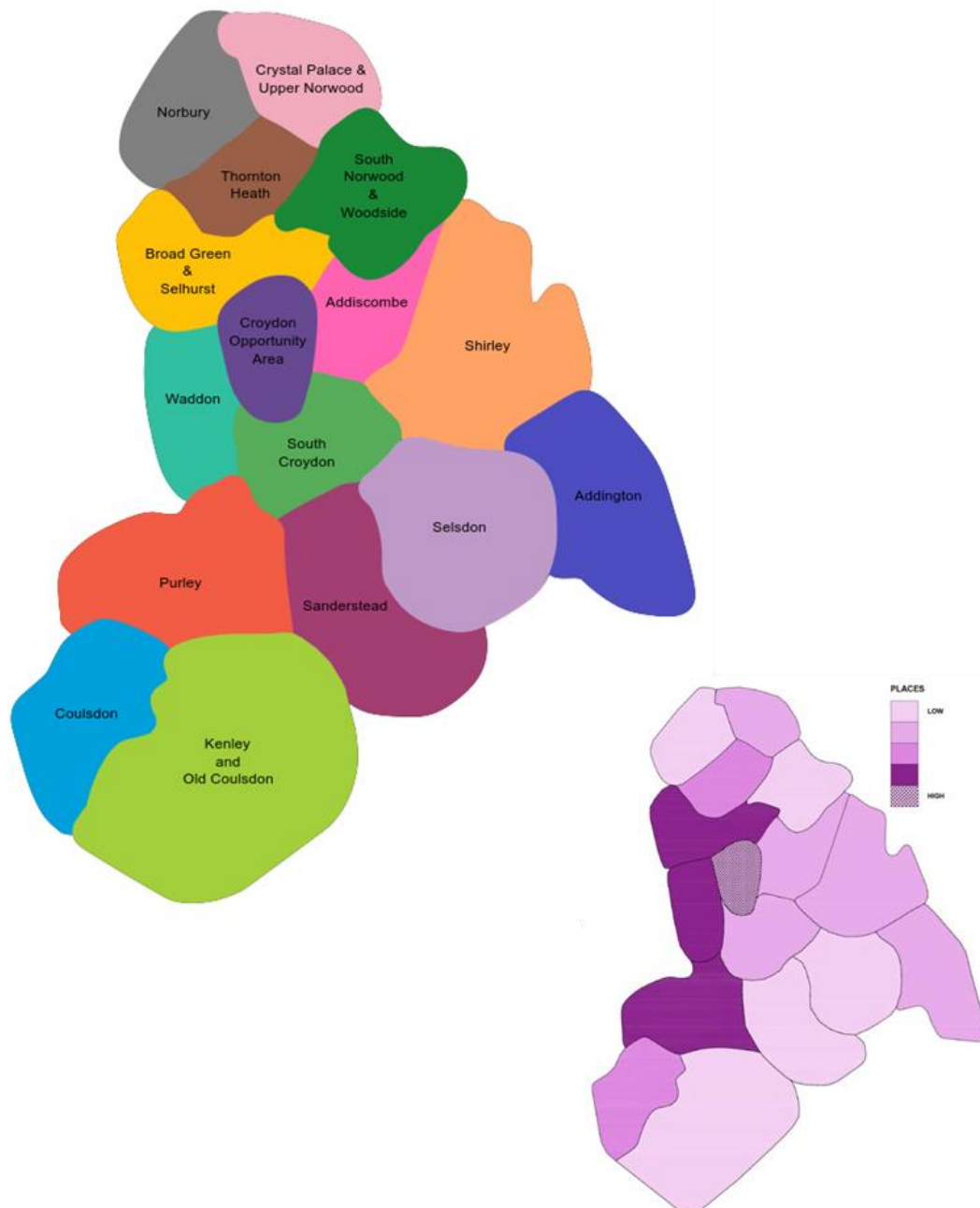
- Highest growth in the Croydon Opportunity (within which is Croydon Metropolitan Centre, CMC);
- Higher growth in the west the Borough within Broad Green and Selhurst, Waddon and Purley;
- Moderate growth at either end of the western spine within Thornton Heath and Coulsdon;

- Lower growth in those places to the east of the Croydon OA, namely Addiscombe, South Croydon and Shirley, as well as at Crystal Palace and Upper Norwood to the north and Addington to the east; and
- Lowest growth at Norbury at the northern edge of the Borough and also at the cluster of three ‘Places’ at the southeast extent of the Borough, namely Kenley and Old Coulsdon, Sanderstead and Selsdon.

2.4.6 The adopted spatial strategy can also be summarised further, in the following terms:³

“The strategy to deliver the housing target of the circa 33,000 homes is based on three sources. A third in Croydon Opportunity Area, a third on other allocated sites and the final third in the suburbs through suburban intensification / evolution (windfalls).”

Figure 2.1: The 16 defined Croydon Places and the CLP 2018 distribution of housing growth



³ LB Croydon Matter Statement submitted in respect of Matter 12 of the London Plan Examination: See https://www.london.gov.uk/sites/default/files/m12_lb_croydon_5662.pdf

2.5 Objectives of the Partial Review

Objectives

2.5.1 The objectives of the Partial Review are as per the objectives of the adopted Local Plan. The established objectives are as follows:

- 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.

2.5.2 However, understanding of planning policy priorities does naturally evolve over time, with the Partial Review needing to respond to the London Plan and changes to the wider planning and policy context. The Issues and Options consultation (2019) explained that key priorities relate to:

- Climate change – this is now a priority following declaration of a climate emergency by the Council.
- Housing crisis – understanding of housing needs has moved-on since adoption of the CLP 2018, including in light of the Strategic Housing Market Assessments (SHMAs) published in 2019 and 2023.

2.5.3 These remain two arguably overwhelming priority issues at the current time.

What is the plan not seeking to achieve?

2.5.4 Firstly, there is a need to reiterate that the Partial Review aims to build on the CLP 2018, and that the objectives of CLP 2018 are being rolled-forward for the purposes of preparing the Partial Review. The Partial Review only seeks to update certain aspects of CLP 2018, and other aspects of CLP 2018 are not a focus of the Partial Review or, in turn, the SA process or the current consultation.

2.5.5 More generally, there is a need to be clear that the Partial Review is strategic in nature, and hence naturally omits consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, for example at the planning application stage. The strategic scope of the Partial Review is reflected in the scope of the SA.

3 What is the scope of the SA?

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan.
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix II** presents further information, and the SA scope is also discussed as part of appraisal work (Sections 6 and 9) as necessary.

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, these authorities were consulted on the SA scope in 2019.⁵

3.3 Key issues and objectives

- 3.3.1 Table 3.1 presents the sustainability topics and objectives that form the core of the SA framework.

Table 3.1: The SA framework

Topic	SA objectives
Air quality	<ul style="list-style-type: none"> Take action to reverse the trend for increasing emissions by supporting and enabling the use of low emission technologies and actively encouraging sustainable modes of transport such as walking and cycling, particularly where it is possible to leverage the opportunities presented by new development. Locate and design development so that current and future residents will not regularly be exposed to poor air quality.
Biodiversity	<ul style="list-style-type: none"> Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of national and local significance. Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.
Climate change adaptation	<ul style="list-style-type: none"> Adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.
Climate change mitigation	<ul style="list-style-type: none"> Continue to drive down CO₂ emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.
Communities	<ul style="list-style-type: none"> Support good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.
Economy and employment	<ul style="list-style-type: none"> Improve the physical and mental health and wellbeing of Croydon residents, including through enhancing access to outdoor recreational spaces, and reduce health inequalities between local communities within the Borough.
Health	<ul style="list-style-type: none"> Improve the physical and mental health and wellbeing of Croydon residents, including through enhancing access to outdoor recreational spaces, and reduce health inequalities between local communities within the Borough.

⁴ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*’

⁵ The Scoping Report is available at: croydon.gov.uk/planning-and-regeneration/planning/get-involved-croydons-planning/croydon-local-plan-review

Topic	SA objectives
Historic environment	<ul style="list-style-type: none"> Protect, conserve and enhance historic environment and heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.
Housing	<ul style="list-style-type: none"> Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of residents, including older people, people with disabilities and families with children.
Land and soils	<ul style="list-style-type: none"> Promote the efficient and sustainable use of land and natural resources, including supporting development which makes effective use of previously developed land and avoids the best and most versatile agricultural land where applicable.
Landscape	<ul style="list-style-type: none"> Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps and key views.
Transport	<ul style="list-style-type: none"> Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change whilst helping to reduce congestion and travel times. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to the public realm, including key services.
Water	<ul style="list-style-type: none"> Promote sustainable forms of development which minimises pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive.



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Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

4.1.1 The aim here is to introduce the information set out in this part of the report, i.e. provided in order to answer the question: *What has plan-making / SA involved up to this stage?*

4.2 Overview

4.2.1 Plan-making has been underway since 2019; however, the aim here is not to relay the entire backstory of plan-making to date, but rather the work undertaken to examine reasonable alternatives in 2023.

Table 4.1: Overview of the plan-making / SA process

	Plan-making	SA
2019	Issues and options consultation	Interim SA Report
2022	Publication	SA Report
2023	Further consider issues and options / reasonable alternatives	
2024	Publication	SA Report
	Submission to Secretary of State	

4.2.2 Specifically, the aim is to: explain the reasons for selecting the alternatives dealt with (**Section 5**); present an appraisal of the reasonable alternatives (**Section 6**); and present justification for the preferred option in light of the appraisal (**Section 7**). This reflects the regulatory requirement to present an appraisal of “reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with”.

Reasonable alternatives in relation to what?

4.2.3 The legal requirement is to examine reasonable alternative taking into account the objectives and geographical scope of the plan (see Section 2). As such, it was determined appropriate to focus attention on reasonable alternatives in the form of ‘**growth scenarios**’, defined as alternative approaches to the supply of land, including by allocating sites (NPPF paragraph 69), in order to provide for development needs and the support the achievement of wider plan objectives. This focus serves to ensure:

- Alternatives that go to the very heart of the plan, ensuring a clear mutually exclusive choice.⁶
- Alternatives that are meaningfully different, in that they will vary in respect of ‘significant effects’.⁷

4.2.4 This as the approach followed in 2021, and no concerns were raised. Formally exploring development management policy alternatives was considered as a possibility, but no ‘reasonable’ alternatives emerged.

The inherent challenge

4.2.5 In practice, the task is to examine the emerging proposed approach to ‘supply’, which essentially amounts to the emerging proposed key diagram and the proposed housing supply trajectory (i.e. a chart showing the proposed supply of homes over time relative to the defined housing requirement) and then define one or more alternatives for appraisal (as a check-and-challenge prior to consultation) and then consultation.

4.2.6 The challenge is that there are many variables, i.e. factors that can be adjusted with a bearing on supply. Unlike with local plans outside of London, where the overriding question is around *which* sites to allocate, for Croydon and other urban local plans a key factor is around *how* to develop allocated sites, in terms of density (inc. building heights) and use mix. Choices around density and use mix are complex, as opposed to a discrete choice regarding whether or not to allocate a site, which creates an inherent challenge.

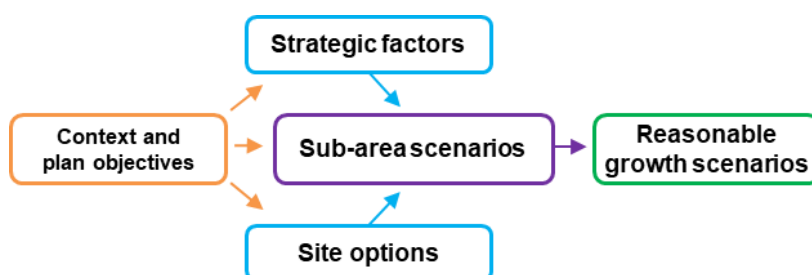
⁶ The requirement (Regulation 12(2) of the SEA Regulations) is simply to focus SA on “the plan and reasonable alternatives”.
⁷ Government’s PPG explains that SA “should only focus on what is needed to assess the likely significant effects of the plan”. In turn, to be ‘reasonable’, alternatives must be meaningfully different to the extent that the appraisal predicts differential significant effects, where significance is defined in the context of the plan as a whole. A focus on growth scenarios guarantees that this will be the case, and so avoids the need for a ‘screening’ process. Also, it is important to bear in mind that ‘no policy’ is not a reasonable alternative to ‘a policy’. This is because ‘no policy’ is the baseline (and so cannot lead to significant effects on the baseline, which is the definition of an effect). Also, ‘no policy’ is not a reasonable option for appraisal where there is a need for the policy given the plan objectives (as the plan objectives are the starting point for defining reasonable alternatives).

5 Defining growth scenarios

5.1 Overview

- 5.1.1 The legal requirement is to explore reasonable alternatives “*taking account of the objectives... of the plan*”,⁸ hence there is a need to define growth scenarios that align with the Local Plan objectives.
- 5.1.2 From this starting point, and also from the starting point of lessons learned through the Issues and Options consultation in 2019 and Publication in 2022, the Council and AECOM went through a process involving: **1)** exploring strategic factors and site options; **2)** pulling together these top-down / bottom-up inputs to define sub-area scenarios; and then **3)** combining sub-area scenarios to form borough-wide scenarios.

Figure 5.1: Defining reasonable alternative growth scenarios



Structure of this section

- 5.1.3 This section is broken down into four sub-sections:
- Section 5.2 – discusses strategic factors;
 - Section 5.3 – discusses site options;
 - Section 5.4 – draws upon the preceding analysis to define sub-area scenarios; and
 - Section 5.5 – combines sub-area scenarios to form reasonable alternative growth scenarios.

5.2 Strategic factors

- 5.2.1 The aim of this section of the report is to explore strategic factors (‘issues and options’) with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:
- Quantum – how many new homes are needed (regardless of capacity to provide them)? Similarly, what is the need locally for employment floorspace, and of what types?
 - Distribution – where within the Borough is more / less suited to growth, broadly speaking, and what types of schemes are supported (e.g. in terms of density and use mix)?

Quantum

- 5.2.2 Central to local plan-making is **A)** establishing development needs; and then **B)** developing a policy response to those needs. Focusing on housing, the Planning Practice Guidance (PPG) explains: “*Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure...*”
- 5.2.3 With regards to **(A)**, the NPPF (paragraph 61) explains that the starting point for local plan-making should be an assessment of housing need. However, the situation is different for London Boroughs, where the key starting point is the ‘housing target’ established by the London Plan (2021).
- 5.2.4 With regards to **(B)**, many local authorities will establish a housing requirement in line with the established housing need figure or, in the London context, a housing requirement in line with the London Plan target. However, under certain circumstances it can be appropriate to set *higher* or *lower* housing requirement.

⁸ Regulation 12(2)(b) of the SEA Regulations

- 5.2.5 The London Plan ([Policy H1](#)) sets a target for Croydon of 20,790 additional homes over a ten year period from **2018/19 to 2028/29**, which equates to a need to deliver 2,079 dwellings per annum. Within the overall target there is also a target to deliver 3,410 homes from small sites (341 dpa).
- 5.2.6 Crucially, there is also a need to consider the final 10 years of the plan period (**2029/30 to 2039/40**). In this respect, paragraph 4.1.11 of the London Plan explains: *“If a target is needed beyond the 10 year period... boroughs should draw on the 2017 SHLAA... and any local evidence of identified capacity...”*⁹
- 5.2.7 In other words, paragraph 4.1.11 suggests that when planning for the period from 2029/30 it is appropriate to simply take a ‘bottom up’ approach driven by available capacity, as opposed to seeking to provide for any particular ‘top down’ target. In particular, there is no suggestion that housing need should be a factor.
- 5.2.8 However, there is nonetheless a clear need to ensure that capacity options are at least considered in the context of a ‘top down’ understanding of development needs and wider strategic arguments for growth. In this respect, it is important to note that it is fairly common for Local Plans in the London context to simply apply the London Plan ten-year target for the entire plan period, or otherwise look to support a level of growth for the post-2029 period beyond that indicated as required on the basis of the London SHLAA. For example, this approach has been taken recently by Ealing,¹⁰ Enfield¹¹ and Wandsworth.¹²
- 5.2.9 The question of precisely what housing requirement / supply figures to reflect across the reasonable growth scenarios is returned to in Section 5.5, subsequent to consideration of capacity / supply issues and options (strategic, site-specific and sub-area specific). Box 5.1 considers employment land needs.

Box 5.1: Employment land needs

Beginning with **office floorspace**, the Employment Land Review (ELR, 2020) forecasts a need for an additional 30,500m² floorspace in the plan period, or 33,000m² if account is also taken of need for R&D space. The ELR explains that this “represents a potentially significant requirement for office space” but is a major departure from the 97,000m² figure within CLP 2018, which is “stretching” and assumes “very high growth”. The CLP 2018 figure was arrived at on the basis of assumptions regarding the distribution of demand for office space across South London that are no longer supported, including on the basis of evidence relating to planning consents for major office schemes not being implemented. The general trend over recent years (para 7.5 of the ELR) has been one of limited new office development (*“three significant deliveries of high-quality stock over the last decade which includes the Council headquarters”*). The ELR (2020) goes on to suggest a more recent trend of lack of supply leading to decreasing rates of vacancy, plus there is increasing demand for grade B / affordable office space; however, on the other hand, there is also a need to consider trends since 2020 (discussed below).

The ELR also discusses the spatial distribution of demand for office floorspace, ultimately concluding that the 33,000m² could be delivered entirely within Croydon Metropolitan Centre, which is a departure from CLP 2018, which supports 7,000m² at district centres. The ELR goes on to discuss the importance of retaining the existing Office Retention Area surrounding East Croydon Station, and also taking steps to stimulate office development.

With regards to **industrial land**, the first point to note is that the Borough has existing strengths and a strategic role to play in respect of B8 warehousing, with meeting warehousing need as *“the most challenging issue for Croydon Council.”* The need figure of 78,000m² is a minimum, and translates as need for 12-21 ha of land. Meeting this need – through new sites and/or intensification of existing – is clearly highly challenging.

With regards to light industrial land, the situation is “complex”. Whilst Croydon not a major location for manufacturing, light industrial units (particularly smaller) are seeing high demand across a wide range of *“sectors associated with higher value, good quality jobs, and which are essential to London’s economy.”* On balance, the ELR recommends continuation of the existing ‘no net loss’ approach, as part of which redevelopment (potentially mixed use) to secure an intensification of employment space will be important.

With regards to retaining and intensifying industrial land, a challenge relates to the dispersal of sites across the Borough (in contrast to office space). The ELR supports the current four tiers of designation and explains the importance of the Council intervening in support of successful intensification (e.g. “case study locations”).

⁹ Specifically, SHLAA capacity for the 12 year period from 2029 to 2041 is set out on [page 193](#) (see phases 4 and 5).

¹⁰ Policy SP4.3 of the Draft Local Plan (2024) explains that the annualised London Plan target to 2029 *“also forms an annual target of 2157 units for the rest of the Local Plan period.”* The alternative SHLAA based figure is thought to be ~724 dpa.

¹¹ An officers report to Full Council (6th March 2024) explains: *“As the London Plan evidence would see a significant drop off in urban capacity beyond this, the ELP then proposes to exceed the urban capacity derived housing figures for the period post 2029, to better meet local needs for more family housing and more affordable homes.”*

¹² The Inspector’s Report explains: *“The plan period extends beyond the 10-year housing requirement set out by the London Plan and the [plan] carries forwards the housing requirement... to establish a housing requirement for the 15-year Plan period of 20,313 new homes. Notwithstanding this... completions... [will likely be]... 26,315 new homes.”*

Broad distribution

5.2.10 This is the second of two sections exploring 'strategic factors' with a bearing on the definition of reasonable alternative growth scenarios. This section gives high level consideration to the following questions:

- Broadly **where** in the Borough might there be opportunities to boost housing supply?
- What changes might be made to policy on **how** sites are developed in order to boost housing supply?

Why focus on options for 'boosting housing supply'?

5.2.11 As discussed, whilst the London Plan supports a capacity-led approach to setting the housing requirement for the period post 2029, it clearly remains the case that understanding of housing needs cannot be discounted entirely, i.e. must factor-in when defining reasonable growth scenarios. This was the case at the time of preparing CLP 2018, and it remains the case now.

5.2.12 With regards to CLP 2018, the plan document explains that housing need for the plan period is ~44,000 homes, but the housing requirement is set at ~33,000 homes due to limited capacity, and this decision was made in light of work to explore higher growth scenarios through the SA process.

5.2.13 With regards to the situation now, the simple fact is that housing need over the plan period is potentially in excess of 2,079 dpa figure that is the target set by the London period to 2029. For example, the Government's standard method for calculating housing need suggests a need for 3,929 dpa and, whilst the Croydon Strategic Housing Market Assessment (SHMA, 2023) does not support this figure, other boroughs do give weight to the standard method, e.g. the Enfield Local Plan published in December 2023 explains that it takes a "capacity-led" approach on balance, and that:

"... by the end of the plan period, there will... be an estimated shortfall of approximately 38,000 homes in the Borough when compared against the locally assessed [standard method] housing need."

5.2.14 Affordable housing need is a further consideration, with the SHMA (2023) finding:

"There is a need for 1,817 low-cost rental homes per annum, falling to 1,243... when households already in low-cost accommodation are excluded. In terms of intermediate housing... up to 1,028 [per annum]."

5.2.15 A final consideration is the Government's current (March 2023) consultation on "Strengthening planning policy for brownfield development", which proposes "a change to national planning policy that would expect local planning authorities to give significant weight to the benefits of delivering as many homes as possible, and to be flexible in applying policies or guidance on the internal layout of developments especially for proposals on brownfield land." However, it is difficult to see that this has significant implications for Croydon, which has been delivering housing at a good rate relative to other London Boroughs (see 2022 [HDT](#)) and is one of the most affordable boroughs (see 2022 [affordability ratio](#)).

5.2.16 In this light, there is a need to explore growth scenarios that '**maximise housing supply**' within reason.

5.2.17 Also, there is a need to recognise that there is an emerging preferred approach to supply (i.e. a preferred strategy, preferred allocations etc) following publication of a version of the plan in 2022 and subsequent decision-making (e.g. in respect of intensification areas) and evidence-gathering etc. As such, the focus of the discussion below is on exploring options that would serve to '**boost housing supply**' relative to the emerging preferred (or 'proposed') approach. Such options will have drawbacks, but they must be given proportionate consideration. It is the aim of this current sub-section (Section 5.2) to start the discussion.

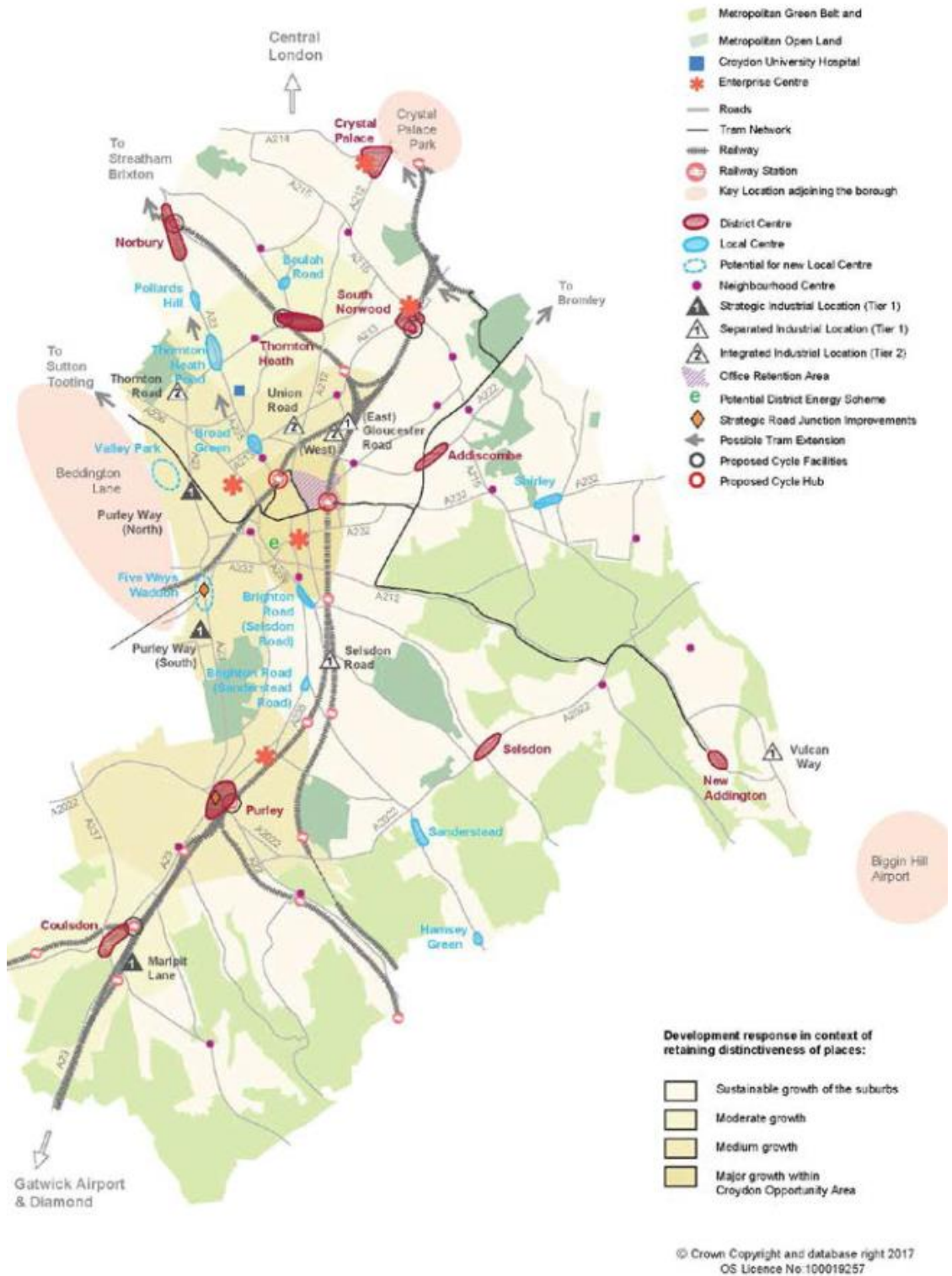
5.2.18 Finally, it should be noted that discussion below (within the remainder of Section 5) is not blind to the possibility of targeted lower growth, i.e. reduced supply from certain of the proposed supply components. However, it is reasonable for the focus to be particularly on options for boosting supply.

Broadly where in the Borough might there be opportunities to boost housing supply?

- 5.2.19 A clear starting point is the approach taken by the **CLP 2018**. The broad spatial approach to growth supported through CLP 2018 is summarised in Figure 2.1 (above) and Figure 2.2 (below).
- 5.2.20 The first point to note is a clear focus on the **Croydon Opportunity Area** (including Croydon Metropolitan Centre, CMC). An Opportunity Area Planning Framework (OAPF) was adopted in 2013, and work has been ongoing since that time to deliver on its aims and objectives. The CLP 2018 then allocated sites for at least 10,760 homes over the period 2016 to 2036, and this was then followed by the Partial Review Issues and Options consultation document, which assumed supply of 8,990 -10,440 homes over the period 2019 to 2039. The 2022 Publication version of the Partial Review then provided for 14,500 homes over the period 2019 – 2039 and the latest emerging proposal involves providing for this same figure over the period 2019 – 2040. Attention focuses on two transformation areas:
- **Brighton Main Line and East Croydon** – the East Croydon station area has been a focus for development since the Masterplan of 2011. The Issues and Options consultation document (2019) then identified a major opportunity associated with upgrade works along the Brighton Mainline, and Network Rail subsequently [consulted](#) on a proposal to “*unblock the Croydon bottleneck to provide Brighton Main Line passengers with [better] services, and to provide [capacity] for future growth*”. As part of this, East Croydon station could be moved to a new location, along with significant new enabling housing.
- The 2022 version of the Partial Review then designated a Transformation Corridor, to include 1,340 homes, but the SA Report (2022) also considered a scenario involving 1,490 homes. The situation has since evolved, with scheme funding and, in turn, deliverability much less certain.
- **North End Quarter** – this second proposed transformation area was presented for the first time at the 2022 publication stage. The area comprises Croydon’s retail core, including the main pedestrianised shopping street (North Street) and two shopping centres. The goal is for the Quarter to 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.
- The proposal in 2022 was to deliver 680 homes, but the SA Report (2022) also considered a scenario involving 1,080 homes. The situation has since evolved, with new masterplanning work underway, to include an added emphasis on homes. Matters are considered further in Section 5.4.
- 5.2.21 Also, within the Croydon OA there is a need to note recent work on **building heights**, through the Tall Buildings Study (2022). This is discussed further below and is a key update to the evidence since 2022.
- 5.2.22 The second point to note from Figure 5.2 is **Purley Way Transformation Area**. Building on CLP 2018, the Issues and Options consultation document (2019) identified the Purley Way as a potential location for transformational change, with major residential and mixed use development alongside intensification of existing uses within strategic industrial areas, transport infrastructure upgrades and improvements to the public realm and green infrastructure. Purley Way was one of the variables across the ‘Strategic Options’ that were a focus of the consultation document and its accompanying Interim SA Report (2019), with the approach to growth ranging between 2,900 homes and 12,000 homes over the plan period. Detailed work was subsequently undertaken to explore how to bring the area forward, including preparation of a draft [masterplan](#) that was then published in early 2021. Subsequently, at the time of the 2022 publication stage, the view was that the transformation area could deliver ~7,500 homes, and there was not considered to be any reasonable higher growth scenario, largely due to public transport accessibility. Most recently, understanding is that a major site (IKEA) is now unavailable, such that the emerging proposed approach involves significantly fewer homes. See further discussion in Section 5.4.
- 5.2.23 Thirdly, from Figure 5.2, there is a need to consider the **Green Belt**. Release of Green Belt for new homes, including family homes, was considered to be a reasonable option to explore at the Issues and Options stage (Strategic Option 3), and the appraisal presented within the Interim SA Report did highlight the option of Green Belt release as having merit in several respects. However, the option of Green Belt release was then found to have low levels of support through the consultation. Subsequently, the London Plan was adopted in 2021 with a housing target for the Borough significantly below that which informed preparation of the Issues and Options consultation document. In turn, the 2022 publication version of the Partial Review proposed nil homes via Green Belt release. However, a scenario involving 2,500 homes from Green Belt release was appraised within the SA Report (2022). At the current time, it remains the case - in the view of officers - that there is low support locally for Green Belt release.

5.2.24 However, non-Green Belt housing capacity has reduced (or, at least, supply options narrowed) since 2022, hence it clearly remains ‘reasonable’ to explore the possibility of Green Belt release. There is a high bar set nationally in order to justify Green Belt release (‘exceptional circumstances’), and the GLA tends to strongly oppose Green Belt release; however, the representation received from the GLA in 2022 did not comment on the reasonableness or otherwise of Green Belt release. Box 5.2 presents further discussion.

Figure 5.2: CLP 2018 housing distribution summary and key diagram



Box 5.2: Green Belt release through a Local Plan – recent precedents from other London Boroughs

Enfield is perhaps the primary example of a Borough for which the emerging Local Plan is giving close consideration to significant Green Belt release for housing. The Draft Local Plan published under Regulation 18 in 2021 proposed significant release, and the GLA [responded](#) as follows:

“[Green Belt release] risks undermining brownfield delivery and viability... It is important to note that the London Plan is clear... that it does not meet all of London’s identified development needs and that further work will be required to explore the potential options for meeting this need sustainably in London and beyond. However, this is a matter for a future London Plan... In light of this... the intention to release Green Belt land is premature.”

The most recent situation is that work is yet to begin on a review of the London Plan, and Enfield has very recently signalled its intention to consult again on a version of the Local Plan that includes significant Green Belt release. Specifically, as discussed [here](#), the proposal is to deliver ~13% of the housing requirement via a strategic Green Belt urban extension and a new settlement. However, this is in the context of a proposed high ambition approach to housing growth locally, with the new version of the plan proposing 35,000 homes (one new home for every four existing) in contrast the previous version which proposed 25,000.

Havering is also of note, as the most recent adopted Local Plan within London to include Green Belt release. However, the Green Belt release is specifically to provide for the accommodation needs of Gypsies and Travellers. With regards to Green Belt release for housing, the paragraph 49 of the Inspector’s Report explains:

“Having regard to... policy for the protection of the Green Belt and the fact that the Plan can demonstrate a 10-year housing supply [N.B. the plan period is 15 years], I am not satisfied that the current lack of a 5 year housing land supply provides the exceptional circumstances necessary to alter the boundaries of the Green Belt...”

The Barking and Dagenham Inspector also recently (January 2024) reached a similar conclusion, requesting that two small Green Belt housing sites be deleted because exceptional circumstances cannot be demonstrated, including given that the established housing requirement can be provided for without Green Belt release.

5.2.25 Finally, from Figure 5.2, there is a need to introduce the scope of supply options from the remaining part of the Borough, i.e. the urban area outside of the Croydon OA. The approach to growth in CLP 2018 is a reflection of both site **allocations** and support for **windfall**. Specifically, CLP 2018 allocated sites to deliver 6,970 homes and identified the potential for / an expectation of 10,060 homes at windfall sites.

5.2.26 Focusing on **windfall** – i.e. supply from sites other than allocations and broad areas specifically identified in the plan (in line with NPPF paragraph 68) – it is important to explain that there are broadly two approaches that can be taken. First is the approach of simply projecting forward past trends, potentially with adjustments made on the basis of safe assumptions (e.g. reducing rates of office to residential conversion). However, there can also be the potential to ‘intervene’ through policy with a view to boosting windfall supply (and, in turn, reducing the pressure on allocations in order to provide for the total required number of homes). The latter ‘intervention’ approach is taken through CLP 2018 (see Table 2.1, above) and further policy aimed at boosting windfall was presented in the version of the Partial Review published in early 2022. However, there is now an established need to review the approach to supporting / boosting windfall through policy. Further background is as follows:

- CLP 2018 – provides for around 30% of supply from windfall, specifically **10,060 homes** over 20 years. In support of this ambitious approach, the plan includes a degree of spatial targeting at the Croydon Opportunity Area (Policy DM36.2), four focussed areas of intensification (DM10.11) and two new Local Centres and their environs (DM36.2 and 49.1). Elsewhere there is a blanket expectation of “sustainable growth of the suburbs” which, in practice, might involve either ‘evolution without significant change’ or ‘guided intensification’, according to work through planning applications.
- Issues and Options (2019) – the consultation document proposed a significant change of tack, in response to: A) the major focus on small sites windfall / suburban intensification set out within the Draft London Plan (2017);¹³ and B) new evidence available through the Suburban Design Guide SPD (2019) which presented evidence in support of an ambitious approach to suburban intensification; and C) further new evidence presented within a “Windfall or Small Sites Evidence Base” study (2019).

¹³ Whilst the final version of the London Plan (2021) sets a small sites (i.e. windfall) target for the Borough of 641 dpa, the Draft London Plan, which informed work at the Issues and Options stage, required 1,511 dpa from small sites. LB Croydon notably submitted the following statement to the Draft London Plan examination in 2019: “Applying the circa 15,000 homes from windfall sites equally across the... Places of Croydon... and... assuming that this will need to be met from semi-detached and detached units... this analysis suggests that nearly 27% of the boroughs existing semi-detached and detached stock would need to be demolished and redeveloped. This is far from suburban evolution and at the heart of the Council’s concerns.”

The proposed approach was to set each of Croydon’s 16 Places a housing target taking into account how suitable it is for small sites windfall, which in turn was determined according to: A) urban character, which is understood on the basis of the Borough Character Appraisal (2015); and B) accessibility to a town/district centre, train and/or tram stop. Two scenarios were then identified for each place, one involving higher growth through windfall and the other lower growth, with the net effect that the total supply from small sites windfall varied from **9,660 - 18,950 homes** over 20 years.

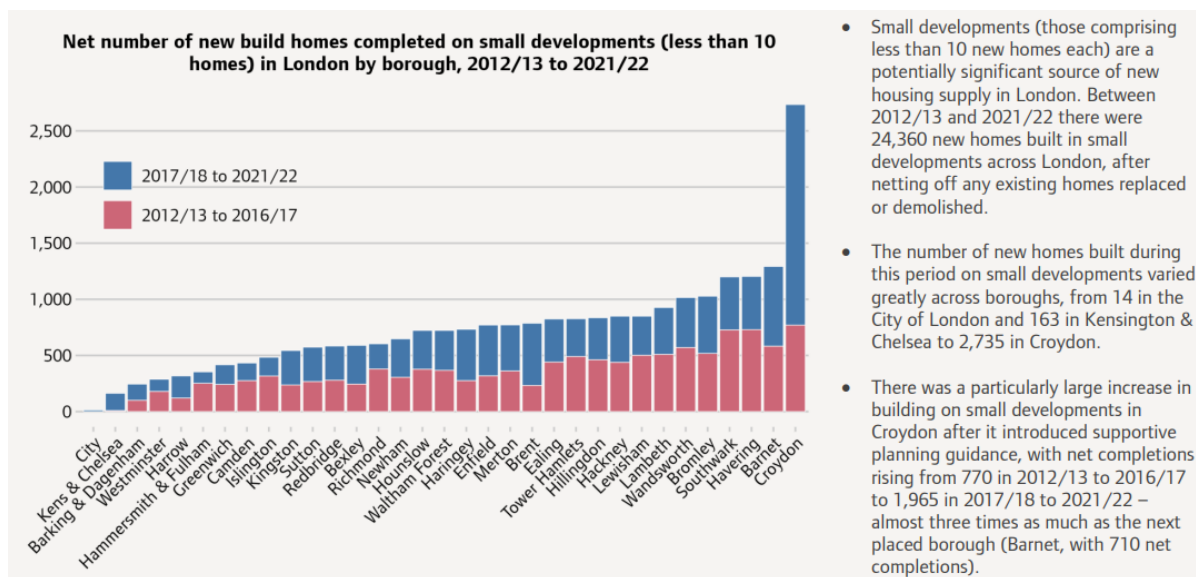
- 2022 publication stage – the version of the Partial Review published in 2022 proposed **10,900 homes** from windfall over 20 years, calculated simply as the London Plan small sites target (641 homes per annum) over the final 17 years of the plan period (to avoid double counting with planning permissions). In support of this approach, the key diagram presented a number of areas of ‘focused intensification’ and ‘moderate intensification’. Also, the SA Report presented an appraisal of a growth scenario involving boosting housing supply from small sites windfall / suburban intensification (relative to the preferred option), in order to reduce the gap to housing needs. Specifically, the assumption was **13,000 homes**.
- At the current time – the Suburban Design Guide SPD has been revoked and there is a political commitment to removing the previously identified areas of intensification. This reflects a view that the rates of small sites development / suburban intensification have been too high in some areas.

The emerging preferred approach is as follows:

- Year 3 and 4 – project forward average rate since 2016 = 1,051 dpa.
- Remaining years – reflect the London Plan’s small sites target for the Borough = 641 dpa
- Total = **9,794 homes** windfall assumption.

5.2.27 The figure below shows the significance of small sites development in Croydon. However, note that it deals only with sites of less than 10 homes (net) whilst the definition of small sites underpinning the numbers set out above (in line with London Plan Policy H4) is below 0.25 ha in size. It is also important to make the point here that small sites development is very important for supporting SME builders.

Figure 5.3: Recent supply of homes from small sites (Source: Housing in London, GLA October 2023)



What ‘policy’ options might be considered with a view to boosting housing supply?

5.2.28 As discussed, in addition to considering *where* in the Borough there could be the potential to boost housing supply (Croydon OA, Purley Way, the wider urban area, the Green Belt) there is also a need to consider adjustments that might be made to policy on *how* development comes forward in order to boost supply. There are clear cross-overs between questions of ‘where’ and ‘how’, but ‘how’ considerations include:

- **Tall buildings** – the emerging proposed approach has evolved considerably since 2023, informed by a Tall Buildings Study (2023) in line with London Plan Policy D9. The study sets out its aims as follows: *“The report puts forward evidence-based conclusions relating to the definition of tall buildings in Croydon, locations where tall buildings might be appropriate and suitable height ranges within these locations.”* The study considers the context, including existing policy on Tall Buildings in CLP 2018 (Figure 5.4), before running GIS analysis and then presenting analysis for 12 broad areas, concluding that six are potentially suitable for tall buildings (Figure 5.5). Comparing Figures 5.4 and 5.5, it can be seen that there is strong alignment (Coulsdon and Norbury are flagged only by the new analysis).

Another factor is the new NPPF published in December 2023, which does include new wording on tall buildings at para 130: *“... significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code...”*

Building heights are clearly a key consideration when exploring options for boosting housing in the Croydon and wider London context. However, it is inherently difficult to define realistic policy options for boosting housing supply. This is because tall building proposals must be determined through the planning application process, i.e. when detailed consideration can be given to scheme proposals.

- **Offices** – since the time of the ELR (2020) it could potentially be that demand for office space in Croydon Metropolitan Centre (CMC) has reduced, noting: low and declining rents; falling occupied office floorspace; weak leasing activity; and continued subdued demand across London and nationally. There is also a strong supply of existing available and consented office. In particular, there may be a need to question whether there may be a move away from demand for large office stock towards smaller scale and potentially higher quality office space, including flexible workspaces. Matters are discussed further below, in Section 5.4, with a particular focus on East Croydon Station and New Town, which is overwhelmingly the focus of office space and demand for office space in the Borough.

Another issue is the challenge associated with retrofitting B grade office space to meet increasingly stringent Energy Performance Certification (EPC) requirements. In this light, the possibility of a policy shift to support residential or mixed use redevelopment leading to a loss of B grade office space might be considered (also noting that redevelopment of large office buildings can help to deliver smaller, affordable, flexible space for start-ups and SMEs). Amongst other things, revisiting the Office Retention Area (ORA) designation surrounding East Croydon Station could potentially be an option.

However, on the other hand, the ELR (2020) strongly supports the current distribution of offices:

“The contribution that substantial numbers of office-based workers make to the strength of town centre retail, leisure and service provision is widely recognised. Trends in large scale office development and take-up over the last decade have seen preferences for rail linked locations in urban areas with good access to such facilities (as opposed to emphasis on out-of-town business park or campus models during the previous decade). In essence, accommodating new office employment in the CMC continues to have a rationale rooted in regeneration and sustainability.”

On balance, it is difficult to envisage a reasonable *broad* policy option for boosting housing supply via *targeted* reduced support for offices, but area and site-specific options are discussed in Section 5.4.

- **Industrial land** – CLP 2018 applies a four tier approach to the designation of industrial locations, and there is limited or no strategic case to be made for amending this approach, as discussed above. The Employment Land Review (ELR, 2020) supports the current approach to designation because there is:
 - A good mix, from very small scale and affordable light industrial and storage space to a small number of businesses operating out of large scale, modern and higher value industrial premises.
 - A healthy distribution across the Borough, e.g. with 46% of B1c/B2 employment in Croydon, 24% in district centres (10% in Purley) and 30% elsewhere in the Borough.
 - Forecast growth in sectors likely to generate continued demand for a wide range of property types and locations, particularly larger scale logistics and distribution facilities, but also premises for SMEs.
 - Evidence from preparing the Purley Way Masterplan that points to the vital role the area plays in accommodating micro and small businesses within a range industrial premises.

These considerations point to limited strategic choice, in respect of potentially compromising on industrial land objectives in order to boost housing supply. There is a need to explore opportunities for mixed use redevelopment of industrial sites, but this must typically be with a view to providing and

intensifying the existing industrial uses, such that there is an overall no-net loss borough-wide. Mixed use intensification of industrial sites is clearly challenging, and a precautionary approach is required.

Ultimately, strategic planning for industrial land is a consideration for the Purley Way (discussed further in Section 5.4) and also a site-specific consideration elsewhere, but it is not clear that there is any broad strategic policy option that might be considered, with a view to potentially boosting housing supply.

- **Other land uses** – firstly, it is important to note that there is extensive out-of-town retail space within Purley Way, which is a matter for further consideration below (Section 5.4). Another point to note is the public sector land estate, including school sites and the NHS estate, with sites under ongoing scrutiny to ensure optimal use. However, there are no clear policy options to explore through the Partial Review.

More generally, there is a clear need to balance a mix of uses within areas, sites and individual buildings, and this is a consideration that extends beyond balancing homes and employment land. Other key land uses include retail, community infrastructure and open space / public realm. However, there is no clear strategic choice for the Partial Review, with a view to potentially boosting housing supply.

- **District Centres** – there are nine district centres, namely: Addiscombe; Coulsdon; Crystal Palace; New Addington; Norbury; Purley; Selsdon; South Norwood; Thornton Heath. Any District centre must come into contention as a possible location for boosting housing supply given strong accessibility and transport credentials, and there can also be the potential for growth to support regeneration objectives. There is considerable variability across the Borough's District centres in both respects, but none stand-out as being associated with a clear opportunity for boosting housing supply – over and above the emerging preferred approach, including as set out in the plan published in 2022 – that warrants mention here.

There is also the question of policy support for shopping parades within both District and Local Centres, recognising issues with reducing footfall. This is a matter that warrants ongoing scrutiny, but it is difficult to envisage a strategic option with significant implications for boosting housing supply.

- **Housing mix** – there is a clear need for a mix of housing types with a view to supporting mixed, inclusive and multi-generational communities. Whilst in smaller homes are theoretically a way of boosting the number of homes delivered, in practice a good mix of homes, to include family homes, is essential. Focusing on market homes only, the latest evidence from the Strategic Housing Market Assessment (SHMA, 2023) shows a need for 62% of new homes to be 3 or 4 bedroom homes, and for only 9% to be one bedroom homes. Equally, whilst relaxing requirements around affordable housing delivery could theoretically serve to boost overall housing delivery, in practice the delivery of affordable homes is a clear local priority. Affordable housing is discussed further below.

Another consideration, and potentially a policy choice with a bearing on total housing supply, is around support for build-to-rent residential schemes, recognising that these are an increasingly popular housing product for developers. Such schemes can be an effective means of improving the quality of the overall rented stock; however, there is a need to avoid an over-proliferation. The turnover of occupiers of private rented housing tends to be rapid, so localised concentrations can impact community cohesion. Also, there are implications for securing affordable housing / affordable housing contributions.

- **Estate renewal** – the Borough contains a number of publicly owned housing estates which make an important contribution to meeting local housing need. A number of these housing estates were developed in the early to mid-20th Century and have been constructed using design and construction principals of different eras. While some assets perform their function well, and will continue to do so, some are starting to come to the end of their lifespan and have a range of issues that need addressing.

There is a particular issue with 1960s Large Panel System (LPS) tower blocks. In late 2022 the Council considered a desktop assessment of the costs of refurbishing or redeveloping the LPS tower blocks on the Regina Road Estate. It was recommended that the site was not economical to refurbish, and as such redevelopment would be more appropriate. A ballot of residents on the site subsequently confirmed local support for the redevelopment of the estate, and the redevelopment is expected to come forward in the plan period. There are other LPS estates in the Borough, and it is likely that further estates will face similar decisions over their future over the plan period. However, this is not a choice to be made at the current time, as part preparing the Partial Review. Estate Renewal must be sensitivity managed.

Figure 5.4: Summary of CLP 2018 approach to targeting tall buildings (from the TBS, 2023)

Place-specific development management policy	Policy ref	Appropriate for tall building?	Site Ref
1. New Addington District Centre	DM34.1	YES up to 12 storeys	44
2. Addiscombe District Centre	DM35.1	NO	
3. Area between Addiscombe Railway Park & Lower Addiscombe Road (section between Leslie Park Road & Grant Road)	DM35.2	NO	
4. Broad Green Local Centre	DM36.1	NO	
5. Potential new Local Centre at Valley Park	DM36.2	NO	
6. Area of the Lombard Roundabout	DM36.3	NO	
7. Area north of Broad Green Local Centre	DM36.4	YES up to 8 storeys	
8. Area of the junction of Windmill Road and Whitehorse Road	DM36.5	NO	
9. Croydon Opportunity Area (all)	DM38.1	NO	
10. Croydon Opportunity Area (New Town and the Retail Core)	DM38.2	NO	
11. Croydon Opportunity Area (Central area)	DM38.3	YES on its merits	
12. Croydon Opportunity Area (Edge area)	DM38.4	YES on its merits	
13. Croydon Opportunity Area (London Road area)	DM38.5	NO	
14. Croydon Opportunity Area (area along Sydenham and Lansdowne Road)	DM38.6	NO	
15. Norbury District Centre	DM41.1	NO	
16. Pollards Hill Local Centre	DM41.2	NO	
17. Purley District Centre and its environs	DM42.1	YES up to 16 storeys	
18. Environs of Reedham station	DM42.2	NO	
19. Area of the junction of Brighton Road and Purley Downs Road	DM42.3	NO	
20. Sanderstead Local Centre	DM43.1	NO	
21. Hamsey Green Local Centre	DM43.2	NO	
22. Selsdon District Centre	DM44.1	NO	
23. Shirley Local Centre	DM45.1	NO	
24. Area between 518 and 568 Wickham Road	DM45.2	NO	
25. Area of the Wickham Road Shopping Parade	DM45.3	NO	
26. Brighton Road (Selsdon Road) Local Centre	DM46.1	NO	
27. Section of Portland Road between the South Norwood Conservation Area and Watcombe Road	DM47.1	NO	
28. Section of Portland Road between Watcombe Road and Woodside Avenue	DM47.2	NO	
29. Thornton Heath District Centre and environs	DM48.1	YES up to 9 storeys	
30. Thornton Heath Pond Local Centre and environs	DM48.2	NO	
31. Waddon's potential new Local Centre	DM49.1	NO	

Figure 5.5: Summary findings of the Tall Buildings Study (Allies and Morrison, 2023)

	Potentially appropriate location	Threshold above which buildings will be considered tall		Appropriate height range for taller buildings	
		Outer zone	Inner zone	Outer zone	Inner zone
Croydon Town Centre	Y	21 m*	33 m	21 m - 39 m	33 m - 78 m
Addiscombe	N				
Brighton Main Line Transformation Area	N				
Broad Green / London Road	Y	21 m*		21 m - 33 m	
Coulsdon	Y	21 m*		21 m - 33 m	
New Addington	Y	21 m*		21 m - 33 m	
Norbury	Y	21 m*		21 m - 33 m	
Crystal Palace	N				
Purley Way Transformation Area	Y * 3	21 m*		21 m - 33 m	
Purley	Y	21 m*		21 m - 39 m	
Selsdon	N				
South Norwood	N				
Thornton Heath	Y	21 m*		21 m - 39 m	
Regina Road	Y	21 m*		21 m - 39 m	
Thornton Heath Pond	N				
All non-appropriate locations	N	21 m*		N/A	

* London Plan default definition of tall which is 6 storeys or 21 metres measured from the ground to the top of the building (Growth and Characterization LPG)

Conclusion on strategic factors

- 5.2.29 This section has considered strategic ('top down') factors with a bearing on the definition of reasonable alternative growth scenarios.
- 5.2.30 The first sub-section considers the question of broadly how many homes the Local Plan Review should be aiming to provide for, via the housing requirement, subject to detailed consideration of supply / capacity options. This essentially amounts to a question of '**housing targets**'.
- 5.2.31 Whilst there is a clear top down target for the early years of the plan period (to 2029), namely the target of 2,029 homes per annum provided by the London Plan, there is no equivalent top down target for the latter years of the plan period (to 2040). This is a key issue, given that the plan period runs to 2040 (also given that work is yet to begin on a review of the London Plan, which will provide the Borough with a new target for years post 2029). One option is to use the London Plan target of 2,029 homes per annum for the entire plan period, but there is also a need to be mindful of housing need, which may be higher (recalling that the London Plan does not provide for needs in full to 2029). However, it is undoubtedly the case that providing for the London Plan target figure of 2,029 homes per annum across the entire plan period is highly challenging, let alone a higher figure. This serves to highlight a need for close scrutiny of capacity / supply options (including strategic, area and site options). The question of housing requirement / supply figures to reflect across the reasonable alternative growth scenarios is returned to in Section 5.5, subsequent to further work to consider capacity / supply options.
- 5.2.32 The second sub-section then asks the question: **Broadly what options exist to boost supply?** There is an emerging proposed approach to supply that broadly aligns with that published in early 2022, adjusted to account for certain key changes to the plan-making context, latest evidence and understanding in respect of specific sites. However, there is also a need to consider ways of boosting supply, over-and-above the emerging proposed approach, in order to close the gap to stretching housing target figures.
- 5.2.33 Attention focuses on at least one of the identified **Transformation Areas**, plus there is a clear need to give proportionate consideration to **Green Belt** release options. On balance, there is also an ongoing need to give proportionate scrutiny to the option of support for **windfall / suburban intensification** in locations with strong accessibility / transport credentials and where local character and constraints allow. However, it is recognised that this is debateable, as the Suburban Design Guide SPD has been revoked (such that there is a reduced potential for supply from suburban intensification to be achieved in a way that aligns with design objectives) and the new plan cannot go as far as identifying intensification areas.
- 5.2.34 These are the three broad choices / variables that emerge from the discussion above as warranting further consideration below. The next port of call is the matter of **tall buildings**, but this is a very spatially-specific (and even site-specific) consideration, such that it is not possible to envisage any broad policy option involving boosting housing supply via increased support for tall buildings. It is also important to be clear that the Tall Building Zones identified by the Tall Building Study (2023) only impact on identified supply in so far as they have an influence on identified/assumed capacity at proposed allocations, all of which are considered in turn below, in Sections 5.3 and 5.4. No supply is assumed from other land that falls within the Tall Building Zones, because the component sites are not currently available.
- 5.2.35 After tall buildings, the next port of call is the possibility of boosting housing supply by adjusting the policy position in respect of **offices**, but again no clear policy option can be envisaged. Attention focuses squarely on the Croydon OA and the Office Retention Area in particular, which is also a key location for consideration of tall buildings.
- 5.2.36 There are also numerous **other 'policy levers'** that could potentially be pulled in order to boost housing supply, but each would likely have a fairly modest impact in isolation, and there is a need to ensure that this current process of defining growth scenarios remains focused and manageable. All policy areas can be considered further in Part 2 of this report.
- 5.2.37 Strategic factors are considered further in Section 5.4 of this report, in context of specific sub-areas and broad supply components. The discussion in Section 5.4 must also be informed by bottom up understanding of the sites that area available and in contention for allocation – see Section 5.3.

5.3 Site options

5.3.1 The aim of this section is to introduce the emerging proposed allocations – and the emerging proposed housing capacity figure for each – with a view to flagging options for boosting housing supply. This is a ‘bottom up’ input to the overall process of defining reasonable growth scenarios (see Figure 5.1, above).

5.3.2 The emerging proposed approach has been developed over the course of several years, including in light of the consultation held in early 2022 and the SA Report published at that time. Key points to note are:

- **Omission sites** – within the urban area there is limited need to focus attention on site options that have been identified and considered by the Council but are ultimately not proposed for allocation, i.e. ‘omission sites’. This is because such sites are typically ‘omitted’ for clear cut reasons, as opposed to on the basis of a decision reached on balance, which might helpfully be scrutinised through appraisal and consultation (quite different to the typical situation when dealing with non-urban allocation options).

Specifically, the reasons for omitting sites typically relate to availability, or perhaps technical achievability, in contrast to factors relating to suitability for development. Some sites are omitted accounting for factors relating to suitability, and a key aim of this section is to flag these sites; however, again it is the case that suitability factors leading to the omission of sites are typically very clear cut, such that there is relatively limited value to be gained by exploring in detail the option of allocating the site in question.

The discussion above relates to omission sites within the urban area; however, there are also a number of omission sites within the **Green Belt**. These are sites that are available and achievable, but not supported by the Council in light of suitability factors that can be questioned (in light of the discussion presented in Section 5.2). As such, omission sites within the Green Belt must be considered in detail.

- **Site capacity** (focusing on homes, but also recalling the need to provide for other uses / floorspace) – the figures arrived at by the Council are the outcome of detailed work over a considerable period of time, including: work by design specialists; formal consultation; and engagement with site promoters and other interested parties. Many proposed allocations feature within CLP2018 and have a planning history that stretches back even further, such that they have been the subject of repeated and ongoing scrutiny over many years, including through Issues and Options consultation in 2019 and at the 2022 publication stage. Since the 2022 publication stage a range of adjustments have been made to site capacities and for a range of reasons, including as a result of detailed design work involving application of a new ‘cookie-cutter’ methodology, whereby exemplary delivered schemes are overlaid on site allocations. The net effect was a loss of over 1,500 homes supply over around 20 sites.

In this light, there is overall limited potential to question the Council’s emerging proposed capacity figures for proposed allocations. However, it is nonetheless helpful to examine each site in turn with a view to potentially flagging types / categories / clusters of sites potentially associated with a strategic choice.

- **Deliverability** – a third key factor is the assumed timescale for delivery, recalling the importance of a smooth housing trajectory, i.e. avoiding dips in housing supply at any point in the plan period. Delivery timescales are typically inherently uncertain, particularly for urban sites, and so there is a need to apply broad rules of thumb. In this light, the aim here is to flag potentially anomalous delivery assumptions.
- **Marginal sites** – for some site options the proposed approach has been more-or-less consistent over time, which is an indication that there is relatively little to be gained from exploring options that would see a boost to housing supply. However, for other sites, the emerging proposed approach has changed significantly over the years, which is an indication that the proposed approach may be marginal and, in turn, might warrant scrutiny through appraisal and consultation.
- **A moving feast** – an inherent challenge is that, despite best endeavours to engage closely and on an ongoing basis, landowners can submit proposals planning applications for sites previously thought to be unavailable, or applications for schemes on allocated / emerging allocation sites that differ significantly to that assumed within the allocation / emerging allocation.

By way of an example, a key site at New Addington has long been expected to deliver significant new homes, but in February 2024 the NHS, as landowner, submitted a planning application for a new community facility (a diagnostics centre) without any associated new homes. This is an example of what makes work to definite reasonable alternative growth scenarios (and local plan-making in general) inherently challenging in the urban context.

Figure 5.6: The aforementioned site at New Addington



5.3.3 In light of these introductory points, **Table 5.1** considers all emerging proposed allocations in turn as well as a number of omission sites. Points to note on the table are as follows:

- **Sub-areas** – sites are grouped by sub-area, and then each of the sub-areas is explored in greater detail in Section 5.4. As well as considering each of the defined Croydon Places in turn, efforts are made to group site options within the Croydon Opportunity Area. The aim is to identify sub-areas / site clusters where there could be a strategic case to be made for boosting housing supply.
- **Status** – all sites are placed into an initial status category, to guide the further consideration of options.
- **Proposed capacity and site area** – sites are also placed in order according to capacity, with it clearly being reasonable to focus attention on larger sites to some extent.
- **Omission sites** – the table highlights a total of 30 omission sites. Numerous other sites have been considered at some point across the plan-making process, but the aim is to show a tailored selection.

By way of context, a total of 55 sites that appeared in CLP 2018 are now shown as deleted within the current Partial Review, but few of these are 'omission sites'. Specifically, this is the case because many have now been completed, or it is the case that they are now known to be unavailable or unachievable.

- **Comments** – a primary aim is to flag evidence that potentially points to the possibility of boosting supply. This primarily comes in the form of evidence that a site has been considered for a higher capacity in the past (which primarily means within CLP2018 and/or at the 2022 publication stage, although another consideration is proposals in 2019 at the Issues and Options stage). However, many recent decisions to reduce capacity reflect the outcome of design work completed in 2023, which is difficult to question.

Also, a secondary aim is to highlight sites where there could be a particular element of delivery risk, i.e. a risk of the site not delivering according to the anticipated timetable and/or not delivering the number of homes anticipated. Overall, there is clear evidence of uncertainty regarding site deliverability, e.g.

- Site capacities and delivery timescales changing considerably over the years.
- Numerous sites being subject to no known developer interest.
- Several sites having been deleted in 2022 and now being re-proposed for allocation.

However, this is unsurprising and unavoidable in the context of urban local plans. The key point is that delivery uncertainty / risk must be managed by ensuring that there is an appropriate supply buffer, i.e. an identified supply that comfortably exceeds the housing requirement (over the plan period).

Table 5.1: Site options place / sub-place

Ref	Status	Homes	Area (ha)	Comments
COA 1: Brighton Mainline and East Croydon Transformation Area				
138	Permitted	445	0.8	Now complete or near complete.
21	CLP allocation	209	0.4	Site cleared but delivery post 2034 (CLP2018 says 2021). Adjacent to the station.
199	CLP allocation	107	1.8	Comprises a builders yard. Delivery post 2034. CLP2018 says 109-313 homes. Less well-connected.
45	Omission site	0	2.8	The station itself. Previously proposed for nil homes but with the option of including homes discussed through SA.
COA 2: North End Quarter				
393	CLP allocation	7.8	1080	Proposed for 650 homes in 2022. This is a centrally important site, discussed in detail in Section 5.4.
New 4	New site (2023)	5.3	636	Adjacent to Site 393. Design work 20213 suggested 846.
220	CLP allocation	0.2	76	Latest policy proposal is: "... <i>main town centre use ground floor use, with employment or educational use above.</i> "
COA 3: Office Retention Area (east)				
50	Permitted	120	0.3	Under construction.
33	New site (2022)	76	0.1	Currently offices.
175	Omission site	-	0.7	CLP2018 says 97-279 homes ("residential and/or offices"). Proposed for 195 homes in 2022. Currently offices.
COA 4: Office Retention Area (west)				
142	Permitted	794	0.5	Originally proposed for 419-441 homes.
218	CLP allocation	331	1.3	Proposed for 418 homes in 2022. 20 storey office building for conversion (architectural merit). Links to site 236.
234	CLP allocation	199	0.9	Proposed for 342 homes in 2022. CLP2018 says 82-234. Currently includes 24 story offices.
186	Permitted	199	0.4	CLP2018 says 41-141 homes (plus offices), then deleted in 2022. Recently permitted for 199 homes with no offices.
172	Permitted	158	0.4	Delivery by 2029.
42	New site 2022	158	0.3	Currently comprises relatively modern offices.
493	CLP allocation	158	0.3	CLP2018 says 44-125 homes. Currently offices.
236	CLP allocation	143	0.6	CLP 2018 says 82-234 homes. Offices. New emphasis on town centre uses and also conversion (architectural merit).
950	CLP allocation	135	0.7	CLP2018 says 125-255 homes. Now proposed for retention/conversion (locally listed).
148	New site 2022	84	0.4	Proposed for 266 homes in 2022. Proposal was mixed use, but now resi only (to rear of Canterbury House only).
311	CLP allocation	76	0.2	New policy emphasis on town centre uses.
489	CLP allocation	49	0.2	2022 proposal for retention/conversion (locally listed) remains. New policy emphasis on town centre uses.
200	Omission site	-	0.4	CLP2018 says 133-384 homes, and then the proposal in 2022 was for 66 homes. Car park has now been refurbished.
37	Omission site	-	0.2	New site in 2022 for 33 homes. A surface car park. Design work in 2023 suggests capacity for 33 homes.
COA 5: West Croydon Station area				
123	CLP allocation	271	0.6	Proposed for 291 homes in 2022. CLP2018 says 40-88.

Ref	Status	Homes	Area (ha)	Comments
203	CLP allocation	109	1.9	CLP2018 says 79-455 homes. Station area.
40	New site (2022)	76	0.3	Bus station.
184	CLP allocation	66	0.3	Close to the station.
COA 6: Mid-Croydon				
194	CLP allocation	820	1.8	Proposed for 874 homes in 2022. Large complex site.
242	CLP allocation	158	0.1	Deleted in 2022. Currently offices. Still no known developer interest but delivery by 2029. Design work 2023 suggests 62.
47	New site (2022)	18	0.1	Within conservation area.
231	Omission site	38	0.2	Now included within Site 194.
COA 7: Fairfield				
34	New site (2022)	352	1.6	Proposed for 626 homes in 2022. Support for conversion.
245	CLP allocation	133	0.2	CLP2018 says 30-85 homes. Opposite station. Post 2034.
294	Permitted	93	0.1	Previously assumed for fewer homes.
192	CLP allocation	54	0.3	Proposed for 66 homes in 2022. CLP2018 says 35-101.
182	Omission site	-	0.2	Proposed for 33 homes in 2022. Currently offices.
COA 8: South east				
New 3	New site (2023)	447	0.7	Currently a hotel with proposal for a mix of uses.
New 1	New site (2023)	364	0.3	Has planning permission. Currently offices.
5	New site (2022)	76	0.2	Currently offices.
COA 9: South				
190	Permitted	357	0.4	Currently clear / car parking.
32	Permitted	230	0.2	Deleted in 2022. Currently clear / car parking.
41	New site (2022)	224	0.3	Proposed for 158 homes 2022. Comprises offices.
952	New site (2022)	121	0.1	To deliver by 2027.
222	Omission site	-	0.6	Proposed for 158 homes in 2022. Multi-story car park.
COA 10: West				
374	CLP allocation	21	0.1	Within a conservation area.
375	CLP allocation	76	0.9	Deleted in 2022. CLP2018 says 128-368 homes by 2026, whilst now assumed to deliver post 2034.
COA 11: North				
133	New site (2022)	372	1.1	Proposed for 505 homes in 2022. Residential estate.
196	Permitted	20	0.1	Delivery post 2034, contrary to CLP2018 (pre 2021).
Purley Way 1: Valley Park				
348	CLP allocation	685	3.0	Proposed to deliver by 2029.
8	Permitted	95	0.4	Proposed for 65 homes in 2022.
314	Omission site	-	6.8	Proposed for 976 homes in 2022
147	Omission site	-	6.6	Proposed for 590 homes in 2022
334	Omission site	-	2.4	Was not assigned a housing figure in 2022.

Ref	Status	Homes	Area (ha)	Comments
Purley Way 2: Waddon Marsh				
125	New site (2022)	632	2.8	Broadly no change since 2022 to Waddon Marsh proposals.
48	CLP allocation	331	2.6	As above. CLP2018 says 17 homes.
332	CLP allocation	265	1.5	As above
355	CLP allocation	260	1.4	As above. Note delivery timetable pushed back.
316	CLP allocation	184	1.0	As above
146	New site (2022)	148	1.0	As above. Note delivery timetable pushed back.
349	CLP allocation	146	1.0	As above
351	CLP allocation	124	0.7	As above
144	New site (2022)	74	0.4	As above
946	Omission site	-	2.7	Proposed for 385 homes in 2022. Whilst all of the sites above are adjacent, this is a separate site some way distant.
N/a	Omission site	-	2.8	Redevelopment of the gas works is discussed in the Purley Way masterplan, but is not an option at the current time
Purley Way 3: Five Ways				
25	CLP allocation	1034	3.8	Few changes since 2022 to Five Ways proposals.
110	New site (2022)	168	0.7	As above
16	Permitted	266	3.6	Proposed for 126 homes in 2022. A partial greenfield site also proposed to deliver a new secondary school.
132	New site (2022)	111	0.5	As above. Delivery timetable pushed back.
153	New site (2022)	91	0.4	As above.
350	Omission site	-	1.6	CLP2018 says up to 260 homes.
Purley Way 4: Waddon Way				
137	New site (2022)	659	3.5	Few changes since 2022 to Waddon Way proposals.
11	CLP allocation	152	1.0	As above. Proposed to deliver by 2029.
143	New site (2022)	84	0.3	As above.
135	New site (2022)	70	1.0	As above.
-	Omission site	-	1.7	Land adjacent to the north of the Waddon Way cluster, including the Bowls Club, was also flagged in 2022.
Addington				
44	CLP allocation	179	1.7	Proposed for 376 homes in 2022 and to deliver by 2027.
1	Omission site	46	0.4	Proposed for 46 homes in 2022. Greenfield amenity land.
Addiscombe				
68	CLP allocation	12	0.2	No change since 2022.
3	Omission site	-	0.7	Ruled out in 2022 as comprises a nursing home.
Broad Green and Selhurst 1: Northern cluster (Thornton Heath Local Centre)				
407	Permitted	101	0.2	Deleted in 2022. CLP 2018 proposed 7-25 homes.
248	CLP allocation	11	0.1	Still no known developer interest.
Broad Green and Selhurst 2: Central cluster (Croydon University Hospital)				
499	CLP allocation	345	8.2	Proposed for 372 in 2022. Delivery timetable has been pushed back (development subject to healthcare re-provision).

Ref	Status	Homes	Area (ha)	Comments
103	Permitted	118	0.8	Proposed to deliver by 2029.
Broad Green and Selhurst 3: Southern cluster (Broad Green Local Centre)				
201	CLP allocation	216	1.2	Proposed to deliver a primary school.
404	Permitted	79	0.7	CLP2018 allocation and then deleted in 2022. Comprises employment land but proposed for residential.
396	Permitted	72	0.3	Proposed for 39 homes in 2022.
337	CLP allocation	45	0.7	Deleted in 2022. CLP2018 says 32-184 homes. Policy notes viability challenges. Proposed to deliver by 2029.
417	CLP allocation	11	0.1	Proposed for 24 homes in 2022. CLP2018 says 23-64.
Broad Green and Selhurst 4: Elsewhere				
13	New site (2022)	57	0.4	Previously proposed for mixed use, now residential. Currently an industrial / commercial site.
22	New site (2022)	16	0.1	Car park in a residential area suggests that the site could be challenging, but it has been a focus of design work in 2023.
471	CLP allocation	11	0.2	Still recorded as no developer interest.
78	CLP allocation	8	0.0	Delivery timescale has been pushed back.
416	Omission site	-	0.8	Proposed for 40 homes in 2022; CLP 2018 says 36-136.
468	Omission site	-	0.3	Proposed for 30 homes in 2022. CLP 2018 says delivery by 2026. Comprises a fenced off grass area behind shops.
20	Omission site	-	0.1	Proposed for 16 homes in 2022. Comprises supported HMO.
Coulsdon				
945	CLP allocation	39	0.3	Proposed for 66 homes in 2022. Delivery timetable pushed back (by 13 years in total).
Crystal Palace and Upper Norwood				
357	CLP allocation	135	1.5	No developer interest. Delivery has always been long term.
126	New site (2022)	27	2.4	Proposed for 72 homes in 2022. Includes school provision.
58	New site (2022)	22	0.4	Proposed for 72 homes in 2022.
59	Omission site	-	0.3	Proposed for 16 homes in 2022. Appears a complex site.
Kenley and Old Coulsdon				
937	CLP allocation	12	0.2	Design work suggests 22 homes capacity. Underused / derelict site with poor accessibility. Delivery by 2029.
Norbury				
951	Omission site	24	0.0	Proposed for 24 homes in 2022. Comprises high street shops with historic character (proposal was to retain).
Purley 1: District Centre				
347	CLP allocation	420	3.8	Proposed for 479 homes in 2022. CLP2018 says 172-990 homes by 2026 (now delivery post 2034).
61	CLP allocation	139	0.6	Proposed for 182 homes in 2022. CLP2018 says 21-119. Delivery timescale has been brought forward.
30	CLP allocation	179	0.7	Proposed for 118 homes in 2022. CLP 2018 says 30-171.
35	Permitted	114	0.4	Delivery timescale has been pushed back.
683	CLP allocation	60	0.6	Proposed for 99 homes in 2022. CLP2018 says up to 91.

Ref	Status	Homes	Area (ha)	Comments
Purley 2: Reedham¹⁴				
490	CLP allocation	52	1.0	Proposed for 36 homes in 2022. To deliver a school.
64	New site (2022)	52	0.3	Proposed for 26 homes in 2022. Delivery pushed back.
410	CLP allocation	18	0.2	Delivery timetable has been brought forward (now pre-2029).
Purley 3: Purley Oaks				
405	CLP allocation	50	0.7	Proposed for 99 homes in 2022. Now residential only.
324	CLP allocation	G+T	1.1	No change.
Purley 4: Elsewhere				
411	CLP allocation	8	0.1	No known developer interest but delivery by 2034.
Sanderstead				
79	New site (2022)	62	0.7	Waitrose with no known developer interest.
306	CLP allocation	41	0.5	Application still expected soon. Delivery by 2029.
71	New site (2022)	34	0.6	Application still expected soon. Delivery by 2029.
Selsdon				
948	Permitted	26	0.1	Delivery by 2029.
85	Omission site	-	0.9	Proposed for 86 homes in 2022 (mixed use regeneration).
Shirley				
128	CLP allocation	123	1.4	Proposed for 91 homes in 2022. Delivery brought forward.
504	CLP allocation	24	0.7	Locally listed building to be converted.
87	New site (2022)	9	0.1	Proposed for 18 homes in 2022. Delivery pushed back.
502	Omission site	-	2.9	CLP2018 says 90 homes by 2027. Low PTAL in Green Belt.
South Croydon				
114	New site (2022)	8	0.1	Comprises garages and amenity land.
54	Omission site	-	0.6	CLP2018 says 42 homes by 2021. A cleared site.
101	Omission site	-	0.4	Proposed for 41 homes in 2022. Comprises a restaurant.
South Norwood and Woodside				
New 2	New site (2023)	260	2.5	Council housing estate. Delivery by 2029.
486	CLP allocation	22	0.2	Deleted in 2022, now proposed to deliver by 2029.
51	Omission site	-	0.7	Proposed for 102 homes in 2022 (delivery by 2027). Amenity land and car park associated with tower blocks.
Thornton Heath				
136	CLP allocation	124	0.7	CLP2018 says 25-55 homes. Within the district centre.
326	Permitted	66	0.4	Proposed to deliver by 2029.
400	CLP allocation	47	0.3	Deleted in 2022. Delivery by 2029. CLP2018 says 12-42.
105	New site (2022)	22	0.3	Delivery timetable has been brought forward.
284	CLP allocation	18	0.2	CLP2018 says 7-23 homes.
106	New site (2022)	18	0.2	Comprises a community centre, to be re-provided.
149	Omission site	-	0.9	Proposed for 118 homes in 2022 (45 to 254 at I+Os stage).

¹⁴ At all three sites the capacity of sites has been boosted taking account of design work completed in 2023.

5.3.4 The figure below shows the sites listed above – other than omission sites – categorised by sub-area (N.B. see Section 5.4 for maps of sites by status). Omission sites are discussed in Section 5.4.

Figure 5.7: Sites by sub-area and cluster

Figure TBC

5.4 Sub-area scenarios

5.4.1 Discussion has so far focused on A) ‘top down’ considerations with a bearing on reasonable scenarios for boosting housing supply; and B) ‘bottom-up’ consideration of site options. The next step is to consider each of the Borough’s sub-areas in turn, exploring options for boosting housing supply in more detail.

N.B. to recap, ‘boosting housing supply’ specifically means boosting supply relative to the emerging proposed approach, in light of stretching potential top-down housing target figures. Also, to reiterate, whilst the focus is on options for boosting supply, some options for reducing supply are also considered.

5.4.2 Each of the 35 sub-areas introduced in Table 5.1 and Figure 5.6 are considered in turn below.

Croydon Opportunity Area

5.4.3 As discussed in Section 5.2, attention focuses on the North End Quarter (NEQ) Transformation Area, but there is also a need for ongoing scrutiny of the Brighton Mainline and East Croydon Transformation Area, the Office Retention Area and other part of the Croydon Opportunity Area. These sub-areas are considered in turn below. Also, by way of introduction, Figure 5.8 is taken from the Tall Building Study (2023) and shows broad variation in growth constraint and opportunity across the Croydon OA. For example, it shows a clear inverse relationship between current locations of tall buildings and areas of constraint, which are primarily areas subject to historic environment constraint. It also notably highlights the NEW Qua as a key are of opportunity, albeit there is historic environment constraint.

Figure 5.8: Constraint and opportunity across the Croydon OA (from the Tall Buildings Study, 2023)



Fig 107 Figure ground



Fig 108 Existing building heights

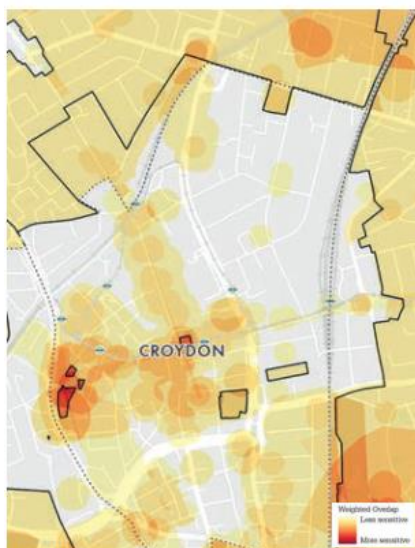


Fig 109 Weighted levels of sensitivity

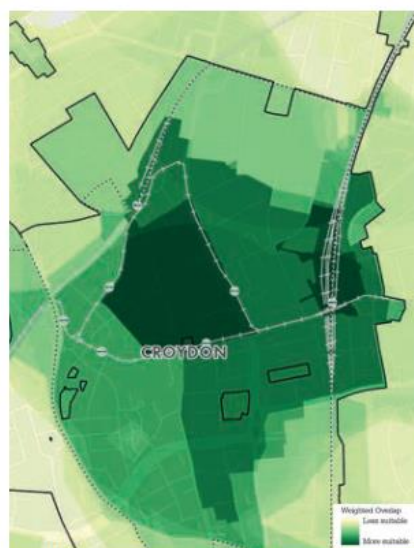


Fig 110 Weighted levels of suitability

North End Quarter Transformation Area

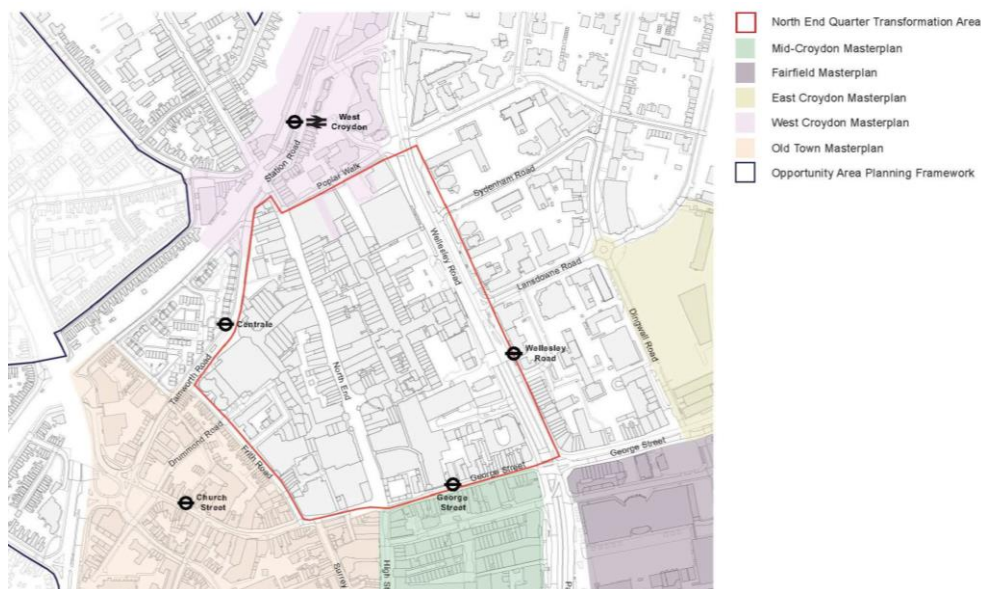
5.4.4 Supporting successful transformation of the North End Quarter is clearly a key objective for the Local Plan. There is a considerable back story– including three comprehensive planning consents for redevelopment of the Whitgift Centre (including Compulsory Purchase Orders) over the last ten years – and the situation has moved on considerably since 2022. In particular, the new proposal for the **Whitgift Shopping Centre** is to boost support for homes, and the adjacent **Centrale Shopping Centre** (which opened only in 2004) is now also proposed for mixed use redevelopment. Wide-ranging strategic considerations include:

- **Place-making** – clearly there is a need to retain the renowned retail role of the area whilst supporting a greater diversity of uses, in line with *Croydon Future of Destination Retail (2020)*, which found: *“There are strong opportunities for positive changes, and Croydon has the right ingredients. With clear... objectives and processes in place, the area can be remodelled to become a pioneering inclusive, resilient, and unique destination for all, which revives central Croydon’s bold and visionary heritage...”*
- **Historic environment** – North Street separates the Whitgift Centre to the east and Centrale to the west. It is Croydon’s main pedestrianised shopping area and a conservation area. Listed buildings (including the Grade I listed almshouses) are found only at the southern extent of this area, but North Street (along with George Street) retains many 19th and early 20th century buildings that reflect Croydon’s past prosperity. A number of frontages are of high quality and protected as part of the conservation area designation, and a number of buildings are also locally listed. The relationship between the Victorian shopping streets and post-war modernist development around Wellesley Road is also locally important.
- **East - west links** – the Whitgift Centre is a barrier to movement, as is Wellesley Road, which separates NEQ from East Croydon. Also, the town centre has 2,000 parking spaces more than the next closest Metropolitan Centre, which serves to highlight a clear opportunity to make the area less car dominated.
- **Delivery** – there has historically been heavy reliance on large scale, comprehensive developments within the town centre to deliver change, but such schemes are challenging to deliver. As such, it is crucially important that policies are in place to enable development to be delivered in a phased, flexible and manageable way, allowing for uncertain development viability and unforeseen issues.

5.4.5 A focus on housing delivery is not a new idea; for example, *Croydon Future of Destination Retail (2020)* stated: *“Mixed-use will characterise the area, but also individual streets and blocks, horizontally and vertically. The area will host public life amenities at different levels, including podiums and rooftops.”* However, there is now added emphasis on homes, including with a view to ensuring a scheme that delivers. The emerging proposed approach is to support 1,680 homes across the two shopping centres (Sites 393 and New 1), plus there is another small site supported for 76 homes (Site 220), but there is a need to consider additional housing growth, informed by ongoing masterplanning.

5.4.6 In **conclusion**, it is reasonable to explore a higher housing growth option, as a means of boosting housing supply borough-wide and also potentially as a means of realising NEW-specific objectives. A reasonable estimate is boosting supply by 500 homes, but higher growth options still are not out of the question.

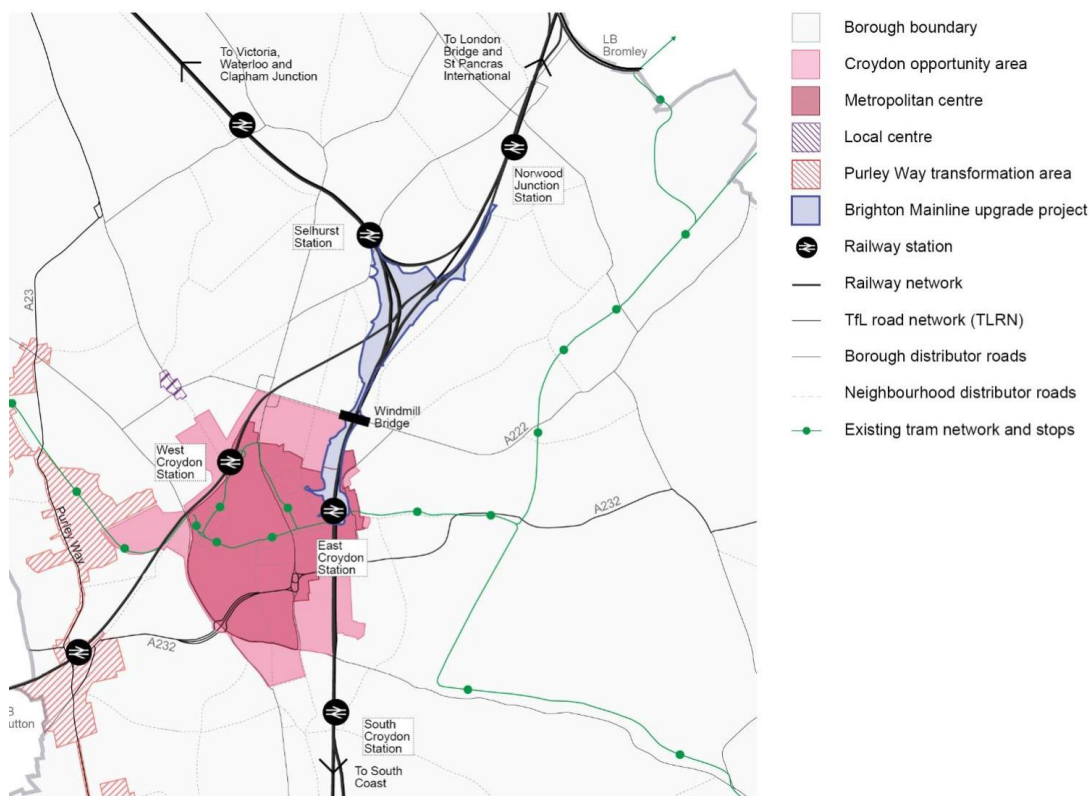
Figure 5.9: North End Quarter in the wider context



Brighton Mainline and East Croydon Transformation Area

- 5.4.7 The Transformation Area has already been introduced above, and Figure 5.10 provides further context, showing the area covered by the Brighton Mainline upgrade project, which includes East Croydon Station at its southern extent, with the northern extent comprising the Selhurst Triangle.

Figure 5.10: East Croydon Station and the Brighton Mainline in the wider context



- 5.4.8 Certainty regarding funding and the timing of upgrade works and associated development has decreased since the 2022 publication stage, e.g. in light of [Network North](#) proposals. This serves to reduce the case for exploring options that would see an additional emphasis on housing delivery as part of the development alongside upgrade works. With regards to the East Croydon Station itself (Site 45), the previous SA Report (2022) dismissed the option of assuming any homes here, and that remains the case at the current time (there is clear support for a public square on the existing station site if / when the station is relocated).
- 5.4.9 The two non-consented proposed allocations directly impacted by the upgrade works are: Site 21, which is directly adjacent to the current station and currently cleared; and Site 199, which comprises a builders yard located to the north of the station. Both sites are currently phased to deliver post 2034, to avoid conflicts with upgrade works, which reduces any argument for considering higher growth options.
- 5.4.10 Focusing on Site 199, this is a 1.8 ha site that is expected to deliver only 107 homes, but this is a less well-connected site, and marks a transitional area between the Metropolitan Centre and the surrounding residential area (with a Grade II* listed church nearby). Having said this, the residential area falls within the Croydon Opportunity Area, and it is noted that the CLP2018 proposal to support a mixed use development to include “light industrial workshops and studio spaces” has now been revised to a mixed use development “comprising employment ground floor use with residential above”.
- 5.4.11 In **conclusion**, there is no reasonable option for significantly boosting housing supply beyond the emerging proposed approach. Also see discussion of nearby sites in the Office Retention Area and Fairfield (including sites considered under the East Croydon / Brighton Mainline heading in 2022).

The Office Retention Area

- 5.4.12 Policy SP3 of CLP2018 designates an Office Retention Area (ORA) surrounding East Croydon Station, and the current proposal is to retain this designation. Within the ORA mixed use developments must include office floor space proportionate to Croydon’s role as an Edge of London Office Centre.

- 5.4.13 The designation primarily covers the area between East Croydon Station and Wellesley Road and to the north of George Street (stretching as far north as the edge of the Metropolitan Centre, to the east of West Croydon Station). However, the designation also extends slightly to the east of East Croydon Station.
- 5.4.14 Beginning with land to the **east of East Croydon Station**, the first point to note is that two previous allocations from 2022 have now completed, namely Site 138 and Site 174, which together deliver just short of 600 homes. Site 50 is then under construction for 120 homes. This leaves just one non-permitted proposed allocation, namely Site 33, which is a small site (0.1 ha) proposed for 76 homes. Finally, there is one omission site, namely Site 175, which was previously proposed for 195 homes. This is a fairly large site (0.7 ha) and is very close to East Croydon Station, but it is currently in use for offices, and the adjacent NLA Tower - which is a Locally Designated Landmark - is presumably a constraint to a tall building.
- 5.4.15 With regards to the Office Retention Area to the **west of East Croydon Station**, there is a total of twelve allocations, of which just three are permitted, hence this is an important area to consider, with a view to potentially boosting housing supply. With regards to the permitted sites, it is noted that one (Site 142; located adjacent to Wellesley Road) is permitted for 794 homes, including a 68 storey tower, having previously been proposed for up to 441 homes. Also, another (Site 186) was recently permitted for 199 homes (with no offices), having previously been proposed for up to 141 homes. The other permitted site in this area is Site 172, which is the northern section of the gateway site known as Ruskin Square, which in total is delivering over 600 homes (see planning permission [23/04130/NMA](#)). Also, another site was recently completed (Site 187) delivering 133 homes (1,654 dph) in comparison to a capacity of up to 44 homes in CLP 2018. As such, it is clear that there is a trend towards boosting housing supply, whether that be via taller buildings and/or support for housing at the expense of support for office floorspace.
- 5.4.16 Taking the non-permitted sites in turn:
- Sites 218 and 236 – are two well-known 1960s office towers of architectural merit fronting Wellesley Road, at the western extent of the Office Retention Area, namely Lunar House and Apollo House. The current assumed number of homes is not at the top end of what has been considered in the past, but there is no case for assuming that additional homes is a reasonable option to explore further.
 - Site 950 – is another sensitive site, in that it is a locally listed modernist building located at the junction of Wellesley Road and George Street, at the south west extent of the Office Retention Area. It is a 0.7 ha site proposed for 135 homes, having previously been proposed for up to 255 homes.
 - Site 234 – stands out as a large site (0.9 ha) that is now proposed for 199 homes having been proposed for notably more (342 homes) in 2022. However, this site currently includes a 24 story office tower, and is in close proximity to East Croydon Station, which perhaps limits calls to support additional homes.
 - The remaining proposed allocations are all smaller, namely Sites 42, 148, 311, 489 and 493. It is not possible to pinpoint any of these as associated with a particular case for boosting housing supply.
- 5.4.17 Finally, there are two omission sites listed in Table 5.1, namely Site 37 and Site 200. Both are located adjacent to Ruskin Square, which is a permitted 'gateway' site delivering over 600 homes plus significant new office space. However, the former is a small site comprising a surface car park that was proposed for only 33 homes in 2022, and the latter comprises a recently refurbished multi-storey car park.
- 5.4.18 In **conclusion**, there is no reasonable option for significantly boosting housing supply over-and-above the emerging proposed approach. Attention focuses on the non-permitted sites to the west of the area, and it is recognised that the ORA overall is relatively unconstrained (no conservation area or listed buildings) with good access to both train stations and the tram network, plus there is a long term opportunity to better link North End Quarter and East Croydon Station via this area, reducing the extent to which Wellesley Road is a barrier to movement. However, on the other hand, there has been a recent trend in this area towards permitting schemes involving a quantum of new homes over-and-above the policy intention and, on balance, there is ongoing support for the Office Retention Area designation, mindful of the ELR (2020) conclusion: *"In essence, accommodating new office employment in the CMC continues to have a rationale rooted in regeneration and sustainability."* In 2022 attention focused on three sites closely linked to East Croydon Station as potential locations for boosting housing supply, but two of these sites are now omission sites (Sites 37 and 200) and the third (Site 199) cannot come forward ahead of the rail upgrade works.¹⁵

¹⁵ The Office Retention Area is perhaps the key sub-area for discussion whereby there is a need to consider the possibility of a reasonable lower growth scenario, essentially involving boosting support for new office floorspace at the expense of residential floorspace. However, there is currently no clear basis for defining, appraising and consulting on a lower growth scenario.

Elsewhere within the Croydon Opportunity Area

- 5.4.19 Beginning with the **West Croydon Station** area, attention does focus on the cluster of four non-permitted allocations here, given transport connectivity and proximity to North End Quarter. However, there are historic environment constraints, and the area has recently seen considerable change with two new residential towers (including previous allocation Site 211, which includes a 25 storey tower).
- 5.4.20 In particular, attention potentially focuses on Site 203, which includes the station itself. The proposed capacity of 109 homes is at the low end of the previously identified range (79 to 455 homes). However, the proposed scheme includes: *“Remodelling of station and redevelopment to provide an improved transport interchange, cycle hub, retail & office units with residential development above.”*
- 5.4.21 The other key site to consider is Site 123, which is now proposed for 271 homes having been proposed for 291 homes in 2022; however, it is proposed for up to 88 homes in CLP2018. Heritage is a constraint here, namely the setting of the Wellesley Road (North) Conservation Area and locally listed buildings.
- 5.4.22 The final two sites are smaller, namely Site 40 and Site 184. The former is a bus station, which must be retained, plus heritage is a constraint to development, with a need to conserve the settings of Croydon Quaker Meeting House and the Adult School Hall, plus a Grade I listed church is nearby. The latter is a constrained site on account of the railway on one side and residential roads on the other two sides.
- 5.4.23 Finally, it is important to note that, of the eight extensions to the Croydon OA Tall Buildings Inner Zone (within which buildings can come forward involving a height of up to 33m before being considered a tall building, and tall buildings up to 78m are potentially suitable), the extension to include West Croydon Station is one of the most significant (alongside the extension along George Street). See Figure 5.11.
- 5.4.24 In **conclusion**, there is no reasonable option for significantly boosting housing supply beyond the emerging proposed approach. However, there is a need for ongoing scrutiny of the approach to growth here in light of latest understanding of proposals / options for adjacent North End Quarter and also given the latest evidence on the potential for tall / taller buildings.

Figure 5.11: An extract from the Tall Buildings Study (20223) showing proposed extensions to the COA inner zone

12.7 Key areas of change

12.7.1 This study puts forward recommended revisions to the tall building boundaries currently included in the Croydon OAPF. With reference to Fig 120, changes to the more central Inner Zone are outlined below:

Inner Zone changes	Explanation for change
1. Extend east of East Croydon Station to include the landmark and locally listed One Croydon/ IILA Tower, and the consented City Link site immediately to its south.	Extremely close to East Croydon Station, the locally listed IILA Tower rises comfortably over the Outer Zone upper threshold of 48m, as does the consented adjacent development on the City Link site. The boundary is drawn tightly around the IILA Tower, to help protect the setting of this landmark building.
2. Extend northward up to the bend in Cheery Orchard Road.	This extension includes a number of recently built apartment buildings which rise to approximately 20 storeys.
3. Extend to include the northern end of Dingwall Road.	Characterise by modern commercial buildings typically 10 - 11 storeys so almost all of them would already be considered tall even within the Inner Zone.
4. Extend northern end of Wellesley Road to incorporate the bus station and Delta Point.	The adjacent Peninsula development changes the context of this part of Croydon. Delta Point already rises to 14 storeys and the bus station site might present opportunities in the longer term. The setting of St Michael's Church will be a key consideration and constraint however.
5. Extend south to incorporate the existing I leafle Tower.	Built in 1904, this is one of Croydon's most prominent landmarks and remains one of the town's tallest buildings.
6. Include a new sub area reflecting the redevelopment of the former Taberner House and the existing cluster of tall buildings on the southern end of High Street.	A number of very tall buildings, the tallest of which rises to 35 storeys. This is now a prominent cluster of tall buildings at the southern end of the town centre.
7. Extend along the south side of George Street to include opportunity sites.	This prominent corner at the intersection between George Street, Wellesley Road and Park Lane marks perhaps the epicentre of the town.
8. Extend south alongside the west side of the rail tracks south between George Street and Barclay Road.	This extension brings in a number of major site allocations in the heart of the town centre.

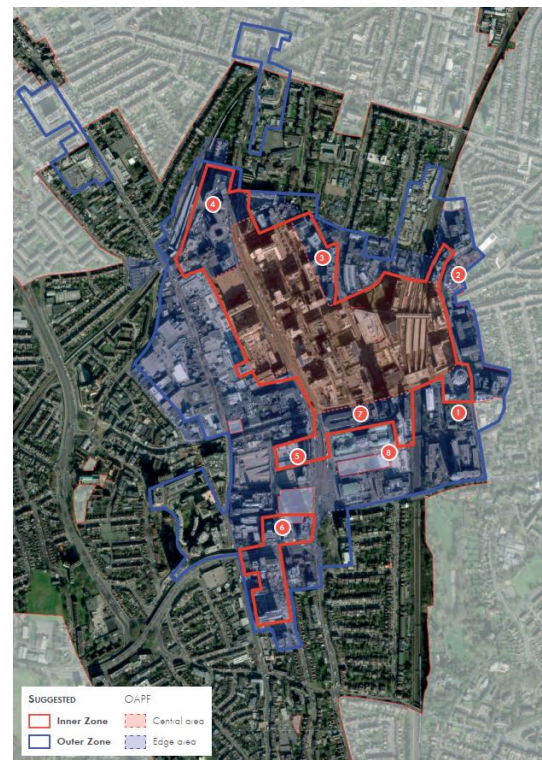


Fig 120 Suggested new tall building zones in central Croydon, cross references with currently adopted OAPF areas

5.4.25 Next there is a need to consider the **Mid-Croydon and Fairfield** areas (see Figure 5.8):

- Mid-Croydon – there are three proposed allocations here, of which Site 194 is the stand-out site, as a large and complex site now proposed for 820 homes having previously been proposed for 874 homes. It links closely to North End Quarter, but there is little reason to suggest any particular opportunity to boost housing supply beyond the emerging proposed approach, including noting the adjacent Grade 2* listed clock tower is adjacent. The other two sites (Site 47 and Site 242) are both very small.
- Fairfield – firstly, there is a need to note one recently completed site, namely previous allocation Site 31, which has delivered 544 homes including a 49 storey tower. This is a figure much higher than the 159 homes anticipated in CLP 2018, plus the site is reduced in extent. There is then one permitted site for 93 homes (Site 294), leaving three non-permitted sites, of which Site 34 is the stand-out large site. This site is proposed for 352 homes, which is significantly fewer than the 626 homes proposed in 2022 (also, it is noted that the proposal at the I&Os stage was for 814 to 2098 homes), but it is noted that the proposal now includes support for retention/conversion, as opposed to demolition. Also of note is Site 245, as it is located directly opposite East Croydon Station; however, the proposal is already to support a higher density scheme (133 homes on a 0.2 ha site) than the CLP2018 proposal (up to 85 homes), and this is a site that is likely not able to deliver until post 2034. The final proposed allocation is then Site 192, which is a 0.3 ha site proposed for 54 homes, having been proposed for 66 homes in 2022. Table 5.1 also lists one omission site here, but this is a small site and currently comprises offices.

5.4.26 In **conclusion**, there is no reasonable option for significantly boosting housing supply beyond the emerging proposed approach. However, there is a need for ongoing consideration of: Mid-Croydon's links to the North End Quarter (albeit this area mostly falls within the Central Croydon Conservation Area); and Fairfield's links to East Croydon Station (albeit recalling that this is a civic / cultural area).

5.4.27 Finally, the following sites are located **elsewhere in the Croydon Opportunity Area**:

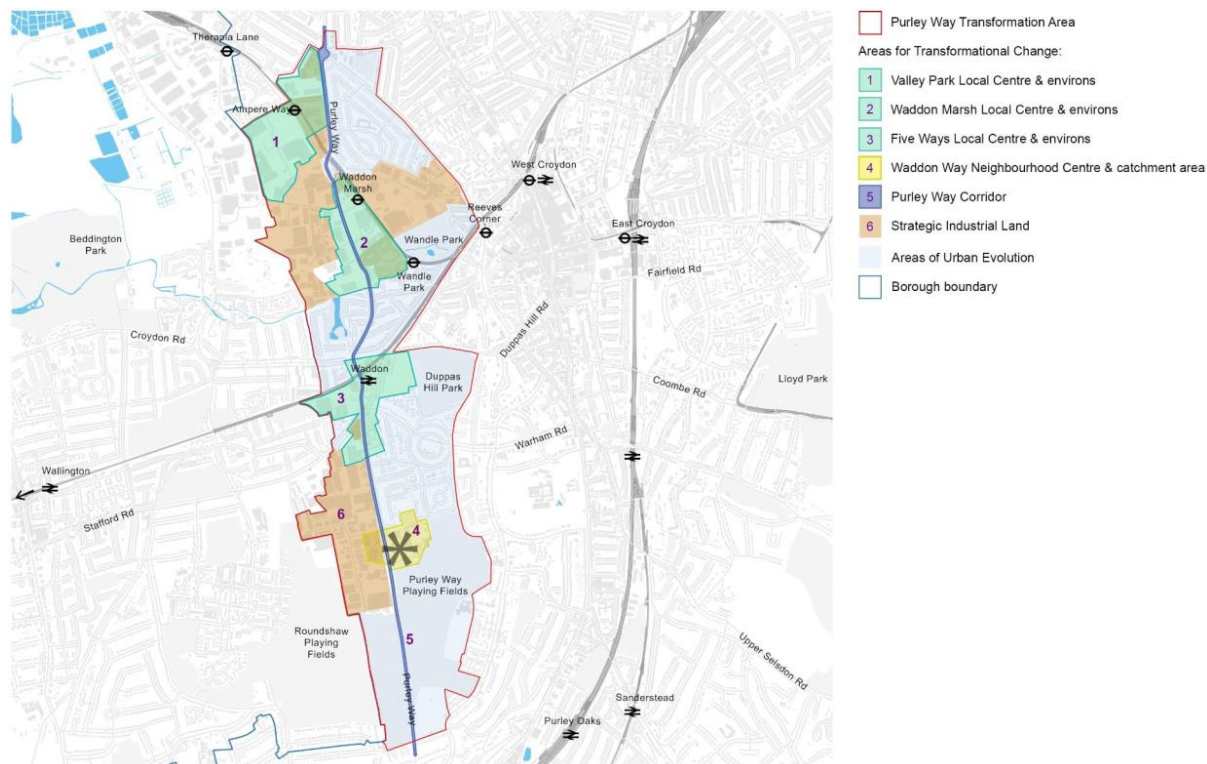
- South east – this area links very closely to East Croydon Station, but there is a need to account for the quick transition to low rise residential neighbourhoods. Beginning with Site 5, this was a new site proposed in 2022, and currently comprises offices located directly opposite the station. It is proposed to deliver a residential scheme (plus town centre uses), but there is no known developer interest, hence delivery is anticipated post 2034. The other two proposed allocations are then new proposed sites, i.e. sites not previously proposed for allocation in 2022. One of these has planning permission, namely Site New 1, leaving Site New 3, which is currently a hotel and proposed for a mix of uses with 447 homes.
- South – two sites are permitted, namely Site 32 and Site 190, with both sites currently cleared (used for car parking) and together set to deliver almost 600 homes. The other larger site is then Site 41, which currently comprises offices and is proposed for 224 homes having previously been proposed for 158 homes. The final proposed allocation is then Site 952, which is a small site (0.1 ha) proposed to deliver 121 homes by 2027. This is located at the southern extent of Croydon High Street and currently comprises an early 20th Century building with a degree of character, and it is noted that a Grade II* listed building is adjacent but one, albeit the intervening building is a modern building.
- West – there are two sites here, namely Site 374 and Site 375. The former is a small site in a conservation area proposed for just 21 homes. The latter was deleted in 2022, but now proposed for 76 homes to deliver post 2034 (in contrast to CLP2018 which says that up to 368 homes by 2026).
- North – Site 196 is small site permitted for 20 homes, but not expected to deliver until post 2014 (with CLP2018 having anticipated delivery by 2021). Site 133 is then a 1.1 ha residential estate closely associated with the Wellesley Road (North) Conservation Area. It is proposed to deliver a net increase of 372 homes, with the proposal in 2022 having been to deliver a net increase of 505 homes.

5.4.28 In **conclusion**, there are no reasonable options in any of these areas for significantly boosting housing supply beyond the emerging proposed approach.

Purley Way Transformation Area

5.4.29 The transformation area has already been introduced above (Section 5.2), including by explaining the backstory of wide ranging scenarios having been published for consultation in 2019, followed by masterplanning work that led to a preferred scenario involving ~7,500 homes (in the plan period) in 2022, and then subsequent loss of a key site (IKEA). As discussed, public transport accessibility is a key barrier to higher growth scenarios, but there is a need to ensure 'no stone left unturned', as part of efforts to boost housing supply, hence sub-areas and individual site options are discussed below.

Figure 5.12: Overview of the Purley Way Transformation Area



5.4.30 The vision for the area involves four new neighbourhoods, retention and intensification of the three areas of SIL, a focus on enhancing the A23 Purley Way corridor itself, other wide ranging transport and wider infrastructure upgrades and urban evolution elsewhere in the transformation area, including protection and enhancement of the strategic green and blue infrastructure associated with the River Wandle corridor.

5.4.31 Set out below is a discussion of how latest proposals vary to those at the I+Os stage, followed by a concluding discussion on reasonable growth scenarios for the area.

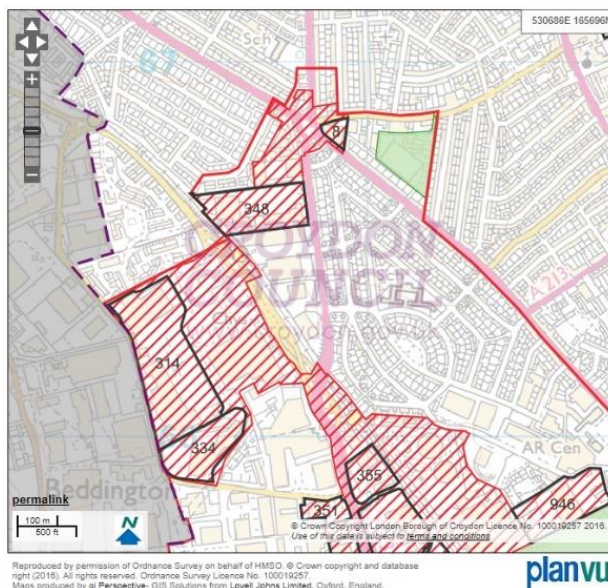
N.B. **maps** presented below show allocations from the Issues and Options stage.

Valley Park

5.4.32 This is the northern extent of the Masterplan Area, stretching from the Lombard roundabout, south along Purley Way to the tram line. The transformation area comprises land between Purley Way and the tram line, and land to the west of the tram line, with a residential neighbourhood to the east of Purley Way.

5.4.33 Important context comes from the CLP 2018, which established policy in support of a new Local Centre at Valley Park (DM36.2) and growth alongside enhancements to Lombard Roundabout (DM36.3).

5.4.34 Focusing on the Lombard Roundabout, the first point to note is that a 96 home residential-led scheme has recently come forward at the southern edge of the roundabout, on land formally designated as SIL. At the eastern edge of the roundabout, Site 8 was proposed for 13-33 homes at the I+Os stage, and 65 homes in 2022, but is now permitted for 95 homes.

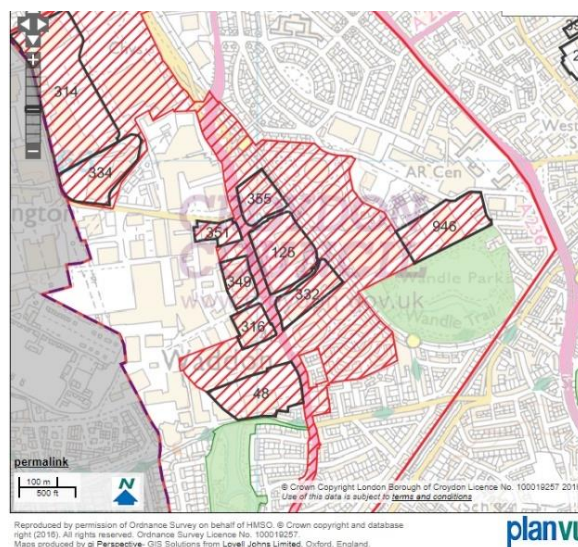


- 5.4.35 Moving to the south, land between Purley Way and the tram line comprises a small remaining area of SIL, and then Site 348, which was proposed for 128-482 homes at the I+Os stage, is now proposed for 685 homes to deliver by 2029, as part of a mixed use scheme associated with a new town/local centre.
- 5.4.36 Moving to the southwest, the entire area of land within the TA, as defined at the I&Os stage, falls within the land identified for a new Local Centre ('Valley Park') by CLP 2018. There were two proposed allocations at the I&Os stage, namely Sites 314 and Site 334, and then a third allocation was added at the 2022 publication stage, namely Site 147 (located to the east of Site 314), which comprises IKEA. Together these sites were proposed to deliver over 1,500 homes; however, they are all now omission sites, including as the IKEA site is not currently available (it is also subject to flood risk).
- 5.4.37 Overall, the proposal in 2022 was to deliver a new Local Centre ('Valley Park') centred on the tram stop at Ampere Way, with the local centre stretching either side of the tramline (as opposed to being focused to the west, as per the CLP 2018 proposal), integrating closely with an area of SIL, and with the extensive Beddington SIL in LB Sutton to the west. However, there is now a need to review the approach.
- 5.4.38 In **conclusion**, there is a clear need for ongoing scrutiny of the strategy for this area in order to ensure achievement of the long term vision, but at the current time there is no clear potential to assume redevelopment of any of the three adjacent omission sites. The vision is as follows:

"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."

Waddon Marsh

- 5.4.39 This area comprises a cluster of allocations either side of the Purley Way, extending east as far as the tram line, which together will deliver a new town centre. An important issue here is flood risk, with flood risk zone 2 significantly intersecting a number of the sites, particularly the two northern-most sites.
- 5.4.40 The cluster comprised seven sites at the I+Os stage, and the latest proposal (unchanged from 2022) involves nine sites, with the two additional sites filling the two gaps that can be seen on the map between the sites west of the Purley Way.
- 5.4.41 Focusing on the seven sites retained from the I+Os stage, the latest proposal is to increase the capacity of all seven. In most cases the proposal is to support a capacity modestly above the upper range figure identified at the I+Os stage; however, Site 125 is an outlier, with the latest proposal for 632 homes a very significant increase on the 38 to 141 homes range from the I+Os stage. 33% of this site intersects fluvial flood risk zone 2.
- 5.4.42 For completeness, the other proposed allocations are: Site 48 (331 homes); Site 332 (265 homes); Site 355 (260 homes); Site 316 (184 homes); Site 146 (148 homes); Site 349 (146 homes); Site 351 (124 homes); and Site 144 (74 homes).
- 5.4.43 There is then one notable omission site, namely Site 946 (Stubbs Mead), which was proposed for 385 homes in 2022. However, it comprises designated SIL, is a South London Waste Plan safeguarded waste site and almost entirely comprises flood risk zone 2 (also a small area of flood risk zone 3). The Purley Way Masterplan explained: *"The park-facing southern part of both Stubbs Mead and Turners Way Gas Works [adjacent to the west of Stubbs Mead]... could be appropriate for mixed use residential development, however the sites are SIL designated, along with a safeguard placed on part of the site for a waste facility as part of the South London Waste Plan."*



5.4.44 As a final point, it is worth noting that to the south east of the main cluster is Woodall Court, which is a recent scheme involving residential co-location with B8 uses, with the SIL designation retained (which also involved deculverting of the River Wandle).

5.4.45 In **conclusion**, proposals for this area are broadly unchanged from 2022, which serves as a reason to suggest no reasonable higher growth option or otherwise any reasonable alternative. The vision is:

“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 replacing car parking with active frontages to accommodate community uses, a high quality public realm and a variety of innovative housing models, co-located with retail, leisure and industrial uses.”

Five Ways

5.4.46 This area extends from Waddon Station south to Five Ways roundabout and also takes-in land to the south of the roundabout, including a small area of SIL.

5.4.47 Context comes from CLP 2018 (DM49.1), which proposed a new Local Centre at ‘Waddon’, centred on the roundabout.

5.4.48 At the I&Os stage the proposal was to deliver 421 - 1,637 homes across four sites (16, 25, 110 and 350), along with a new Local Centre.

5.4.49 The latest proposal involves three of the four sites from the I+Os stage (Site 350 is no longer available), plus two additional modest sites.

5.4.50 Site 25 is by far the largest. The proposal at the I+Os stage was for 251 - 1,028 homes, and the latest proposal (unchanged from 2022) is for 1,034 homes.

5.4.51 Also, it is important to note that one of the two new sites since the I+Os stage (Site 153) comprises a small isolated SIL, adjacent to the Five Ways roundabout. The proposal is for a scheme involving 91 homes and town centre uses, with consideration given to the adjacent Grade II listed tithe barn.

5.4.52 Finally, there is one omission site, namely Site 350, which was a proposed allocation for up to 660 homes in CLP 2018 and at the I+Os stage; however, in addition to being unavailable, this site is relatively distant from Waddon Station, and this area does not benefit from tram links.

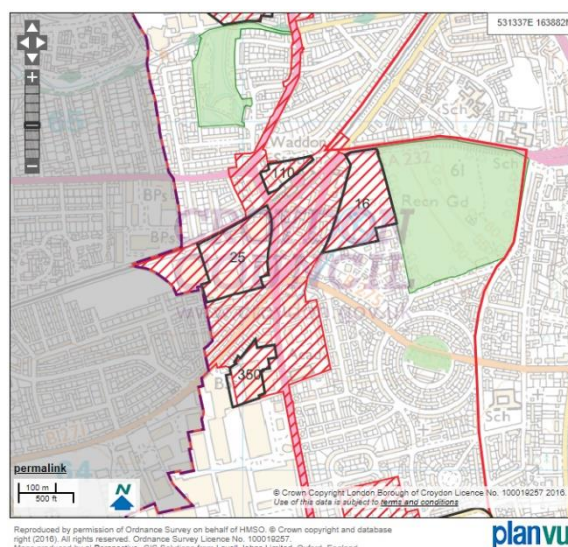
5.4.53 In **conclusion**, proposals for this area are broadly unchanged from 2022, which serves as a reason to suggest no reasonable higher growth option or otherwise any reasonable alternative. The vision is:

“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 retail, community and leisure uses, whilst celebrating the Waddon Hotel and Old Tithe Barn heritage assets.”

Waddon Way

5.4.54 This is the southern-most of the proposed growth areas, with the I&Os document identifying one modest allocation (Site 11) for 35 to 94 homes, as well as allocating Site 152 for leisure facilities.

5.4.55 The most recent proposal involves three additional proposed allocations, all adjacent to Site 11, with the combined proposal for 965 homes, linked to a potential Waddon Way Neighbourhood Centre. With regards to Site 152 (leisure uses), this was proposed for allocation in 2022 but is no longer allocated.



5.4.56 Focusing on Site 11, which is the only retained allocation from the I+Os stage, the new proposed capacity of 152 homes is notably higher than the previously proposed capacity.

5.4.57 In **conclusion**, proposals for this area are broadly unchanged from 2022, which serves as a reason to suggest no reasonable higher growth option or otherwise any reasonable alternative. It is also important to recognise that this area is relatively poorly connected, although work may be undertaken to explore the option of a new tram corridor along the Purley Way to Purley and Coulsdon. The vision is:

“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 retail, community and leisure uses, whilst celebrating the Waddon Hotel and Old Tithe Barn heritage assets.”

Overall conclusion on the Purley Way

5.4.58 The current proposal is to allocate 20 sites to deliver ~ 5,600 homes, with the only significant change since 2022 being a significantly reduced scale / ambition of growth at Waddon Marsh (IKEA site not available).

5.4.59 There are theoretical arguments for exploring a more ambitious growth strategy, including with a view to supporting major transport infrastructure upgrades, to include a tram extension along the Purley Way to Purley and Coulsdon. However, the overriding consideration is that transport infrastructure constrains growth, as well as community infrastructure (e.g. secondary school capacity). Transport infrastructure concerns are particularly acute, because there is a need to address traffic along the Purley Way, which suffers from heavy traffic, air pollution and a poor environment, with a number of identified ‘pinch points’.

5.4.60 For this reason, the current plan document explains: *“It is common ground with TfL that there is sufficient overall sustainable transport capacity to support 4,000 additional homes in the area... Growth beyond 4,000 homes could require a range of additional improvements to highway and public transport capacity.”* 13 of the 20 proposed allocations are flagged as expected to come forward first within the 4,000 capacity.

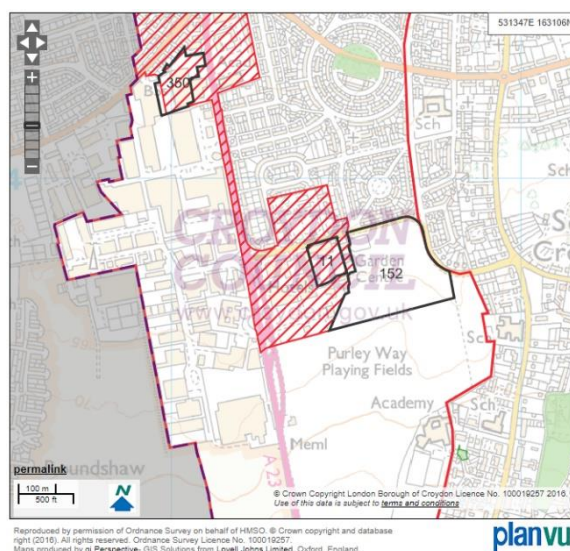
5.4.61 There are also potentially transport infrastructure challenges that could constrain growth at levels below 4,000 homes, with the Partial Review document explaining:

“... 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... Beyond this number, capacity on the existing tram network would need to be increased, either by longer trams or greater frequency, or both.”

5.4.62 There is feasibly the possibility of revisiting the visioning and masterplanning work for the Purley Way, potentially with a view to seeking to develop the area as something of a new community linked to Croydon Metropolitan Centre, with a strong focus on self-containment / maximising trip internalisation. Also, the possibility of a major retirement community has been suggested as another means of making the most of the area despite public transport accessibility constraints. However, ultimately there would be a need for much further work before any such options could be ‘worked up’ for inclusion in the Partial Review.

5.4.63 In this light, and as per the conclusion reached in 2022, there is no reasonable higher growth scenario for the Purley Way Transformation Area, i.e. no reasonable option involving significantly boosting housing supply over-and-above the emerging proposed approach.

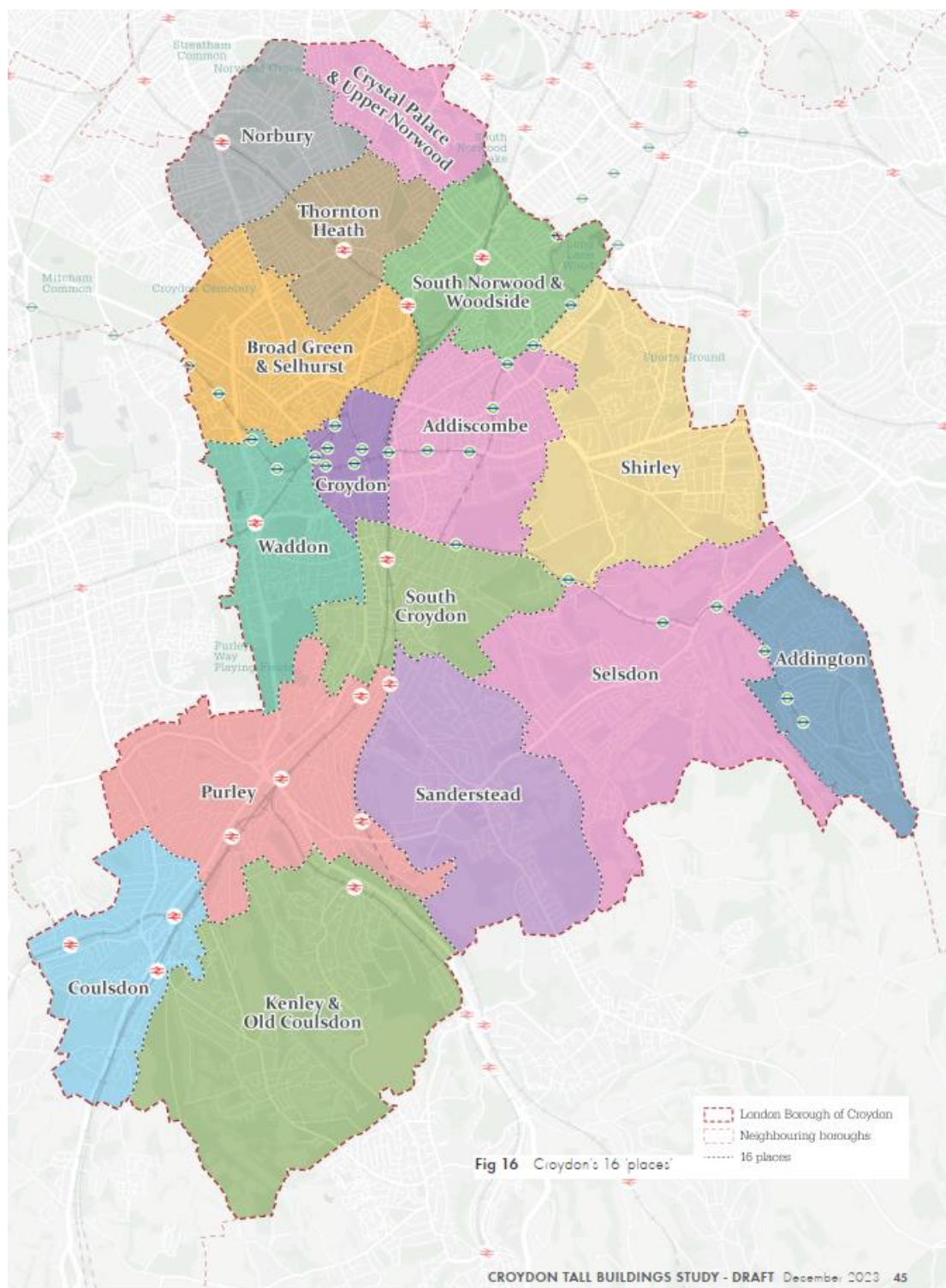
5.4.64 With regards to the possibility of lower growth, whilst there are no significant ‘suitability’ arguments for lower growth, there is a need for ongoing scrutiny of delivery assumptions, i.e. the number of homes that will deliver in the period and when within the plan period certain sites are likely to deliver.



Allocations elsewhere

5.4.65 The aim of this section is to consider all other site options listed in Table 5.1 by sub-area. Rather than considering sub-areas in alphabetical order, they are considered in broad order of growth opportunity.

Figure 5.13: The 16 sub-areas



Purley

5.4.66 This area is a key focus of growth but is subject to a range of issues and constraints, including associated with the River Wandle valley (including flood risk and heritage). There are three clusters of sites:

- Purley District Centre – one previous allocation has now completed (Site 130; 106 homes) and one allocation is permitted (Site 35; 114 homes). There are then four non-permitted sites for a total of ~800 homes, all of which are CLP2018 allocations.

Of the four non-permitted allocations, three are associated with a reduced proposed capacity relative to the 2022 stage, reflecting recent design work (also noting an adjacent local heritage asset in the case of Site 683). One of these sites is notably large, namely Site 347, which is now proposed for 420 homes, in contrast to CLP2018, which supports up to 990 homes. This site is currently Tesco extra and falls within a Tall Building Zone (Tall Buildings Study, 2023), but flood risk zone 3 is a constraint.

The final non-permitted site is then Site 30, which comprises Purley Leisure Centre, which would be re-provided. Capacity is increased relative to 2022, noting that the site falls within a **Tall Building Zone**.

- Reedham – the three modest allocations here are unchanged since 2022, namely Site 65, Site 410 and Site 490. At two of these sites capacity has been increased since 2022 in light of design work. These sites are all located in proximity to Reedham Station, and Site 490 will deliver a primary school.
- Purley Oaks – the two allocations are unchanged, namely Site 324 and Site 405, although the proposal is to significantly reduce capacity at the latter site, from 99 homes to 50 homes, in light of design work. The site is located in close proximity to Purley Oaks station but is affected by flood risk.
- Elsewhere – Site 411 is proposed for 8 homes to deliver post 2034 (no known developer interest).

5.4.67 In **conclusion**, there is no reasonable option for significantly boosting housing supply. The emerging proposed approach sees significant growth directed to Purley, and there is limited case for questioning the detailed design work completed for the proposed allocations, including noting flood risk affecting certain of the sites. Also, there is a need to consider the [Purley Strategic Regeneration Framework](#) (2021).

Broad Green & Selhurst

5.4.68 Attention focuses on:

- Broad Green Local Centre and land along London Road to the south, in close proximity to West Croydon Station. The Local Centre is described as ‘important’ by the Tall Buildings Study including on account of relatively low sensitivity (although it is important to recall that this is a *local* centre); and
- Croydon University Hospital, located further north along London Road.

5.4.69 Another local centre is also located further north along London Road, namely Thornton Heath Local Centre, but this is less well-connected. Elsewhere in this area PTAL is relatively low (although Selhurst Station is at the eastern extent of the area) and there is notably relative deprivation.

5.4.70 Taking the clusters of allocations in turn:

- Northern cluster (Thornton Heath Local Centre) – there is one permitted site for 101 homes (Site 407), which was proposed for up to 25 homes in CLP2018 (and not allocated in 2022). The other site option in this area is very small (Site 248).
- Central cluster – there is one permitted site for 118 homes (Site 103), and then Site 499 is a key site for consideration. This is Croydon University Hospital, and the proposal is for 345 homes subject to healthcare re-provision. The site was proposed for 372 in 2022, and delivery has been pushed back. This area is a defined **Tall Building Zone** within the Tall Building Study (2023).
- Southern cluster (south of Broad Green Local Centre) – this is also a defined **Tall Building Zone**. Firstly there are two permitted sites, namely Site 404 (79 homes; currently comprises employment land but proposed for residential only; CLP2018 allocation but deleted in 2022); and Site 396 (permitted for 72 homes but previously proposed for 39 homes in 2022). Non-permitted site are:
 - Site 201 – a CLP2018 allocation set to deliver 216 homes and a primary school.
 - Site 337 – a CLP2018 allocation for up to 184 homes, which was deleted in 2022 and is now supported for 45 homes following design work and proposed to deliver by 2029. Policy notes viability challenges.
 - Site 417 – CLP2018 allocation for up to 64 homes; now supported for 11 homes following design work.

The Tall Buildings Study strikes a note of caution: “... a suburban location, generally characterised by low prevailing building heights with relatively low levels of [PTAL]. Care will therefore need to be taken to [take] account of this context and [respond] positively to the existing townscape character.”

- Elsewhere – there are four other proposed allocations, all of which are non-permitted, and three of which are very small (Site 22, Site 78 and Site 471). Site 13 is then 0.4 ha and proposed for 57 homes. It comprises a commercial site now proposed for residential (previously been proposed for mixed use).

- 5.4.71 Table 5.1 also lists three omission sites, of which one is of particular note, namely Site 416, which was proposed for 40 homes in 2022 and is allocated in CLP2018 for up to 136 homes. However, this is a very irregular-shaped site adjacent to Croydon cemetery, which is MOL, SINC and a local heritage area.
- 5.4.72 In **conclusion**, there is no reasonable option for significantly boosting housing supply. Attention focuses on larger sites 499 and 201, but both sites are associated with distinct issues. There are also two sites with notably reduced capacities, but this is a reflection of recent design work.

Thornton Heath

- 5.4.73 Attention here focuses on Thornton Heath District Centre, for which the Tall Buildings Study finds: *“Sensitivity and suitability analysis undertaken reveals Thornton Heath District Centre as one of the most suitable of the district centres across the borough, whilst also being one of the least sensitive.”* The study goes on to define a **Tall Buildings Zone**. However, there is a degree of heritage constraint, with a High Street Local Heritage Area which contains distinctive architectural styles from the late 19th to 20th century.
- 5.4.74 There are six allocations here proposed to deliver a total of 295 homes, of which one is permitted for 66 homes (Site 326), with CLP2018 having anticipated up to 145 homes.
- 5.4.75 Of the five non-permitted allocations, the stand-out large site is Site 136, which is a district centre site for 124 homes (CLP2018 says up to 55 homes). The other site of note is Site 400, which is a CLP2018 allocation deleted in 2022 but now proposed for 47 homes by 2029. It is in a less accessible location.
- 5.4.76 Site 106 is also of note as a small site that must deliver a replacement community centre. It is located close to a neighbourhood centre, and also close to another smaller proposed allocation (Site 284). The remaining site (Site 105) is a small site located in close proximity to the district centre.
- 5.4.77 There is one omission site, namely Site 149, which was proposed for 118 homes in 2022 and up to 254 homes at the I&O stage. This is a district centre site comprising shops / town centre uses on the ground floor with two levels of flats above (plus parking to the rear) but is deemed no longer developable.
- 5.4.78 In **conclusion**, there is no reasonable option for significantly boosting housing supply. There is presumably a need for ongoing consideration of district centre regeneration / intensification.

Addington

- 5.4.79 The proposal is now a significantly reduced growth strategy relative to 2022, with one allocation removed (Site 1, previously proposed for 46 homes) and the capacity at the other proposed allocation (Site 44) reduced from 376 homes to 179 homes on the basis of detailed (‘cookie cutter’) design work. Also at Site 44 there is a need to note a current planning application that would see the site developed as a diagnostics centre by the NHS (the landowner) without any accompanying homes (discussed in Section 5.3).
- 5.4.80 Both of these sites are associated with New Addington, which is one of the most deprived areas in Croydon (despite very good transport connectivity). The Tall Buildings Study (2023) defines a **Tall Buildings Zone**; however, there is still no clear case for assuming a higher growth strategy aimed at achieving regeneration objectives. The omission site comprises amenity greenspace, and a priority for Site 44 is healthcare.
- 5.4.81 Both the Interim SA Report (2019) and the previous SA Report (2022) also discussed the option of **Green Belt** release, and this remains an option. Specifically, Lodge Lane comprises Council owned land at the western edge of New Addington, including the eastern half of Addington Court Golf Club. Transport connectivity is strong, given the adjacent tram line; and development could integrate well with New Addington. However, there is a clear concern from a Green Belt perspective, as the landscape gap to Selsdon would be reduced to c.200m. The landscape parcel as a whole, between Selsdon and New Addington, is judged to contribute significantly to Green Belt purposes; however, the proposed scheme would involve only the eastern half of the parcel. There are also biodiversity and potentially landscape sensitivities associated with the valley / valley sides to the southwest.¹⁶

¹⁶ It is also noted that land directly to the north is available. This site benefits from being adjacent to the Addington Village bus/tram interchange, but mostly comprises a SINC, and is clearly sensitive in Green Belt terms.

- 5.4.82 In **conclusion**, the only reasonable option for significantly boosting housing supply beyond the emerging proposed approach is the option of Green Belt release. However, there is a need for ongoing scrutiny of growth options given regeneration objectives and also strong transport connectivity, both in terms of a tram connectivity and proximity to Biggin Hill Strategic Outer London Development Centre (SOLDC).

Coulsdon

- 5.4.83 This is the next sub-area for consideration given a district centre and a defined **Tall Building Zone**; however, there is only one small non-permitted proposed allocation. By way of context, Coulsdon is located at the south west extent of the Borough, closely associated with the railway line (with a station), the A23 and a large SIL. There is a degree of relative deprivation.
- 5.4.84 There were two proposed allocations in 2022, but one is now complete, namely Site 372, which has delivered 157 homes (CLP 2018 identifies no housing capacity). The non-permitted allocation is Site 945, which is now proposed for 39 homes (previously 66 homes). The reduced scale of growth reflects recent design work, and this is not an identified Tall Building Zone, but there is perhaps a case for higher growth given very good accessibility credentials (although, on the other hand, the proposal is also to deliver retail and car parking, recognising that the site currently comprises a supermarket).
- 5.4.85 In **conclusion**, there is no reasonable option for significantly boosting housing supply. Attention focuses on Site 945, but there is limited basis for questioning the detailed design work that has been completed.

Norbury

- 5.4.86 This is the final sub-area for consideration with a defined **Tall Building Zone**, and there is a district centre; however, there are no proposed allocations. By way of context, this area comprises the north west extent of the Borough and is mostly associated with good PTAL.
- 5.4.87 There are now no proposed allocations here, with Site 951 from 2022 now no longer supported. It comprises high street shops with historic character (proposal was to retain) and was previously proposed for 22 homes. It is located within the district centre, and in close proximity to the rail station.
- 5.4.88 In **conclusion**, there is no reasonable option for significantly boosting housing supply. Site 951 appears suitable, but clearly is not developable, having been a proposed allocation since CLP2018. There is clearly a need for ongoing scrutiny of the defined Tall Building Zone, to the south of the District Centre, where there are currently no allocations. Growth here could contribute to a strategy for delivering growth and associated enhancements along the London Road in combination with growth at the three local centres to the south, Croydon University Hospital, West Croydon Station and North End Quarter.

Sanderstead

- 5.4.89 Site 306 is a CLP 2018 allocation now proposed for a 41 home residential scheme, in contrast to an 8 to 24 home mixed use scheme. It is within a local centre but has low PTAL. The other two allocations - Site 71 and Site 79 - do not feature in CLP2018. Site 79 is notably some way distant from a rail station, but it is associated with a local centre. It comprises a supermarket with no current developer interest.
- 5.4.90 Both the Interim SA Report (2019) and the previous SA Report (2022) also discussed the option of **Green Belt** release to deliver an urban extension to Sanderstead, and this remains an option at the current time. Specifically, Mitchley Hill, Sanderstead performs fairly poorly in transport accessibility terms relative to the New Addington Green Belt option discussed above, but better in Green Belt terms, with the Council's assessment explaining "*it is in effect completing a development begun in the interwar period that was never completed due to the onset of World War II.*" This is, however, steeply sloping land and there is a need to consider whether it could alternatively be suitable for an enhanced green infrastructure role.¹⁷

¹⁷ One other site is of note because a representation was received from the site promoter at the Issues and Options stage and again at the 2022 publication stage, namely Site 531 from the Council's assessment, known as Mitchley Avenue South. However, the Council's assessment sets out clear reasons for ruling this site out, including: "*Site 531, also on Mitchley Avenue, would only integrate well with the existing built form if it were a small linear development along Mitchley Avenue (and therefore, not an urban extension), or if it were undertaken as part of the development of all the sites identified along Mitchley Avenue and Mitchley Hill.*" The site does benefit from being closer to Riddlesdown Station than the shortlisted Mitchley Hill site (discussed above), but there are clear sensitivities around the edges of the site, namely public rights of way, Mitchley wood and mature hedgerows/small areas of woodland shown to be priority habitat by the national dataset. A cul-de-sac from Mitchley Avenue might be envisaged, with a considerable amount of the site given over to green space and habitat creation (including the southern raised part of the site), but such a scheme might be modest in scale, such that it does not warrant further consideration here.

- 5.4.91 It is also important to note that the promoter of this site responded to the consultation, pointing out that the assumed capacity figure in the Issues and Options document (680 to 780 homes) was not correct. The site is in the region of 10ha in size, and so capacity is assumed here to be circa 350 homes.
- 5.4.92 In **conclusion**, the only reasonable option for significantly boosting housing supply beyond the emerging proposed approach is the option of Green Belt release.

Selsdon

- 5.4.93 Selsdon is located at south east extent of the Borough and includes significant areas of Green Belt. The Tall Buildings Study (2023) explains:

“Selsdon is a street-based small district centre. The commercial high street buildings are generally of a domestic scale and character, typically three storeys... The immediate residential neighbourhoods around the centre are located tightly adjacent to the commercial uses... Local trees are currently the tallest structures in the local townscape... This small centre is not considered appropriate for tall buildings.”

- 5.4.94 The one proposed allocation (Site 948) has planning permission for 26 homes. A second site was proposed in 2022 (Site 85) but is now an omission site. It was proposed for a mixed use regeneration scheme within the neighbourhood centre at the eastern extent of the sub-area, involving 86 homes, but the site is no longer seen to be developable. It had previously been suggested for 6 to 41 homes at the I+Os stage, and the site does benefit from accessibility to the tram line (PTAL 3).
- 5.4.95 Both the Interim SA Report (2019) and the previous SA Report (2022) also discussed the option of **Green Belt** release to deliver an urban extension to Selsdon, and this remains an option at the current time. Specifically, Gravel Hill, Selsdon – comprises land between the northern edge of Selsdon and Gravel Hill, forming the southern part of a wider landscape parcel that stretches north beyond Gravel Hill, and is judged to make a ‘moderate to significant’ contribution to Green Belt purposes. Further considerations include: adjacent Grade II listed Heathfield, which is associated with a designated view cone that crosses the site and the high density of nearby woodlands, including associated with former Addington Park. The Issues and Options consultation document suggested a capacity of 1,300 to 1,540 homes; however, this site is now judged to perform poorly relative to the two sites Green Belt sites discussed above.
- 5.4.96 In **conclusion**, the only reasonable option for significantly boosting housing supply beyond the emerging proposed approach is the option of Green Belt release. However, this option is of questionable reasonableness, in the context of wider strategic considerations, as discussed further below. There is also a need for ongoing considerations of opportunities around regenerating the neighbourhood centre.

Addiscombe

- 5.4.97 Located to the east of the Croydon OA, much of the Addiscombe is relatively affluent, and the area benefits from a district centre, tram links and strategic open space. However, the Tall Buildings Study explains:

“Addiscombe is a single sided high street-based district centre with a residential hinterland tightly bordering the commercial uses... Most retail and commercial uses in the centre occupy low-scale domestic style buildings, with a strong prevailing two storey character... The few taller buildings are exceptions with little discernible change in urban grain between the centre and its hinterland. Whilst there are few identified heritage assets within the centre itself, there is a conservation area and locally listed buildings to the south... Given this constrained context and the street-based nature of the centre, Addiscombe is not considered an appropriate location for tall buildings.”

- 5.4.98 As per 2022, there is only one proposed allocation, which is a vacant industrial site located close to the Croydon OA. The proposed capacity of 12 homes is unchanged from 2022, but CLP2018 anticipated up to 57 homes.
- 5.4.99 In **conclusion**, there is no reasonable option for significantly boosting housing supply.

South Norwood and Woodside

- 5.4.100 This is the northeast extent of the Borough. The Tall Buildings Study (2023) explains: *“South Norwood district centre falls entirely within the South Norwood Conservation Area... Tall buildings are not therefore considered an appropriate form of development under the tall building policy... There are some tall buildings within South Norwood which might be considered a precedent. However, any such proposal would need to be considered on its merits, including the potential impact on the... Conservation Area.”*
- 5.4.101 The proposal in 2022 was for one proposed allocation (Site 51; 102 homes to be delivered by 2027), but this is now an omission site. It comprises amenity land and a car park associated with tower blocks. It is located adjacent to the district centre and within a conservation area.
- 5.4.102 The latest proposal is for two allocations: Site 486 - is a CLP2018 allocation deleted in 2022 but now proposed to deliver 22 homes by 2029; Site New 2 – comprises a housing estate proposed to deliver 260 homes (net) by 2029. Also, Site 140 is an omission site adjacent to a tram stop but comprising MOL.
- 5.4.103 In **conclusion**, there is no reasonable option for significantly boosting housing supply.

Crystal Palace & Upper Norwood

- 5.4.104 This is the northern extent of the Borough. The Tall Buildings Study (2023) explains: *“The analysis... soon reveals the historically sensitive townscape of the area which is almost entirely covered by a conservation area... Whilst a vibrant and important district centre... Crystal Palace is not seen as a suitable location for new tall buildings in view of its townscape value and character.”*
- 5.4.105 The stand-out large site is Site 357, which is located within the district centre and within the Upper Norwood Triangle Conservation Area. The proposal is for a 135 home mixed use scheme (unchanged from 2022), with CLP2018 having proposed 39 to 223 homes.
- 5.4.106 The two other sites are both associated with notably reduced capacities following detailed design work completed in 2023 (using a ‘cookie cutter’ methodology): Site 126 – was proposed for 72 homes, now 27 homes. PTAL rating is 2, i.e. quite low; and Site 58 – was proposed 72 homes, now 22 homes.
- 5.4.107 In **conclusion**, there is no reasonable option for significantly boosting housing supply. There is limited strategic case for questioning the detailed design work completed for either of the proposed allocations.

Kenley and Old Coulsdon

- 5.4.108 The one proposed allocation (Site 937) is located in Old Coulsdon and is the subject of a pending planning application for 12 homes, with CLP 2018 previously having supported a mixed use scheme to include a community use. This is a poorly connected part of the Borough, distant from road and rail corridors.
- 5.4.109 In **conclusion**, there is no reasonable option for significantly boosting housing supply.

Shirley

- 5.4.110 Located at the eastern extent of the Borough, and mostly associated with low PTAL, although there is a local centre. The proposal in 2022 was for four allocations, although the latest proposal is for three.
- 5.4.111 Two of these are small sites, namely:
- Site 504 – conversion of a locally listed pumping station for 24 homes, with the CLP2018 allocation for up to 68 homes. Closely associated with a cemetery (a designated SINC) and open green space.
 - Site 87 – proposed for 9 homes, having been proposed for 18 homes in 2022 and up to 25 homes at the I&O stage. The scheme must deliver a replacement community centre.
- 5.4.112 The final site is then larger (Site 128), now proposed for 123 homes having been proposed for 91 homes in 2022. It is described by CLP2018 as a ‘cleared site’ but includes significant mature vegetation.
- 5.4.113 The one omission site (Site 502) is located in the Green belt but the CLP2018 allocation (90 homes) assumes that development could occur without Green Belt release. A SINC is adjacent and PTAL is very low, hence there is little case for questioning the decision to delete the allocation.
- 5.4.114 In **conclusion**, there is no reasonable option for significantly boosting housing supply.

South Croydon

- 5.4.115 This area benefits from rail connectivity and two local centres, but there is limited development opportunity.
- 5.4.116 The proposal in 2022 was for three allocations, although the latest proposal is for just one, namely Site 114, which is proposed for 8 homes (versus up to 50 homes at the I+Os stage). One of the omission sites (Site 54) is a CLP2018 allocation for 42 homes, and was recorded as permitted in 2022 (it is cleared), but it is within flood risk zone 3. The other omission site (Site 101; 22 homes in 2022) is also in flood zone 3.
- 5.4.117 In **conclusion**, there is no reasonable option for significantly boosting housing supply. However, there is a need for ongoing scrutiny of growth options noting relatively good PTAL and given that previously proposed locations for housing growth are now ruled out on account of flood risk.

Conclusion on sub-areas outside the Croydon OA and Purley Way

- 5.4.118 As per 2022, it remains appropriate to consider the possibility of Green Belt release as a means of boosting housing supply (see further discussion below).
- 5.4.119 With regards to boosting supply in the urban areas, attention focuses on Coulsdon, Purley and potentially also previously proposed neighbourhood / district centre regeneration sites at Selsdon and Thornton Heath. However, on balance, it is not possible to identify any reasonable higher growth scenario(s).
- 5.4.120 There is also clearly a need for ongoing scrutiny of non-allocated land within identified Tall Building Zones, perhaps most notably the zone located adjacent to the south of Norbury District Centre. Related to this, there is a need for ongoing consideration of coordinated growth along London Road, between North End Quarter and Norbury, via West Croydon Station, three local centres and West Croydon Hospital.
- 5.4.121 With regards to lower growth, there is a need for ongoing scrutiny of detailed design considerations and constraints affecting sites (notably flood risk and historic environment), but arguments for lower growth are reduced on account of the detailed work on site capacities that has been undertaken since 2022, which overall has led to a significant reduction in supply. Also, arguments are potentially reduced on account of the deletion of the previously proposed intensification areas (discussed below).

Figure 5.14: An example of analysis from the Tall Buildings Study (2023)

24.2 Thornton Heath tall building thresholds

24.21 The Thornton Heath area south of the centre is identified as a location considered potentially appropriate for tall buildings:

Threshold of tall in Thornton Heath

24.22 Casting a VuCity laser beam at the equivalent height of 6 residential storeys demonstrates that only existing large and bulky buildings in the vicinity of the station are taller than that threshold, and these are substantially taller than other buildings in the Thornton Heath area.

24.23 The definition of tall for Thornton Heath is the London Plan default definition of 21 metres measured from the ground to the top of the building (Growth and Characterization LPG). See Fig 227.

Upper threshold heights for tall buildings in Thornton Heath

24.24 The upper threshold for tall buildings within the area potentially appropriate for tall buildings in Thornton Heath is 39 metres measured from the ground to the top of the building. This takes account of taller developments in the immediate vicinity of the railway station, some of which are site allocations and present major regeneration opportunity. See Fig 228.

Is this area appropriate for tall buildings?	YES
Minimum threshold	Upper threshold
21 metres measured from the ground to the top of the building	39 metres measured from the ground to the top of the building



Fig 227 View demonstrating the minimum threshold with green datum line set at approximately 21m (equivalent to 6 storeys)



Fig 228 View demonstrating the upper threshold with green datum line set at approximately 39m (equivalent to 12 storeys)



Fig 229 Area potentially appropriate for tall buildings



Fig 230 Area potentially appropriate for tall buildings

Conclusion on sub-area scenarios

- 5.4.122 To reiterate, this section has focused on exploring potentially reasonable scenarios involving boosting housing supply over-and-above the emerging proposed approach (or 'higher growth' scenarios).
- 5.4.123 A clear focus is on exploring a higher growth scenario for **North End Quarter**, albeit what can be achieved is limited whilst masterplanning is ongoing. With regards to the other two transformation areas: **Brighton Mainline and East Croydon** was judged to be associated with reasonable growth scenarios in 2022, but there is no longer any case for exploring higher growth given uncertainty regarding funding of, and timing for, the rail and station upgrade works; and **Purley Way** is not associated with any reasonable higher growth scenario due to transport and other delivery constraints (as per the conclusion in 2022).
- 5.4.124 With regards to the **Croydon Opportunity Area outside of the transformation areas**, attention focuses on areas well linked to North End Quarter, including the West Croydon Station Area, and also the western part of the Office Retention Area (ORA) given an aspiration to better link North End Quarter and East Croydon Station. However, on balance, it is not clear that there is a reasonable higher growth scenario. Within the ORA as a whole there is a need for ongoing consideration of long term spatial strategy, noting the number of new homes recently delivered, committed and proposed through the current allocations.
- 5.4.125 With regards to part of the Borough **outside of the Croydon Opportunity Area**, the first point to consider is the possibility of **Green Belt** release. Whilst the emerging proposed approach is to *not* support any Green Belt release (unchanged from 2022), it is appropriate to explore the possibility of Green Belt release as a reasonable alternative (as per the conclusion reached in 2022). This is because it could feasibly be an effective means of boosting housing supply, particularly with a focus on family and affordable housing. Whilst officers are of the view that it is *not* possible to demonstrate the 'exceptional circumstances' necessary to justify Green Belt release (mindful that Green Belt release is particularly difficult to justify in the London context, as it is arguably a strategic matter for the London Plan), it remains reasonable to test.
- 5.4.126 The previous SA Report (2022) presented a stand-alone section on shortlisting Green Belt site options, with reference to officer-led work at the Issues and Options stage, including assessment of 52 submitted sites, and as reported in a paper entitled *Proposed urban extensions on Green Belt land – site selection analysis*. Within this current report the discussion is presented above, under sub-area headings, but the conclusion is unchanged, namely that a shortlist of three options can be identified (see Figure 5.14), of which one performs sequentially poorly. On balance, from the shortlist, it is judged reasonable to appraise and consult upon a scenario involving ~2,500 homes from the two better performing sites (as per 2022).
- 5.4.127 Finally, with regards to **suburban areas**, attention focuses on a number of sites and clusters / areas; however, on balance it is not clear that there is a scenario involving significantly boosting housing supply. Purley and Coulsdon are associated with a strategic case for higher growth in order to realise strategic transport (rail metroisation and tram extension) objectives, but there are constraints to growth. At Thornton Heath District Centre there is a need for ongoing consideration of regeneration and intensification, given good transport connectivity and relatively limited constraint, but no developable scheme currently exists. Similarly, but on a smaller scale, ongoing consideration should be given to the possibility of regeneration of Selsdon Neighbourhood Centre, including noting the relative proximity of a tram stop.
- 5.4.128 There is also clearly a need for ongoing scrutiny of non-allocated land within identified Tall Building Zones, perhaps most notably the zone located adjacent to the south of Norbury District Centre. Related to this, there is a need for ongoing consideration of coordinated growth along London Road, between North End Quarter and Norbury, via West Croydon Station, three local centres and West Croydon Hospital.
- 5.4.129 For numerous of these suburban areas, further context is deletion of areas of focused and/or moderate intensification (see Figure 5.15), which would have served to encourage additional homes via **windfall** developments. However, this does not serve as a strong reason for exploring the possibility of boosting housing supply from any of the proposed allocations.
- 5.4.130 See further discussion of windfall below. One key point to note from Figure 5.15 though is around the potential to spatially target windfall development at transport hubs and rail / tram corridors, in line with transport and accessibility objectives, e.g. supporting the case for maintaining and improving services.

Figure 5.14: Strategic Option 3 from the I+Os stage, showing the shortlisted GB sites at that time (dark orange)

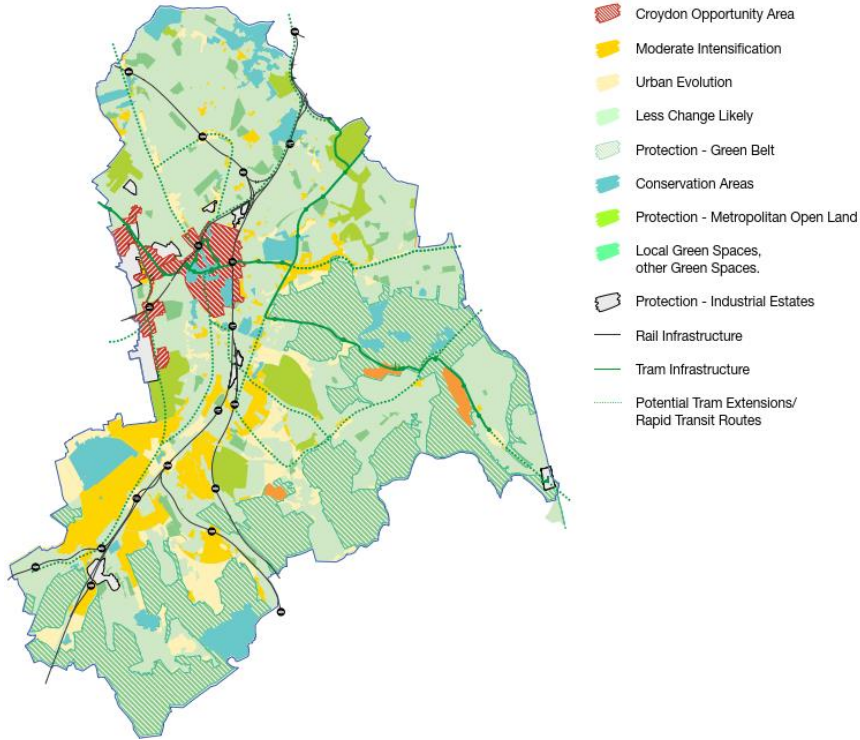
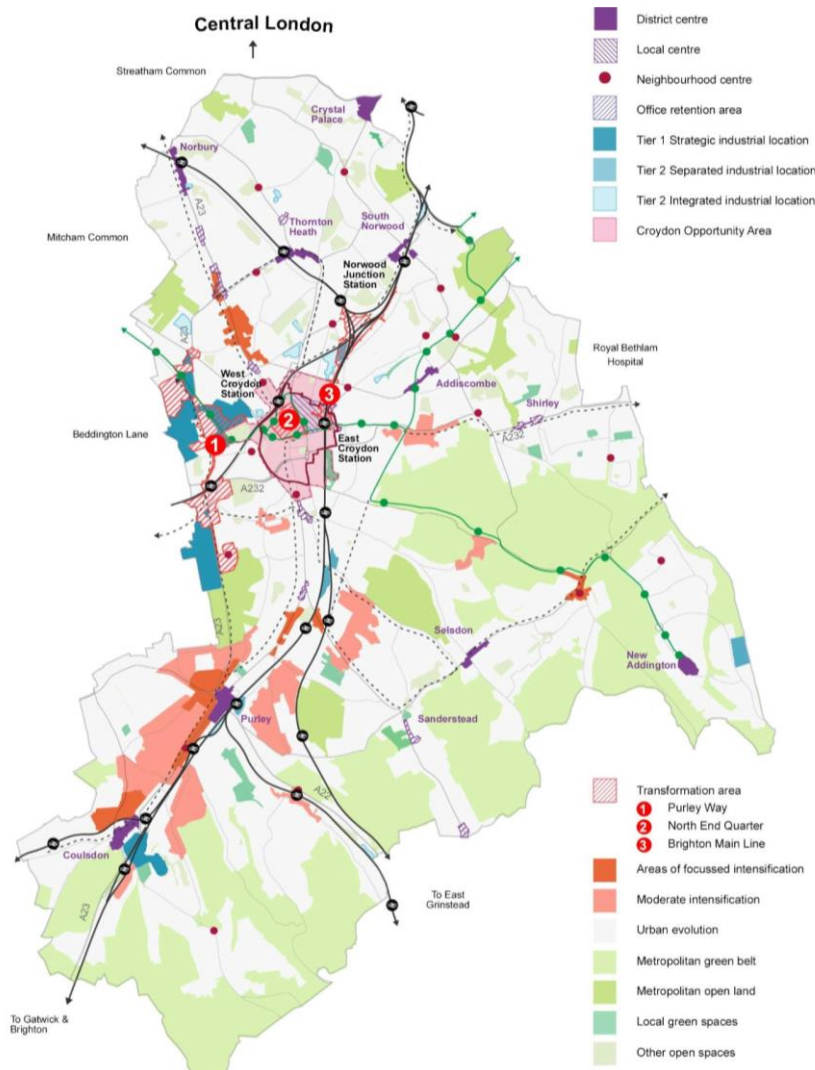


Figure 5.15: The key diagram from the 2022 publication stage, showing previously proposed intensification areas



5.5 The reasonable growth scenarios

5.5.1 The discussion above has served to identify a need to further explore the possibility of boosting housing supply (i.e. delivering a quantum of homes significantly above the emerging proposed approach) via:

- Increased support for windfall / suburban intensification (see further discussion in Box 5.3);
- Support for additional homes in the North End Quarter (ballpark figure ~500 additional homes); and/or
- Green Belt release (~2,500 homes assumed from two shortlisted sites).

Box 5.3: Defining a reasonable higher growth scenario in respect of windfall / suburban intensification

As discussed in Section 5.2, the emerging preferred approach to windfall supply is to assume 9,794 homes over the plan period. This assumes windfall at a rate of 641 dpa for the final 12 years of the plan period, despite recent rates having been ~1,050 per annum. Whilst setting policy so as to enable continuation of recent rates of windfall (~1,050 per annum) is 'unreasonable', it is fair to consider setting policy so as to enable windfall at a rate of perhaps 750 dpa, which would boost housing supply by in the region of 1,500 homes over the plan period.

With regards to the nature of the policy support that would be set out in the Partial Review, it is beyond the scope of this report to define this with any precision, but it is fair to assume a degree of spatial targeting. The approach to spatial targeting ('intensification areas') at the Issues and Options stage (2019) and at the previous Publication stage (2022) was somewhat complicated. However, the underpinning principal was not, namely support for intensification in where A) the urban character is one of houses in large plots (as understood from the Borough Character Appraisal, 2015); B) there is good accessibility and public transport connectivity, taking account of proximity to a centre, proximity to a secondary school and PTAL; and C) there are no clear constraints to growth, particularly heritage designations. It is fair to assume that a similar approach would be applied.

5.5.2 The emerging proposed approach involves a total supply of 40,320 homes over the plan period, which is a figure about 18% above the Council's proposed housing requirement, which is 34,145 homes. 18% is a reasonable 'supply buffer' in the context numerous supply components that are uncertain ('delivery risk') and given the Government's recent proposal that London boroughs must deliver over 95% of their housing requirement or else face the presumption in favour of sustainable development (discussed below).

5.5.3 The 34,145 home housing requirement is calculated on the basis of the London Plan target to 2029, which is 2,079 dpa, and then the identified capacity figure from the London SHLAA (2017) for the subsequent eleven years of the plan period, which involves considerable 'step down' to 1,227 dpa. This is in the context of average delivery of 2,126 dpa over the past four monitoring years, although expected completions for the current monitoring year (2023/24) are lower, at 1,608 homes.

5.5.4 This approach aligns with paragraph 4.1.11 of the London Plan, as discussed in Section 5.2. However, paragraph 4.1.11 also makes reference to the need to account for "any local evidence of identified capacity" when setting a housing requirement for the period post 2029, which opens the door to exploring scenarios involving setting the housing requirement above 34,145 (e.g. this is the approach taken by the emerging Enfield Local Plan).¹⁸ Also, as discussed in Section 5.2, it is not uncommon to simply roll forward the London Plan target for the entire plan period if there is capacity, e.g. see Ealing and Wandsworth.

5.5.5 In this light and given that housing need is likely to be in excess of 34,145 homes (plus there is a need to factor-in specific needs, including for affordable, family and specialist housing),¹⁹ there is a case for exploring scenarios that would involve setting the housing requirement above 34,145 homes.

5.5.6 However, the case for exploring higher growth scenarios is limited given the forthcoming London Plan Review and the fact that Local Plans must be reviewed every five years. As such, it is only reasonable to explore scenarios involving a housing requirement *modestly* above 34,145. Another factor is unmet housing need from neighbouring Tandridge District, but this is a strategic matter for the London Plan.

¹⁸ An officers report to Full Council (6th March 2024) explains: "As the London Plan evidence would see a significant drop off in urban capacity beyond this, the ELP then proposes to exceed the urban capacity derived housing figures for the period post 2029, to better meet local needs for more family housing and more affordable homes."

¹⁹ The SHMA (2023) explains that the Government's standard method identifies housing need as 3,929 dpa (which theoretically equates to 78,500 homes over the plan period). However, on the other hand, the SHMA also considers an alternative methodology for calculating housing need, which serves to suggest that need may equate to 1,341 homes per annum.

- 5.5.7 On balance **five reasonable growth scenarios** are defined for appraisal – see Table 5.2. These comprise the emerging proposed approach and four higher growth scenarios involving boosting supply by between 1,500 and 3,000 homes. Boosting supply by 3,000 homes would certainly allow for a housing requirement modestly above 34,145, and there could also be potential for this under one or more of the other scenarios.
- 5.5.8 However, it is beyond the scope of this current work to state exactly what the housing requirement would be set at, under each scenario. This is because a decision would need to be made after having taken into account the need for a supply buffer to account for delivery risks. The importance of a robust supply buffer has recently been brought into sharp focus following the Government’s recent [proposal](#) that across London the ‘presumption in favour of sustainable development’ will apply (for applications on previously developed land) where the local authority scores below 95% on the Housing Delivery Test (HDT).
- 5.5.9 In summary the reasonable alternative growth scenarios are as follows:²⁰
- Scenario 1 – the emerging proposed approach (housing requirement 34,145)
 - Scenario 2 – boost windfall (housing requirement potentially > 34,145)
 - Scenario 3 – boost windfall and NEQ (housing requirement potentially > 34,145)
 - Scenario 4 – Green Belt release (housing requirement potentially > 34,145)
 - Scenario 5 – Green Belt release and boost NEQ (housing requirement > 34,145)
- 5.5.10 Finally, Figure 5.16 aims to visually depict the five scenarios, highlighting:
- The allocations that are held constant across the scenarios.
 - The North End Quarter (NEQ) which see a boost to housing supply under Scenarios 3 and 5.
 - The two shortlisted Green Belt sites assumed to deliver ~2,500 homes under Scenarios 4 and 5.
 - A broad indication of the suburban area that would see a boost to windfall under Scenarios 2 and 3.

Table 5.3: The reasonable growth scenarios (N.B. constant supply components greyed-out; figures rounded)

		Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
Completions		8,505	8,505	8,505	8,505	8,505
Permissions (not allocated)		2,532	2,532	2,532	2,532	2,532
Allocations	North End Quarter	1,792	1,792	2,300	1,792	2,300
	Elsewhere in the COA	8,709	8,709	8,709	8,709	8,709
	Purley Way	5,579	5,579	5,579	5,579	5,579
	Urban elsewhere	3,409	3,409	3,409	3,409	3,409
	Green Belt sites (x2)	-	-	-	2,500	2,500
Windfall		9,794	11,300	11,300	9,794	9,794
Total supply		40,320	41,820	42,320	42,820	43,320
% above 34,145		18%	22%	24%	25%	27%

²⁰ To be clear, these are the ‘reasonable alternatives’ at the current time, and are defined for appraisal in order to reflect a central requirement of the SA process, which is for the SA Report to present an appraisal of “the plan and reasonable alternatives”. The reasonable alternatives (growth scenarios) reflect the latest evidence and so are tailored to informing the current consultation. They supersede the reasonable alternatives defined, appraised and subjected to consultation in 2021/22.

Figure 5.15: *The proposed allocations and shortlisted options for boosting housing supply*

TBC

6 Growth scenarios appraisal

6.1 Introduction

6.1.1 The aim of this section is to present an appraisal of the reasonable growth scenarios.

6.2 Appraisal findings

6.2.1 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. Under each topic the aim is to: 1) rank the scenarios in order of preference; and 2) categorise the performance of each scenario in terms of significant effects (**red** / **amber** / **light green** / **green**).²¹

6.2.2 Further points on methodology

- Systematic appraisal – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within SEA Regulations (including Schedules 1 and 2), and the Planning Practice Guidance.
- Concise appraisal – every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios, the wide ranging nature of issues / receptors and an understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inherently limited. There is a need to set out the thought process that leads to appraisal conclusions, but in doing so a balance must be struck with the objective of ensuring a concise and engaging appraisal.

Air quality

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	5	4	3	2

6.2.3 In 2022 the GLA prepared a report for LB Croydon on air quality, and by way of introduction explained:

- Air pollution in London leads to thousands of premature deaths and costs the city’s economy ~£3.7bn a year.
- NO₂ and PM2.5 and the two pollutants of key concern and are linked to a variety of adverse health impacts.
- Air pollution disproportionately affects the poorest and most vulnerable. Groups that are particularly susceptible include children, older people, pregnant women and those with existing cardiovascular disease. People who spend time in polluted areas, near busy roads or in traffic for long periods are at increased risk.

6.2.4 The report explains that the rate of mortality attributable to PM2.5 and NO₂ in LB Croydon is below the London average, but nonetheless high. The report also explains that there are 187 Air Quality Focus Areas in London, of which five are located in LB Croydon. These are mapped in Appendix II, but in summary:

- Wellesley Road through the town centre
- Thornton Heath
- Purley
- Two along the London Road (A212 / A23) heading northwest out of the Borough.

6.2.5 In order to address poor air quality there is a need to minimise car movements and particularly car movements through known air pollution and traffic congestion hotspots. There is also a need to avoid decisions that result in more people spending more time in areas that suffer from poor air quality (particularly vulnerable groups).

²¹ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- 6.2.6 Beginning with the question of whether or not to support additional housing growth within the **North End Quarter**, this is clearly a highly accessible part of the borough, such that development would be car free. In the context of a Borough where Public Transport Accessibility Level (PTAL) varies greatly (see Appendix II), there is a clear transport and air quality case for maximising housing growth in Croydon Metropolitan Centre in order to minimise the pressure for housing growth PTAL is much lower. A further consideration is the potential to support additional investment in the public realm, including potentially measures to improve east-west connections between NEQ and East Croydon Station including addressing Wellesley Road which is a barrier to movement and a source of problematic air pollution. A final consideration is air and noise pollution from Wellesley Road being a constraint to residential development, but this could likely be mitigated through design.
- 6.2.7 It follows that there is a degree of concern with the scenarios that would see a boost to housing supply via additional policy support for small sites **windfall** (or ‘suburban intensification’) or **Green Belt** release. With regards to the former, the concern is that a lack of spatial targeting could lead to a prevalence of new homes in locations that are relatively poorly connected in transport terms, and another consideration is recent adjustments to the Council’s preferred policy approach to car-parking, with the increased support for onsite parking in the least well connected parts of the Borough (relative to 2022; see discussion in Part 2). With regards to the latter (Green Belt release), the larger of the two shortlisted Green Belt sites is located adjacent to a tram stop and close a district centre, and the smaller site is within fairly easy walking distance of an overground station and close to a local centre. New Addington is also located on the national cycle network (NCN 21), and there are opportunities to improve the network linking to the Croydon Metropolitan Centre (also, there is an aspiration to deliver a tram depot at New Addington). However, the over-riding consideration is that there would be a strong element of car dependency amongst new residents, a prevalence of car trips to Croydon Metropolitan Centre.
- 6.2.8 Finally, with regards to **Scenario 1**, there are a number of proposed allocations adjacent to the Strategic Road Network; and there are significant air, noise and wider environmental quality issues (and opportunities) associated with the Purley Way Transformation Area. It is also the case that there are a number of allocations in locations that are poorly connected in transport terms, and a degree of growth directed to Air Quality Focus Areas, or locations that could lead to traffic through one or more Air Quality Focus Areas. It is potentially the case that adjustments to the approach to growth via allocations since 2022 is positive in terms of air quality (see Table 5.1, which aims to flag changes since 2022), but this is uncertain and likely of limited significance. The pros and cons of Scenario 1 are explored in further detail in Part 2 of this report.
- 6.2.9 In **conclusion**, it is difficult to place the scenarios in an order of preference, because whilst there support for boosting housing supply at NEQ, the assumption is that this would occur in combination with a boost to housing supply via either additional windfall or Green Belt release. On balance it is considered appropriate to flag Scenario 1 as best performing to highlight a particular concern (‘limited or uncertain negative effects’) with scenarios involving a boost to housing supply via added policy support for windfall.

Biodiversity

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
	2	2	2	2

- 6.2.10 The Borough is associated with a dense network of Sites of Importance for Nature Conservation (SINCs), and a priority issue is both to protect this network of locally designated sites (including mindful of the potential for indirect impacts, e.g. recreational pressure) and enhance the network.
- 6.2.11 With regards to enhancement, efforts must be focused both on the sites themselves and also functional connectivity between the sites, mindful that they are not distributed randomly, but rather are associated with clear patterns at landscape scales, often correlated with topography, historic land uses and historic settlement. There is also a need to consider the national and regional (London Plan) context to biodiversity enhancement efforts, including the Environment Act (2021), which requires a strategic approach to securing biodiversity net gain under a framework set out through Local Nature Recovery Strategies (LNRS). A LNRS is not yet in place for Croydon, but in the interim there is a need to ensure a strategic approach to nature recovery.

6.2.12 In this light, there are concerns with all three of the higher growth options over-and-above Scenario 1:

- **Windfall** – a key concern is loss of mature gardens, including mature trees. This is a significant issue London-wide (e.g. see a report prepared by the London Wildlife Trust [here](#)), and gardens across suburban Croydon are potentially significant in the London context. There could well be a correlation between areas with mature / valued gardens and SINC’s / biodiversity priority areas.

For example (and notably), previously identified areas for intensification at the northern edge of Selsdon are surrounded by woodland SINC’s. Furthermore, the large rear gardens here clearly contain mature trees such that they are largely indistinct from the adjacent woodlands when viewed on satellite imagery.

- **NEQ** – work completed to date has included a focus on realising targeted biodiversity objectives (i.e. objectives tailored to the local situation, mindful that there are no SINC’s in proximity to either area). As such, there is a concern that higher densities could conflict with biodiversity / greenspace objectives, albeit there is uncertainty as higher densities could be achieved via taller buildings, and could feasibly lead to enhanced development viability and, in turn, more funding for biodiversity measures (e.g. green roofs, green walls).
- **Green Belt** – both of the sites in question have limited onsite sensitivity but are associated with wooded valleys, such that onsite habitat creation could prove well targeted. Of the two sites, the New Addington site is likely more sensitive, as the northern section of the site (which comprises part of a golf course) is associated with mature trees; however, this is mainly historic field boundaries around the perimeter. With regards to the Sanderstead site, Mitchley Wood SINC is nearby and there is generally a high density of nearby woodland.

6.2.13 Finally, with regards to **Scenario 1**, there are a range of issues associated with certain site allocations. For example, a number of proposed allocations are adjacent or close to a SINC. Furthermore, there are significant biodiversity issues and opportunities associated with transformation of the Purley Way, particularly to the north (River Wandle) and to the south (rising land towards Roundshaw Down) of the area. However, overall there is confidence that Scenario 1 would involve taking a suitability proactive approach to avoiding conflicts with biodiversity objectives through site selection / spatial strategy. Matters are explored further in Part 2.

6.2.14 In **conclusion**, there are clear concerns with both boosting windfall and Green Belt release, given the specific context of Croydon Borough (N.B. it is not the case that higher growth *automatically* gives rise to concerns from a biodiversity perspective, as lower growth only serves to displace growth to elsewhere). With regards to NEQ, whilst there is a degree of concern, there is also a case for maximising development density in an area overall subject to limited sensitivity in the Croydon and wider context.

Climate change adaptation

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
	2	2	2	2

6.2.15 Whilst climate change adaptation objectives have wide ranging implications for the Partial Review, the key matter for consideration here is avoiding areas of flood risk, and fluvial flood risk in particular (it is more challenging to differentiate scenarios in terms of surface water flood risk, given available evidence).

6.2.16 Beginning with **Scenario 1**, a number of the proposed allocations intersect the flood risk zone, but concerns are notably reduced relative to 2022 (the previous publication stage). There is a clear need to take a sequential approach to avoiding flood risk; however, it is not uncommon for proposed locations for residential-led regeneration / intensification to intersect the fluvial flood risk zone, including because it is often areas within river valleys (which are associated with transport corridors) where the last remaining areas of lower intensity land uses (e.g. industrial areas) can be found. Furthermore, it is important to recognise that there are wide range of well-established approaches and methods for mitigating flood risk through master planning, design and other measures at the development management stage. Matters are explored further in Part 2.

6.2.17 With regards to the higher growth scenarios:

- **NEQ** – is subject to limited flood risk constraint.

- **Windfall** – it is difficult to draw strong conclusions, as there is little certainty regarding locations for growth. However, it is noted that two of the previously proposed focused intensification areas (Purley and Purley Oaks) significantly intersect the area of flood zone 3 associated with the River Wandle.
- **Green Belt** – both of the sites are associated with fairly steeply sloping valley sides, with significant surface water flood risk corridors affecting roads / lanes associated with adjacent valley bottoms. Focusing on the larger site at New Addington, a clear surface water flood channels follows Featherbed Lane and ‘downstream’ passes through the centre of Addington Village, and then further downstream becomes a fluvial flood risk channel that passes through West Wickham and Hayes, before meeting the River Ravensbourne at Bromley. However, there would be excellent potential to design-in high quality Sustainable Drainage Systems (SuDS).

6.2.18 In **conclusion**, whilst the equivalent appraisal in 2022 flagged ‘moderate or uncertain’ negative effects across the scenarios, the situation has improved following adjustments made to the approach to growth at the allocations that are a constant across all scenarios. It is appropriate to flag a degree of concern with the higher growth scenarios over Scenario 1, but this is potentially somewhat marginal.

Climate change mitigation

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
2	2	1	2	1

6.2.19 The focus of discussion here is minimising per-capita emissions from the built environment, given that matters relating to per capita transport emissions are discussed below under ‘Transportation’.

6.2.20 A key consideration is that higher density development can give rise to opportunities to design-in and deliver new heat networks, linking heat sources (e.g. waste heat from industry or tube-train breaking or ambient heat from the ground or water sources, captured via heat pumps) and heat users, e.g. offices and residential areas, which together will have a good constant demand for heat across a 24 hour period. For example, London Borough of Lewisham has recently completed work to explore the potential for delivery of a fifth generation heat network as part of the regeneration of Catford town centre.

6.2.21 In this light, there could well be an opportunity associated with the higher growth at **NEQ**, given the mix of uses that would be delivered onsite (i.e. residential, retail, offices, leisure).

6.2.22 With regards to **Green Belt**, it could well be that strong development viability associated with greenfield development supports an ambitious approach to built environment decarbonisation, particularly at the larger New Addington site, likely in the form of greenhouse gas emissions standards that exceed the minimum requirements set by the Building Regulations; however, there is no certainty at this stage.

6.2.23 With regards to boosting **windfall**, residential intensification can provide an opportunity to improve the thermal efficiency of the building stock, deliver rooftop solar PV and ensure that homes are heated by heat pumps rather than gas boilers (the three key considerations when seeking to manage operational, or ‘in use’ built environment emissions). However, there is also a need to be mindful of non-operational emissions, including the embodied carbon within building materials and emissions associated with demolition and construction. The extent to which additional suburban intensification would be achieved via reuse of existing buildings versus new build is unclear.

6.2.24 Finally, with regards to **Scenario 1**, the proposal is for three transformation areas, other areas for high density development in the Croydon Opportunity Area and also several other notable development clusters (see discussion in Section 5.4). However, it is not clear that heat network opportunities are set to be fully realised (opportunities are identified at both Purley and Coulsdon, but with limited detail). It is important to recognise that this is a fast moving policy area (e.g. new combined heat and power (CHP) is no longer a low carbon solution in the Croydon context) and latest understanding is that heat networks are challenging to viably deliver.

6.2.25 In **conclusion**, there is support for boosting growth at **NEW**, whilst the other scenarios are judged to perform broadly on a par. With regards to effect significance, on one hand climate change mitigation is a global issue such that local actions can only have limited significance; however, on the other hand, climate change mitigation is a national, regional and local priority. There is a need to take a highly proactive approach through Local Plans and, in this context, it is appropriate to flag a risk of opportunities not being realised in full under all scenarios.

Communities

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	2	2	★ 1	★ 1

6.2.26 A key consideration is schools capacity, and, in this respect, it is fair to highlight a particular opportunity associated with **Green Belt** release, as the New Addington site would certainly be able to deliver new capacity alongside housing. It could also be that the scheme could deliver or fund targeted community infrastructure to the benefit of the local community, which experiences a notable degree of relative deprivation. The northern part of the site comprises part of a golf course that is currently accessible only to golfers; however, a clear sensitivity relates to the southern part of the site, which comprises North Down Recreation Ground. This is a historical recreation ground associated with the New Addington Estate, but historical satellite imagery serves to suggest it is potentially somewhat underused (outside of the large children’s play area, which is clearly valued). The website for the open space is [here](#), but it is not reviewed in the Open Spaces Study (2023). It is also noted that the 2019 Natural Capital Accounting Report found parks in New Addington to be ‘under provided’.

6.2.27 Conversely, increased support for **windfall** could well lead to increased pressure on school facilities.

6.2.28 A further consideration is the need to support the objectives for the **NEQ**, including as set out in *Croydon Future of Destination Retail (2020)*. On balance there is tentative support for additional housing, even if this were to be at the expense of some car parking space, given good potential to align with the vision for the North End Quarter as a central feature within the wider Croydon OA:

“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.”

6.2.29 With regards to **Scenario 1**, there are a number of proposed allocations associated with current or proposed future community facilities onsite, as discussed further in Part 2. There are also wide ranging other matters for discussion in Part 2, including relating to relative deprivation (Croydon is the most deprived of the six ‘southern region’ London boroughs, with 18% of super output areas among the 20% most deprived nationally) and issues of particular relevance to groups with protected characteristics under the Equality Act.

6.2.30 In **conclusion**, it is difficult to differentiate between the scenarios with any certainty; however, on balance, it is considered appropriate to flag a concern with boosting windfall. This primarily relates to concerns around strategic infrastructure planning, but it is also recognised that widespread community concerns, including in respect of local character, were raised with the previously proposed intensification areas in 2022. There is a degree of sensitivity with the Green Belt site at New Addington, but matters could be addressed through masterplanning, and the likelihood is that a development scheme could deliver a net community benefit.

Economy and employment

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
2	★ 1	★ 1	★ 1	★ 1

6.2.31 The growth scenarios vary only in respect of residential development, and there is no reason to suggest that any of the three higher growth scenarios would constrain or conflict with the achievement of employment land or wider economic objectives.

6.2.32 There is broadly a case for supporting housing growth in Croydon, as a well connected location where residents are able to provide a workforce for key employment growth areas across London and the South East.

- 6.2.33 With regards to boosting growth at the **NEQ**, it could well be that this aligns with wider objectives for the Croydon Opportunity Area, as discussed in Section 5.4, but there is little reason to suggest a significant opportunity specifically in respect of ‘economy and employment’ objectives. There is also an argument that new and expanded family housing via additional support for **windfall** development or **Green Belt** release could help to ensure a suitably skilled workforce locally, thereby minimising the need for in-commuting; however, again, benefits would likely be quite marginal. Another consideration is that New Addington benefits from proximity to Biggin Hill, where the Bromley Local Plan allocates land to deliver about 2,300 jobs over the next 15-20 years.
- 6.2.34 Another important consideration is supporting SME housebuilders, which is a significant consideration in the Croydon context. This is evidenced from Figure 5.3 (above) and high rates of building lockdowns in 2020/21.
- 6.2.35 In **conclusion**, whilst the equivalent appraisal in 2022 found the growth scenarios to perform broadly on a par, it is now considered appropriate to flag potential support (albeit likely quite marginal) for higher growth.
- 6.2.36 With regards to effect significance, wide ranging land supply components that feature as constants under all of four scenarios are positive from an ‘economy and employment’ perspective, and the proposed approach to protecting and intensifying SIL is supported. However, there are also potentially certain tensions, e.g. around the proposed mix of residential and industrial uses along the Purley Way; also protecting office space.

Health

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
=	=	=	=	=

- 6.2.37 One important consideration is ensuring access to **health facilities**, but there is little potential to differentiate between the growth scenarios in this respect. Additional windfall development could potentially lead to health infrastructure capacity issues in some areas, but there is little reason to suggest that this would be a significant issue. With regards to the existing and new proposed allocations that feature in Scenario 1 and all other scenarios, it is noted that site specific policy is set to include a considerable focus on identifying sites with the potential to deliver new facilities (subject to further discussions with providers), although there are also certain issues and potential tensions, e.g. in respect of the proposed allocation in New Addington District Centre.
- 6.2.38 Aside from access to health facilities, another important consideration is access to **green and blue infrastructure**, and access to private or shared garden spaces. In this respect Green Belt release clearly has a degree of merit, as a high proportion of the new homes would likely have private gardens. With regards to windfall development, on one hand there would undoubtedly be loss of garden space; however, on the other hand, a high proportion of the new homes delivered would likely have some access to garden space.
- 6.2.39 In **conclusion**, whilst there are arguments in favour of Green Belt release, and also potentially windfall, these are relatively marginal considerations, so the scenarios are judged to perform on a par overall. With regards to effect significance, the clear focus on health facilities is encouraging, but objectives relating to health and local plan-making are wide ranging, so there is a degree of uncertainty regarding effect significance.

Historic environment

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
	3	5	2	4

- 6.2.40 There is an immediate concern with taller buildings at North End Quarter (**NEQ**), which is closely associated with the Central Croydon Conservation Area. In particular, taller buildinging could clearly impact setting of historic buildings / facades along North Street, albeit few are nationally listed (see discussion in Section 5.4).

- 6.2.41 With regards to Green Belt, neither of the sites in question are located in close proximity to a nationally designated asset, although the Addington Village Conservation Area (also Addington Palace Registered Park and Garden, which is Grade II listed) is located a short distance to the north of the New Addington urban extension site that, it is assumed, would feature under Scenarios 4 and 5.
- 6.2.42 With regards to **windfall**, whilst there is no certainty regarding which areas would see growth in practice, there are certain parts of the Borough where early 20th century detached and semi-detached homes in large plots are associated with historic character (perhaps increasingly so, as time goes by) and which could come into contention as locations for suburban intensification. One key area for consideration is the series of housing estates in the vicinity of rail stations in the southwest of the Borough, given a river valley topography which is a major influence on historic built form. Perhaps most notable is the Webb Estate Conservation Area, which is located on raised land to the west of the Purley/Reedham transport corridor, and where the intensification area previously proposed in 2022 extended to include housing estates on two sides. These two housing estates do not contain any listed buildings, but pre-date WWI (according to OS maps) and so presumably are associated with a degree of historic character. Looking more widely across the previously proposed intensification areas in the southwest of the Borough, these included only three Grade II listed, but there are other assets were adjacent. What was also notable in 2022 was the lack of a proposed intensification area to the southeast of Purley station / east of Reedham station, presumably reflecting the rising topography and, in turn, townscape / landscape factors. The land rises quite steeply here to Foxley Wood, although there are no listed buildings and this land is mostly undeveloped on the pre-1914 OS map. Two other areas of sensitivity previously identified as suitable for suburban intensification are: Addiscombe (the previously identified intensification area contains one Grade II listed former farm cottage, but the estate in question is post WWII); and Selsdon (the previously identified intensification area is a sensitive location between locally listed estates adjacent to the north and south, including the Heathfield Estate; however, this is a heavily wooded area, which would presumably help to enable effective visual screening). A number of other housing areas date from pre-WWI and are not designated conservation areas, but are not associated with homes in large plots well suited to intensification.
- 6.2.43 Finally, with regards to **Scenario 1**, there are relatively few instances outside of the Croydon Opportunity Area (which is a very specific context) of an existing or new proposed allocation intersecting or in proximity to a listed building, conservation area or other designated asset/area, and issues are quite concentrated, e.g. Purley. It is also noted that site-specific policy includes a significant focus on avoiding and mitigating historic environment impacts (e.g. listed building issues/impacts are discussed as part of site specific policy for numerous sites) and a number of sensitive sites have a reduced capacity relative to the 2022 publication stage (see Section 5.4).
- 6.2.44 In **conclusion**, in addition to NEQ, there is a clear degree of concern in respect of windfall, although significance is uncertain, particularly once account is taken of the fact that the approach to supporting windfall would be reduced, and less spatially targeted, relative to the 2022 publication stage. It is understood that Historic England did not raise concerns regarding support for windfall (or increased support for windfall, as explored through the appraisal of growth scenario in the SA Report) at the 2022 publication stage.

Housing

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
5	4	3	2	1 

- 6.2.45 There is a clear need to rank the alternatives in order of total growth quantum because (as discussed in Section 5.4), whilst Scenario 1 aligns with the guidance set out in the London Plan, there is a clear case to be made for higher growth with a view to more fully providing for housing needs, both in terms of market housing (including with a view to ensuring a good mix of homes, to include family homes) and affordable housing.
- 6.2.46 Under Scenario 5 the additional **supply** would certainly allow the Council to commit to a higher housing **requirement**. With regards to Scenarios 2, 3 and 4, the additional supply could potentially enable the Council to commit to a higher housing requirement, but it is difficult to be certain (as discussed in Section 5.5). Regardless, there is generally support for boosting supply over-and-above Scenario 1.

- 6.2.47 Aside from the matter of total supply and the likely housing requirement under each of the scenarios, there is a need to consider the nature and location of growth. In this respect, there is clear support for **Green Belt** release, which would deliver family housing. There would also likely be additional family housing under a scenario involving additional support for **windfall**, if implementation is well managed, e.g. with single homes on large plots redeveloped to provide several smaller family homes. The current plan document explains: *“There has been a steady decline in the number of new homes being delivered with 3 or more bedrooms... From April 2020 to March 2022, 16% of homes had 3 or more bedrooms... [which] does not match the Strategic Housing Assessment’s findings that 60% of new homes should be larger homes.”*
- 6.2.48 Also, windfall development serves to meet very locally arising housing needs and is a proven low risk approach to delivering high rates of housing in the Borough (although the latest proposal to boost support for car parking in parts of the Borough with lower PTAL could impact on development viability at some small sites in the suburbs). However, many windfall sites fall below the threshold size for requiring affordable housing.
- 6.2.49 In **conclusion**, whilst there is a clear need to rank the scenarios according to total quantum, there is also support for Green Belt release from a ‘housing’ perspective. New flats in NEQ would be a positive from a housing perspective, but there would be little potential to deliver family housing, delivering the full policy quota of affordable housing could prove challenging and there is also a need to consider high delivery risk.

Land and soils

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	3	2	5	4

- 6.2.50 There is clear support for boosting supply from **NEQ**, because higher density development in the Croydon OA would reduce the pressure for greenfield development (**Green Belt**) and/or loss of gardens (**windfall**).
- 6.2.51 With regards to the assumed Green Belt sites, the nationally available agricultural land quality dataset (which is low resolution and low accuracy) suggests that both sites comprise land that is ‘grade 3’ quality. Also, adjacent land *has* been surveyed in detail in both cases. Specifically, at New Addington adjacent land has been surveyed and been found to be of grade 2 quality (i.e. land that is best and most versatile, BMV); and, at Sanderstead, adjacent land is of grade 3b quality (i.e. not BMV). The Sanderstead site is currently in agricultural use.
- 6.2.52 In **conclusion**, there is support for higher densities at NEW and concerns regarding Green Belt release (loss of agricultural land, including land that may be BMV) and windfall (loss of gardens).

Landscape and townscape

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	2	3	4	5

- 6.2.53 Both of the shortlisted **Green Belt** sites under Scenario contribute to Green Belt purposes (see discussion in Section 5.4) and area also likely to be associated with a degree of wider landscape value, e.g. accounting for their contribution to the wider character of wooded valleys. In the case of the Sanderstead site, there is a footpath along one edge of the site, and clear views of the site from Mitchley Hill. In the case of the New Addington site, there is a notable absence of public footpaths, but this land is presumably highly visible from trams and undoubtedly contributes to the setting of New Addington within rolling downland (although potentially the Fieldway estate more so than the earlier New Addington estate, which was constructed from 1935).
- 6.2.54 With regards to **windfall**, there are clearly implications for suburban character, and there is also a need to consider the links between suburban areas and surrounding wooded hillsides, e.g. in the Coulsdon area, given views to and from high ground. However, these matters have already been discussed above.

- 6.2.55 With regards to **NEQ**, there are no particular concerns regarding an increased risk of impacts to any of the designated Croydon Panoramas, but it is important to note that only the eastern extent of NEQ (adjacent to Wellesley Road), falls within the Tall Buildings Inner Zone, as defined by the Tall Buildings Study (2023).
- 6.2.56 In **conclusion**, there is a need to consider the risk of impacts to sensitive landscape gaps and the characteristic valley landscapes of the south of the Borough, which gives rise to concern in respect of Green Belt release. However, limited Green Belt release could potentially be delivered as part of a long term strategy for protecting and enhancing the Borough’s Green Belt, including in line with the emerging Local Nature Recover Strategy. There is also a degree of concern around building heights in the NEQ relative to Scenario 1, and similarly a degree of concern with boosting support for windfall given implications for suburban character.

Transport

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	5	4	3	2

- 6.2.57 Transport issues/opportunities have already been discussed above under Air quality, with a headline conclusion being that there is not support for **Green Belt** release or additional **windfall**, albeit one of the two shortlisted sites under Scenario 3 is adjacent to a tram line and potentially associated with a cycle infrastructure opportunity. With regards to **NEQ**, there is clear support for higher densities from a transport perspective, given the accessibility levels in this area and also given the potential to support aspirations for the wider Croydon OA.
- 6.2.58 Focusing on windfall, a key consideration is the change of context since 2022. Specifically, there is less potential to assume a spatially targeted approach with support for suburban intensification in the most accessible areas. The close correlation between previously identified intensification areas and the rail and tram network is clear from Figure 5.14 above, and there is also a need to consider Figure 6.1, which is the Council’s latest proposed transport priority areas. There is clear potential for targeted growth to help deliver priority transport upgrades.
- 6.2.59 Maintaining a focus on windfall, it is also important to note that the latest proposal is for increased support for car parking as part of new developments in areas with the lowest PTAL. This is potentially a pragmatic response to a situation whereby some suburban areas have both low levels of PTAL and limited ability to walk / cycle due to poor infrastructure (including roads with no pavements) and steep topography. However, it does serve to highlight that windfall development will often be associated with high car dependency.
- 6.2.60 With regards to **Scenario 1**, it is fair to describe the proposed spatial strategy as transport-led, noting the focus of Brighton Mainline, the wider Croydon OA with the NEQ at its heart, the Purley Way (where there are a range of existing issues, and potentially an opportunity for housing growth to unlock a tram extension), Purley (which is set to benefit from ‘metroisation’ of the rail service, following BML upgrades) and other district and local centres (with identified opportunities to support walking/cycling and public transport, e.g. the A235 corridor). However, there are a range of issues and potential tensions with transport objectives, as discussed in Part 2.
- 6.2.61 In **conclusion**, the order of preference and conclusions on significant effects are both as per under ‘air quality’.

Water

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
=	=	=	=	=

- 6.2.62 A key consideration for Local Plans is capacity at wastewater treatment works (WwTW), which in the Croydon context means considering capacity at Beddington WwTW (in LB Sutton), Crossness WwTW (in LB Bexley) and Long Reach WwTW within Dartford Borough. It is understood that no major concerns were raised through consultation in 2022; however, there are known to be significant concerns with capacity at Long Reach WwTW, as discussed within a recent [Catchment Strategic Plan](#) prepared by Thames Water. The Long Reach works serves the east of the Borough including New Addington, but it is difficult to conclude any significant concerns.

6.2.63 There is similarly a Catchment Strategic Plan for Crossness WwTW (see below), but this is Europe’s second largest WwTW catchment (serving 2 million people) and LB Croydon is at the very edge of the catchment.

6.2.64 In **conclusion**, wastewater treatment work capacity is high on the agenda nationally at the current time, hence there is a need to avoid risks of capacity breaches as far as possible. This can mean directing growth to locations served by WwTW with existing capacity, as opposed to relying on capacity upgrades, which can be subject to delays. However, no concerns have been raised regarding wastewater treatment capacity being a significant constraint to growth with a bearing on the quantum of new homes supported though the Partial Review. With regards to the spatial approach to growth, there is no clear basis for differentiating the options.

Figure 6.1: Identified growth related transport priorities

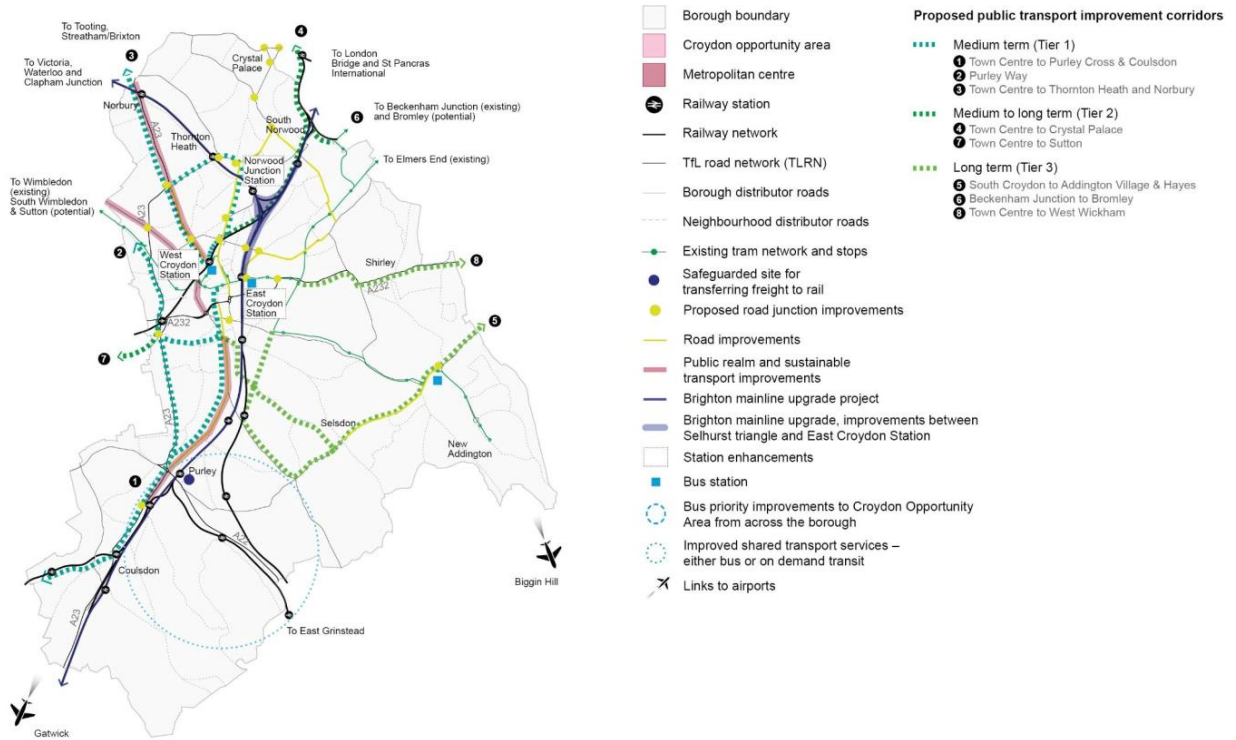


Figure 6.2: Front cover from a recent Thames Water Strategic Plan for Crossness WwTW



6.3 Appraisal summary

6.3.1 The table below presents an overview of the appraisal findings presented across the 13 sections above.

Table 6.1: Appraisal summary

Topic	Rank of preference and significant effects				
	Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
Air quality	★1	5	4	3	2
Biodiversity	★1	2	2	2	2
Climate change adaptation	★1	2	2	2	2
Climate change mitigation	2	2	★1	2	★1
Communities	★1	2	2	★1	★1
Economy and employment	2	★1	★1	★1	★1
Health	=	=	=	=	=
Historic environment	★1	3	5	2	4
Housing	5	4	3	2	★1
Land and soils	★1	3	2	5	4
Landscape	★1	2	3	4	5
Transport	★1	5	4	3	2
Water	=	=	=	=	=

Concluding discussion

The appraisal shows Scenario 1 (the emerging preferred scenario) to perform best in terms of the greatest number of objectives, and Scenario 1 is also predicted fewest negative effects. However, it does not necessarily follow that Scenario 1 is best performing or 'most sustainable' overall, recognising that the sustainability topics are not assigned any particular degree of importance (or 'weight') in the appraisal process, nor is it fair to assume that the topics have equal weight. For example, if particular weight were to be attributed to housing objectives, including in respect of meeting needs for affordable and family housing, then there could potentially be overall support for one of the alternative scenarios. It is for the plan-maker (LB Croydon) to assign weight and trade-off between the competing objectives in order to reach an overall conclusion on which of these scenarios best reflects the plan objectives and best represents sustainable development. The following bullet points provide further summary conclusions:

- **Air quality and transport** – there is a clear concern with additional support for windfall development, particularly if not spatially targeted, albeit the assumption is a modest boost relative to the assumption made through the equivalent appraisal in 2022. There is strong support for maximising growth at North End Quarter (NEQ) as a highly accessible area relative to alternative potential locations for growth in the Borough and more widely, plus there are opportunities to improve east-west connectivity across the Croydon OA and reduce car dominance.
- **Biodiversity** – whilst it is not always simply appropriate to conclude that higher growth options give rise to greater concern from a biodiversity perspective, in the Croydon context it is fair to flag concerns with higher growth achieved via either increased suburban intensification (including loss of garden space) or Green Belt release.
- **Climate change adaptation** – there is a degree of added concern regarding flood risk under the higher growth scenarios, noting the topography in the southern part of the borough, but concerns are likely fairly limited.
- **Climate change mitigation** – higher growth at NEQ might help to secure a heat network for the area. The ‘amber’ score for all scenarios reflects the ambition needed to achieve the 2030 borough-wide net zero target.
- **Communities** – high rates of windfall development can put a strain on local infrastructure, and also give rise to community concerns more widely. Another consideration is greenspace constraining the New Addington GB site.
- **Economy and employment** – there is support for higher growth scenarios, but this is fairly marginal. A successful NEQ scheme is clearly of larger-than-local significance, and windfall development is important for SME builders.
- **Health** – it is not possible to meaningfully differentiate between the scenarios. There is support for the package of proposed allocations that are a constant across the scenarios, which are appraised in Part 2 of this report.
- **Historic environment** – increased density to include taller buildings in NEQ does give rise to a potentially significant concern from a historic environment perspective. Suburban historic character is another consideration.
- **Housing** – there is a clear case for boosting housing supply over-and-above the emerging proposed approach if there is capacity to do so. Matters are discussed in detail in Section 5 of this report.
- **Land and soils** – there is clear support for maximising housing supply from NEQ, whilst there is a clear argument against Green Belt release, which could well result in the loss of best and most versatile agricultural land.
- **Landscape** – there are clear concerns with Green Belt release, given the two shortlisted sites in question, and more generally the context of the southern part of the Borough (a series of valleys and wooded hillsides).
- **Water** – wastewater treatment is typically a key matter for consideration, but there are no clear concerns. There will be a need for ongoing liaison with the Environment Agency and Thames Water.

7 The preferred growth scenario

Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the reasonable growth scenarios is best, or ‘most sustainable’ overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of LBC Officers to the appraisal.

Officers reasons for selecting the preferred scenario

- 7.1.2 The following statement explains Officers’ reasons for supporting **Growth Scenario 1**:

The appraisal shows Scenario 1 to perform well in a number of respects. Indeed, it performs best in terms of more sustainability objectives than any of the other scenarios, and is predicted fewest negative effects.

It is recognised that higher growth scenarios would help to meet housing needs more fully, including need for affordable and family housing. This is an important consideration; however, a higher growth strategy would risk departing from the London Plan, which balances housing needs and capacity across London. In particular, given the forthcoming London Plan Review there are no exceptional circumstances to justify the release of Green Belt for housing. With regards to windfall development, the Borough will continue to deliver windfall in line with the London Plan target, but there is an established need to reduce recent higher rates of windfall given implications for the Boroughs suburban areas, particularly in terms of character, traffic and infrastructure capacity. With regards to boosting supply from the North End Quarter, this is a detailed matter that will need to be revisited in light of further masterplanning, including with a focus on avoiding/mitigation heritage impacts.

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal the CLP Partial Review as a whole.

8.1.2 In practice, this means:

- expanding on the appraisal of Growth Scenario 1 presented in Section 6; and
- appraising proposed new thematic policies and proposed adjustments to CLP 2018 policies;
- being mindful of aspects of CLP 2018 that are not proposed to be changed, noting that whilst these aspects of CLP 2018 are not the subject of the current consultation, there is naturally a need to consider in-combination (or ‘cumulative’) effects associated with the Partial Review and existing CLP 2018.

Overview of the Partial Review

8.1.3 The plan as a whole (i.e. CLP 2018 plus proposed changes through the Partial Review) comprises 11 strategic policies, each associated with a series of development management policies. All of the strategic policies are proposed to be significantly changed, and hence are discussed in the appraisal below, namely:

SP1: Growth strategy, **SP3:** Employment; **SP4:** Employment; **SP5:** Design, character & heritage; **SP6:** Environment & climate change; **SP7:** Green grid; **SP8:** Transport and communication; **SP9:** Place policies; **SP10:** North End Quarter Transformation Area; **SP11:** Purley Way Transformation Area.

8.1.4 With regards to **development management policies**, the majority of these are proposed to be significantly amended, and several are new proposed policies (i.e. do not appear in CLP 2018).

8.1.5 It is also important to be clear that:

- Policy SP1 presents the proposed **housing requirement** and broad spatial strategy.
- The policy is supported by a **Key Diagram**, which aims to summarise the strategy.
- Proposed **allocations** are presented under Policy SP9 with added detail in a supporting appendix.
- The proposed housing **supply trajectory** is also presented in an appendix.

8.1.6 Finally, it is important to note that not all **tracked changes** within the document represent substantive changes to policy. Many reflect factual updates and, as part of this, it is important to note that of the ~55 deleted allocations the majority are deleted because they have now been completed. Also, some of the tracked changes showing new and deleted text in fact indicate text that has simply been moved.

Appraisal methodology

8.1.7 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the Partial Review, as a whole, before reaching an overall conclusion on significant effects. Specifically, in accordance with the SEA Regulations, the aim is to “identify, describe and evaluate” significant effects.

8.1.8 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the Partial Review. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how the Partial Review will be implemented ‘on the ground’ and the effect on particular receptors.

N.B. there is not a focus on seeking to up-date the appraisal of CLP 2018, as presented within the SA documents that were published as part of consultations ahead of plan adoption. One reason for this is that the CLP 2018 appraisal was undertaken under a ‘framework’ that differs significantly to the framework used as the basis for the appraisal presented below, namely the framework of 13 topic headings.

9 Appraisal of the Partial Review

9.1 Introduction

9.1.1 The aim of this section is to present an appraisal of the Partial Review under the 13 SA topics.

9.2 Air quality

Appraisal discussion

9.2.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that the proposed broad strategy performs well, in air quality terms, relative to reasonable alternatives. There is support for the proposed focus of growth at North End Quarter, although there is a case for supporting a greater concentration of growth here; and there is also potentially support for the proposed approach to windfall, although the lack of spatial targeting via ‘intensification areas’ generates a degree of concern.

9.2.2 Aside from the matters that are a focus of the appraisal in Section 6, a key consideration is the approach to growth within the **Purley Way Transformation Area**. There is support for transformational change along the corridor, to address the current car dominated and poor quality urban realm, and also potentially to deliver an extension of the tram network south to Purley and Coulsdon. However, site availability is a barrier to realising aspirational objectives, and there is a ‘chicken and egg’ situation in that transport connectivity also serves to limit growth, i.e. there is a need to avoid growth ahead of transport upgrades.

9.2.3 Within the Purley Way, the proposed growth strategy for Waddon Way is of particular note, as this part of the Transformation Area is less well-connected by public transport, and new homes will not be within easy walking distance of a district centre. The I&Os document identified one modest allocation (Site 11) for 35 to 94 homes, whilst the proposal is now for 965 homes. The strategy is mostly unchanged from 2022.

9.2.4 With regards to specific **proposed allocations**, it seems clear that PTAL has been a key factor when assigning capacities to sites. However, a number of proposed reductions to site capacities relative to 2022 can be questioned from a PTAL perspective, notably at Purley and New Addington. Conversely, Site 128 at Shirley is proposed for around 25% more homes despite being within the lowest PTAL zone.

9.2.5 Another consideration is reduced supply from sites at **Purley**, along with deletion of the previously proposed areas for focused and moderate intensification (which covered much of the suburban areas around the district centre). There is an Air Quality Focus Area affecting the district centre, but also an identified opportunity to improve the public realm and street environment. The following vision is of note: *“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... will be safeguarded and new development will help transform hostile main roads into urban streets... and more space to people.”*

9.2.6 Another consideration is sites in proximity to a **main road or railway line**, being mindful of noise pollution as well as air pollution. In this respect there is a need to consider proposals within the Croydon OA to support residential or mixed use redevelopment or refurbishment of current office buildings. For example, Site 245 (George Street) is proposed for 133 homes, which is a notable increase on CLP 2018 (and it is noted that site specific policy requires acoustic measures). West Croydon Station and Bus Station are also of sites note with regards to noise and air pollution.

9.2.7 A further consideration is the proposed redevelopment of car parking land. Over 30 sites include significant car parking, either as part of the current use or as the current primary use, around half of which are new proposed allocations. These sites are located both within the Purley Way Transformation Area and within the Croydon OA, which are both locations associated with a clear case for reduced car parking to reduce car dominance. As discussed in Section 5.4, the Croydon OA has very high levels of car parking.

Appraisal conclusion

9.2.8 The plan performs well in numerous respects but there are also a range of tensions with air quality objectives and the potential for adjustments to the plan to improve its ‘air quality’ performance can be envisaged (albeit not without knock-on implications for other objectives). The 2022 SA Report recommended further consideration of air quality issues along the Purley Way, but it has transpired that there is very limited room for manoeuvre. On balance, an overall **neutral effect** is predicted (as per 2022).

9.3 Biodiversity

Appraisal discussion

- 9.3.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that the proposed broad strategy performs notably well relative to reasonable alternatives, essentially because the alternatives would involve higher growth in a Borough that is sensitive in biodiversity terms. The appraisal in Section 6 focuses on the North End Quarter, windfall and Green Belt release and, in each case, there is support for the emerging proposed approach over the higher growth alternative (albeit this is marginal in the case of North End Quarter, i.e. there is a case for supporting additional growth here).
- 9.3.2 Aside from the matters that are a focus of the appraisal in Section 6, there are a range of issues associated with certain **proposed allocations**. In particular, a number are adjacent or close to a SINC. However, what is apparent is a notably improved situation since the previous publication stage (2022), with five previously proposed allocations adjacent to a SINC now removed, namely Site 502 (Shirley), Site 416 (Broad Green and Selhurst), Site 946 (Waddon Marsh) and Site 59 (Crystal Palace and Upper Norwood).
- 9.3.3 The six remaining allocations adjacent to a SINC are:
- Site 34 (Croydon OA) – now proposed for significantly fewer homes relative to 2022.
 - Site 16 (Five Ways, Purley Way) – now permitted for significantly more homes relative to 2022.
 - Site 357 (Crystal Palace and Upper Norwood) – a site for 135 homes with delivery post 2034.
 - 504 (Shirley) – conversion of a locally listed building for 24 homes.
 - 87 (Shirley) – now proposed for 9 homes, having previously been proposed for 18 homes.
 - Site 48 (Waddon Marsh) – is proposed for 331 homes (unchanged from 2022), having previously been proposed for 17 homes in CLP2018. This site is adjacent to Waddon Ponds, which was historically associated with a large mill. The site proforma does not note this as an issue; however, the policy for the Transformation Area as a whole does include a strong focus on biodiversity.
- 9.3.4 Focusing on the **Purley Way** as a whole, it is clear that there are significant biodiversity issues and opportunities, particularly to the north (River Wandle) and to the south (rising land towards Roundshaw Down) of the area. There is limited detail in area-wide policy (see above), but supporting text explains:
- “The council supports the continued development of the Wandle River 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... 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.”*
- 9.3.5 Finally, there is a need to consider borough-wide **strategic policies**, particularly:
- Policy SP1 (Growth in Croydon) – is proposed to include a new requirement for: *“An enhanced Green Grid with creating a biodiversity network contributing towards better health and well-being of the residents and help address climate change.”*
 - Policy SP7 (Green Grid) – is also proposed to be significantly bolstered, with a clear table identifying spatial priorities, namely priority areas; green spaces to link together; key opportunities; and linking routes. There is also a clear focus on links to transport and health objectives, via a policy criterion:
- 9.3.6 Finally, there is a need to note the following new and significantly amended **DM policies**:
- Policy DM26 (Metropolitan Open Land and Local Green Spaces) – sets out that the Council will protect and safeguard the extent of the borough’s Metropolitan Green Belt and Metropolitan Open Land.
 - Policy DM27 (Protecting and enhancing our biodiversity and Urban Greening) – includes a new focus on the urban greening factor, building on the London Plan setting out that:
- “To secure urban greening a borough specific [UGF]... identifies the appropriate amount of urban greening developments required for new build developments with 5 units or more as follows...”*

Appraisal conclusion

- 9.3.7 Relative to CLP2018 there is a considerable new focus on matters relating to biodiversity, green infrastructure and urban greening through revised borough-wide thematic and site specific development management policies. Also, relative to the 2022 publication stage, a total of five of the site allocations previously identified as potentially sensitive in biodiversity terms (due to an adjacent SINC) have been removed from the plan. However, there is a need to carefully consider the potential for a high growth strategy for the Purley Way to achieve a biodiversity net gain, given the river valley sensitives. On balance, **neutral effects** are predicted, noting that Natural England had no comments on the plan in 2022.

9.4 Climate change adaptation

Appraisal discussion

- 9.4.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that the proposed broad strategy performs well relative to reasonable alternatives.

- 9.4.2 Aside from the matters that are a focus of the appraisal in Section 6, a key issue is certain **proposed allocations** affected by fluvial flood risk. However, what is apparent is a notably improved situation since the previous publication stage (2022). Key locations are:

- Waddon Marsh – which has been discussed above, under Biodiversity. Flood risk zone 2 significantly intersects a number of the sites, and almost entirely covering the two northern-most sites. The cluster as a whole comprised seven sites at the I+Os stage, and the latest proposal involves 11 sites, plus site capacities have been significantly increased. Most notably, at Site 125 the latest proposal is for 632 homes (unchanged from 2022), which is a very significant increase on the 38 to 141 homes range from the I+Os stage. 33% of this site intersects fluvial flood risk zone 2.

However, it is important to note deletion of Site 946 (Stubbs Mead) since 2022, which is not only affected by flood risk but also comprises designated SIL and is a South London Waste Plan safeguarded site.

- Purley / Purley Oaks – is a key focus of growth but is strongly associated with the River Wandle valley. There are three clusters of sites, as discussed in Section 5.4. The key sites within flood risk zone 3 are: Site 347 - is now proposed for fewer homes (and significantly fewer than in CLP2018); and Site 405 – the new proposed capacity is ~50% that from 2022 and ~25% that in CLP2018.

- 9.4.3 Also, it is important to note that two of the three previously proposed allocations in South Croydon (which links closely to Purley Oaks) have been removed, noting flood risk. See discussion in Section 5.4.

- 9.4.4 With regards to **DM policies**, no significant changes are proposed to CLP 2018, in line with the following key finding set out in the Level 1 Strategic Flood Risk Assessment (SFRA, 2021): *“The existing flood risk and surface water management policies within the Croydon Local Plan are sufficient to enable future development proposals to be assessed to ensure they adequately address any identified flood risk issues.”*

- 9.4.5 Finally, it is noted that comprehensive updates were made to the Flood Risk Planning Practice Guidance in August 2022, including in respect of surface water flood risk, which is a significant issue locally. One consideration, in this regard, is the new proposed approach to not identifying intensification areas to guide windfall, which could potentially have assisted with planning for Sustainable Drainage Systems (SuDS).

Appraisal conclusion

- 9.4.6 A number of proposed allocations intersect the flood risk zone. However, in each case development will deliver benefits, which could serve to justify development in a flood risk zone, whether that be: A) the potential to realise a particular site-specific opportunity; B) the potential to contribute to achievement of strategic objectives for a centre, neighbourhood or sub-area (e.g. Purley Way and Purley); and/or C) the potential to contribute to strategic objectives for the Borough, including in respect of meeting housing needs in the context of limited supply options. Furthermore, there are a range of site specific and scheme masterplanning and design factors affecting flood risk, as explored through the Level 2 SFRA (2021) and which can be further explored through a Flood Risk Assessment (FRA) at the planning application stage. Also, it is noted that a number of important changes have been made since the 2022 publication stage that potentially serve to reduce concerns regarding development in the flood risk zone. It will be for the Environment Agency to comment in detail through the current consultation; however, at this stage, it is appropriate to flag a **negative effect** of limited or uncertain significance.

9.5 Climate change mitigation

Appraisal discussion

- 9.5.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that there is a case for supporting higher growth via higher density redevelopment of the North End Quarter, particularly with a view to securing a heat network. Also, a clear conclusion of the appraisal in Section 6 is the need for urgent action given the stretching nature of the target of achieving borough-wide net zero by 2030.
- 9.5.2 Aside from the matters that are a focus of the appraisal in Section 6, there is a need to consider other aspects of the proposed strategy, particularly with a view to considering: A) the extent to which development is located and concentrated (also with a fine grained use mix) with a view to potentially delivering one or more heat networks; B) the extent to which development is directed to more viable locations / sites with a view to enabling an ambitious approach to built environment decarbonisation (notably in terms of exceeding the minimum requirements set out in Building Regulations); and C) the extent to which there is a focus on refurbishing and reusing existing buildings ahead of demolition.
- 9.5.3 With regards to (A), namely realising opportunities to deliver new **heat networks**, there is an established opportunity associated with the Purley Way, given the possibility of utilising waste heat from the nearby Beddington Energy Recovery Facility. However, there is a need to question whether the reduced scale of ambition for the Waddon Way area (relative to 2022) serves to reduce the opportunity in practice. Elsewhere, the plan references Purley and Coulsdon as potentially suitable for a heat network (or ‘district heating’), but the latest proposed approach involves a reduced scale of growth, and allocations are somewhat piecemeal, which calls into question the potential to realise the opportunity in practice. Finally, it is noted that there are still some references in the plan to CHP, which should be revised to reflect dramatically changed views on CHP due to decarbonisation of the national grid since the time of CLP2018.
- 9.5.4 With regards to (B), namely directing growth to areas with strong **viability**, it is difficult to draw any strong conclusions. However, it is fair to question reduced support for suburban windfall (at least relative to the recent trend of delivering over 1,000 homes per annum via small sites windfall). Clearly the prioritisation of other policy asks – most notably affordable housing – also has a bearing on the potential to viably deliver net zero development, or otherwise development to a standard beyond Building Regulations.
- 9.5.5 With regards to (C), there is thought to be some added emphasis on refurbishment and reuse of buildings, in line with **whole lifecycle carbon** and circular economy principles. However, this is not entirely clear, with there seemingly considerable flexibility at a number of allocations. One example is Site 236 (Apollo House, Wellesley Road), which is a prominent modernist office building in Croydon Metropolitan Centre. New policy wording states: *“Conversion should be considered in the redevelopment to increase sustainability of the site and due to the notable architecture of the building.”* It should be noted that the need to strike a sensible balance, in terms of seeking to avoid demolition in order to minimise embodied / embedded built environment greenhouse gas emissions has recently been explored in a prominent legal [case](#) involving the Marks and Spencer store on Oxford Street.
- 9.5.6 Finally, there is a need to consider **Policy SP6** (Environment and Climate Change), which is proposed for limited updates, which is perhaps surprising given the Council’s declaration of a climate emergency (along with a 2030 net zero target date) in 2019 and also given the fast paced nature of built environment decarbonisation policy-making nationally and within London in particular. For example, it should be noted that 18 London Boroughs – not including LB Croydon – published a joint evidence base [study](#) in 2023 that compares and contrasts the two broad alternative approaches that can be taken to setting local policy in respect of operational (or ‘in use’) built environment greenhouse gas emissions. Furthermore, several of these boroughs have subsequently published Draft Local Plans that aim to take the more ambitious of the two approaches, which involves measuring ‘absolute energy use’ from developments, in contrast to the default Building Regulations approach, involving calculating performance relative to a Target Emissions Rate (TER). It is well-established that the Buildings Regulations method is complicated and has other drawbacks relative to the ‘absolute energy-based’ approach of assessing, reporting and monitoring building performance. However, a Written Ministerial Statement was recently published that explains:

“Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures: [A] That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. [B] The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER)...”

Appraisal conclusion

- 9.5.7 Whilst the 2022 SA Report concluded ‘neutral effects’ it is now considered appropriate to flag a **negative effect** of ‘moderate or uncertain’ significance, essentially to reflect: the increasingly stretching nature of the Borough’s 2030 net zero target; uncertainty around the potential to realise heat network opportunities in practice; and the extent of work that has been undertaken nationally, and within London in particular, around policy (and strategy) approaches to minimising built environment greenhouse gas emissions (both operational and embedded). Also, whilst the focus of this section has been on built environment decarbonisation, there is also a need to note the decision to remove the previously proposed intensification areas that sought to direct windfall development to areas with higher PTAL. The 2022 SA Report recommended that consideration be given to undertaking further proportionate work, ahead of plan finalisation, to ensure that built environment decarbonisation opportunities will be fully realised (as opposed to leaving key decisions to later stages of the planning process, when options can be constrained or foreclosed) and this recommendation also holds true at the current time.

9.6 Communities

Appraisal discussion

- 9.6.1 There are a wide range of issues / opportunities that could potentially be a focus of discussion here. Focusing on a select range of key issues, the appraisal in **Section 6** finds that the proposed broad strategy performs well relative to the option of higher growth via increased support for windfall, but that there is a case to be made for higher growth via Green Belt release, from a communities perspective. With regards to the North End Quarter, there is support for the emerging proposed approach, but it could transpire that additional housing growth would help to secure delivery and ensure that opportunities are fully realised.

- 9.6.2 Aside from the matters that are a focus of the appraisal in Section 6, key aspects of the strategy include:

- **Brighton Main Line / East Croydon** – as discussed in Section 5, there is much uncertainty regarding deliverability / delivery timescales, but there has nonetheless been a considerable amount of work undertaken to consider how to masterplan development associated with the upgrade works in order to realise opportunities. Perhaps the key consideration is the proposal to deliver a new station square over the railway line, without any associated housing. Supporting text explains:

“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 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.”

- **North End Quarter** – *“will build on its history as an education, commercial and social hub, to be an attractive destination to live, work and visit with a vibrant public and cultural offer alongside retail, leisure and commercial development.”* It is clear that there is a major opportunity, with a key consideration being the degree to which new housing is supported alongside town centre uses and employment, as discussed in Sections 5 and 6.
- **Office Retention Area** – is located between North End Quarter and East Croydon, and so has an important role to play in terms of better linking these two key hubs within the Croydon OA, including reducing the extent to which Wellesley Road acts as a barrier to movement.
- **Purley Way** – *“will be transformed from a hostile and divisive road in to a green city street. It will integrate developments with important retail and industrial areas and existing communities in Broad Green & Selhurst and Waddon. Three new local centres and one neighbourhood centre will be delivered, with roles complementary to Croydon Metropolitan Centre, Purley Town Centre, the Beddington Lane industrial area, and other places in Croydon and Sutton.”*

Challenges are focused on: integrating new communities and SIL (including from a perspective of maintaining employment opportunities in SIL); the risk of continued high levels of traffic, including HGV traffic; and ensuring new communities have good access to a district centre. Certain key sites in the north of the area are no longer available, relative to the 2022 publication stage, and so there will be a need for ongoing consideration of the extent to which the vision for the area as a whole can be realised.

- **District, Local and Neighbourhood Centres** – *“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...”* A number of adjustments have been made to site capacities in light of detailed design work, which is likely a ‘positive’ from a communities perspective; however, fewer homes can also mean less funds available for infrastructure delivery, place-making and design measures. There are also notable regeneration sites supported in Thornton Heath and Selsdon (Forest Gate) that were proposed for allocation in 2022 but are now removed from the plan.

- **Schools capacity** – is clearly a key issue for any local plan. Supporting text explains:

“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... 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...”

9.6.3 Other area and **site-specific considerations** include:

- Broad Green and Selhurst – Site 499 Croydon University Hospital is a key 8.2 ha site proposed for 345 homes, which is notably more than the current allocation (also the proposal at the I+Os stage) for 77 to 290 homes. The proposal is for: Residential development subject to the adequate re-provision of the existing health care use.” In contrast, CLP2018 says: *“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.”*
- Crystal Palace & Upper Norwood – Site 126 is a new proposed allocation since the I+Os stage. The site currently comprises a school, and the proposal is for education facilities and 27 homes (with the proposal for 72 homes in 2022). Also, within the district centre, Site 357 is proposed for a 135 home mixed use scheme (CLP 2018 supports 39 to 223 homes), but in the long term (post 2034).
- New Addington – as discussed in Section 5.4, a site in the district centre is proposed to deliver a mixed use scheme but there is now a pending planning application for a diagnostics centre.
- Norbury / Thornton Heath – Site 106 is a new proposed allocation currently comprising a community centre. The proposal is for a mixed use residential and community (to retain equivalent floor space or functionality of the community use), to include 18 homes (unchanged from 2022).
- Sanderstead – Site 306, within the local centre, is a retained allocation from CLP 2018 proposed for a 41 home residential scheme, with the CLP2018 allocation for a mixed use scheme of up to 24 homes.
- Selsdon – the proposal in 2022 was for: *“Residential development incorporating a new shopping parade with retail, finance, and food & drink.”* However, this is now an omission site.
- Shirley – Site 87 comprises Shirley Community Centre and was proposed for an 18 home mixed use scheme in 2022 but is now proposed for a 9 home residential development *“subject to the adequate re-provision of the existing community use.”*
- Thornton Heath – Site 136 is within the district centre and proposed for a 124 home mixed use scheme (unchanged from 2022; CLP2018 says 55 homes), but no longer with a requirement for employment.

9.6.4 Regarding borough-wide **thematic policies**, perhaps a primary point to note is changes to Policy DM2 (Housing) and its supporting DM policies, which are a focus of discussion below. With regards to Policy SP5 (Community Facilities), there are no significant proposed changes. Finally, it is important to note Policy DM1A (Estate Renewal), which is a new policy in response to a situation whereby:

“A number of... housing estates were developed in the early to mid 20th Century, and have been constructed using design and construction principals of different eras. While some assets perform their function well, and will continue to do so, some are starting to come to the end of their lifespan, and have a range of issues that need addressing.”

Appraisal conclusion

- 9.6.5 Having taken careful account of both the proposed spatial strategy and thematic policy (borough-wide, area-specific and site specific, also mindful of existing CLP 2018 policies that are not proposed for change) it is fair to predict **positive effects**, albeit with a degree of uncertainty given a number of proposed allocations associated with existing community uses that will need careful consideration through the development management process. Perhaps the key point to note is that the three new Transformation Areas are all strongly supported from a communities perspective (which is not to say that the policy approach at each should not be the subject of further scrutiny with a view to making adjustments, to maximise community benefits, ahead of plan finalisation; most notably with respect to the Purley Way).

9.7 Economy and employment

Appraisal discussion

- 9.7.1 The appraisal in **Section 6** finds that the proposed broad strategy performs well in absolute terms, but that there is a case to be made for supporting a higher growth strategy, whether that be via additional housing growth at North End Quarter, additional policy support for windfall or Green Belt release.
- 9.7.2 The appraisal in Section 6 does not focus on the Purley Way or the approach to growth at allocations other than within the North End Quarter, but these are key factors with a bearing on the performance of the Partial Review in respect of 'economy and employment' objectives.
- 9.7.3 Beginning with **office floorspace**, the Employment Land Review (ELR, 2020) forecasts a need for an additional 30,500m² floorspace in the plan period, or 33,000m² if account is also taken of need for R&D space. The ELR explains that this "represents a potentially significant requirement for office space" but is a major departure from the 97,000m² figure within CLP 2018, which is "stretching" and assumes "very high growth". The CLP 2018 figure was arrived at on the basis of assumptions regarding the distribution of demand for office space across South London that are no longer supported, including on the basis of evidence relating to planning consents for major office schemes not being implemented. The general trend over recent years (para 7.5 of the ELR) has been one of limited new office development ("*three significant deliveries of high-quality stock over the last decade which includes the Council headquarters*"). The ELR (2020) goes on to suggest a more recent trend of lack of supply leading to decreasing rates of vacancy, plus there is increasing demand for grade B / affordable office space; however, on the other hand, there is also a need to consider trends since 2020 (discussed below).
- 9.7.4 The ELR also discusses the spatial distribution of demand for office floorspace, ultimately concluding that the 33,000m² could be delivered entirely within Croydon Metropolitan Centre, which is a departure from CLP 2018, which supports 7,000m² at district centres. The ELR goes on to discuss the importance of retaining the existing Office Retention Area surrounding East Croydon Station, and also taking steps to stimulate office development.
- 9.7.5 In light of these introductory points on the context to planning for office space, the conclusion is that the Partial Review appears to perform suitably well, but that it is difficult to reach clear conclusions, due to a complex situation whereby numerous allocations – particularly within the Office Retention Area – are proposed for mixed use schemes whereby there is uncertainty regarding the level of office floorspace. It is recommended that further (proportionate) work is undertaken to clarify the situation.
- 9.7.6 With regards to **industrial land**, the first point to note is that the Borough has existing strengths and a strategic role to play in respect of B8 warehousing, with meeting warehousing need as "*the most challenging issue for Croydon Council.*" The need figure of 78,000m² is a minimum, and translates as need for 12-21 ha of land.
- 9.7.7 With regards to light industrial land, the situation is "complex". Whilst Croydon not a major location for manufacturing, light industrial units (particularly smaller) are seeing high demand across a wide range of "*sectors associated with higher value, good quality jobs, and which are essential to London's economy.*" On balance, the ELR recommends continuation of the existing 'no net loss' approach, as part of which redevelopment (potentially mixed use) to secure an intensification of employment space will be important.

9.7.8 With regards to the performance of the Partial Review, the simple fact is that meeting need for industrial land is highly challenging and, in practice, the Partial Review does not propose any significant new industrial land. This gives rise to the strong possibility of a significant unmet need. However, the Partial Review is strongly supportive of protecting existing industrial land (in the context of a situation whereby industrial land in London inevitably comes under pressure for more high value uses) and also intensifying existing industrial land, particularly within the Purley Way Transformation Area. Outside of the Purley Way industrial land is quite widely dispersed across numerous pockets borough-wide, which gives rise to a challenge in terms of retention and intensification (in contrast to office space). However, the proposal to retain the current four tiers of designation is supported by the ELR, which seeks to emphasise the importance of the Council intervening in support of successful intensification (e.g. “case study locations”). There is overall limited focus on mixed use intensification, at least relative to some other London Boroughs. This warrants being a focus of ongoing consideration (and clarity through a topic paper would be welcomed, as per the situation in respect of office space), but is tentatively supported given the inherent challenges and complexities involved with mixed use redevelopment / intensification of industrial land.

9.7.9 With regards to **DM policy**, there are numerous matters that could potentially be discussed here, but a key issue is affordable workspace, which is a focus of new Policy DM9A. The policy explains:

- 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.
- Proposals resulting in the loss of existing affordable workspace will be resisted.
- There is particular support for affordable workspace in: Transformation Areas; Croydon Opportunity Area; and All tiers of designated employment locations identified in Policy SP5.

9.7.10 Other area and **site-specific considerations** include:

- Purley Way – it is within the Valley Park area that the proposed new community will integrate most closely with SIL, with the extensive Beddington SIL in LB Sutton to the west. Also, within the Five Ways area, it is important to note that one of the two new sites since the I+Os stage (Site 153) comprises a small isolated SIL, adjacent to the Five Ways roundabout. The proposal is for a scheme involving 91 homes and town centre uses. It is recommended that there should be a clear vision for the future of industrial uses along the Purley Way, with a focus on explaining how the nature of industrial uses (e.g. heavy industry versus light industry versus storage and distribution) is likely to change over time.
- Broad Green & Selhurst – Site 13 is of note as a vacant industrial site closely associated with Thornton Heath, with the proposal for a mixed use scheme to include industrial/warehousing.
- Thornton Heath – Site 136 is proposed for a 124 home mixed use scheme, with the CLP allocation (also the I+Os proposal) for 25 to 55 homes, and the proposal is to remove the requirement for employment.

Appraisal conclusion

9.7.11 The broad aim of ‘retaining and intensifying employment land’ is supported, and all three of the Transformation Areas reflect a strong degree of ambition, from an ‘economy and employment’ perspective. However, there would be merit to further exploring precise implications of the Partial Review for the nature of office space available in the Borough (in terms of total quantum, distribution and type/grade) and the nature of the Borough’s industrial land resource. For example, and in particular, along the Purley Way there is a need to carefully consider the implications of intensifying SIL alongside major housing growth, with a view to ensuring that existing typologies of industrial / employment use are not unduly ‘pushed out’ of the area, and in turn potentially out of London. Overall **positive effects** are predicted, but with a degree of uncertainty, not least due to the changing national and regional context around the need for office-type workspaces and nature of demand for industrial-type land uses. It will be important to maintain a watching brief ahead of plan finalisation.

9.8 Health

Appraisal discussion

9.8.1 The appraisal presented in **Section 6** finds that the preferred broad strategy performs well, and that there is no clear case to be made for any of the higher growth reasonable alternatives.

- 9.8.2 One important consideration is ensuring access to **health facilities**, with site specific policy set to include a considerable focus on identifying sites with the potential to deliver new facilities (subject to further discussions with providers), although there are also certain issues and potential tensions, e.g. proposed redevelopment at Croydon University Hospital (discussed above). The proposed allocation at New Addington is a site where there is now an urgent need to decide whether the site can both deliver a health facility and deliver significant new homes (as anticipated by CLP2018).
- 9.8.3 Aside from access to health facilities, another important consideration is design quality and space standards, with the proposal being to supplement **Policy SP2** (Homes) to include new policy criteria on:
- Shared spaced – *“Development will need to demonstrate the design of both private and communally shared spaces... successfully meet the needs of all residents, including families...”*
 - Internal and external spaces – *“which contribute positively to resident’s health and wellbeing, whilst offering places for activity, shared experiences and retreat...”*
 - Design and layout that supports independent living – assigned a policy criterion.
 - Wider design considerations – *“designed to the highest quality; be functional, accessible, adaptable, sustainable, in compliance with all relevant standards and applied neutrally across all tenures...”*
 - Accessible - all developments should *“provide accessible and adaptable dwellings... At least 10% of all affordable homes built to meet M4 (3) wheelchair user dwellings and the remainder should meet M4 (2) accessible and adaptable dwellings standards.”*
- 9.8.4 Changes to Policy SP2 are supplemented by changes to **DM policies**, notably:
- New Policy DM 1A (Amenity standards for residential developments) – sets out minimum requirements, with supporting text explaining: *“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 wellbeing 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.”*
 - New Policy DM2A (Large scale purpose built shared living) – sets out the facilities that each private unit shall include or have exclusive access to, including living space separate from the communal facilities.
- 9.8.5 Access to green and blue infrastructure is also a key consideration here. In this respect, the primary point to note is **Policy SP7** (Green Grid), which includes a new focus on the north of the Borough within the supporting text: *“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.”* Within the policy itself, there is a new focus on Very Special Community Green Spaces (Local Green Spaces) and other Important Green Spaces.
- 9.8.6 With regards to **site allocations**, the following are of particular note:
- Site: 44 – is the aforementioned site at New Addington.
 - Site New 2 – is a new proposed site for estate regeneration, following a successful residents ballot.
 - Site 133 – currently comprises various low rise residential blocks and associated parking and amenity land, and the proposal is to deliver a 372 home redevelopment (previously proposed for 505 homes).
 - Site 34 – is a large new proposed allocation within the Croydon OA that currently includes public realm.
 - Numerous sites – are discussed as potential locations for a health facility. For example, Site 945 was previously earmarked as a potential site for a health centre, but that is no longer anticipated.

Appraisal conclusion

- 9.8.7 One important consideration is ensuring access to health facilities, with site specific policy set to include a considerable focus on identifying sites with the potential to deliver new facilities (subject to further discussions with providers), although there are also certain issues and potential tensions, e.g. proposed redevelopment at Croydon University Hospital. Aside from access to health facilities, another important consideration is design quality and space standards, with the proposal being to supplement Policy S2 (Housing) to include new policy criteria on: shared spaced; internal and external spaces; design and layout that supports independent living; wider design considerations; and accessible/adaptable housing. Overall **positive effects** are predicted, but with a degree of uncertainty, ahead of receiving consultation responses from partner organisations including those that operate under the SW London [Integrated Care System](#).

9.9 Historic environment

Appraisal discussion

- 9.9.1 The appraisal in **Section 6** shows the preferred broad strategy to perform well relative to reasonable alternatives. With regards to North End Quarter, the emerging preferred approach involves additional homes relative to the proposal in 2022, which does create a tension with historic environment objectives, and so there is a clear concern with the option of yet higher housing growth. With regards to windfall development, a higher growth strategy would likely necessitate spatial targeting at areas close to transport hubs and with low density residential character, and when this approach was taken in 2022 the appraisal at that time did flag some historic environment concerns (albeit of potentially of limited significance).
- 9.9.2 Other considerations not a focus of the appraisal in Section 6 include:
- Mid Croydon – is strongly associated with the Central Croydon Conservation Area, as well as Queen’s Gardens open space. Site 194 is a large and constrained site (the Grade II* listed clock tower is adjacent, and the view cone intersects the site), where the proposal is for 820 homes, which is a notable increase on the equivalent figure from CLP 2018 (88 to 504 homes).
 - Southern part of Croydon OA – this area lies to the east of the River Wandle floodplain and the Laud Street local heritage area, and to the west of a residential conservation area. There are four sites, one of which (Site 190) is consented for 357 homes, which is a figure notably higher than the CLP 2018 capacity figure (56 to 162 homes). Two other sites (41 and 952) are both new allocations of note, including due to proximity to listed buildings, including (in the case of Site 952) a Grade II* listed building.
 - Western part of Croydon OA – Site 374 is a small site in the Old Town, and within a conservation area. The proposal is to support 21 homes, a slight decrease on the 23 to 64 range from CLP 2018.
 - Purley Way – is a historic transport corridor, plus there is a need to consider the heritage value of the River Wandle corridor. In the Five Ways area, one of the two new sites since the I+Os stage (Site 153) is adjacent to Grade II listed tithe barn. This could represent a heritage opportunity, given existing uses.
 - Purley – Site 683 is adjacent to the designated local heritage area. It is proposed for 60 homes, which is a reduction on the 99 homes proposed in 2022.
 - Broad Green & Selhurst – Site 416 is now an omission site. It is closely associated with Croydon cemetery - a local heritage area - although redevelopment could have represented an opportunity.
 - Coulsdon – Site 372 is now completed for 157 homes (a notable departure from the CLP2018 allocation). It is adjacent to the Surrey Iron Railway embankment Scheduled Monument.
 - Crystal Palace & Upper Norwood – the stand-out large site is Site 357, which is located within the district centre and within the Upper Norwood Triangle Conservation Area. The proposal is for a 135 home mixed use scheme, with CLP 2018 having proposed 39 to 223 homes.
 - Norbury – Site 951 is now an omission site. The previous policy stated: *“The buildings fronting on to London Road contribute to the Local Heritage Area and should be retained and converted...”*
 - Selsdon – Site 948 is an existing allocation for 11 homes, with the new proposal for 26 homes to reflect planning consent. It is described as a disused art deco dance hall, last used as a car repair garage.
 - Shirley – Site 504 comprises a locally listed building, with the current proposed capacity of 24 homes below the range set out in CLP 2018 (26 to 68 homes). New site specific policy is proposed: *“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.”*
 - South Norwood and Woodside – Site 51 is now an omission site, having been proposed for 102 homes in 2022. It is within a conservation area, comprising amenity land and car park associated with tower blocks.
- 9.9.3 With regards to borough-wide **thematic policies**, there are limited significant implications for the historic environment, i.e. policy is mostly quite standard (recalling the Government’s current proposal to publish national development management policies. However, relative to CLP2018 there are some substantial changes to Policy DM10 (Design and character), including a new proposed focus on *“reflecting and maintaining the local character of the area including any heritage assets having regard to... The heritage assets and natural features of the surrounding area and the Place of Croydon in which it is located.”*

Appraisal conclusion

- 9.9.4 The historic environment is a key consideration for one of the proposed Transformation Areas, namely the North End Quarter, and also an important consideration for the Purley Way. It is also a key consideration for several of the district and local centres that are a focus of growth, plus numerous of the proposed allocations elsewhere (including within the Croydon OA) have a degree of historic environment constraint. However, there will typically be the potential to avoid or sufficiently mitigate impacts through careful design (in line with the design-led, character-based approach as set out in Chapter 3 of the London Plan). Many site allocations reference the need to account for historic environment constraints, including with a good degree of specificity that leads to confidence. Overall, it is fair to predict **positive effects**, albeit with a degree of uncertainty ahead of receiving the views of Historic England through the current consultation.

9.10 Housing

Appraisal discussion

- 9.10.1 The appraisal in **Section 6** concludes that the proposed broad strategy performs well in absolute terms, but that there is a clear case for a higher growth scenario, in order to meet housing needs more fully. In particular, there is support for higher growth scenarios that would direct growth so as to maximise delivery of family and affordable housing and, as part of this, consideration could be given to Green Belt release.
- 9.10.2 Another key consideration is **deliverability** of the proposed housing requirement, which is 34,135 homes over the plan period, and which breaks down as a requirement for 2,079 dpa over the early years of the plan period years to 2029 and then 1,214 dpa for the subsequent eleven years to 2040. The total identified supply is 40,320, such that there is a supply buffer of 18%, which is quite high in the national context. However, in the London context it is not necessarily high, reflecting the inherent uncertainties associated with the number of homes that will be delivered at many of the proposed allocations in practice (e.g. see discussion of the Wandsworth supply buffer in Section 5.2). Delivery risk / uncertainty is evident from the changes to sites and site capacities that has occurred over the years (as discussed in Section 5.4) and the need for criteria to be met at certain sites before they can be developed, e.g. in respect of re-providing community infrastructure. Another consideration is certainty regarding windfall development in the absence of identified intensification areas, although there are few concerns with the proposed approach of delivering 641 dpa from small sites / windfall, in the context of recent delivery of over 1,000 dpa.
- 9.10.3 Having said this, it is important to be clear that the matter of defining an appropriate supply buffer is far from an exact science, and that it is also common for planning applications to be submitted involving much higher numbers of homes than previously anticipated in policy. For example Site 31 has recently been completed and delivered 573 homes (including a 49 storey tower), which is a figure much higher than the 159 homes anticipated in CLP 2018 (plus the site is reduced in extent).
- 9.10.4 A related matter for scrutiny is assumptions made regarding the **delivery timescales** for site allocations, with it again being the case that significant adjustments have been made to many sites over the years. However, overall there is confidence that a suitably precautionary approach has been taken, with sites proposed to deliver in the early years of the plan mostly being those with planning permission, and those sites currently recorded as “no known developer interest” mostly assumed to deliver post 2034. Further confidence in the housing trajectory is then generated once account is taken of the fact that there would be the potential to boost supply for the latter years of the plan period through a Local Plan Review (or another Partial Review) informed by a new London Plan.
- 9.10.5 Focusing on **affordable housing**, the supporting text to Policy S2 increases the ambition of CLP 2018 (specifically, see [paragraph 4.4](#)) from a target of 35% to 50% affordable housing to be delivered by new residential development over the plan period. 25% of this will be First Homes in accordance with Government Policy, with the remaining 75% delivered in accordance with the emerging SHMA evidence.
- 9.10.6 With regards to the need for **family housing**, this has already been discussed as a key issue. There is a need to deliver new family housing, but also address the redevelopment of larger homes. The latter issue is a focus of Policy DM1, which aims 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.
- 9.10.7 Further considerations include: a new focus in Policy SP2 on supporting a range of housing delivery methods, including self-build, custom-build and community-led housing.

Appraisal conclusion

- 9.10.8 The appraisal in Section 6 concludes a positive effect of ‘moderate or uncertain significance’. However, after having accounted for proposed development management policies, particularly in respect of affordable housing and family housing, it is possible to predict a **significant positive effect** (as per 2022). Nonetheless, there is a clear need for ongoing scrutiny of the housing requirement for the period beyond 2029, which is currently proposed to be 1,214 dwellings per annum (dpa). This is significantly below recent rates of delivery (above 2,000 dpa) and housing need is likely to be significantly higher. There is also a need to consider the national context in terms of the NPPF’s focus on “significantly boosting the supply of homes” and the Government’s current consultation (March 2023) on “Strengthening planning policy for brownfield development”, which proposes *“a change to national planning policy that would expect local planning authorities to give significant weight to the benefits of delivering as many homes as possible, and to be flexible in applying policies or guidance on the internal layout of developments especially for proposals on brownfield land.”* There is also a current focus nationally on boosting rates of housing in London (see the London Plan Review Report of Expert Advisers, 2024) and there is significant unmet housing need arising from neighbouring districts in Surrey, most notably Tandridge District.

9.11 Land and soils

Appraisal discussion

- 9.11.1 The appraisal in **Section 6** raises few concerns, and there is limited potential to elaborate further here. Whilst the proposal is to develop some small areas of amenity land, there is no proposed loss of greenfield land within the Green Belt, or MOL.
- 9.11.2 A further consideration is Site 946 (Stubbs Mead), which was proposed for allocation in 2022 but is now an omission site. This is a South London Waste Plan safeguarded waste site.
- 9.11.3 A final consideration is the potential to make further use of brownfield land within the Purley Way, subject to transport infrastructure upgrades and wider issues being addressed. For example, the Purley Way Masterplan explored options for the Gas Works site, and the site is discussed in Section 5.3, above.

Appraisal conclusion

- 9.11.4 This is a relatively minor issue for the Croydon Local Plan Partial Review, with **neutral effects** predicted.

9.12 Landscape

Appraisal discussion

- 9.12.1 The appraisal in **Section 6** shows the preferred broad strategy to perform well relative to reasonable alternatives. The plan also potentially performs well relative to 2022 as the proposal is to remove the previously proposed intensification areas that would have served to concentrate windfall development at the most accessible areas from a transport perspective. However, this is uncertain, as the windfall assumption is broadly unchanged, a more dispersed windfall could have similar implications for townscape and landscape character in the Borough’s suburban areas.
- 9.12.2 Also of note are proposed changes to **Policy SP4** (Urban Design, Heritage and Local Character), including in respect of tall buildings, with a new proposed focus on *“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.”* **Policy DM15** (Tall and large buildings and high density developments) also includes a notable new policy criterion stating: *“Rigorous testing [of wind, sunlight, and wider microclimate conditions] will need to be carried out to assess potential impacts at the earliest possible opportunity in order to assess the suitability of development... Development should drive improvements to any problematic areas to create a safe, comfortable and inviting public realm.”*
- 9.12.3 There are also notable changes to **Policy DM10** (Design and character), including a new proposed focus on *“reflecting and maintaining the local character of the area including any heritage assets having regard to... The heritage assets and natural features of the surrounding area and the Place of Croydon in which it is located.”* Finally, there are also notable changes to DM10.3 which has added specification regarding the provision of landscaping as part of an overall design that enables the development to respect the character of the existing area, integrating with surrounding buildings.

Appraisal conclusion

- 9.12.4 A key consideration is policy support for, and spatial targeting of, small sites windfall in the Borough's suburban areas. There is a notable adjustment to the proposed approach relative to 2022, with the removal of the previously proposed intensification areas, but it is difficult to conclude what the effect of this will be for townscape and landscape character. Another key change since 2022 is the definition of Tall Building Zones, in line with the London Plan requirement, and informed by the Tall Buildings Study (2023). Definition of these zones has only had a modest impact on proposed allocations, however within the defined zones other sites may become available and be proposed for taller buildings in the future. Finally, there is strong support – from a townscape / landscape perspective – for the detailed work on design-led site capacities that has been undertaken since 2022, including applying a 'cookie-cutter' methodology, whereby exemplar schemes are overlaid on site boundaries. However, this has led to an overall reduction in supply across the site allocations that must be scrutinised in light of wider objectives, including making the best use of land in the best connected / most accessible locations. Overall a **positive effect** of moderate or uncertain significance is predicted (in contrast to a predicted neutral effect in 2022).

9.13 Transport

Appraisal discussion

- 9.13.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that the proposed broad strategy performs well relative to reasonable alternatives. There is support for the proposed focus of growth at North End Quarter, although there is a case for supporting a greater concentration of growth here; and there is also potentially support for the proposed approach to windfall, although the lack of spatial targeting via 'intensification areas' generates a degree of concern.
- 9.13.2 Aside from the matters that are a focus of the appraisal in Section 6, a key consideration is the approach to growth within the **Purley Way Transformation Area**. This is a very challenging area for growth from a transport perspective, as there is a considerable opportunity but also a need to avoid housing growth coming forward ahead of supporting transport and community infrastructure. Growth in the Purley Way must also be considered in combination with growth to the south Purley and also Coulsdon beyond, including with a view to potentially securing a new tram extension. In these areas there is likely to be an overall reduced quantum of growth relative to 2022, and there is a need to question whether growth is coming forward in a suitably coordinated way in order to realise infrastructure objectives.
- 9.13.3 A further consideration are the proposed significant changes to Policy SP8, notably:
- A new focus on East Croydon station – *“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.”*
 - Revised support for trams – for example, support for *“potential development of a tram depot in New Addington or other locations in the borough.”*
 - Notable changes to supporting DM policies, including: new Policy DM 28 (Ensuring the safe and effective movement of the network); notable changes to Policy DM29 (Promoting sustainable travel and reducing congestion); and notable changes to Policy DM30 (Car and cycle parking in new development).

Appraisal conclusion

- 9.13.4 The proposed spatial strategy is 'sustainable transport-led' to a large extent, and certain of the interventions supported by the Local plan are of larger-than-local significance, most notably Brighton Mainline (although delivery certainty here has reduced since 2022). However, there remain a wide range of challenges and uncertainties, notably in respect of the Purley Way Transformation Area and at Purley. Also, there is a need for ongoing scrutiny of the potential for windfall development to come forward in line with transport objectives, including recalling the Borough's 2030 net zero commitment. Overall the conclusion is a **positive effect** of limited or uncertain significance (as per 2022).

9.14 Water

Appraisal discussion

- 9.14.1 A key consideration for Local Plans is capacity at wastewater treatment works (WwTW), which in the Croydon context means considering capacity at Beddington WwTW (in LB Sutton), Crossness WwTW (in LB Bexley) and Long Reach WwTW within Dartford Borough. It is understood that no major concerns were raised through consultation in 2022; however, there are known to be significant concerns with capacity at Long Reach WwTW, as discussed within a recent [Catchment Strategic Plan](#) prepared by Thames Water. The Long Reach works serves the east of the Borough including New Addington, but it is difficult to conclude any significant concerns. There is similarly a Catchment Strategic Plan for Crossness WwTW (see below), but this is Europe's second largest WwTW catchment (serving 2 million people) and LB Croydon is at the very edge of the catchment.
- 9.14.2 A further consideration is Sustainable Drainage Systems (SUDS) measures, which are important from both a flood risk and water quality perspective. New proposed supporting text within the Broad Green and Selhurst section of the Partial Review notably explains:
- “Developers will need to liaise with the Council Local Lead Flooding Authority team and the Environmental Agency, to investigate the suitability of SUDS... due to the geological characteristic, to reduce the risk of groundwater flood risk. The Council will continue to work with Thames Water... and other stakeholders, to... enhance the ecological status of Norbury Brook, in line with the Water Framework directive.”*
- 9.14.3 With regards to thematic policy, there are limited proposed changes; for example, the proposed requirement within Policy SP6 (Sustainable Design and Construction) for all new-build residential development to meet a minimum water efficiency standard of 110 litres/person/day is unchanged. In this respect, it is noted that a commitment to achieve at least 105 litres per person per day is becoming increasingly common, and some water companies now target 100 l/p/d.
- 9.14.4 Finally, proposed changes to Policy SP7 (Green Grid) are of note. Specifically, a new policy criterion requires: *“Through green infrastructure respond to climate change – through carbon sequestration and storage, temperature regulation, storm water regulation and air purification...”* This policy criterion is presented under the 'biodiversity' heading, which might be reviewed.

Appraisal discussion

- 9.14.5 In **conclusion**, wastewater treatment work capacity is high on the agenda nationally at the current time, hence there is a need to avoid risks of capacity breaches as far as possible. This can mean directing growth to locations served by WwTW with existing capacity, as opposed to relying on capacity upgrades, which can be subject to delays. However, no concerns have been raised regarding wastewater treatment capacity being a significant constraint to growth with a bearing on the quantum of new homes supported through the Partial Review, or the spatial strategy. As such, a **neutral effect** is predicted.

9.15 Conclusions

- 9.15.1 In conclusion, the appraisal predicts a **significant positive effect** in respect of housing objectives (although there is a need to give ongoing consideration to options that would involve boosting supply). A **moderate uncertain positive effect** is then predicted under the communities, economy, health, historic environment, landscape and transport headings (recalling that the baseline situation is one whereby development continues but in a less plan-led fashion). A **neutral effect** is then predicted under the air quality, biodiversity, land/soils and water headings. Finally, a **moderate or uncertain negative effect** is predicted under two headings, namely: climate change adaptation (ahead of the EA further reviewing several development sites that intersect a flood risk zone); and climate change mitigation (given the highly stretching target of achieving net zero greenhouse gas emissions borough-wide by 2030).
- 9.15.2 There will be the potential to make improvements to the plan through the forthcoming examination in public, if / where they relate to matters of soundness. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to explore the predicted negative effects / tensions with sustainability objectives.

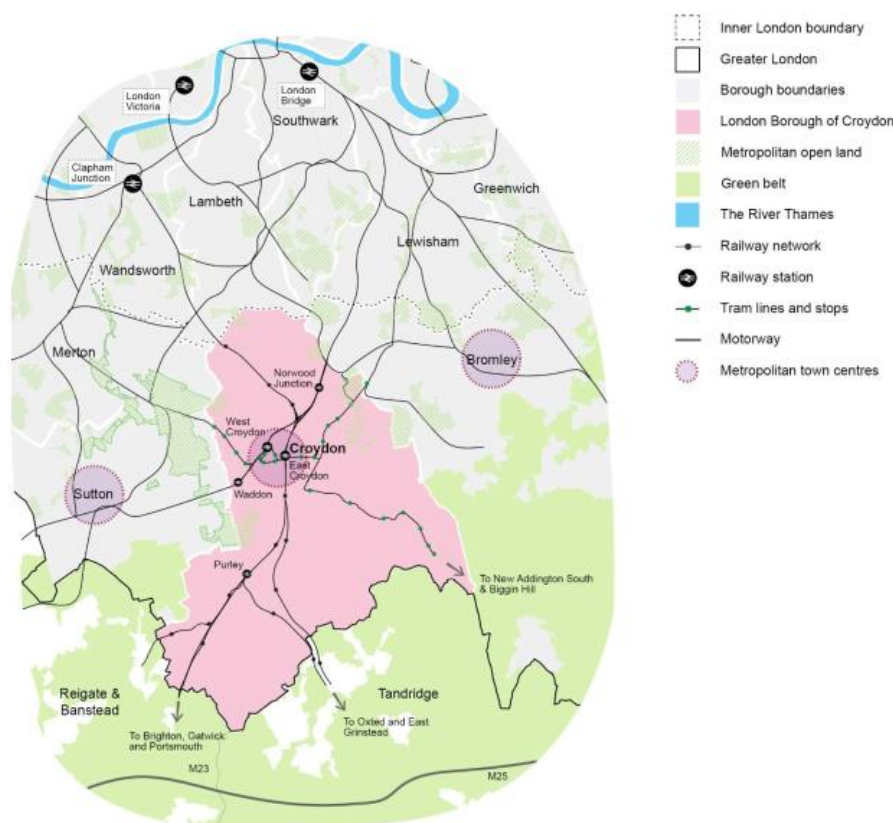
Cumulative effects

9.15.3 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential ‘larger than local’ effects. The following bullet points cover some key considerations:

- **Adopted CLP 2018** – an immediate consideration is the effect of the Partial Review in combination with those aspects of CLP 2018 that are not a focus of the Partial Review. However, such considerations are limited, because the spatial strategy is entirely revisited, albeit there are certain aspects of the spatial strategy proposals through the Partial Review that are only a modest adjustment on the strategy set out in CLP 2018 (e.g. the strategy for the Croydon Opportunity Area outside of the Transformation Areas).
- **Housing** – as well as contributing to London’s housing needs, there is a need to recognise that the Croydon housing market area has historically been seen as closely linked to that of Tandridge District. The Tandridge Local Plan was recently found to be unsound, hence there is unmet housing need.
- **Transport infrastructure** – aside from the headline matter of the Brighton Mainline, the Borough also shares other strategic transport corridors with neighbouring areas. In respect of the tram network, the focus on the Croydon OA, the Purley Way and district/local centres on the network amounts to a proactive approach to supporting patronage and, in turn, investment in network improvements. There is also a need for an ongoing focus on road corridors associated with district/local centres and other growth locations, perhaps most notably the London Road linking to LB Lambeth to the north.
- **Employment** – Croydon is a regionally important centre of employment, hence the carefully considered proposals for the Croydon OA are broadly supported. With regards to SIL, which is by definition of regional importance, the appraisal above has emphasised the importance of closely scrutinising and monitoring the practical implications of the proposed policy approach of retention and intensification. There is also a need to consider key employment areas close to the Borough boundary, notably Beddington to the west and Biggin Hill to the south east.
- **Landscape scale net gain** – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider ecosystem services, at functional landscape scales, perhaps most notably the River Wandle corridor, which extends northwest from Croydon into LB Sutton.

9.15.4 The figures below serve to highlight a selection of sub-regional geographies.

Figure 9.1: Croydon in the South East London context



Part 3: What are the next steps?

10 Plan finalisation

- 10.1.1 Once the period for representations on the Partial Review / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the Partial Review is 'sound' and ready for submission. If this is the case, it will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.2 At Examination the Inspector(s) will consider representations on the Partial Review (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.3 Once found to be 'sound' the Partial Review will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 The SA Report must present 'measures envisaged concerning monitoring'.
- 11.1.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Affordable housing needs – certainly warrant being a focus of ongoing close monitoring.
 - Flood risk – it would be useful to monitor not only the number of homes that come forward in a flood risk zone, but also the nature of the schemes / flood risk avoidance and mitigation measures implemented.
 - Built environment decarbonisation – is a rapidly evolving policy area, and so it will be important to monitor the sufficiency of Local Plan policy closely, potentially with a view to preparing supplementary planning guidance, in order to ensure that opportunities are fully realised, including in respect of heat networks.
 - Community uses – it would be useful to monitor how existing community uses on sites proposed for allocation are re-provided, for example onsite versus in the local area versus further afield. It will also be important to monitor the process of identifying sites suited to delivering new health infrastructure.
 - Purley Way – there will be a need for very close monitoring of infrastructure upgrades, the needs of businesses within the SILs and traffic / air quality (also possibly wider environmental) quality along the busy road. Also project-specific green and blue infrastructure measures could be monitored to ensure that the 'sum of parts' aligns with the vision for a River Wandle Regional Park.
 - North End Quarter – there will be a need to be mindful of ongoing changes to retail trends and understanding of best practice in respect of reimagining town centres and high streets.
 - Suburban intensification – there could be merit to monitoring shifting character over time, with a view to avoiding cumulative impacts to townscape, landscape and the setting of heritage assets.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the SA scope?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1		What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2		What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3		What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to our report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available online.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented within Section 3 ('What's the scope of the SA').
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	Key issues highlighted through context and baseline review are also presented within Appendix II.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review and explains how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. With regards to explaining "how... considerations have been taken into account", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Partial Review as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents some specific recommendations, but more important is that the Council takes steps to address the predicted negative effects and tensions with sustainability objectives, balancing competing issues and objectives.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside the proposed / pre-submission version of the plan, in order to inform representations and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	An Interim SA Report was published for consultation as part of the Issues and Options consultation in 2019, and an SA Report was published alongside a full draft plan in 2022. These reports informed subsequent plan-making. This SA Report will be taken into account when finalising the plan post submission (as discussed in Section 10).

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27 March 2024	
REPORT TITLE:	PROPOSED PARKING CHARGE AMENDMENTS 2024 / 2025	
CORPORATE DIRECTOR / DIRECTOR:	NICK HIBBERD, CORPORATE DIRECTOR OF SUSTAINABLE COMMUNITIES, REGENERATION & ECONOMIC RECOVERY	
LEAD OFFICERS:	KAREN AGBABIAKA, DIRECTOR STREETS AND ENVIRONMENT JAYNE RUSBATCH, HEAD OF HIGHWAYS AND PARKING DAVID WAKELING, PARKING DESIGN MANAGER Email: david.wakeling@croydon.gov.uk Telephone: 020 8726 6000 Ext. 28444	
LEAD MEMBER:	CLLR SCOTT ROCHE, CABINET MEMBER FOR STREETS AND ENVIRONMENT	
KEY DECISION?	YES	FORWARD PLAN KEY DECISION REFERENCE NO.1323EM
CONTAINS EXEMPT INFORMATION?	NO	Public
WARDS AFFECTED:	ALL	

1 SUMMARY OF REPORT

- 1.1 The way that the council manages its parking and balances the competing uses of its limited roadside space is vitally important to the vibrancy and vitality of the town, district and local centres. The successful and safe movement of people and goods is critical to the borough including residents, businesses and our visitors. The Road Traffic Regulation Act 1984 gives the council power to introduce and operate parking schemes and give the opportunity for the public to engage with the council on proposals.
- 1.2 The Executive Mayor's Business Plan sets the main policy drivers for the new parking policy to be fair, supportive, transparent and efficient and the proposed amendments to the parking charges helps to meet these aims. The recommendations complement Croydon's New Parking Policy and the proposed new charges, which are subject to statutory consultation, are aimed at simplifying parking charges and recognising that vehicles are increasingly more efficient, whilst not penalising the cost of the less

efficient vehicles that may be more likely to be used by those that are less likely to be able to upgrade their vehicle.

- 1.3 This report is proposing changes to the existing emission bandings for parking permits and charged for parking as well as the introduction of some new parking charges. This compliments Croydon's new Parking Policy approved on 26 July 2023 that required the review of the current free short stay parking plus updating and simplifying the fees and charges. These proposals will undergo a statutory consultation process.
- 1.4 Retaining the one hour free parking arrangements in district and local centres and increasing the maximum stay to two hours, with a nominal fee for the second hour, supports the local economy ensuring the vitality of the borough.
- 1.5 The report seeks approval to commence statutory consultation where this is required for new parking charges.

2 RECOMMENDATIONS

- 2.1 For the reasons set out in the report and appendices, the Executive Mayor in Cabinet is recommended to:
- 2.2 Authorise officers to undertake statutory consultation on the proposed parking charges which include:
 - 2.2.1 To increase and retain the 1 hour free parking bays in district and local centres.
 - 2.2.2 To introduce a new 2 hour maximum stay for all 1 hour free parking bays with a nominal charge for customers that require longer parking.
 - 2.2.3 To increase to 1 hour the current 30 minute free parking arrangement in South End and Selsdon Road, South Croydon and London Road, West Croydon with new reduced fees for parking up to 2 hours so that all 1 hour free areas are consistent.
 - 2.2.4 For Central Parade Car Park, to extend the 30 minute free parking arrangement to 1 hour, matching the existing free parking arrangement in the Central Parade service road.
 - 2.2.5 To introduce a flat rate charge for on-street 12 hour maximum stay bays for parking events of more than 8 hours, reducing the current rates for long term parking.
 - 2.2.6 Reduction in the parking charges for West Croydon Station Car Park so that the charges of Town Centre Car Parks are consistent.
 - 2.2.7 New charges for parking permits as set out in Appendix A, with no increase in the resident permit charge for the highest band 5 charges, and increasing the charges for other bands, together with an adjustment of emission bandings, recognising the improved efficiency of vehicles.

2.2.8 New On-street and Off-street (car parks) parking charges as set out in Appendix B and C, with an adjustment to the emissions bandings to reflect the improved efficiency of vehicles:

- **Band 1** – emission vehicles (Electric Vehicles) – reduced discount from 90% to 25%
- **Band 2** – emission vehicles – reduced discount from 25% to 15% and amending the band from 1 to 185 grams/km CO₂ to 1 to 138 grams/km CO₂.
- **Band 3** – emission vehicles – no increase in the existing band 3 tariff and adjusting the band so that it commences for vehicles emitting more than 138 grams/km CO₂ in place of the current 185 grams/km.

2.2.9 Increase in operational hours in district centre car parks from 7am to 6pm, Monday to Saturday to a 24 hour operation (Monday to Saturday) with a nominal flat fee (£2.20 for band 3 with 25% and 15% discounts for band 1 and 2 respectively) for parking between 6pm and 7am.

2.2.10 Standardise the no-return period for on-street parking from 1 to 2 hours for all payment bays.

2.2.11 Review of the permit charges for Housing residents and contractors.

2.3 Delegate authority to the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery, in consultation with the Executive Mayor and Cabinet Member for Streets and Environment, to give public statutory notice of the above proposals and subject to receiving no objections, make the necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended).

2.4 In the event that objections are received, delegate authority to the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery in consultation with the Executive Mayor and Cabinet Member for Streets and Environment to consider the outcome of the consultation and determine whether Traffic Management Order/s under the Road Traffic Regulation Act 1984 (as amended) should be introduced.

2.5 Note that the proposals will be reported to the Scrutiny Streets and Environment Sub-Committee, this proposed to be at its upcoming meeting on 2 April 2024.

3. REASONS FOR RECOMMENDATIONS

3.1 As part of Croydon's New Parking Policy the council are reviewing parking fees and charges and parking permit products, simplifying the structures and improving the fairness of the charges. The updated fees and charges will be established in a way that simplifies the charging levels. This will help those parking with more transparent information to understand the charge rates and make more informed decisions about where, when and how long they park.

3.2 The recommendations complement Croydon's New Parking Policy and the proposed new charges, which are subject to statutory consultation requirements, are aimed at simplifying parking charges and recognising that vehicles are increasingly more

efficient, whilst not penalising the cost of the less efficient vehicles that may be more likely to be used by those that are less well of.

- 3.3 Retaining the 1 hour free parking arrangements in district and local centres and increasing the maximum stay to 2 hours, with a nominal fee for the second hour, supports the local economy ensuring the vitality of our districts and town centres.

4 DETAIL

- 4.1 This report recommends changes to existing fees, and the introduction of new fees and charges. Permit charges were last amended in April 2020 and on and off-street parking charges in January 2021.
- 4.2 Parking charges form a significant part of managing parking demand and are an integral part of the New Parking Policy for Croydon ensuring a balanced use of road space and ensuring the vitality of the Borough. The new policy aligns with the Executive Mayor's Business Plan in being fair, supportive, transparent and efficient in supporting residents and businesses whilst meeting the obligations of the air quality action plan. The council has a duty to undertake statutory consultation on changes to the parking charges and consider any objections.



- 4.3 The Council's authority to operate and set parking-related charges is defined by legislation. It is important to note that on-street parking charges cannot be set as a means to raise revenue and charges must have regard to the costs of administration and enforcement.

- 4.4 Permit and on-street parking charges can be set to ensure the council provides suitable and adequate parking facilities on the public highway, whilst ensuring this does not negatively effect traffic flow across the borough. The council is, therefore, able to set charges to manage demand and enable a more effective management of its kerbside for wider transport and environmental benefits.
- 4.5 The council's authority to operate and set parking-related charges is defined by legislation. It is important to note that on-street parking charges cannot be set as a means to raise revenue and charges must have regard to the costs of administration and enforcement.
- 4.6 Sections 45 and 46 of the Road Traffic Regulation Act 1984 (RTRA) provide the council with the power to manage parking by designating on-street parking places on the highway and charge for use of them and issue parking permits for a charge and restricting (or providing for) the use of such places by powers to designate parking places.
- 4.7 The setting of parking charges is a function which, like other functions under the RTRA, must be exercised in accordance with section 122 of the RTRA, to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway so far as practicable having regard to the following matters:
- the desirability of securing and maintaining reasonable access to premises.
 - the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
 - the strategy prepared under section 80 of the Environment Act 1995 (national air quality strategy)
 - the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
 - any other matters appearing to the council to be relevant.
- 4.8 When exercising this function, the council must have regard to the Mayor of London's Transport Strategy as provided by sections 142 and 144(1)(a) Greater London Authority Act 1999. The strategy emphasises the need to develop and implement policies for the promotion and encouragement of safe, integrated, efficient and economic transport facilities and services to, from and within Greater London. This includes meeting the needs of persons living or working in, or visiting, Greater London.
- 4.9 Section 55 of the Road Traffic Regulation Act 1984 defines how any surplus from civil parking enforcement must be spent. This includes the provision of public transport services, highway maintenance and improvements, and environmental projects.

Resident and Visitor Permits

- 4.10 There are currently considerable discounts for Electric Vehicles with annual residents permits costing only £6.50 compared to £104 for the majority of permit holders, which is below the London average. It is proposed to increase the electric vehicles permit charge to the London average for these vehicles at £34. This is still a significant discount on the cost of permits for internal combustion powered vehicles which have

remained the same for the last four years. It is proposed to increase band 2 to 4 resident permit charges by approximately 20%.

- 4.11 It is recognised that vehicles are becoming more efficient with a significant increase in electric vehicles and hybrids. Transaction figures for Croydon from RingGo show that between November 2022 and October 2023 the number of Electric Vehicles has almost doubled and overall, there was a reduction in the average emissions of 12%. It is likely that similar reductions in emissions have occurred with permits. It is proposed to reduce the emission bands to reflect this change and meet obligations under Section 122 of the Road Traffic Regulation Act 1984 including section 80 of the Environment Act 1995 (national air quality strategy). Some resident permit holders with vehicles falling into the 76 to 90 g/km CO₂ (band 2) will be subjected to a reduced permit fee (from £104 to £78) whilst those emitting between 131 and 165 g/km (band 4) will see an increase (from £104 to £175).
- 4.12 Currently the majority of resident's vehicles are in the 76 to 165 g/kmCO₂ band 3 charge and pay £104 per annum for a permit. It is proposed to increase the charge of the permit by 20% to £125 per annum and amend the band range to 91 to 130 g/km CO₂.
- 4.13 It is proposed to retain current permit charges for band 5 vehicles recognising the relatively high cost of this permit and the current cost of living pressures. It is also proposed to retain permit surcharge rates for:
- The second permit at the same address - £50
 - The third permit at the same address (renewals only) - £150
 - Non-Euro 6 compliant diesel vehicles that are registered before September 2015 - £50.
- 4.14 Resident Visitor Permits can be purchased by residents for their visitors, and these currently operate for half a day (4 hours for the majority of zones operating 9am to 5pm, Monday to Saturday). These operate on a Pay by Phone (RingGo) basis and match on and off-street bandings with band 1 being electric vehicles emitting less than 1 gram /kmCO₂, band 2 (1 to 185g/kmCO₂) and band 3 (more than 185 g/kmCO₂ and diesel engines that are registered before September 2015). District Centre visitor permits are charged at a lower rate than those purchased within the main Croydon CPZ reflecting the higher parking demand in the Croydon CPZ.
- 4.15 The current charges for visitor permits (4 hours for the majority of zones operating 9am to 5pm, Monday to Saturday) are 30p, £2 and £3 for the Central CPZ and 20p, £1.30 and £1.90 for the District CPZs – bands 1, 2 and 3 respectively. It is proposed to increase these charges to £2.25, £2.55 and £3 for the Central CPZ and £1.43, £1.62 and £1.90 for the District CPZs. The emission bandings for on and off-street parking charges are proposed to be in line with band 1 for electric vehicles, band 2 for vehicles emitting between 1 and 138g/km CO₂ and band 3, those vehicles emitting more than 138 g/km CO₂ and diesels registered before September 2015.

Business Permits

- 4.16 It is proposed to amend the business permit bandings to mirror the bandings for resident permits with band 1 (electric vehicles), band 2 (1 to 90g/km CO₂), band 3 (91 to 130g/km CO₂), band 4 (131 to 190g/km CO₂) and band 5 (>190g/km CO₂ and pre-September 2015 diesels). Charges are proposed to increase by 20% so the annual permit will increase from £50 to £60, £100 to £129, £400 to £480, £500 to £600 for bands 1 to 4 respectively and no change to the current band 5 charge of £750.
- 4.17 The surcharges for the second, third and fourth permits at the same business address are proposed to remain the same - £50, £150 and £500. Please note that the maximum number of permits is two for the Croydon CPZ and four for the district centre CPZs.
- 4.18 Business permits can also be obtained for 3 months with proposed charges shown in Appendix A.

Other Permits

- 4.19 Other permits include All Zone Permits for on and off-street parking, Doctors Bay permits, Community Care Parking Permits, Council Permits and Charity Permits. The CO₂ bandings have all been amended to mirror those for the proposed Business and Resident Permits and similar 20% increases are proposed in the cost of the permits except for Band 5 vehicles which are proposed to remain the same as the current fee.
- 4.20 Community Care Permits are only available to registered NHS Care Staff who use their vehicles for visiting patients throughout the Borough. Council Permits (formally Statutory Undertakers permits) are those council employees who use their vehicles to carry out site statutory duties for the council only. Charity Permits are issued to registered charities only at the discretion of Parking Services.
- 4.21 It is proposed to review charges for Housing residents and Housing contractors permits.
- 4.22 A list of permit charges with the current and proposed charges are outlined in Appendix A.

On and Off-street Parking Charges

- 4.23 The majority of parking charges in the Borough are in on-street parking bays which are mainly shared between permit holders and Pay & Display / Pay by Phone users. This maximises flexibility for drivers ensuring that there are opportunities for visitors and customers to local businesses whilst giving priority to resident permit holders. Charges are a necessity in meeting supply and demand so that in general roads and car parks where parking demand is high, there are higher charges and shorter parking duration than lower demand areas.
- 4.24 The council's new proposal offers a balanced approach for parking, taking into consideration all vehicle types, whilst still recognising the environmental impacts of vehicles, and retains the Emission-Based Parking Charges for on-street parking. With the changing vehicle fleet since 2019, we have seen the uptake of electric vehicles increase and as such we have reviewed the discount offer for this vehicle type, to ensure we are offering a discount regime that fairly reflects the vehicle fleet on the network.

- 4.25 As with permits it is proposed to amend the emission bands for on and off-street parking charges. Figures from RingGo pay by phone transactions in Croydon show that between November 2022 and October 2023 the number of electric vehicles using this method of payment has increased by 95% and the average emissions of vehicles reduced by 12% in the same period. These figures indicate a significant shift in the proportion of vehicles with lower emissions.
- 4.26 There are currently 3 bands for vehicles – Band 1 for electric vehicles, band 2 for vehicles emitting between 1 and 185g/km CO₂ and band 3 for those emitting more than 185 g/km CO₂ and for diesel vehicles registered before September 2015 (non-Euro 6 vehicles). It is proposed that the bandings will be reduced so that band 2 is for vehicles emitting between 1 and 138 g/km CO₂ and band 3 for vehicles emitting more than 138g/km CO₂.
- 4.27 It is proposed to reduce the current discount for band 1 and 2 vehicles. Currently there is a 90% discount for electric vehicles (band 1) and 25% for band 2 on the cost of parking on-street or in the car parks. It is proposed to reduce the discount from 90% to 25% and from 25% to 15% respectively. For example for a band 1 vehicle this will increase the cost of parking for one hour in an on-street Town Centre parking bay from 40p to £3, a band 2 vehicle from £3 to £3.40 with no change for band 3 vehicles at £4.
- 4.28 Currently most district centres and many local centres offer some free 1 hour maximum stay bays close to the businesses to ensure the viability of these centres. It is proposed to retain the 1 hour free period and introduce charged for parking for those customers who require to park for more than 1 hour up to a maximum of 2 hours. The proposed rates for parking of up to 1 hour 30 minutes and 2 hours maximum is proposed to be £1.20 and £2.40 respectively (band 3) with 25% and 15% discounts for band 1 and 2 vehicles respectively.
- 4.29 For consistency it is proposed to introduce the 1 hour free parking arrangements (and 2 hour maximum stay with the above proposed charges) in all current free areas including London Road, West Croydon and South End and Selsdon Road, South Croydon where there is currently 30 minute free parking and relatively high (£8 for 2 hour – band 3) charges.
- 4.30 The current free 30 minute period for parking in Central Parade Car Park, New Addington is also proposed to increase to 1 hour to match the parking bays in the service road.
- 4.31 Mobile parking (RingGo) has been in place since September 2014 as an alternative method of payment in both on and off-street parking and for Visitor Permits which are purchased by residents. The proportion of payments has increased significantly over the last few years and currently around 80% of parking sessions are now obtained using Pay by Phone rather than using cash or credit card at a Pay & Display machine. This has been led mainly through the discount that most drivers obtain.
- 4.32 Currently there is a linear tariff with a set rate for parking for each 30 minutes for on-street parking and 1 hour for off-street parking. For Croydon Town Centre car parks (which operate for 24 hours) there is a flat fee for parking durations in excess of 7 hours with a higher rate for parking for 24 hours. For District Centre car parks (which operate

between 7am and 6pm, Monday to Saturday) the maximum charge is reached for parking durations of 6 hours.

- 4.33 It is proposed to incorporate a similar maximum rate for on-street parking for long-term parking (12 hour maximum stay bays in the N2 and West Thornton Permit zones), which operate between 8am and 8pm. It is proposed that the maximum stay is reached at 8 hours so the same rate is paid for parking durations over 8 hours. This reduces the fees to a more acceptable level, in areas that are predominantly residential. Transaction figures show that 85% of parking events across the borough are for parking up to 8 hours.
- 4.34 Extending the operational hours of district car parks recognises the fact these are used during the evening and a nominal charge addresses potential supply and demand issues. It is proposed to extend the operational hours of District Centre Car Parks which currently operate between 7am and 6pm, Monday to Saturday to a 24 hour operation and fixed tariffs of £1.65, £1.87 and £2.20 for bands 1, 2 and 3 respectively for parking between 6pm and 7am the following morning. Sunday charges are to remain free.
- 4.35 Currently there is a discrepancy in the no return period – the length of time where drivers cannot return to the same parking place (set of parking bays) after leaving. There is a mixture of 1 and 2 hour no return periods and it is proposed to standardise this to 2 hours, which reduces the number of the same vehicles returning to bays once they have left. This gives the opportunity for increased turn-over of spaces with new customers enabling businesses to thrive.
- 4.36 Appendix B outlines the existing and proposed on and off-street parking charges.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1 The council has a statutory duty under the Traffic Management Act 2004 to manage road space and the expeditious movement of traffic.
- 5.2 No alternative options have been considered as the previous policy only covers the period 2019-2022 and without the proposed parking charges being in place, the council would be making decisions about parking in the absence of any cohesive framework which is aligned to our corporate priorities.
- 5.3 Please note that these proposals are subject to statutory consultation.

6 CONSULTATION

- 6.1 In accordance with Section 46 of the Road Traffic Regulation Act 1984 if the proposals within this report relating to any new parking charges, they will be required to be published in a local paper (Croydon Guardian) and London Gazette for a minimum of 3 weeks and that any objections to the proposals will be considered before a decision is made either to introduce the charges as advertised, amend or withdraw them.

6.2 To ensure transparency it is proposed to consult on the new parking charges which include:

- amendments to the emission-based charges for permits and on & off-street parking charges.
- Retaining the current one-hour free parking arrangements that are in most district and local centres and including an additional nominal charge for those wishing to park for up to 2 hours.
- Replacing 30-minute free parking arrangements in London Road, West Croydon, South End & Selsdon Road, South Croydon and the Central Parade car park, New Addington with one-hour free parking with a reduced charge the second hour in London Road, South End and Selsdon Road.
- Standardising the no return period at all on-street parking places within the borough to two hours from the time the vehicle leaves the parking place.
- To introduce a flat rate charge for on-street 12 hour maximum stay bays for parking events of more than 8 hours, reducing the current rates for long term parking.
- Reduction in the parking charges for West Croydon Station Car Park so that the charges of Town Centre Car Parks are consistent.
- Increase in operational hours in district centre car parks from 7am to 6pm, Monday to Saturday to a 24 hour operation (Monday to Saturday) with a nominal flat fee for parking between 6pm and 7am.

6.3 It is proposed that any objections to these proposals will be considered in delegated decision report in consultation with the Executive Mayor and Cabinet Member for Streets and Environment and, if approved, make the necessary Traffic Management Orders under the Road Traffic Regulation Act 1984 (as amended).

6.4 The proposed parking charges will be considered by Streets & Environment Scrutiny Sub-Committee on 2 April 2024. Recommendations from the committee will be considered in the delegated decision report that finalises the new tariffs. It is proposed that the new tariffs will be included in a made notice on 20 June with implementation from 1 July 2024.

7 CONTRIBUTION TO COUNCIL PRIORITIES

7.1 Providing the ability to pay for parking helps to manage the demand of parking especially in areas of parking stress and within Controlled Parking Zones give a higher priority for resident permit holders where non-permit holders are required to pay for parking and may be limited to a maximum stay.

7.2 The proposals to retain one-hour free parking and charged for parking for between 1 and 2 hours, with relatively low charges for most district and local centres, will help to

support the regeneration of the borough and meet the Mayor’s Business Plan objective of Croydon being a place of opportunity of business, earning and learning.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 The proposed parking charges support the Medium-Term Financial Strategy for the period 2024 to 2028 (2024-28 SAV SCRER 002).

8.1.2 Summary of report under consideration and the cumulative effect on budgets:

	Current Year	Medium Term Financial Strategy – 3 year forecast		
	2023/24 £'000	2024/25 £'000 (*)	2025/26 £'000 (*)	2026/27 (*)
Revenue Budget Available				
Expenditure	0	0	0	0
Income	(10,507)	(10,507)	(11,458)	(11,458)
Effect of decision from report				
Expenditure	15	0	0	0
Income	0	(951)	0	0
Adjusted Budget				
Expenditure	0	0	0	0
Income	(10,507)	(11,458)	(11,458)	(11,458)
Capital Budget available				
Expenditure	0	0	0	0
Income	0	0	0	0
Effect of decision from report				

Expenditure	0	0	0	0
Income	0	0	0	0
Adjusted Budget	0	0	0	0

8.1.3 Revenue and Capital consequences of report recommendation

The cost of advertising the Traffic Management Order for the new parking charges has been estimated at £15k. This cost can be contained within the available revenue budget.

8.1.4 The effect of the decision

Should the proposal be agreed then this will align the budgets to the Medium-Term Financial Strategy for the period 2024 to 2028 (2024-28 SAV SCRER 002).

8.1.5 Risks

As parking activities be that P&D or Permitted Parking are a subject to demand the associated budget for Fees and Charges are only an indicative projected figure and may fluctuate from these original projections.

8.1.6 Future savings/efficiencies

Although not currently projected there may be future savings / Income derived from the proposed change in Fees and Charges which would be dependent on the demand for those particular activities.

8.1.7 Comments approved by Darrell Jones, Acting Head of Finance SCRER, on behalf of the Director of Finance and S151 Officer Investment & Risk. 29 February 2024.

8.2 LEGAL IMPLICATIONS

8.2.1 Sections 6, 45, 46, 46A, 47, 49, 124, Schedule 1 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.

8.2.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure) (England and Wales) Regulations 1996 (the 1996 Regulations). The 1996 Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to and considered by the decision maker before the Order is made.

- 8.3.3 By virtue of Section 122(1) of the RTRA, the Council must exercise its powers under that Act, including in relation to charging for parking, so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. Decisions by the Courts show that this duty needs to be balanced in substance against the factors which may point in favour of imposing a restriction on that movement specified in Section 122(2). Broadly, these factors are, the desirability of securing and maintaining reasonable access to premises, the effect on the amenities of any locality affected, including the importance of regulating and restricting heavy commercial vehicles, the national air quality strategy, the importance of facilitating public service vehicles, the safety and convenience of people using or wanting to use such vehicles, and any other matters appearing to the authority to be relevant.
- 8.2.4 The Council must have proper regard to the matters set out at Section 122(1) and (2) and specifically document its analysis of all relevant Section 122 considerations when reaching any decision.
- 8.2.5 It should be noted that the Courts have been clear that the Road Traffic Regulation Act 1984 is not a fiscal measure and does not authorise a local authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.
- 8.2.6 When designating and charging for parking places the authority should be governed solely by the section 122 purposes. Charging may be justified provided it is aimed at the fulfilment of the statutory purposes which are identified in section 122 (broadly referred to as “traffic management purposes”). Such purposes may include but are not limited to, the cost of provision of on-street and off-street parking, the cost of enforcement, the need to “restrain” competition for on-street parking, encouraging vehicles off-street, securing an appropriate balance between different classes of vehicles and users, and selecting charges which reflect periods of high demand. What the authority may not do is introduce charging and charging levels for the purpose, primary or secondary, of raising section 55(4) revenue.
- 8.2.4 Comments approved by — Head of Litigation & Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (19/03/2024)

8.3 EQUALITIES IMPLICATIONS

- 8.3.1 Under the Public Sector Equality Duty (PSED) of Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken. This includes any decisions relating to how authorities act as employers; how they develop, evaluate and review policies; how they design, deliver and evaluate services, and also how they commission and procure services from others.
- 8.3.2 Section 149 of the Act requires public bodies to have due regard to the need to:
- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act.
 - Advance equality of opportunity between people who share a protected characteristic

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

8.3.3 An equality analysis was undertaken and identified an adverse impact for some older people and some disabled people and introducing a Pay Point option for those that do not have mobile phones or wish to pay for parking using cash. Pay Point has been used for the recent trials and has proven to be a viable alternative, depending on the location of these businesses to the parking bays, although only used by a very small proportion of users.

8.3.4 Approved by: Helen Reeves – Head of Strategy and Policy (18/03/2024).

8.4 HUMAN RESOURCES IMPACT

8.4.1 There are no immediate human resource implications arising from this report. However, if any HR issues arise these will be managed under the council's corporate HR policies and procedures.

8.4.2 Approved by: Dean Shoesmith, Chief People Officer. (6/3/2024)

8 APPENDICES

9.1 Appendix A Existing and proposed parking permit charges.

9.2 Appendix B Existing and proposed on-street parking charges.

9.3 Appendix C Existing and proposed off-street (car park) parking charges.

9.4 Appendix D: Figure 1 – Controlled Parking Zones
Figure 2 – Free parking in district and local centres
Figure 3 – Council Car Parks

9 BACKGROUND DOCUMENTS

10.1 None

APPENDIX A – Permit Charges

(Please also see Appendix D, figure 1 - Controlled Parking Zones)

APPENDIX A – Permit Charges

Residents parking permits (annual, 12 months)

Charge Band	Existing CO2 emission (g/km)	Existing charge	Proposed CO2 emission (g/km)	Proposed new charge
Band 1	<1	£6.50	<1	£34
Band 2	1 – 75	£65	1 – 90	£78
Band 3	76 – 165	£104	91 – 130	£125
Band 4	166 – 225	£146	131 – 190	£175
Band 5	>225	£300	>190	£300
Vehicles registered Before March 2001	>1601cc	£300		£300
	<1601cc	£150		£150

Surcharge for a second permit at the same address, whatever the charging band.	£50
Surcharge for a third permit at the same address, whatever the charging band. [note*]	£150

Implemented on a renewal basis. First time permit admin fee applies.

* The third residents permit is no longer available for new permit applications. The third permit is available on a renewal basis only.

Resident's visitor permit (half day) for inner zones (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones)

Charge Band	Existing CO2 emission (g/km)	Existing charge	Proposed CO2 emission (g/km)	Proposed new charge
Band 1	<1	£0.30	<1	£2.25
Band 2	1 – 185	£2.00	1 – 138	£2.55
Band 3	>185	£3.00	>138	£3.00
Vehicles registered before March 2001		£3.00		£3.00

Resident's visitor permit, (half day) for outer zones (i.e. all permit zones within Croydon not listed above)

Charge Band	Existing CO2 emission (g/km)	Existing charge	Proposed CO2 emission (g/km)	Proposed new charge
Band 1	<1	£0.20	<1	£1.43
Band 2	1 – 185	£1.30	1 – 138	£1.62
Band 3	>185	£1.90	>138	£1.90
Vehicles registered before March 2001		£1.90		£1.90

* Diesel surcharge also applies.

Business parking permits (annual, 12 months)

Charge Band	Existing CO2 emission (g/km)	Existing charge	Proposed CO2 emission (g/km)	Proposed new charge
Band 1	<1	£50	<1	£130
Band 2	1 – 75	£100	1 – 90	£300
Band 3	76 – 165	£400	91 – 130	£480
Band 4	166 – 225	£500	131 – 190	£600
Band 5	>225	£750	>190	£750
Vehicles registered before March 2001		£750		£750

Surcharge for a second permit at the same address, whatever the charging band.	£50	£50
Surcharge for a third permit at the same address, whatever the charging band. [note*]	£150	£150
Surcharge for a fourth permit at the same address, whatever the charging band. [note*]	£500	£500

Implemented on renewal basis. First time permit admin fee applies.

* The third and fourth business permits are not available at addresses within the Croydon Central CPZ (i.e. the North, N1, South, East Outer, East Inner, E2 and West permit zones).

Business parking permits (quarterly, 3 months)

(Proposed to withdraw this permit)

Diesel surcharge on parking permits

Date diesel vehicle registered	surcharge (1/2 day)	surcharge (3 months)	surcharge (6 months)	surcharge (12 months)
From September 2015	Nil	Nil	Nil	Nil
Before September 2015	£0.50	£16	£30	£50

The diesel surcharge is applied to any permit type, new application or renewal, whatever the charging band and in addition to any other surcharges already being applied.

All Zones on and off-street parking permit (annual, 12 months)

Charge Band	Existing CO2 emission (g/km)	Existing charge	Proposed CO2 emission (g/km)	Proposed new charge
Band 1	<1	£100	<1	£325
Band 2	1 – 75	£300	1 – 90	£750
Band 3	76 – 165	£1000	91 – 130	£1200
Band 4	166 – 225	£1300	131 – 190	£1460
Band 5	>225	£1600	>190	£1600
Vehicles registered Before March 2001		£1600		£1600

First time permit admin fee applies. Diesel surcharge applies.

All Zones on and off-street parking permit (half year, 6 months)

Charge Band	Existing CO2 emission (g/km)	Existing charge	Proposed CO2 emission (g/km)	Proposed new charge
Band 1	<1	£60	<1	£195
Band 2	1 – 75	£180	1 – 90	£450
Band 3	76 – 165	£600	91 – 130	£720
Band 4	166 – 225	£780	131 – 190	£936
Band 5	>225	£960	>191	£960
Vehicles registered Before March 2001		£960		£960

First time permit admin fee applies. Diesel surcharge applies.

Doctor's bay parking permit, (annual, 12 months)

Charge Band	Existing CO2 emission (g/km)	Existing charge Initial Permit	Existing charge Additional Permit *	Proposed CO2 emission (g/km)	Proposed new charge Initial Permit	Proposed new charge Additional Permit *
Band 1	<1	£60	£6	<1	£195	£19.50
Band 2	1 – 75	£180	£18	1 – 90	£450	£45
Band 3	76 – 165	£600	£60	91 – 130	£720	£72
Band 4	166 – 225	£780	£78	131 – 190	£936	£93.60
Band 5	>225	£960	£96	>190	£960	£96
Vehicles registered Before March 2001		£960	£96		£960	£96

Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

* Additional Doctors permit for the same doctors parking bay(s).

Community Care parking permit (annual)

Charge Band	Existing CO2 emission (g/km)	Existing charge *(6 months)	Proposed CO2 emission (g/km)	Proposed new charge *(12months)
Band 1	<1	£30	<1	£195
Band 2	1 – 75	£90	1 – 90	£450
Band 3	76 – 165	£300	91 – 130	£720
Band 4	166 – 225	£390	131 – 190	£936
Band 5	>225	£480	>190	£960
Vehicles registered Before March 2001		£480		£960

First time permit admin fee applies. Diesel surcharge applies.

Community Care parking permit (6 months)

Charge Band	Existing CO2 emission (g/km)	Existing charge (6 months)	Proposed CO2 emission (g/km)	Proposed new charge (6 months)
Band 1	<1	£30	<1	£98
Band 2	1 – 75	£90	1 – 90	£225
Band 3	76 – 165	£300	91 – 130	£360
Band 4	166 – 225	£390	131 – 190	£468
Band 5	>225	£480	>190	£480
Vehicles registered Before March 2001		£480		£480

Council (formally Statutory Undertaker) parking permit (annual, 12 months)

Charge Band	Existing CO2 emission (g/km)	Existing charge	Proposed CO2 emission (g/km)	Proposed new charge
Band 1	<1	£60	<1	£195
Band 2	1 – 75	£180	1 – 90	£450
Band 3	76 – 165	£600	91 – 130	£720
Band 4	166 – 225	£780	131 – 190	£936
Band 5	>225	£960	>190	£960
Vehicles registered Before March 2001		£960		£960

Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Charity parking permit (annual, 12 months)

Charge Band	Existing CO2 emission (g/km)	Existing charge	Proposed CO2 emission (g/km)	Proposed new charge
Band 1	<1	£10	<1	£28
Band 2	1 – 75	£25	1 – 90	£64
Band 3	76 – 165	£85	91 – 130	£102
Band 4	166 – 225	£105	131 – 190	£126
Band 5	>225	£160	>190	£160
Vehicles registered Before March 2001		£160		£160

Implemented on a renewal basis. First time permit admin fee applies. Diesel surcharge applies.

Car Park Season Tickets / Permits

Town Centre Car Parks			Proposed new charges				
			Charge Band - CO2 emission (g/km)				
		Existing Charge	Band 1	Band 2	Band 3	Band 4	Band 5
			<1	1–90	91–130	131–190	>190
Res. Pass* Factory Lane	12 months	£400.00	£130.00	£300.00	£480.00	£600.00	£750.00
Jubilee Bridge Season Ticket	12 months	£700.00	£228.00	£525.00	£840.00	£1050.00	£1313.00
Jubilee Bridge^ Residents permit	12 months	£15	£5	£11	£18	£23	£28
Spices Yard Season Ticket	12 months	£920.00	£299.00	£690.00	£1,104.00	£1380.00	£1,660.00

* renewals only, no longer available (legacy arrangement)

^ Bourne Streets and Lower Church Road residents only

District Centre Car Parks			Proposed new charges				
			Charge Band - CO2 emission (g/km)				
		Existing Charge	Band 1	Band 2	Band 3	Band 4	Band 5
			<1	1–90	91–130	131–190	>190
Central Parade Season Ticket	12 months	£500	£163.00	£375.00	£600.00	£750.00	£938.00
Central Parade Traders Permit	All day	£80	£26.00	£60.00	£96.00	£120.00	£150.00
Clifford Rd evening permit*	12 month	£60.00	£20.00	£45.00	£72.00	£90.00	£113.00
Garnet Road Season Ticket	12 month	£420.00	£140.00	£315.00	£504.00	£630.00	£758.00
Granville Gdns Season Ticket	12 month	£420.00	£140.00	£315.00	£504.00	£630.00	£758.00
Purley MSCP Season Tickets	1 month	£65.00	£21.00	£49.00	£78.00	£98.00	£122.00
	3 month	£180.00	£59.00	£135.00	£216.00	£270.00	£338.00
	12 month	£600.00	£195.00	£450.00	£720.00	£900.00	£1126.00
Sanderstead Rd Permit ^	12 month	£290.00	£95.00	£218.00	£348.00	£435.00	£544.00

* For Poets Court residents only Evening Permit - 7 max, 5pm to 9am, Monday to Sunday

^ For Vantage Point residents only – 10 max

Ad Hoc Permits

	Existing charge	Proposed new charge
Temporary 6 week resident permit	£12	£15
6pm to midnight + Sunday permit	£15	£18
Companion Badge	£33	£36

APPENDIX B – On-Street Parking Charges

(Please also see Appendix D, figure 1 & 2 - Controlled Parking Zones)

APPENDIX B – On-Street Parking Charges (refer to figure 1 – Appendix D)

Croydon CPZs, 2-hour max stay bays

in London Road (West Croydon Station to Sumner Rd) South End and Selsdon Road, South Croydon and Brighton Road (between Baines Close and Upland Road)

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat 9am - 5pm	30min	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
	1hr	£0.40	£3.00	£4.00	£0.00	£0.00	£0.00
	1hr 30min	£0.60	£4.50	£6.00	£0.90	£1.02	£1.20
	2hrs	£0.80	£6.00	£8.00	£1.80	£2.04	£2.40
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Croydon CPZs, 2-hour max stay bays

(in the Central, East Inner, East Outer & West CPZs)

Note: Sunday & evening charges apply in Central CPZ only.

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hours	30min	£0.20	£1.50	£2.00	£1.50	£1.70	£2.00
	1hr	£0.40	£3.00	£4.00	£3.00	£3.40	£4.00
	1hr 30min	£0.60	£4.50	£6.00	£4.50	£5.10	£6.00
	2hrs	£0.80	£6.00	£8.00	£6.00	£6.80	£8.00
Sunday	1hr	£0.23	£1.73	£2.30	£1.65	£1.87	£2.20
	All day	£0.56	£4.20	£5.60	£4.20	£4.76	£5.60
6pm - Midnight Mon – Sun	1hr	£0.22	£1.65	£2.20	£1.65	£1.87	£2.20
	All night	£0.56	£4.20	£5.60	£4.20	£4.76	£5.60

Croydon CPZs 4-hour max stay bays

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hours	30min	£0.15	£1.13	£1.50	£1.13	£1.28	£1.50
	1hr	£0.30	£2.25	£3.00	£2.25	£2.55	£3.00
	1hr 30min	£0.45	£3.38	£4.50	£3.38	£3.83	£4.50
	2hrs	£0.60	£4.50	£6.00	£4.50	£5.10	£6.00
	2hr 30min	£0.75	£5.63	£7.50	£5.63	£6.38	£7.50
	3hrs	£0.90	£6.75	£9.00	£6.75	£7.65	£9.00
	3hr 30min	£1.05	£7.88	£10.50	£7.88	£8.93	£10.50
	4hrs	£1.20	£9.00	£12.00	£9.00	£10.20	£12.00
Sunday	1hr	£0.22	£1.65	£2.20	£1.65	£1.87	£2.20
	All day	£0.56	£4.20	£5.60	£4.20	£4.76	£5.60
6pm - Midnight Mon – Sun	1hr	£0.22	£1.65	£2.20	£1.65	£1.87	£2.20
	All night	£0.56	£4.20	£5.60	£4.20	£4.76	£5.60

Croydon CPZs, 8-hour max stay standard charge bays

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hrs	30min	£0.07	£0.53	£0.70	£0.53	£0.60	£0.70
	1hr	£0.14	£1.05	£1.40	£1.05	£1.19	£1.40
	1hr 30min	£0.21	£1.58	£2.10	£1.58	£1.79	£2.10
	2hrs	£0.28	£2.10	£2.80	£2.10	£2.38	£2.80
	2hr 30min	£0.35	£2.63	£3.50	£2.63	£2.98	£3.50
	3hrs	£0.42	£3.15	£4.20	£3.15	£3.57	£4.20
	3hr 30min	£0.49	£3.68	£4.90	£3.68	£4.17	£4.90
	4hrs	£0.56	£4.20	£5.60	£4.20	£4.76	£5.60
	4hr 30min	£0.63	£4.73	£6.30	£4.73	£5.36	£6.30
	5hrs	£0.70	£5.25	£7.00	£5.25	£5.95	£7.00
	5hr 30min	£0.77	£5.78	£7.70	£5.78	£6.55	£7.70
	6hrs	£0.84	£6.30	£8.40	£6.30	£7.14	£8.40
	6hr 30min	£0.91	£6.83	£9.10	£6.83	£7.74	£9.10
	7hrs	£0.98	£7.35	£9.80	£7.35	£8.33	£9.80
	7hr 30min	£1.05	£7.88	£10.50	£7.88	£8.93	£10.50
	8hrs	£1.12	£8.40	£11.20	£8.40	£9.52	£11.20
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Croydon CPZs, 8-hour max stay premium charge bays

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hrs	30min	£0.10	£0.75	£1.00	£0.75	£0.85	£1.00
	1hr	£0.20	£1.50	£2.00	£1.50	£1.70	£2.00
	1hr 30min	£0.30	£2.25	£3.00	£2.25	£2.55	£3.00
	2hrs	£0.40	£3.00	£4.00	£3.00	£3.40	£4.00
	2hr 30min	£0.50	£3.75	£5.00	£3.75	£4.25	£5.00
	3hrs	£0.60	£4.50	£6.00	£4.50	£5.10	£6.00
	3hr 30min	£0.70	£5.25	£7.00	£5.25	£5.95	£7.00
	4hrs	£0.80	£6.00	£8.00	£6.00	£6.80	£8.00
	4hr 30min	£0.90	£6.75	£9.00	£6.75	£7.65	£9.00
	5hrs	£1.00	£7.50	£10.00	£7.50	£8.50	£10.00
	5hr 30min	£1.10	£8.25	£11.00	£8.25	£9.35	£11.00
	6hrs	£1.20	£9.00	£12.00	£9.00	£10.20	£12.00
	6hr 30min	£1.30	£9.75	£13.00	£9.75	£11.05	£13.00
	7hrs	£1.40	£10.50	£14.00	£10.50	£11.90	£14.00
	7hr 30min	£1.50	£11.25	£15.00	£11.25	£12.75	£15.00
	8hrs	£1.60	£12.00	£16.00	£12.00	£13.60	£16.00
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Croydon CPZs, 12-hour max stay bays
(in the North, N2 and West Thornton CPZs)

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hours	30min	£0.10	£0.75	£1.00	£0.75	£0.85	£1.00
	1hr	£0.20	£1.50	£2.00	£1.50	£1.70	£2.00
	1hr 30min	£0.30	£2.25	£3.00	£2.25	£2.55	£3.00
	2hrs	£0.40	£3.00	£4.00	£3.00	£3.40	£4.00
	2hr 30min	£0.50	£3.75	£5.00	£3.75	£4.25	£5.00
	3hrs	£0.60	£4.50	£6.00	£4.50	£5.10	£6.00
	3hr 30min	£0.70	£5.25	£7.00	£5.25	£5.95	£7.00
	4hrs	£0.80	£6.00	£8.00	£6.00	£6.80	£8.00
	4hr 30min	£0.90	£6.75	£9.00	£6.75	£7.65	£9.00
	5hrs	£1.00	£7.50	£10.00	£7.50	£8.50	£10.00
	5hr 30min	£1.10	£8.25	£11.00	£8.25	£9.35	£11.00
	6hrs	£1.20	£9.00	£12.00	£9.00	£10.20	£12.00
	6hr 30min	£1.30	£9.75	£13.00	£9.75	£11.05	£13.00
	7hrs	£1.40	£10.50	£14.00	£10.50	£11.90	£14.00
	7hr 30min	£1.50	£11.25	£15.00	£11.25	£12.75	£15.00
	8hrs	£1.60	£12.00	£16.00	£12.00	£13.60	£16.00
	8hr 30min	£1.70	£12.75	£17.00	£12.00	£13.60	£16.00
	9hrs	£1.80	£13.50	£18.00	£12.00	£13.60	£16.00
	9hr 30min	£1.90	£14.25	£19.00	£12.00	£13.60	£16.00
	10hrs	£2.00	£15.00	£20.00	£12.00	£13.60	£16.00
10hr 30min	£2.10	£15.75	£21.00	£12.00	£13.60	£16.00	
11hrs	£2.20	£16.50	£22.00	£12.00	£13.60	£16.00	
11hr 30min	£2.30	£17.25	£23.00	£12.00	£13.60	£16.00	
12hrs	£2.40	£18.00	£24.00	£12.00	£13.60	£16.00	
Sunday	1hr	£0.22	£1.65	£2.20	£1.50	£1.70	£2.00
	All day	£0.56	£4.20	£12.75	£4.20	£4.76	£5.60

District CPZ, 2-hour max stay bays

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hrs	30min	£0.12	£0.90	£1.20	£0.90	£1.02	£1.20
	1hr	£0.24	£1.80	£2.40	£1.80	£2.04	£2.40
	1hr 30min	£0.36	£2.70	£3.60	£2.70	£3.06	£3.60
	2hrs	£0.48	£3.60	£4.80	£3.60	£4.08	£4.80
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

District CPZ, 4-hour max stay bays

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hours	30min	£0.10	£0.75	£1.00	£0.75	£0.85	£1.00
	1hr	£0.20	£1.50	£2.00	£1.50	£1.70	£2.00
	1hr 30min	£0.30	£2.25	£3.00	£2.25	£2.55	£3.00
	2hrs	£0.40	£3.00	£4.00	£3.00	£3.40	£4.00
	2hr 30min	£0.50	£3.75	£5.00	£3.75	£4.25	£5.00
	3hrs	£0.60	£4.50	£6.00	£4.50	£5.10	£6.00
	3hr 30min	£0.70	£5.25	£7.00	£5.25	£5.95	£7.00
	4hrs	£0.80	£6.00	£8.00	£6.00	£6.80	£8.00
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

District CPZs, 8-hour max stay bays

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hours	30min	£0.07	£0.53	£0.70	£0.53	£0.60	£0.70
	1hr	£0.14	£1.05	£1.40	£1.05	£1.19	£1.40
	1hr 30min	£0.21	£1.58	£2.10	£1.58	£1.79	£2.10
	2hrs	£0.28	£2.10	£2.80	£2.10	£2.38	£2.80
	2hr 30min	£0.35	£2.63	£3.50	£2.63	£2.98	£3.50
	3hrs	£0.42	£3.15	£4.20	£3.15	£3.57	£4.20
	3hr 30min	£0.49	£3.68	£4.90	£3.68	£4.17	£4.90
	4hrs	£0.56	£4.20	£5.60	£4.20	£4.76	£5.60
	4hr 30min	£0.63	£4.73	£6.30	£4.73	£5.36	£6.30
	5hrs	£0.70	£5.25	£7.00	£5.25	£5.95	£7.00
	5hr 30min	£0.77	£5.78	£7.70	£5.78	£6.55	£7.70
	6hrs	£0.84	£6.30	£8.40	£6.30	£7.14	£8.40
	6hr 30min	£0.91	£6.83	£9.10	£6.83	£7.74	£9.10
	7hrs	£0.98	£7.35	£9.80	£7.35	£8.33	£9.80
	7hr 30min	£1.05	£7.88	£10.50	£7.88	£8.93	£10.50
8hrs	£1.12	£8.40	£11.20	£8.40	£9.52	£11.20	
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Existing 1 Hour free parking bays – Proposed to increase to 2 hours

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat During CPZ hrs	30min	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
	1hr	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
	1hr 30min	n/a	n/a	n/a	£0.90	£1.02	£1.20
	2hrs	n/a	n/a	n/a	£1.80	£2.04	£2.40
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

APPENDIX C – Council Car Park Charges

(Please also see Appendix D, figure 3 – Council Car Parks)

APPENDIX C – Council Car Park Charges

Croydon Town Centre Car Parks

East Croydon Station

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sun 7am - 6pm	15min	£0.09	£0.68	£0.90	£0.68	£0.77	£0.90
	30min	£0.18	£1.35	£1.80	£1.35	£1.53	£1.80

Factory Lane, Jubilee Bridge, Spices Yard, Wandle Road Surface and Fairfield Halls

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat	1hr	£0.23	£1.73	£2.30	£1.73	£1.96	£2.30
	2hrs	£0.46	£3.45	£4.60	£3.45	£3.91	£4.60
	3hrs	£0.69	£5.18	£6.90	£5.18	£5.87	£6.90
	4hrs	£0.92	£6.90	£9.20	£6.90	£7.82	£9.20
	5hrs	£1.15	£8.63	£11.50	£8.63	£9.78	£11.50
	6hrs	£1.38	£10.35	£13.80	£10.35	£11.73	£13.80
	7hrs	£1.61	£12.08	£16.10	£12.08	£13.69	£16.10
	24hrs	£1.84	£13.80	£18.40	£13.80	£15.64	£18.40
Evening 6pm - 7am	1hr	£0.22	£1.65	£2.20	£1.65	£1.87	£2.20
	All night	£0.56	£4.20	£5.60	£4.20	£4.76	£5.60
Motorcycles	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

West Croydon (Station)

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sun	1hr	£0.22	£1.65	£2.80	£1.73	£1.96	£2.30
	2hrs	£0.44	£3.30	£5.60	£3.45	£3.91	£4.60
	3hrs	£0.66	£4.95	£8.40	£5.18	£5.87	£6.90
	4hrs	£0.88	£6.60	£11.20	£6.90	£7.82	£9.20
	5hrs	£1.10	£8.25	£14.00	£8.63	£9.78	£11.50
	6hrs	£1.32	£9.90	£16.80	£10.35	£11.73	£13.80
	7hrs	£1.54	£11.55	£19.60	£12.08	£13.69	£16.10
	24hrs	£1.76	£13.20	£22.40	£13.80	£15.64	£18.40
Evening 6pm - 7am	1hr	£0.22	£1.65	£2.20	£1.65	£1.87	£2.20
	All night	£0.56	£4.20	£5.60	£4.20	£4.76	£5.60
Motorcycles	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

District Centres Car Parks

Clifford Road (South Norwood), Garnet Road (Thornton Heath), Granville Gardens (Norbury), Lion Green Road (Coulston), Purley MSCP, Russell Hill Place (Purley), Sanderstead Road

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat 7am - 6pm	30min	£0.00	£0.00	£0.00	n/a	n/a	£0.00
	1hrs	£0.15	£1.13	£1.50	£1.13	£1.28	£1.50
	2hrs	£0.18	£2.25	£3.00	£2.25	£2.55	£3.00
	3hrs	£0.27	£3.38	£4.50	£6.00	£7.50	£4.50
	4hrs	£0.36	£4.50	£6.00	£4.50	£5.10	£6.00
	5hrs	£0.45	£5.63	£7.50	£5.63	£6.38	£7.50
	6hrs	£0.54	£6.75	£9.00	£6.75	£7.65	£9.00
Evening 6pm to 7am	Flat rate	n/a	n/a	n/a	£1.65	£1.87	£2.20
	Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00
Motorcycles	All night	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Central Parade (New Addington) Car Park

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat 7am - 6pm	30min	£0.00	£0.00	£0.00	n/a	n/a	£0.00
	1hrs	£0.15	£1.13	£1.50	£0.00	£0.00	£0.00
	2hrs	£0.18	£2.25	£3.00	£2.25	£2.55	£3.00
	3hrs	£0.27	£3.38	£4.50	£6.00	£7.50	£4.50
	4hrs	£0.36	£4.50	£6.00	£4.50	£5.10	£6.00
	5hrs	£0.45	£5.63	£7.50	£5.63	£6.38	£7.50
	6hrs	£0.54	£6.75	£9.00	£6.75	£7.65	£9.00
Evening 6pm to 7am	Flat rate	n/a	n/a	n/a	£1.65	£1.87	£2.20
	Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00
Motorcycles	All night	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

**Croydon Adult Learning and Training (CALAT) Centre Car Park, Chipstead
Valley Road, Coulsdon**

		Existing charges			Proposed New charges		
Tariff	Duration	Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat 7am - 6pm	1hr	£0.15	£1.13	£1.50	£1.13	£1.28	£1.50
	2hrs	£0.30	£2.25	£3.00	£2.25	£2.55	£3.00
	3hrs	£0.45	£3.38	£4.50	£3.38	£3.83	£4.50
	4hrs	£0.60	£4.50	£6.00	£4.50	£5.10	£6.00
	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Reedham Station

		Existing charges			Proposed New charges		
Tariff	Duration	Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sun	24 hrs	£0.53	£3.98	£5.30	£3.98	£4.51	£5.30
Motorcycles	24hrs	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Waddon Leisure Centre

		Existing charges			Proposed New charges		
Tariff	Duration	Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sun 7am - 10pm	1hr	£0.15	£1.13	£1.50	£1.13	£1.28	£1.50
	2hrs	£0.30	£2.25	£3.00	£2.25	£2.55	£3.00
	3hrs	£0.45	£3.38	£4.50	£3.38	£3.83	£4.50
	4hrs	£0.60	£4.50	£6.00	£4.50	£5.10	£6.00
	5hrs	£0.75	£5.63	£7.50	£5.63	£6.38	£7.50
	6hrs	£0.90	£6.75	£9.00	£6.75	£7.65	£9.00
	7hrs	£1.05	£7.88	£10.50	£7.88	£8.93	£10.50
	15hrs	£1.20	£9.00	£12.00	£9.00	£10.20	£12.00
Motorcycles	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Station Approach, Sanderstead

		Existing charges			Proposed New charges		
Tariff	Duration	Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat 9am - 5pm	30min	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
	1hr	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
	1hr 30min	n/a	n/a	n/a	£0.90	£1.02	£1.20
	2hrs	n/a	n/a	n/a	£1.80	£2.04	£2.40
Sunday	All day	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00

Drovers Road and Duppas Hill Terrace

Tariff	Duration	Existing charges			Proposed New charges		
		Band 1	Band 2	Band 3	Band 1	Band 2	Band 3
Mon – Sat 9am - 5pm	30min	£0.15	£1.13	£1.50	£1.13	£1.28	£1.50
	1hr	£0.30	£2.25	£3.00	£2.25	£2.55	£3.00
	1hr 30min	£0.45	£3.38	£4.50	£3.38	£3.83	£4.50
	2hrs	£0.60	£4.50	£6.00	£4.50	£5.10	£6.00
	2hr 30min	£0.75	£5.63	£7.50	£5.63	£6.38	£7.50
	3hrs	£0.90	£6.75	£9.00	£6.75	£7.65	£9.00
	3hr 30min	£1.05	£7.88	£10.50	£7.88	£8.93	£10.50
	4hrs	£1.20	£9.00	£12.00	£9.00	£10.20	£12.00

APPENDIX D – MAPS

Figure 1 – Controlled Parking Zone

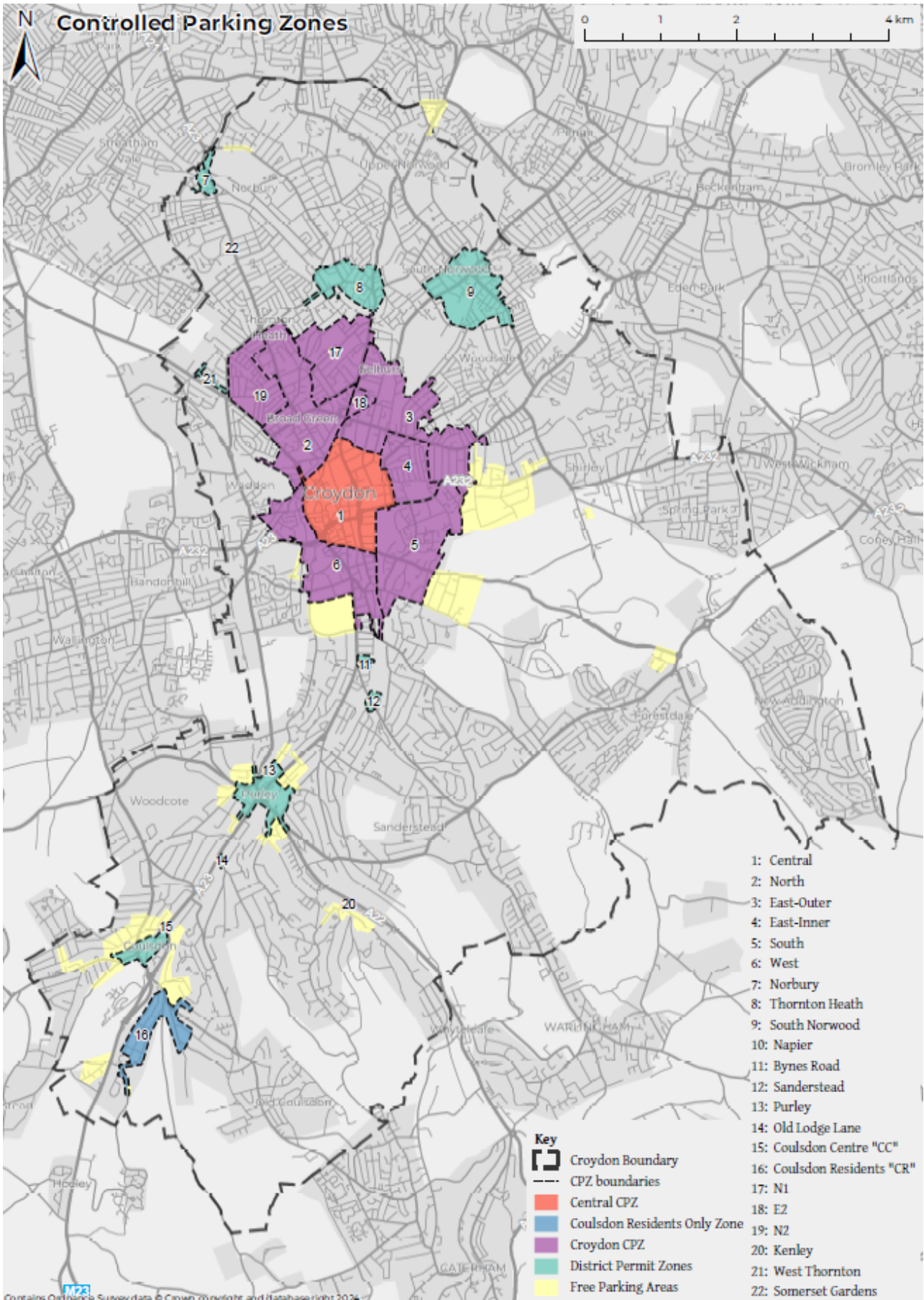


Figure 2 – Free 1 hour parking in district and local centres

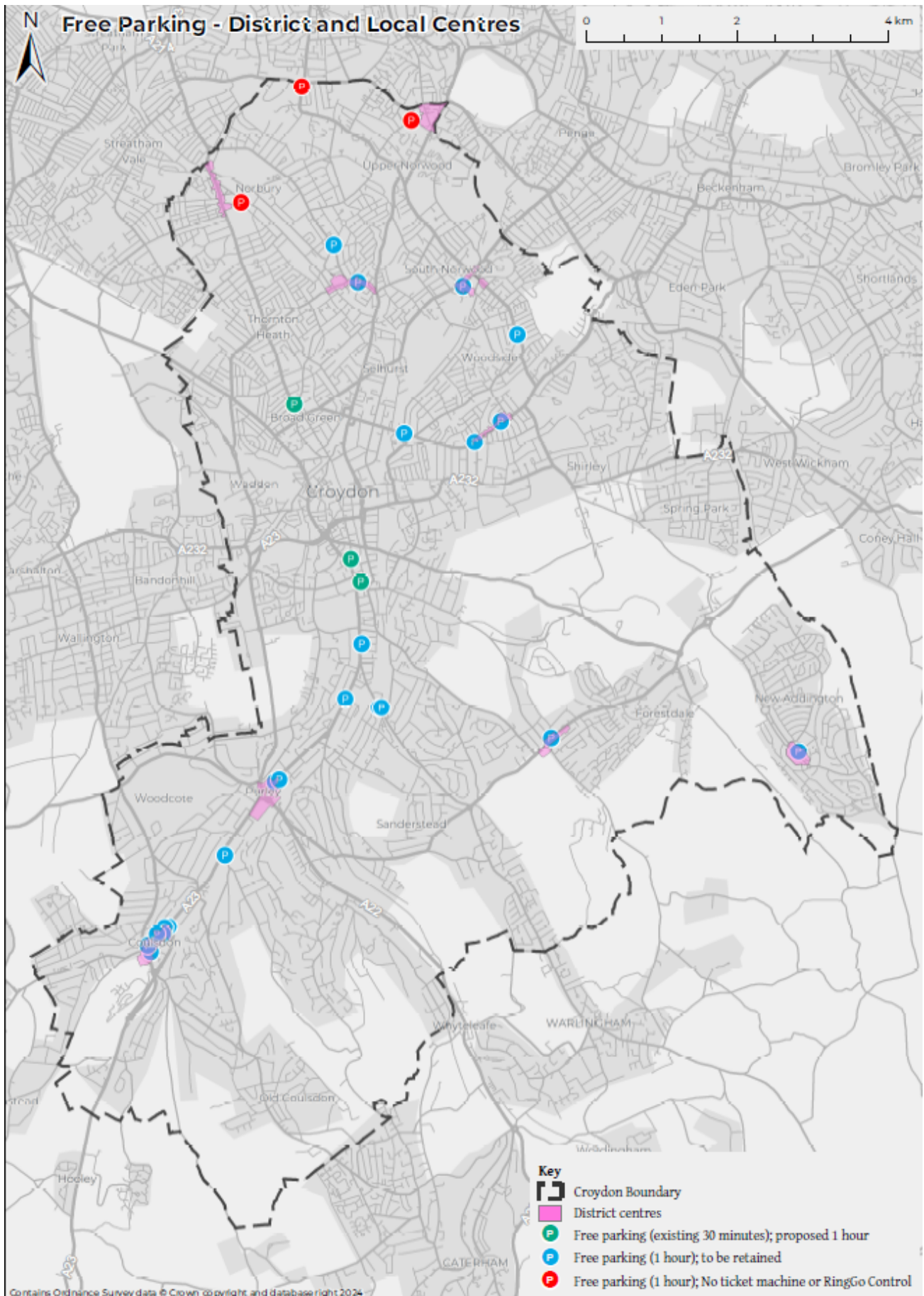
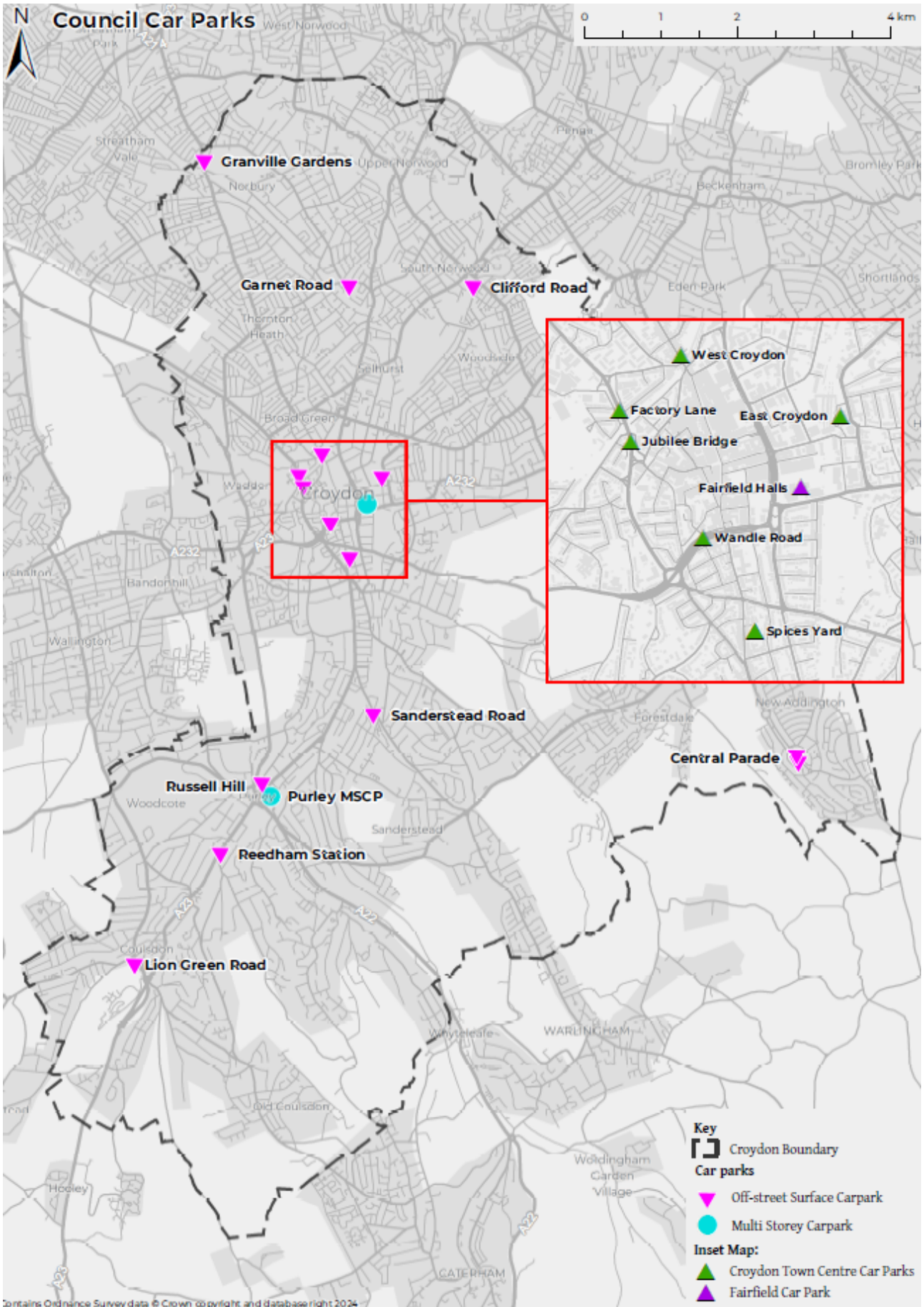


Figure 3 – Council Car Parks



LONDON BOROUGH OF CROYDON

REPORT:	CABINET
DATE OF DECISION	27th March 2024
REPORT TITLE:	Update on the Housing Transformation Programme
CORPORATE DIRECTOR / DIRECTOR:	Susmita Sen, Corporate Director of Housing
LEAD OFFICER:	Lara Ashley, Housing Transformation Lead
LEAD MEMBER:	Councillor Lynne Hale, Cabinet Member for Homes
Key Decision?	No
CONTAINS EXEMPT INFORMATION?	No
WARDS AFFECTED:	All

1 SUMMARY OF REPORT

- 1.1 This report provides an update on the Housing Transformation Programme following the last update to Cabinet in October 2023.
- 1.2 Work continues to progress well across the Housing Transformation Programme, with several projects now completed and others being added as required by the service.
- 1.3 This report re-iterates the workstreams as agreed under the Housing Transformation Programme and details the progress to date on all of the live projects, according to each workstream.

2 RECOMMENDATIONS

For the reasons set out in the report [and its appendices], the Executive Mayor in Cabinet is recommended to:

- 2.1 Note the progress since October 2023 on the Housing Transformation Programme which includes the Voluntary Undertaken given to and accepted by the Regulator of Social Housing (“the Regulator”) which is attached at Appendix A.

3 REASONS FOR RECOMMENDATIONS

- 3.1** To provide the Executive Mayor and Cabinet with oversight of the Council's Housing Transformation Programme.
- 3.2** To improve governance and transparency around decision-making.
- 3.3** To provide public information regarding transformation of the authority's housing related activities and practices to support meeting its best value duty.

4 BACKGROUND AND DETAILS

- 4.1** Members will be aware that in May 2021, following a self-referral to the Regulator of Social Housing (RSH), the London Borough of Croydon (LBC) was served with a regulatory notice for being in breach of both the Tenant Involvement and Empowerment Standard and the Home Standard and as a consequence of this breach, there was actual and potential serious detriment to the Council's tenants.
- 4.2** The extremely poor living conditions suffered by residents at Regina Road in South Norwood was highlighted by the media and this led to the self-referral and subsequent regulatory notice.
- 4.3** It became clear in the subsequent investigation of this case that there was a serious broader issue of widespread disregard for the priorities and needs of residents as well as a long-term lack of investment in the Council's housing stock.
- 4.4** In December 2022, Cabinet approved a Housing Transformation Programme to work closely with residents to transform the services provided by the Housing Directorate and return to compliance with the Regulator's Consumer Standards.
- 4.5** There have been a number of achievements in the programme since Cabinet was last updated in October 2023.
 - Our Voluntary Undertaking reported initially to members in September 2023, has been submitted to the Regulator of Social Housing and been accepted. A copy is attached for members' information and endorsement. This sets out our path to compliance and the steps we have committed to take to ensure that we provide better services for our residents. This is being monitored monthly by the Regulator and internally within the Council under the transformation governance process.
 - Development of a new Housing Strategy 2023- 2028: The Housing Strategy and its accompanying delivery plan were passed at Cabinet on 6th December and approved by Full Council on 13th December 2023.
 - Changes to Leadership Team: We have recruited to two of the five permanent Director posts. These are for the Director of Housing – Neighbourhood Management and the Director of Housing - Homelessness and Temporary Accommodation. We have also recruited an interim Director of Housing – Compliance, Asset Management and Repairs.

- KPI Dashboard - The KPI Dashboard is now being monitored at the Housing Improvement Board and DMT.
- NEC Migration: The NEC Housing Management IT system was successfully implemented in June 2023 and issues that arose since go live continue to be addressed. The first system upgrade was completed in January 2024. The development phase will be released in stages over the next 12-months.
- Regina Road Phase 1: design of an estimated 86 units is progressing. A bid for GLA funding has been accepted at approximately 50% build cost. Project Architects were appointed in December 2023.
- Compliance plan for Building Safety Act – All high-risk buildings were registered to deadline with the Building Safety Regulator in October 2023.
- Repairs Contact Centre: Recruitment has taken place to stabilise the workforce and to raise the standards of the service. New starters join the Contact Centre in April 2024.
- Homelessness Prevention and Rough Sleeping Strategy: The consultation is complete and this Strategy will be going to April Cabinet.

These are in addition to what has already been achieved since the programme was developed in 2022. In particular:

- Vision and Mission for the directorate – co-designed with residents
- Residents Charter – co-designed with residents
- HRA funding and recharging review completed
- HRA Business Plan
- Voids lettable – co-designed with residents
- NEC migration
- Procurement of three new Repairs Contractors
- In-sourcing of a Housing Repairs Contact Centre
- Rent-setting consultation programme
- Estate Inspection Programme

5 PROGRESS UPDATE

5.1 The progress to date for each workstream is detailed below. These are in addition to regular updates to the Housing Improvement Board, Regulator, Executive Mayor and Deputy Executive Mayor and this and other reports to Cabinet provide additional programme level updates. RAG-ratings have been provided for each of the projects in the left-hand column using the following key:

Project is not on track and requires an immediate intervention to plan to return to committed deadlines.	Project is not on track but does have a plan to ensure it delivers the agreed outcomes by committed deadlines.	Project is on track to deliver the agreed outcomes by committed deadlines.	Project is complete and will no longer be reported on.
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5.2 Projects are constantly progressing and may change in RAG status from the point of report submission to Cabinet meeting and members will be updated if that is the case. Where any deadlines/commitments change through the formal change control processes then it is against the new deadlines/commitments that the RAG status is provided.

Workstream 1: Vision, Direction & Transformation Plan for Housing Directorate

<p>1.3 Housing Strategy</p>	<p>The Housing Strategy and its accompanying delivery plan were recommended by Cabinet for adoption by Full Council on 6th December and were approved by Full Council on 13th December.</p> <p>This strategy builds on our work to ensure residents are at the heart of what we do and strengthen the relationships with our partners. It is a non-statutory document, but it is required by some services to access government support and highlights to This is now complete and will not be reported on in future.</p>
<p>1.5 High level re-structure and recruitment</p>	<p>We have recruited to two of the five permanent Director posts. These are the Director of Housing Management and the Director of Housing - Homelessness and Temporary Accommodation. We have also recruited an interim Director of Housing – Compliance, Asset Management and Repairs.</p> <p>Recruitment is ongoing for the remaining permanent Director posts.</p>

Workstream 2: Governance & Information Management

<p>2.1 Revised Performance Framework and Business Intelligence</p>	<p>Our KPI dashboard has been agreed with the Housing Improvement Board. This framework sets out clear measures of performance for service areas and enable appropriate objective setting for staff, projects and initiatives, with a clear focus on customer services.</p>
<p>2.6 Website Update</p>	<p>Work is ongoing with CDS and our contractors to ensure information is reviewed, helpful and provides guidance to our residents on how they can support themselves with everyday easy to resolve matters. This will include videos that customers can watch to independently carry out maintenance tasks at home.</p> <p>Wider review across all of Housing to also to be carried out in upcoming months.</p>

Workstream 3: Customer Excellence

<p>3.2 Resident Engagement Strategy</p>	<p>The Resident Involvement Strategy was drafted between July 2023 and November 2023. Residents and staff residents and staff were involved in a number of design workshops.</p>
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	<p>The group (Design and Discovery) are now revising all the current formal groups, terms roles and responsibilities as well as designing the strategy framework engagement structure.</p> <p>The initial target for February Cabinet was changed to allow for additional consultation. The strategy is planned to now come to Cabinet in the summer (subject to agenda capacity) and Full Council shortly after.</p>
3.4 Customer Information review	<p>Data gaps in NEC have been identified and the tenancy audit form has been updated in order to better capture tenant information. A revised occupancy check form is now in use. A review of all tenancy information on the website is nearing completion – design of new information channels is in progress. The contact centre telephone script is being updated to help us capture more customer information.</p>
3.5 Customer Journey Review	<p>The project seeks to co-review our residents' pathways through housing services to create and inform a new operating model and deliver a fit-for-purpose website.</p> <p>Tenancy Services Subject Matter Experts (SMEs) have reviewed a range of webpages and Leasehold SMEs have re-reviewed the Leasehold pages. Once these reviews have been completed, we will engage customers to access and test the live web pages, ensuring that they are fit for purpose and make any further amendments to these as required.</p>
3.7 Customer Service Training	<p>The discovery stage has now been completed for the Customer Care programme and we are now in the design stage. A pilot is scheduled for March 2024.</p>
3.8 Customer Learning & review of process	<p>In January 2024 we updated our complaints policy and compensation guide to ensure it meets the standards set by the Housing Ombudsman. We also completed a self-assessment against the Complaint Handling code and published our findings.</p> <p>We set up action plans in December 2023 to clear a backlog of complaints and member enquiries with Housing Needs and Repairs. To support with the delivery of this plan, we recruited additional staff and at the time of writing have since closed over 500 complaints and over 500 member enquiries. We are continuing to work through the backlogs with our teams.</p>
3.9 “Stop Social Housing Stigma” Campaign	<p>Stop Social Housing held a presentation in November to highlight the work that has been done in 2023 on the campaign. Work has been ongoing with Universities of Durham, Sheffield, TPAS and the CIH since last year.</p> <p>Stop Social Housing Stigma (SSH) have applied for funding from DHLUC to develop a sector wide pledge to tenants and the development of a toolkit ‘which supports local partnerships of tenants, landlords, their partners, contractors and suppliers, to address social housing stigma locally’.</p> <p>SSH are seeking landlords to support them in developing the pledge, toolkit and self-assessment. Croydon have volunteered to become one of the landlords who will pilot this and are awaiting a response from SSH.</p>

3.10 Review of Consumer Standards	A review of Consumer Standards and a gap analysis against these standards has been completed. Updates to projects have been actioned. We will review them against the finalised standards agreed at the end of February 2024.
3.12 Know our Neighbourhoods programme & Estate Inspections	<p>Since June 2023, we have been working with Sustainable Communities to develop a ground maintenance service-level agreement to improve the delivery of services to residents. This was signed off in November 2023.</p> <p>Successful Go Live took place with 146 Estate Walkabout / inspection forms completed by Operations Managers and Tenancy Officers using the Photobook app. In addition, work is progressing with sustainable communities' teams to promote messages around food waste and appropriate recycling assets.</p>
3.16 NEC Post Go-Live Product Development	<p>The NEC Housing system was implemented in mid-2023 and issues that arose since go live have largely been addressed. The second phase of NEC Housing is in the final stages of planning and resourcing.</p> <p>The development phase will be released in stages over the next 12-months.</p>

Workstream 4: Long-term Homes & Neighbourhood Planning

4.1 Resolution programme for Regina Road.	<p>GLA Deputy Mayor for Housing visited in November with the Executive Mayor and Deputy Executive Mayor, and a bid for GLA funding was submitted and accepted at approximately 50% build cost. GLA advise that grant will be dependent upon achieving Planning Permission for an estimated 225 homes in context of outline Masterplan for Regina Road and having a single main contractor for the build.</p> <p>Architects appointed and contract to be signed imminently.</p>
4.2 Resolution programme for LPS blocks	<p>In person resident engagement meetings were held with all 15 LPS blocks between Summer and Winter 2023. We have confirmed the summary findings back to residents and progressed actions raised. Once we complete the initial resident engagement meeting with all 46 High Risk Buildings in Spring 2024, we will then commence the 2nd round of resident engagement meetings, starting with the residents in the LPS blocks.</p> <p>A proposal for the structural assessment on all LPS blocks has been prepared. An update paper on LPS will be coming to Cabinet in Spring 2024. Initial responses and arrangements are in place against all the requirements. Our information and arrangements are being developed over the coming months.</p>
4.3 Development of Asset Management Strategy	The Strategy will detail the long-term plan for the management of Council stock (as part of a five-year rolling programme) and link in with clear financial planning. Online and face to face resident engagement has taken place to support the development of the strategy which is proposed for

	May Cabinet. 33% of our stock condition surveys were delivered by December 2023 and we are on track to deliver 40% by the end of the current financial year.
4.4 Estates and Improvement restructure	The purpose of this restructure is to redesign the way in which the Housing Assets are managed, repaired, invested in and meet all applicable compliance standards. Our new Interim Director of Asset Management and Repairs is reviewing the restructure and design conversations are ongoing.

Workstream 5: Asset Compliance

5.1 Compliance plan for Fire Safety Act 2021	Initial responses and arrangements are in place against all the requirements. Our information and arrangements are being developed over the coming months, to meet all the requirements. Examples of this are improving building floor and block drawing plans, resending safety information to residents, collecting more detailed external wall information through surveys required under the Building Safety Act. (Oct 23)
5.2 Compliance plan for Building Safety Act	<p>All High-Risk Buildings were registered, within the deadline, with the Building Safety Regulator in October 2023.</p> <p>We are working hard with the procurement team to finalise requirements for the procurement of a broad range of consultancy support to assist with meeting the requirements of the Building Safety Act. This includes fire & structural engineering, building surveying, safety case and specialist contractors to support these surveys such as asbestos removal and concrete specialist. These surveys will be carried out over several years.</p>

Workstream 6: Maintaining our Homes

6.1 Repairs re-procurement / mobilisation	This project has now been completed. It is now being reported on as part of Phase 2 of the NEC project.
6.2 Repairs Contact Centre mobilisation	LBC's in-house repairs contact centre went live on the 1 st of August 2023. Stabilisation of this service is reported in project 6.9.
6.3 Repairs restructure and behaviour change programme	<p>This project aims to ensure an effective, motivated and skilled workforce which can manage the new repairs contracts and deliver our capital and asset management programmes.</p> <p>The design of the restructure is being finalised. Our new Interim Director of Asset Management and Repairs has been reviewing operating activities to feed into the new structure. We are also mapping new ways of working to ensure governance is well managed and have introduced the new competency model.</p>

<p>6.4 Voids transformation</p>	<p>Following stakeholder consultation of the Void Policy by attendees from the weekly voids meeting group, it has since passed review from subject matter experts and the Legal team. The Policy is now awaiting review from residents.</p> <p>The revised Voids Lettable Standards have been agreed with resident consultation. Following agreement with energy suppliers, new tenants will be supplied with a small sum of credit on their meter following their sign up to properties. This will enable maintenance works to begin immediately once the property becomes void as power will be restored in an empty property without unnecessary delays.</p>
<p>6.5 Disrepair transformation</p>	<p>A Disrepair Paper was presented to the Corporate Management Team on 31st January regarding the issues around disrepair, the work being undertaken to improve the service and to minimise new claims. A plan has been agreed to increase the capacity of the Disrepair Team and the term contractors to clear the backlog of claims by April 2025, with the necessary budget approved and the appropriate monitoring and reporting in place.</p>
<p>6.6 Review of policies, procedures, business processes and customer journeys</p>	<p>Over 50 Housing Policies have been identified that will require development, 29 have been drafted and are under review with subject matter experts and the Legal team. These included Tenancy Management policy, Void Management Policy, the Decant Policy, and six important Health and Safety Policies: Asbestos Management, Fire Safety, Electrical Safety, Gas Safety, Lift Safety, and Water Hygiene.</p> <p>23 key policies that impact service delivery have been identified and are being reviewed by residents that have volunteered to support our policy development.</p>
<p>6.7 Review of Capital Delivery Contract</p>	<p>An independent company has been engaged to undertake this review of our Capital Delivery Contract with the aim to analyse the customer journey, customer satisfaction and areas for service improvement.</p> <p>Feedback sessions were held on 1st Feb with tenants and leaseholders who have received works to their homes, properties or estates in the last 12 months to understand the resident experience of the contractor's service. This review is now complete.</p>
<p>6.8 Targeted Approach to Damp and Mould</p>	<p>Capacity for dealing with damp and mould has been increased by ensuring the main contractors have onboarded specialist teams to ensure mould is treated as an emergency which allows time for each case to be reviewed and addressed within our target times.</p> <p>New template agreed with contractors to return consistent data to build accurate picture of damp and mould within Croydon housing stock. A revised Void Lettable Standard specification has developed to ensure all presence of damp and mould is addressed at this stage.</p>
<p>6.9 Repairs Contact Centre Stabilisation</p>	<p>Previously the contact centre data was managed by Axis and no data or trends were handed over at the end of the Axis contract which made it hard to forecast call volumes. These volumes have been a lot higher than expected, causing some pressure to the team. The contact centre has also</p>

	experienced challenges with the new system, staff turnover and training gaps. All these issues have been identified and are being managed by the contact centre manager with support from other teams. Recruitment has taken place to stabilise the workforce and to raise the standards of the service. New starters from this process will join the Contact Centre in April 2024.
6.10 Asset Register and Management review	This project is designed with the objective of reviewing and setting out the data governance of asset information and ownership throughout the housing directorate and the wider organisation. Project is new.

Workstream 7: People & Organisational Development

7.2 Enabling high performing teams and setting behavioural expectations	Competency model used for recruitment of posts and will be integrated into Appraisals for 2024/25. Change management sessions are being designed to support the changes within the directorate and establish standards in the way we work. This plan will include team building sessions, standard setting sessions; engagement activities; training needs analysis, housing induction and work towards meeting the Competence Standard.
7.6 Talent acquisition: Apprenticeship/ Graduate Programme/EVP	Talent acquisition is ongoing. We are part of the apprentice programme and Graduate scheme. We are also collaborating with Croydon Works on engaging local residents with routes back to employment.

Workstream 8: Managing our Housing Needs

8.1 Housing Needs restructuring	<p>Following restructure of the Housing Needs Service recruitment to the new roles commenced in December.</p> <p>Delivery of the Change Management and Staff Development Programme is on track. This includes a training programme, team building events and increased engagement sessions.</p>
8.2 Supported Housing Review	<p>The Council has now appointed Homeless Link, a national homeless charity, to carry out a full review of the existing supporting housing pathway. This will also include additional floating support providers.</p> <p>The pathway currently provides supported accommodation for single vulnerable homeless adults, care leavers, mental health hospital discharges and homeless adults with learning disabilities.</p> <p>The review and recommendations (including a new tender) will be carried out throughout 2024/2025 with a new pathway commissioned to start from the 01 April 2025.</p>

<p>8.3 DPS – Procurement of contracts</p>	<p>Software has now been purchased for the Dynamic Purchasing System (DPS). A strategy report, Nightly Paid Accommodation Agreement, and a review of the draft specification is now ongoing.</p> <p>The project is being implemented in two phases. In the first phase, which is in progress, all existing providers will be onboarded onto the system, and this will be completed by the 31 March 2024. Phase 2 allows new providers to join the framework, and this will go live in first quarter of 2024/25 financial year.</p>
<p>8.4 Homelessness Prevention and Rough Sleeping Strategy</p>	<p>The Homelessness Prevention and Rough Sleeping Strategy has been produced following extensive consultation. This has involved meetings with a range of partners such as the Family Justice Centre, Evolve Housing, Crisis, SLAM, St Mungo's and Nightwatch as well as online sessions with residents. In addition, there are over 300 customer responses to recent surveys carried out in homelessness and the housing strategy which will provide input into the final strategy.</p> <p>Initial feedback from external partners (both statutory & voluntary) shows a strong desire to work in closer partnership with the council to support homeless residents. This includes work to both support the prevention of homelessness and residents if they have been rehoused and need extra help in their new tenancy (which could include daily living skills and access to employment & training).</p> <p>The strategy includes workstreams to enable these pieces of work and includes the need for strong partnership delivery and resident involvement. The strategy is on track for April Cabinet.</p>
<p>8.8 Housing Association Liaison Recharges & Nominations</p>	<p>This project intends to improve governance of all relevant contracts and nomination agreements to maximise the properties the Council can use to move people out of temporary accommodation.</p> <p>Currently 60 housing associations have properties in Croydon. The largest has a total social stock of 3708 units. Four other housing associations have stock of over 1000 units. Overall, there are 29,852 social units in Croydon with 24,092 being general needs self-contained units. Croydon owned stock represents 45% of this total stock (13,454).</p> <p>The recharges relate to the use of Home Connections which is the councils online bidding system for social housing. Updated milestones and a recovery action plan are in place.</p>
<p>8.11 Temporary Accommodation Occupancy Checks</p>	<p>This project has been set up to visit all current residents in temporary accommodation to confirm occupancy, review the household composition and confirm the standard of the temporary accommodation unit.</p> <p>To date 1785 inspections have been carried out and access has been gained to 1231 units. This is out of a total of approximately 3300 properties.</p>

The project was due to end by the 31st of March 2024 however will need to be extended to the end of June to allow for access issues to be resolved.

5.3 New Projects Commencing shortly

5.4 There are several new projects which are developing and will form part of the next update to Cabinet. These include:

- Review of housing provision for young people
- Collaborative Corporate Parenting project
- Adults & Housing stock review and collaborative pathways
- Temporary & Emergency Accommodation provider review & acquisitions

5.5 Risks and challenges

5.6 Highlight reports are produced monthly and report on the risks and issues for the delivery of the Housing Transformation Programme at a project level. These risks, issues, and mitigations are reviewed each month at meetings of the Housing Transformation Steering Board. Any risks or issues with implications for the entire Council are elevated to the attention of the Corporate Management Team by adding them to the corporate risk log (JCAD).

5.7 There are several challenges faced by the Council in delivering the Housing Transformation Programme. These include challenges which stem from legislative changes introduced by the Government in the past three years as well as upcoming proposed changes, which impact or could impact various aspects of social housing, housing needs, and homelessness:

- Fire Safety Act 2021
- Building Safety Act 2022
- Social Housing Regulation Act 2023
- Renters (Reform) Bill
- Supported Housing (Regulatory Oversight) Act 2023

5.8 In addition to the new legislation, the Regulator of Social Housing and the Department for Levelling Up, Housing & Local Government have recently revised the Consumer Standards and Decent Homes Standard. The standards that social homes and our landlord services must meet are therefore due to be revised. A gap analysis has been undertaken on the proposed consumer standards to identify any risks. This will now be reviewed in light of the final consumer standards published on the 29th February 2024

5.9 The economic circumstances faced by the Council pose additional challenges for the delivery of the Housing Transformation Programme. Escalating costs related to building materials and labour, driven by inflation, have necessitated careful budgetary considerations for specific projects. Furthermore, the ongoing cost-of-living challenges have intensified the demands on the Council's homelessness services, requiring a

delicate balance between the reform to the Housing Needs service and sustaining essential front-line services.

6 CONTRIBUTION TO COUNCIL PRIORITIES

- 6.1 This programme, alongside the development of the Housing Strategy 2023-2028, is key to ensuring the Council delivers against the Mayor's priorities to "Invest in council homes to drive up standards and develop a responsive and effective housing service" and "Develop our workforce to deliver in a manner that respects the diversity of our communities."

7 IMPLICATIONS

7.1 FINANCIAL IMPLICATIONS

- 7.1.1 The delivery of the Housing Transformation Programme required an upfront investment to ensure we transform the directorate to create services that meet the needs of residents. The Finance, Legal & Environment enabler is providing the necessary financial governance of the projects within the Housing Transformation Programme as they are developed, including ensuring the projects are financially viable, deliver value for-money and are managed to budget.
- 7.1.2 As the projects are both HRA and GF the financial costs incurred in year will be funded using HRA reserves to ensure this investment delivers the right plan for the community, and the GF Transformation Funding.
- 7.1.3 The draft HRA budget for financial year 2023-2024 has been updated to reflect known budgetary requirements. Work is underway on the 2024-25 HRA Business Plan and budget setting. The budget will be reviewed to reflect the needs that have been identified in each of the work streams and monitored against the budget set.
- 7.1.4 Comments approved by Orlagh Guarnori on behalf of the Director of Finance. (Date 12/09/2023)

7.2 LEGAL IMPLICATIONS

- 7.2.1 The Regulator for Social Housing is established under Section 80A of the Housing and Regeneration Act 2008 ("the 2008 Act") as amended, and has regulatory oversight in respect of social housing landlords, including local authorities. The regulator sets consumer standards and may, as is the case with Croydon, take action if these standards are breached and there is a significant risk of serious detriment to tenants or potential tenants.
- 7.2.2 The giving of voluntary undertakings is governed by section 125 of the 2008 Act and where the regulator accepts a voluntary undertaking from a social housing provided, the

regulator will have regard to this undertaking in determining actions it considers are needed under its regulatory and enforcement powers (Chapter 6 and 7 of Part 2 of the 2008 Act) and may additionally take into account any failure of the Council to honour the voluntary undertaking in making determinations about current or future enforcement or regulatory action against the Council.

7.2.3 The legal basis for the Housing Transformation Programme is the Council's general power of management of its housing stock in Section 21 of the Housing Act 1985. In addition, the Council has legal obligations in relation to how it maintains and repairs its housing under Sections 9A and 11 of the Landlord and Tenant Act 1985, Section 4 of the Defective Premises Act 1972 ("DPA"), under common law nuisance and negligence principles, and under express or implied terms of the tenancies it has granted.

7.2.4 Separately, there are statutory requirements on the Council to consult with tenants where they are likely to be substantially affected by changes in housing management practice or policy, and the Council must ensure that it meets these requirements as part of the development and delivery of the Housing Transformation Programme.

7.2.5 There is also a range of legislation which has been introduced in the past three years, the implementation of which impacts on various aspects of the council's legal responsibilities in relation to the provision and maintenance of social housing, housing needs, and homelessness. In particular:

7.2.5.1 The Fire Safety Act 2021 and the Fire Safety (England) Regulations 2022 have been introduced to meet the recommendations arising from the Grenfell Tower Inquiry and impose significant new legal requirements upon the 'responsible person' (i.e., those who own or have control over premises) for relevant buildings containing two or more domestic premises. This will require a programme of fire risk assessments to meet the new compliance regime and timetable.

7.2.5.2 The Building Safety Act 2022 is intended to improve the design, construction and management of high-rise buildings introducing greater accountability and responsibility for fire and structural safety issues throughout the lifecycle of buildings in scope of the new regulatory regime for building safety. One of the significant elements of the Building Safety Act 2022 has been its amendments to the Defective Premises Act 1972 ("DPA") referenced above. Previously the limitation period to bring a claim under the DPA was 6 years from the date of completion of the works. This limitation period has now been extended to 30 years retrospectively for claims accruing before 28 June 2022 and to 15 years for claims accruing after 28 June 2022. Given these extended limitation periods, there is likely to be an increase in claims referencing the DPA in relation to dwellings where other methods of recourse are no longer available.

7.2.5.3 The Social Housing Regulation Act 2023 amends Part 2 of the Housing and Regeneration Act 2008 and enhances the core framework for the regulation of social housing. Key measures will require the Council to investigate hazards and fix repairs including damp and mould in Council properties within strict new time limits or rehouse residents where a home cannot be made safe. The new rules will form part of the tenancy agreement, so residents can hold landlords to account if they fail to comply. Also, the Regulator will have new and stronger powers to 'proactively assess' social landlords such as the

Council against the consumer standards, enter properties with 48 hours' notice and make emergency repairs at the landlord's expense. Housing Managers will be required to have an 'appropriate level housing management qualification' regulated by Ofqual.

7.2.5.4 The Supported Housing (Regulatory Oversight) Act 2023 impacts the provision of supported housing and sets a new framework of systems for the supported housing and older person's housing sector.

7.2.5.5 Finally, the Renters Reform Bill is currently in the initial stages of consideration in parliament, having recently entered the report stage in the House of Commons. In its current form, it proposes to abolish 'no fault' evictions empowering renters to challenge the landlords who provide poor quality housing without the worry of a 'no fault' eviction.

7.2.6 Under the provisions of section 3 of the Local Government Act 1999 the Council is required, as a best value authority to 'make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness'. The best value duty applies to all functions of the Council including delivery of its statutory housing services.

7.2.7 Under Section 15 of the 1999 Act, the Secretary of State has the powers to intervene if satisfied that the Council is failing to meet its best value duty. This includes the power to issue directions that the function of the authority be exercised by the Secretary of State, or a person nominated by him for a specified period.

7.2.8 On 20th July 2023, the Secretary of State for Levelling Up, Housing and Communities ("the SoS") issued Directions under Section 15(5) of the 1999 Act to the Council on the basis that the Council was failing to comply with its Best Value Duty setting out actions to be taken by the Council to comply the duty. The SoS Directions require the Council, amongst other things, 'to continue to improve the capacity and capability of the authority's housing service.'

7.2.9 On 6 October 2023, The Improvement and Assurance Panel agreed an intervention Exit Strategy which describes the tangible improvements they expect the Council to make by March 2025. One of the key elements of the Exit Strategy links to the Housing Transformation Programme and its delivery and this report provides details to Members on how progress is being made and monitored to ensure that the requirements of the Exit Strategy are supported and met.

Comments approved by the Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (15/03/2024)

7.3 EQUALITIES IMPLICATIONS

7.3.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in Section 149 of the Equality Act 2010. The Council must, in the performance of its functions, have due regard to its duty to:

Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.

Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.3.2 Access to safe and secure housing has a great bearing on the wellbeing of our residents and has a significant impact on equalities outcomes. As such, regard for the PSED will be key to the Housing Transformation Programme.

7.3.3 Overall, transforming the Housing service is likely to have a positive impact on equalities outcomes. However, as the Housing Transformation Programme is developed, specific Equality Impact Assessments will need to be provided at a project level. The officers responsible for the development and delivery of these projects or workstreams will need to ensure that the EQIAs produced accurately assess the potential impact of any proposed changes on protected groups, and the aims of the PSED, recognising that this can be both positive or negative in nature. All EQIAs produced should be treated as living documents and be updated when new data or customer experience feedback becomes available.

7.3.4 The Transformation Programme includes a new IT system designed to improve data collection for residents. Improving data collection from service users across the nine protected characteristics will benefit decision making by ensuring that decisions are based on clear evidence about the service user base, helping to assess the likely impact of proposed changes upon them. Projects will also benefit from data around customer satisfaction across the protected characteristics to ensure that the Council is delivering a fair and equitable service to all protected groups.

Comments and approval provided by Helen Reeves, Head of Strategy and Policy, 08/03/2024

7.4 HUMAN RESOURCES IMPACT

7.4.1 There are no immediate human resources impacts arising directly from the recommendations in this report. However, there will be impacts associated with the development and delivery of the Housing Transformation Programme. The Housing Transformation Programme constitutes a key part of the Mayor's Plan, and it is inevitable that the Plan will have an impact on the Council's workforce. This will be managed under the Council's policies and procedures as the need arises. And will include but not limited to, the Recruitment Policy as well as the Restructure & Re-organisation Policy, which may include redundancies/redeployment/insourcing/TUPE of staff.

7.4.2 To achieve an enduring culture change in the housing directorate a set of appropriate and carefully designed organisational development initiatives will need to be created and delivered to enable that change, with contextual relevance and sensitivity. To implement this action, input will be required from the Council's Learning and Development Team and may incur extra costs if additional capacity is required for designing and implementing the change programme via an external provider procurement.

7.4.3 Any HR issues arising will be managed under the Council's Corporate Policies and Procedures, including, as appropriate, meaningful consultation with the trade unions and affected staff groups.

7.4.4 Approved by Jennifer Sankar, Head of HR Housing Directorate & Head of HR SCRER for and on behalf of Dean Shoesmith, Chief People Officer [29/02/2024].

7.5 CRIME & DISORDER IMPACT

7.5.1 Crime and disorder have a disproportionate impact on our housing tenants, across the whole crime spectrum from anti-social behaviour through to domestic violence and is one of the highest concerns of residents. The Housing transformation plan and the reconciliation of the HRA budget is strengthening our response to these concerns and is improving how we work as a council and partner to support our residents, reduce crime and disorder, and make Croydon safer.

7.5.2 In particular, the new Homelessness Prevent and Rough Sleeping strategy will directly contribute towards improving ASB, protecting some of our most vulnerable residents, and our response to victims of domestic violence in the Borough, and is a key part of the borough's statutory work to reduce crime and disorder.

7.5.3 Comments approved by Director of Culture & Community Safety, Kristian Aspinall [29/02/2024]

8 APPENDICES

Appendix A Voluntary Undertaking submission

Appendix B Programme Workstreams

9. BACKGROUND DOCUMENTS

N/A

10. URGENCY

N/A

Appendix A

London Borough of Croydon: Voluntary Undertaking for Regulator of Social Housing – Sept 2023

1. Introduction

In March 2021, an ITV media show reported on the appalling living conditions of social housing residents living on the Regina Road Estate, South Norwood. As owners of these social housing properties, the London Borough of Croydon (LBC) commissioned the Ark consultancy to investigate the issues causing the conditions endured by residents. At the same time a self-referral was made to the Regulator for Social Housing (RSH) for breaching the Home Standard and Tenant Involvement and Empowerment standard.

In May 2021, LBC was served a regulatory notice by the RSH for breaching the Tenant Involvement and Empowerment Standard and the Home Standard.

The areas of the standards breached are:

Home Standard: Repairs and Maintenance

- Provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choices to, tenants, and has the objective of completing repairs and improvements right first time
- Meet all applicable statutory requirements that provide for the health and safety of the occupants in their home

Tenant Involvement and Empowerment Standard

- Provide choices, information and communication appropriate to the diverse needs of their tenants in the delivery of all standards
- Have an approach to complaints that is clear, simple and accessible that ensures that complaints are resolved promptly, politely and fairly.
- Treat all tenants with fairness and respect
- Demonstrate that they understand the different needs of their tenants, including in relation to the equality strands and tenants with additional support needs.

In May 2021 the Ark Consultancy concluded from their investigation that there were several areas which led to severe failings within the Housing service:

- A lack of capacity and competence
- A poor operating culture with a lack of care and respect for tenants
- Systemic problems in how the Council communicates and deals with tenants' concerns and complaints

- Weak performance management meaning senior managers do not appear to know what is going on
- Poor use of data and 'intelligence' by the Council and its contractors

In the May 2021 Cabinet meeting, LBC accepted these findings and agreed to develop a Housing Improvement plan to address these issues and return to compliance.

2 Returning to Compliance

The Regulator expects registered providers to take responsibility for self-improvement and where they believe the social housing provider has the capacity and capability to respond to the issues, and they have a detailed plan to address compliance recovery, they will consider a voluntary undertaking.

The period since the breach of the consumer standards has been tumultuous for LBC. The immediate response to the breach focused on engaging with and rehousing of some of the key residents affected at Regina Road.

At the time of the breach, the teams responsible were dispersed across the council and an early action brought the teams together under one housing directorate with a view to recruit a permanent Corporate Director for Housing. This difficult early period was marred by intervals of interim managers and interim housing directors responding reactively and struggling to identify and address the deep-rooted dysfunction that existed. This resulted in a lack of direction within the directorate and without a clear plan of action to re-comply with the standards and deliver appropriate services to our customers. An independent Housing Improvement Board was established (Dec 2021) with resident representatives sitting alongside partners from the LGA, London Councils and the Council's Improvement & Assurance Panel. They worked closely with interim directors to drive improvements to the service but were unsupportive of the initial improvement plan which went to Cabinet in March 2022.

The election of a new Executive Mayor coupled with the recruitment of a permanent Corporate Director in May 2022 presented an opportunity to understand the deep-root failings that had led to non-compliance with a view to creating a programme of transformation which would address the core issues across the housing service. The Ark Consultancy findings were used as a starting point to inform a large-scale diagnostic involving, staff, managers and residents conducted between July – September 2022. This diagnostic identified several issues and was used to create a programme of projects to deliver sustainable change. This programme was approved by LBC Cabinet in December 2022 and endorsed by the independent Housing Improvement Board in the same month. It should be noted that the Housing Improvement Board have been instrumental in shaping the approach to the programme ensuring it is fit for purpose and providing continuous challenge.

Key initiatives within this programme are designed to address the issues which led to the breaches of the stated consumer standards. These initiatives form part of the undertaking to be monitored by the RSH and we have updated the RSH on progress in our regular meetings.

3 The Issues

The breaching of the consumer standards was due to numerous issues that are outlined below. Understanding these issues has been key to developing a programme to address them effectively.

The issues are sometimes distinct and relate to only one aspect of the breach but often the issues cut across the standards and across the housing service.

3.1 The Repairs Contractor and contract management

The Repairs Contractor had been underperforming for a substantial period of time. Contract management discussions resulted in occasional improvements, but these were not sustained. Data on performance (including repairs logged, appointments kept, repairs completed and direct complaints) was contractually held by the contractor. This dependency created an unreliability on the quality and integrity of data which made it harder to contract manage. The set-up of the contract also hampered improvements with a “Price per property” model failing to incentivise the contractor as costs sharply escalated over the preceding years. This coupled with insufficient contract management expertise and poor staff capability in leading this relationship, had a substantial cumulative impact on services delivered to customers. The Repairs contractor eventually gave notice on the contract with a termination date of July 31st 2023.

3.2 Escalation

Issues existed around poor escalation pathways for repairs. Customers, staff and managers struggled to escalate repairs and complaints which resulted in dissatisfaction amongst customers, staff and managers. A lack of response from the contractor and poor contract management led to high levels of complaints and frustration for many involved. Teams did not have sufficient pathways to escalate matters and little recourse given the looming departure of the existing contractor.

3.3 Poor organisation of resource and under-development of skill

From inception and as a result of the speed at which disparate teams from across the council were brought together, the housing directorate as a whole, struggled with direction and organisation. Bringing the teams together without an overarching model of service delivery resulted in duplication of effort within teams, poor strategic planning and disjointed interfaces. A lack of experienced leadership at director level led to poor organisation of resources, a general feeling of being overworked with little progress demonstrated and ineffective problem-solving. This impacted on the ability to manage complaints, manage requests, and deliver effective outcomes for customers. It also meant a lack of long-term planning and permanent firefighting without core issues being addressed. This can be evidenced in the lack of an up-to-date Housing strategy, Homelessness strategy, Asset Management Strategy and Housing Investment/build programme.

3.4 Under-development of skills

The housing service has had insufficient focus and effort on developing staff and managers over recent years. A lack of professional development and behavioural development coupled with insufficient management of poor practice has resulted in poor service delivery.

3.5 Inadequate data and deficient systems

Use of outdated and/or manual systems that didn't contain reliable customer or up-to-date asset data led to inefficient decision-making and a lack of joined up response. Teams were less able to assess trends in asset depletion and health and safety concerns as well as monitor contractor performance. Poor data, poor information sharing and the lack of a single view of the customer delivered sub-standard services as demonstrated by poor void turnaround, poor set-up times for rent accounts and a lack of long-term asset planning.

3.6 Inadequate Performance Management

Poor data across the housing teams and a lack of performance data monitoring resulted in poor performance management practices and a lack of emphasis on using Key Performance Indicators to manage service improvements and contractor performance. This translated into fewer appraisals, fewer objective setting meetings and a loss of performance management overall. No reliable performance dashboards existed by which robust performance management occurred.

3.7 Fragmented Complaints system

Customers had been complaining to the housing teams via the corporate complaints system, via tenancy officers and via the corporate contact centre. These complaints were then distributed to the appropriate complaints' teams within the housing teams. Resource issues, poor escalation pathways (as described above) and a lack of trend analysis and learning from complaints led to recurring issues, customers feeling disrespected and ignored and issues that could have been more quickly eradicated. Residents also found it difficult to access the complaints system online and this led to further frustrations.

3.8 Poor behaviour

Residents described feeling disrespected by council officers, being blamed for the issues arising in their properties and generally not being heard. They had, on occasion, been left feeling like the officer they are engaging with did not demonstrate empathy with their situation or their needs and did not treat them with respect. When explored further with staff, there were issues of attitude and behaviour which need to be addressed, however there are also issues of processes that don't empower staff to deliver services to customers, frustration that the escalation processes don't work and that resources feel stretched. These are all issues that need to be addressed.

3.9 Poor engagement

The housing teams did not have an approach or strategy for engaging with residents in a meaningful way on key decisions which would impact them. When engagement did occur, it was considered tokenistic and not impactful. Again, residents were left to feel their views didn't count and they went unheard.

The issues outlined above are complex and intertwined with cultural issues that the housing directorate needed to address. The programme of transformation was designed to address the issues over a short, medium and longer-term period with the change being sustained through the designed interventions.

4 How we are addressing the Issues.

The new housing directorate leadership team, led by the permanent corporate director, designed a programme of transformation composed of eight workstreams and over seventy projects over a three to five-year time-frame (with a view that projects can also be added to the programme as time progresses and needs evolve). The workstreams address issues wider than those outlined above and broader than the breaches of the consumer standards, however the focus of this report will be on those projects which directly address the breaches so LBC can return to compliance. The programme is governed by the Transformation Steering Board which is chaired by the Corporate Director for Housing and attended by the Cabinet member for Homes and meets monthly to review progress. Colleagues from across the council are invited to attend as appropriate. Progress is also monitored regularly:

- by the Housing Improvement Board through formal board meetings and update workshops;
- By the Tenant and Leaseholder panel;
- With Cabinet receiving an update on progress on a quarterly basis;
- By Scrutiny; and
- Through regular engagement with the Improvement and Assurance Panel.

As of the end of August 2023, several projects have already completed which address in part, the breaches. These are outlined below:

4.1 Achievements to date:

Activity	Outcome
Vision & Mission set	Give direction to the housing directorate and set out the service expectations to all.
Regina Road short term remedy plan completed	Re-housing of worst-affected residents. An extensive programme of repairs, including fire safety works, has been carried out. Detailed surveys of all blocks have been undertaken and shared with residents.
Regina Road Long – term planning	Residents of Regina Road have been involved in an extensive engagement, consultation and ballot. As of June 2023, 88.1% of those voting (80%), voted to demolish the estate. Cabinet approval to demolish and rebuild provided in July 2023. Work is currently underway on next steps.
Change in leadership team	More experienced interim leaders brought into the service to drive improvements and re-structure services.

	Recruitment to new divisional leadership roles has commenced
Residents Charter co-created and approved	Declaration of our commitments to residents – embedded in restructures and operating models
Re-procurement and mobilisation completed for new Repairs contracts	Three new contractors selected to deliver improved services for repairs, voids and heating. There are 2 suppliers for repairs and voids; contract 1- 70% of the borough; contract 2- 30% of the borough. There will be one contract for heating maintenance. These contracts have now been mobilised.
Repairs Contact Centre	Insourced a new repairs contact centre to take calls and schedule repair appointments. Enable LBC to own initial relationship between customers and repairs service – delivering a better direct communication channel
Establishment of contract Management Hub	A new Contract Management Hub has been set-up for the new contractors to be more expertly managed
HRA recharges reviewed and SLAs created	Ring fenced funding is protected for services directly delivered to residents - circa £9m rectified
Rents consultation completed	Residents clearly informed of increases to rents and impact on services for 23/24 and a rolling programme in place for subsequent years
Drafted Voids Lettable standard	Clear standard set for acceptable voids for residents – ensuring fit for purpose homes with clear commitments
New Damp & Mould response team	Dedicated response team to triage and proactively manage damp & mould cases in stock
5% sample Stock Condition survey completed	Undertaken to understand the extent of survey required and reprogramme costs. Full survey programme now in place.
NEC system	New customer interface and asset management system now live. Removal of most manual and outdated systems.
Data Cleansing exercise	As part of the NEC system implementation programme, we have conducted a data cleanse exercise so that clean data is uploaded into our new systems
Estate walkabout/inspection programme	Programme of engagement with residents on estate improvements.

Consumer Standards review	Self-assessment against existing Consumer Standards informing service development plans
Compliance	A new and very experienced Head of Building Safety and Compliance manager has started working with us on restructuring the compliance function to ensure full compliance with our statutory obligations. Sufficient resource allowance made from HRA budgets.
Competency Model	New competency model designed setting out behavioural expectations of staff and managers

These projects demonstrate our commitment to making services better and form part of the journey to return to compliance.

4.2 Projects in progress to address the breaches:

The following projects are ongoing and contribute to our return to compliance. They are set out according to the standard which they address:

4.2.1 Projects which address the Home Standard

Project	Purpose	Milestones	Dates
1.5 Re-structure of the Housing Directorate	To conduct a review and restructuring of the Housing Directorate divisions following reviews of performance, operating practice and delivery to best deliver efficient and effective services to customers. To stabilise leadership at a senior level to deliver improvements and lead employees in transforming the service.	New Housing directorate structure finalised and posts recruited to	Dec-2023
2.1 - Performance review framework	To devise and implement a Performance framework which sets out clear measures of performance for service areas and enables appropriate objective setting for staff, projects and initiatives with focus on customer services. To refine which KPIS are shared to improve business intelligence.	Performance Dashboards with KPIs for DMT and the Housing Improvement Board are finalised.	July 2023
4.3 Asset Management	The Strategy will detail our long-term plan for the management of our Council stock (as part of a ten-year	Stock condition survey 1/3 target achieved	Dec-2023

Strategy	rolling programme) and link in with clear financial planning.	HRA Business Plan & Asset Management Strategy	Mar-2024 delayed to April 2024*
6.3 Repairs restructure and behaviour change programme	To have an effective, motivated and skilled workforce which can manage the new repairs contracts and deliver our capital and asset management programmes. To have sufficient capacity within the Compliance function to monitor and provide assurance against the big 6	Agree structure in alignment with operating model and statutory requirements	July 2023
		Implement/complete restructure including change mgmt. In alignment with operating model	Dec 2023
		Training plan	Mar-2024

4.2.2 Projects which address the Tenant Involvement and Empowerment Standard

Project	Purpose	Milestones	Dates
3.2 Resident engagement strategy	To set out how residents will be engaged in decision-making, information-sharing and consultation	Obtain feedback from stakeholders and wider residents on proposals	Jul-2023
		Draft strategy shared with HIB and TLP	Sept-2023
		Final strategy submitted to Cabinet for scrutiny and approval	Dec-2023 – delayed to Summer 2024*
3.4 Customer Information Review	To evaluate the information captured for customers, profiling customer information, ensuring characteristics are used to inform communication channels and service delivery.	Gap Analysis completed on existing data	Jun-2023
		Action Plan implemented	Aug-2023
		Profiling exercise - feeding into operating model	Nov-2023
3.7 Customer Care Training Programme	Transform customer interactions through a programme of training	Procurement process	Jul-2023
		Commence delivery Phase 1	Sep-2023

	focused on behaviour and creating a positive customer experience	Delivery Phase 2	Nov 2023 – delayed to April 2024
3.8 Review of our Complaints Process	Improve and standardise responses, minimise backlogs and learn from complaints – ensure the process for managing complaints is easy to navigate for customers	Problem investigation complete	July-2023
		Solution designed and action plan & onboarding of Complaints Mgr	Aug-2023
		Review of approach	Oct-2023
6.6 Review of Policies and procedures	Aligned with a new operating model, new contractors, new service standards and utilising our customer data – a review of our procedures and policies to deliver better outcome for our customer base	Prioritisation of policies and procedures	May 2023
		Implement tier one review	June 2023
		Implement tier two review commence	Nov 2023
7.2 Enabling high-performing teams and setting behavioural expectations	Creation of a competency model setting out clear behavioural expectations and linking it with succession planning, recruitment and recognition	Competency Model drafted and shared with DMT	June 2023
		Competency Model consultation	August 2023
		Competency model launch	Sept 2023
		Link to appraisals	Mar 2024
		Link to recruitment	Mar 2024

4.2.3 Projects which address both Standards

Project	Purpose	Milestones	Dates
1.3 Housing Strategy	To compose a Housing Strategy which sets out the long-term Strategic Aims of the Housing directorate incorporating the environmental and organisation constraints	Draft priorities out for consultation	June/July 2023
		Strategy to Cabinet	November 2023
3.10 Consumer	Assessment against the four consumer standards to ensure compliance and	Consumer Stds audit and action plan	June 2023

Standards Review	best practice and implementation of action plan	Update to Transformation Programme	Oct 2023
3.15 NEC	Delivery of NEC Housing in order to exploit the capabilities of a modern system presenting a single view of the customer. The relational database reduces data duplication and allows all service areas to share resident, property and repairs information.	New NEC Data Management System Implemented - Phase 1	June 2023
		New NEC Data Management System Implemented - Phase 2 initiated and planned	Oct 2023

*timescales extended with regulator

5 Evidencing Compliance

The Housing Transformation Programme will deliver compliance against the consumer standards as projects directly target the cause of the breach and deliver improved outputs.

5.1 Milestones

Achieving the milestones is one form of evidence and we have sought to ensure the milestones clearly link to the return to compliance. Progress against the milestones will be monitored at meetings with the Regulator, Transformation Steering Board and Housing Improvement Board as stated above. In addition, we provide updates to Cabinet on a regularly basis and scrutiny subcommittee.

5.2 Key Performance Indicators

Key Performance Indicators are part of how we monitor impact of the projects, and these indicators are reviewed in Housing's monthly performance meetings, the monthly corporate performance meetings as a senior leadership team and performance reporting to the Mayor. The KPIs which we monitor are mixed in terms of the direct causal relationship between indicator and intervention. In some cases, it is obvious and direct e.g. gas safety checks, however, for others e.g. TP08 Agreement that the landlord treats tenants fairly and with respect, it will be the case that numerous interventions will impact the TSM. We will continue to monitor and take a more holistic view on the impact the interventions are making. KPIs monitored for our journey back to compliance can be found in Appendix 1.

It is expected that we will be demonstrating a positive trajectory consistently against these KPIs from January 2024 onwards. This allows for the cleansing and rebasing of our performance data following the implementation of NEC and the onboarding of new contractors in August 2023. We will be using HouseMark data (annual data sets) to measure our performance against peers and will be expecting to start meeting Median targets by September 2024 if not earlier. This allows for the performance to be reflected in the data collection for which there will be a lag. Meeting (at least) the Median target is part of the journey and not the end destination for our performance and we will be looking to

continuously improve from that position over the years ahead. The targets outlined in Appendix 1 are based on consideration being given to the transformation projects outlined within this report having an impact on those performance areas and is based on actuals known as of July 2023.

5.3 Timescales and impact

The housing directorate is on its way to compliance, but the transformation journey is one expected to take another two years. Having said that we are confident that we will be fully compliant with the consumer standards by September 2024. This allows for the Repairs contracts to be embedded and working well, providing significant improvements in customer satisfaction metrics by September 2024 (allowing for the lag in data collection). In addition, the restructures will be implemented and the majority of projects described above will be complete. Staff groups will be working in a new operating model with customers sitting at the core, performance will be monitored closely and issues or dips in performance will be picked up in our Performance Management Meetings (held monthly) and by our new Customer Insight team. We will have a complaints process in place which will allow customers to easily make contact to raise a concern and we will be monitoring trends in complaints to identify areas to improve and address in a more planned way.

Our Asset Management strategy will be agreed at Cabinet with a costed HRA Business plan associated with it guiding our planned programme of investment. A new “development and new supply division” will be working on our regeneration plans and looking at how we will address our remaining LPS blocks, in addition to looking at our wider supply plans with partners. Staff will have undergone a training audit and will be equipped with tools and the mindset to deliver better customer service whilst also awaiting any professional qualifications training/opportunities that have been identified for them.

We will be fully compliant with the consumer standards and our Tenant Satisfaction measures will be consistently improving. Our compliance teams will be appropriately resourced and we will have high levels of confidence in our metrics and in the actions we have completed to ensure compliance with the Building Safety Act and Fire Safety Act. The experience for our customers will feel markedly different with more engagement, empathy and respect demonstrated across the service. Whilst we may not always get the service right, we will keep customers informed of our actions, involve them in key decisions that affect them and seek to rectify issues quickly and fairly.

6.0 External Assurance

We will commission an external partner/s to assess how we are performing against the consumer standards to provide additional assurance to ourselves, our customers and the regulator for social housing. We will look to commission this provider in the summer of 2024 with a view to reporting back in October 2024.

Appendix 1 Performance Metrics

KPIs for the Tenant Involvement and Engagement Standard:

Measure	Median from HouseMark Annual report Jan 2023	Actual (Q1 23/24)	Target Sept 2024
Overall satisfaction	60%	60%	75%
Satisfaction that the landlord listens to tenant views and acts upon them	42%	45%	50 %
Satisfaction that the landlord keeps tenants informed about things that matter to them	55.4%	60%	80%
Agreement that the landlord treats tenants fairly and with respect	59%	65%	75%
Satisfaction with Complaint handling	26.8%	35%	60%
Complaints responded to within the CHC timescale	tbc	tbc	80%
% increase year on year of data profiling on our customers/Tenants	n/a	tbc	5%
Escalation of complaints to stage 2	n/a	9%	7%

KPIs for the Home Standard:

Measure	Median from HouseMark Annual report Jan 2023	Actual Q1 23/24	Target Sept 2024
Gas safety Checks	99.98%	99.5%	100%
Fire Safety Checks	99.4%	99%	100%
Asbestos Safety Checks	100%	98.5%	100%
Water Safety Checks	100%	100%	100%
Lift Safety Checks	100%	98.1%	100%
Electrical Checks (EHICS)	100%	93%	100%
Homes that do not meet the Decent Homes Standards	10.35% (July 23 benchmark)	0.13%*	0%
Repairs completed within target timescale	n/a	new contractor data	80%
Satisfaction with Repairs	63.7%	65%	70%
Satisfaction with time taken to complete recent repair	62%	53%	62%
Satisfaction that the home is well maintained	58%	52%	58%
Satisfaction that the home is safe	69%	65%	69%
Appointments made and Kept	n/a	new contractor data	80%

*Data reliant on APEX will be reviewed with stock condition outputs and Damp and Mould/disrepair cases

Appendix B

The eight workstreams within the programme are:

Workstream 1: Vision, Direction & Transformation Plan for Housing Directorate

Purpose: To establish a direction for the directorate, identify key challenges internally and externally, determine priorities, structure directorate accordingly to deliver improve services

- Workstream 2: Governance & Information Management

Purpose: To develop a robust framework for effective governance of the directorate to ensure accountability, high performance, and effective financial and information management.

- Workstream 3: Customer Excellence

Purpose: To deliver a Customer Excellence approach to re-focus the directorate on delivery of excellent customer services that meet and exceed the Tenant Involvement & Empowerment Standard.

- Workstream 4: Long-term Home and Neighbourhood Planning & Investment

Purpose: The proactive management of our Homes and Neighbourhoods to create robust investment plans and deliver regeneration ambitions.

- Workstream 5: Asset Compliance

Purpose: To develop a compliance service with a robust framework for ensuring compliance with legislative and regulatory standards, ensuring safe and compliant homes

- Workstream 6: Maintaining our Homes

Purpose: The reactive maintenance of our assets to meet and exceed our obligations to the Home Standard, ensuring supply of homes is optimized for customers and income.

- Workstream 7: People & Organisational Development

Purpose: To proactively manage our culture, our development as a directorate and enable our workforce to deliver excellence to our customers, partners, and each other.

- Workstream 8: Managing our Housing Needs

Purpose: To proactively manage our Housing Needs Statutory Duty.

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET		
DATE OF DECISION	27 March 2024		
REPORT TITLE:	2023-24 Period 9 Financial Performance Report		
CORPORATE DIRECTOR	Jane West Corporate Director of Resources (Section 151 Officer)		
LEAD OFFICER:	Allister Bannin, Director of Finance (Deputy S151)		
LEAD MEMBER:	Cllr Jason Cummings, Cabinet Member for Finance		
KEY DECISION? 0624EM	Yes	Key Decision – Decision incurs expenditure, or makes savings, of more than £1,000,000 or such smaller sum which the decision-taker considers is significant having regard to the Council’s budget for the service or function to which the decision relates	
CONTAINS EXEMPT INFORMATION?	No	Public Grounds for the exemption: N/A	
WARDS AFFECTED:	All		

1 SUMMARY OF REPORT

1.1 This report provides the Council’s financial performance as at Period 9 (December 2023) for the General Fund, Housing Revenue Account (HRA) and the Capital Programme. The report forms part of the Council’s financial management process for publicly reporting financial performance on a monthly basis.

Financial Performance Summary Table

Financial Performance Area	2023-24 Revised Budget (£m)	2023-24 Forecast (£m)	2023-24 Forecast Variance (£m)	2023-24 Forecast Variance (%)
Revenue Forecast (General Fund)	340.9	339.4	(1.5)	(0.4%)
Revenue Forecast (Housing Revenue Account)	-	12.0	12.0	N/A
Capital Forecast (General Fund)	124.0	104.0	(20.0)	(16.1%)
Capital Forecast (Housing Revenue Account)	37.2	39.0	1.8	4.8%

2 RECOMMENDATIONS

For the reasons set out in the report, the Executive Mayor in Cabinet is recommended:

- 2.1** to note the General Fund revenue budget outturn is forecast to underspend by £1.5m at Period 9, after the budgeted utilisation of £63m capitalisation directions requested from DLUHC.
- 2.2** to note the progress in Medium Term Financial Strategy (MTFS) savings achievement of £32.4m (89.8%) against the total savings target of £36.1m as set out in paragraph 4.102.
- 2.3** to note the work that has commenced on the Council's Transformation Programme as set out from paragraph 4.97.
- 2.4** to note the Housing Revenue Account (HRA) revenue budget outturn is forecast to overspend by £12.0m.
- 2.5** to note the General Fund capital programme 2023-24 forecast underspend of £20.0m against the revised capital budget of £124.0m. The 2023-24 General Fund capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 14 February 2024.
- 2.6** to note the HRA capital programme 2023-24 forecast overspend of £1.8m against the revised capital budget of £37.2m. The 2023-24 HRA capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 14 February 2024.
- 2.7** to approve within the multi-year HRA capital budget the re-profiling of £2.071m budget from 2024-25 to 2023-24. This is to align the budget with the acquisition of the Belgrave and Grosvenor site and freehold of the previous Printworks site on Portland Place from Brick By Brick in March 2024, as set out from paragraph 4.141.
- 2.8** to note the Council's historic borrowing and subsequent debt burden continues to be critical to the non-sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of structural indebtedness to ensure it can deliver sustainable local government services.
- 2.9** to note that the Council continues to operate Spend Control Panels to ensure that tight financial control and assurance oversight are maintained.

- 2.10** to note that current forecasts are based on the best available information at the time and will be subject to review and change during the financial year.

3 REASONS FOR RECOMMENDATIONS

- 3.1** The Financial Performance Report is presented monthly to Cabinet and provides a detailed breakdown of the Council's financial position and the in-year challenges it faces. It covers the General Fund, Housing Revenue Account (HRA) and Capital Programme. The Financial Performance Report ensures there is transparency in the financial position, and enables scrutiny by the Executive Mayor, Cabinet, Scrutiny & Overview Committee and the public. It offers reassurance regarding the commitment by Chief Officers to more effective financial management and discipline.

4 BACKGROUND AND DETAILS

- 4.1** The 2023-24 budget approved by Council in March 2023 set a net revenue budget of £340.9m. This required capitalisation directions from government of £63m to balance, owing to resolving historical inaccurate accounting treatments and to fund the ongoing annual cost of servicing the disproportionate level of debt.
- 4.2** The Council's historic legacy borrowing and debt burden continues to be critical to the non-sustainability of the Council's revenue budget.

Cost of Living Considerations

- 4.3** There are a number of inflationary pressures that the Council, like all local authorities, is managing. The UK's Consumer Prices Index (CPI) inflation rate was 4.0% in the 12 months to December 2023, remaining higher than the Bank of England's target rate of 2% albeit reduced from the peak of 11.1% in October 2022. The inflationary impact goes beyond the Council as the cost of living is affecting all households and businesses.
- 4.4** These macro-economic factors are impacted by international events and, therefore, well beyond the control of Croydon Council. Despite the limitations, the Council is seeking to support households wherever possible.
- 4.5** A dedicated cost of living information hub has been established on the Council's website. This provides a single source of information, informing residents of the financial support available and signposting to further support, advice and guidance.

4.6 The Council provides a wide range of support for residents that may be struggling owing to cost of living pressures. These include:

- Discretionary support for residents in financial hardship, including the Household Support Fund
- Council Tax Support Scheme – for residents on a low income or in receipt of benefits, Council Tax bills could be reduced by up to 100%
- Council Tax Hardship Fund (supporting low income households that cannot afford to pay their full increase in Council Tax)
- Housing Revenue Account (HRA) discretionary fund targeted for tenants that are not in receipt of housing benefit
- Benefits calculator, to ensure residents receive the support to which they are entitled
- Energy advice, including heating and money saving options, through the Croydon Healthy Homes service
- Free holiday activity clubs with healthy meals for children
- Croydon Works to help residents into employment or to receive training to support them into work and funding of the voluntary sector to provide advice and guidance

4.7 The cost of living information hub also signposts residents to a range of support provided by other organisations in Croydon, including:

- NHS Healthy Start vouchers for families
- Free school meals
- Support from voluntary, community and faith sector organisations
- Support for businesses through the London Business Hub and the British Business Bank
- CroydonPlus credit union which offers affordable ways to manage money, including savings accounts and loans

GENERAL FUND REVENUE BUDGET SUMMARY

4.8 The General Fund revenue forecast outturn shows an overall underspend of £1.5m, however this is following the budgeted utilisation of the £63m capitalisation directions requested from DLUHC. Although the current overall forecast does not utilise the risk contingency budget, individual service directorates in an overspend position will work to bring their positions within budget as well.

Table showing the revenue forecasts by Directorate

Directorate	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)	Prior Month Forecast Variance (£m)	Change in Forecast Variance (£m)
Adult Social Care and Health	140.8	115.2	139.3	(1.5)	(1.3)	(0.2)
Assistant Chief Executive	43.8	28.3	42.6	(1.2)	(1.2)	-
Children, Young People and Education	101.4	60.7	105.5	4.1	4.1	-
Housing	23.9	24.5	23.9	-	-	-
Resources	38.3	138.0	35.4	(2.9)	(2.9)	-
Sustainable Communities, Regeneration & Economic Recovery	73.9	63.7	73.9	-	-	-
Subtotal Service Directorates	422.1	430.4	420.6	(1.5)	(1.3)	(0.2)
Corporate Items and Funding	(81.2)	(30.2)	(81.2)	-	-	-
Total Net Expenditure Budget	340.9	400.2	339.4	(1.5)	(1.3)	(0.2)

- 4.9** Work will continue through to the end of the year to manage those areas with forecast overspends to ensure the Council remains within budget.
- 4.10** The Council continues to build on the improvements in financial management that were made in the last financial year. However, there is a considerable amount yet to do, which is fully recognised within the organisation.
- 4.11** A financial assurance process and independent challenge of expenditure and income takes place. This is in addition to Cabinet and Scrutiny & Overview Committee review. The assurance meetings provide the Corporate Director of Resources (Section 151 Officer) and the Chief Executive with an opportunity to scrutinise and challenge the forecast outturn, review risks and opportunities, and ensure that savings are delivered and income targets are met. The meetings ensure the Council is doing all it can to reduce overspends and deliver a balanced budget.

DIRECTORATE VARIANCES

ADULT SOCIAL CARE AND HEALTH (ASCH)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Adult Social Care Operations	122.0	113.5	121.6	(0.4)
Adult Strategic Commissioning, Policy & Improvement	16.9	0.2	15.8	(1.1)
Central ASCH	1.9	1.5	1.9	-
Total ASCH	140.8	115.2	139.3	(1.5)

- 4.12** At period 9 the ASCH directorate has a forecast underspend of £1.5m (1.1%) against a budget of £140.8m which is an improvement of £0.2m from period 8.

4.13 The ASCH directorate has challenging savings targets totalling circa £10m to deliver in 2023-24 on placements and care packages through demand management, commissioning and review of care packages.

Adult Social Care Operations - Forecast underspend of (£0.4m)

4.14 Staffing across this division demonstrates a forecast underspend (broken down by area below) owing to periods of vacancy above the £1m MTF5 5% vacancy factor saving applied to staffing budgets in 2023-24. There is a national shortage of both social workers and occupational therapists and recruitment to many roles is proving challenging. The staffing underspend is reduced by the need to employ agency social workers and occupational therapists to ensure statutory duties are met and that transformation is delivered.

4.15 Localities and Living Independently For Everyone (LIFE) have an underspend of (£1.5m) owing to a net underspending on care of (£0.9m) and staffing (excluding agency) of (£0.7m), partially offset by an overspend on equipment costs of £0.1m. LIFE includes integrated hospital discharge, rehabilitation and reablement services.

4.16 Working Age Adults and Transitions has an overspend of £3.6m. This comprises an overspend on care of £3.7m (owing to clients with increased care needs) which is partly mitigated by an underspend in staffing of (£0.1m). The service is managing demand to reduce pressures coming into the service and this is estimated to have resulted in a positive impact on the forecast of circa £2m. The service is on target to achieve savings of £5.3m and has committed to achieving further savings to offset the budget pressure.

4.17 Provider Services has a (£1.5m) forecast underspend on staffing owing to vacancies. This is a favourable movement of (£0.2m) since period 8.

4.18 Safeguarding service has a (£0.2m) forecast underspend on staffing owing to vacancies across the service.

4.19 Business Compliance and Early Intervention has a (£0.1m) forecast underspend on staffing owing to vacancies.

4.20 Mental health services have a (£0.7m) forecast underspend owing to the application of external discharge funding.

Adult Social Care Policy and Improvement – Forecast underspend of (£1.1m)

4.21 The Policy and Improvement division is forecasting an underspend of (£1.1m) owing to staffing vacancies and minor contract underspends.

Central ASCH – Forecast breakeven position

4.22 This area is forecast to breakeven against the budget for central staffing and non-pay budgets.

4.23 Risks

Risks continue in the provider market from inflation including higher fuel, labour and property costs which may result in claims for increased fees and/or financial instability with the potential for 'handing back' contracts. The potential reprovisioning costs if providers exit the market could be significant. It should be noted that this risk is already materialising. Providers are requesting increases in costs for existing care packages and new placements are increasing in costs. These are included in the forecast and are hardest felt in the working age adult cohort.

4.24 Opportunities

Savings achievement is improving and will continue to support the forecast outturn for the ASCH directorate.

ASSISTANT CHIEF EXECUTIVE (ACE)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Policy, Programmes and Performance	5.2	3.8	4.7	(0.5)
Elections Service	0.4	0.1	0.4	-
Croydon Digital and Resident Access	33.6	21.0	33.1	(0.5)
Chief People Officer	3.9	2.6	3.7	(0.2)
Central ACE	0.7	0.7	0.7	-
Covid Grants	-	0.1	-	-
Total ACE (General Fund)	43.8	28.3	42.6	(1.2)
Public Health Grant Ringfenced Services	-	8.5	-	-

4.25 At period 9, the ACE directorate has a General Fund forecast underspend of £1.2m (2.7%) against a budget of £43.8m.

Policy, Programmes & Performance Division - £0.5m forecast underspend

4.26 Recruitment is continuing into the new staffing structure for the Policy, Programmes and Performance Division. The forecast underspend is owing to periods of vacancy of some posts in the new structure.

Elections Service - breakeven position

4.27 There is a breakeven forecast against budget for the Council's core Elections Service.

Croydon Digital and Resident Access Division - £0.5m forecast underspend

4.28 Underspends in Concessionary Travel are forecast owing to staff vacancies and a favourable final concessionary travel settlement for the year.

Chief People Officer Division - £0.2m forecast underspend

- 4.29** Staffing related underspends and lower than expected training expenditure is offsetting the overspend in the payroll service owing to the delay in the restructure of the team.

Central Assistant Chief Executive – breakeven position

- 4.30** There is a breakeven forecast against budget for the Central Assistant Chief Executive.

Public Health Division – breakeven position in ringfenced grant after movement in reserves

- 4.31** It is currently forecast that Public Health will contribute £3.7m to ring fenced Public Health reserves at the end of 2023-24.

- 4.32** A Council wide task and finish group was set up in July 2023 to address underspends in the Public Health Grant for the current year, and the accumulated balance on the balance sheet as an earmarked Public Health reserve from underspends in previous years.

- 4.33** Work has been ongoing this year to identify areas of additional allocation of grant. A revised investment plan is due to be presented by the Director of Public Health to the Corporate Management Team in April 2024 which will set out investments agreed to date, and future potential investment in public health services and activities. This will ensure that grant is fully allocated for 2024-25 and future years.

4.34 Risks

Elections - The majority of the costs of administering the London Assembly, Mayor of London, and a potential General Election, in 2024 will be reclaimed from the Greater London Authority (GLA) and the UK Government's Consolidated Fund. As the criteria for reclaiming costs have not yet been set, there is a risk that the Council may incur costs which cannot be reclaimed which would need to be funded corporately. Any such costs will fall in the 2024-25 financial year.

4.35 Opportunities

There are no opportunities to report on at this time for the ACE directorate.

CHILDREN, YOUNG PEOPLE AND EDUCATION (CYPE)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Children's Social Care	76.0	50.3	79.6	3.6
Unaccompanied Asylum-Seeking Children (UASC) and UASC Care Leavers	(0.3)	4.8	0.2	0.5
Asylum Seekers and Homes for Ukraine	-	(6.5)	-	-
Quality, Commissioning and Performance Improvement	7.6	4.3	7.7	0.1
Non-DSG Education Services	17.6	7.4	17.5	(0.1)
Central CYPE	0.5	0.4	0.5	-
Total CYPE (General Fund)	101.4	60.7	105.5	4.1
Dedicated Schools Grant (DSG) High Needs Education Services	82.0	62.5	82.7	0.7
Dedicated Schools Grant (DSG) Early Years Block	31.1	23.3	31.1	-

4.36 At period 9, the CYPE directorate has a General Fund forecast overspend of £4.1m (4.0%) against a budget of £101.4m. There is no movement since period 8.

Children's Social Care Division – forecast overspend of £4.1m (including UASC and UASC Care Leavers)

£3.3m placements overspend owing to six active high-cost placements including residential, semi-independent and secure. Four of these high-cost placements are new in the current year. Whilst the number of children in care has continued on a downward trend, unit costs for residential and semi-independent placements have risen at a faster rate e.g. the number of residential placements increased by 17%, but the full year costs for these increased by 54%.

High-cost placements are reviewed on a weekly basis with the aim of reducing spend and stepping down to family-based care with support where possible. There are a small number of children with very complex needs where the high costs of care make up a significant proportion of the overall placement budget.

£0.1m staffing underspend owing to delays in recruitment.

£0.3m under-achievement in income (including £0.5m unachieved 2022-23 MTFS NHS Funding savings which have been partially offset through other income).

£0.1m forecast overspend on Adopt London South, over and above the agreed budget owing to interagency fees and staffing costs across the consortium calculated at year end.

£0.5m overspend in the Unaccompanied Asylum-Seeking Children (UASC) budget because of the disproportionate number of care experienced young people who were formerly unaccompanied children. At 18 years old the grant provided by the Home Office to the Council for young people's care and support reduces significantly.

Quality, Commissioning and Performance Improvement Division – forecast overspend of £0.1m

- 4.37** The division is forecasting a staffing overspend of £0.2m from the impact of increased quality assurance activity to support and assure the response to increased demand for children’s social care services. The staffing pressure is being partially offset through a £0.1m forecast underspend in non-pay budgets.

Non-Dedicated Schools Grant (DSG) Education services – forecast underspend of £0.1m

- 4.38** Non-DSG Education services are still forecasting an underspend of £0.1m at Period 9, with staffing vacancies offsetting income pressures in other parts of the service.
- 4.39** £0.3m unachieved 2022-23 MTFs NHS Funding savings are being mitigated by underspends in other areas of the service.

DSG High Needs education services – forecast overspend of £0.705m

- 4.40** The SEND High Needs forecast at period 9 remains at an overspend of £0.705m against the budget of £82.059m. This represents no movement from period 8.
- 4.41** The overall variance at Period 9 represents a favourable variance of £0.020m from the expected overspend of £0.725m submitted to the Department of Education (DfE) Safety Valve Team as part of the approved Deficit Recovery Plan.
- 4.42** See below the key areas:

£2.226m Out of Borough and Independent – Forecast overspend due to two key factors: 1) significant percentage uplifts in the cost for current and new placements; and 2) continued demand for placements for the most complex cases where provision within the borough is full. This includes an additional pressure from a number of high-cost specialist medical residential placements through Tribunal direction. The service is working with our special and mainstream schools to expand local provision and placement options for September 2024 and 2025.

£1.110m overspend due to increased placements in Mainstream Education provision exceeding the budgeted allocation. This forms part of the invest to save SEND strategy in year 2.

(£0.406m) underspend in Early Years provision.

(£0.250m) underspend in top up funding related to delayed implementation of the proposed expansion of Enhanced Learning Provision across a few schools.

(£0.953m) underspend in the Service Transformation budget set up to support the DSG Deficit Recovery strategy.

(£0.400m) underspend in funding related to staffing cost in therapies and support services owing to service re-alignment to maximise savings.

(£0.622m) expected clawback from specific Resource Provision (academies) for extra funding received from DfE.

- 4.43** DSG High Needs education services will continue to closely monitor the demand pressures in Independent and Out of Borough placements owing to cost implications. Addington Valley Academy, St Nicholas, Coulsdon College Croydon, and Waddon Youth Disability Services are increasing placement numbers, which is reducing high-cost placements out of borough.
- 4.44** The 2023-24 period 9 High Needs forecast outturn variance of £0.705m leads to an overall DSG deficit projection of £16.089m at the end of 2023-24 compared to the Safety Valve target of £16.109m prior to the £3.290m Deficit Recovery payment from the DfE as per the Safety Valve agreement. This demonstrates that the Council is still ahead of the DfE target.

DSG Early Years Block – forecast breakeven position

- 4.45** The Department for Education (DfE) provides six key funding streams for the Early Years Block. The budget allocation for 2023-24 is £31.088m, and a breakeven position is forecast for Period 9. The government recently announced an additional grant (Supplementary funding) of £2.507m for Croydon covering the period from September 2023 to March 2024. The DfE operational guide directs local authorities to “pass-through” 100% of the allocation to the sector and the Council is on target to meet the DfE requirements. Schools Forum was recently provided with updates on the payment to date.

4.46 Risks

- The Children’s Social Care Division is monitoring placement and care package expenditure during the year. Pressure on placement spend is due to the sufficiency challenges both locally and nationally. The introduction of regulation for supported accommodation is predicted to increase charges as providers seek to pass on costs to Local Authorities. “Costs of new Ofsted regulation and inspection regime for semi-independent placement provision could be nine times higher than government funding, whilst one in five care beds could be withdrawn”, report warns – London Innovation and Improvement Alliance (LIIA).
- The service is also reviewing the housing accommodation charges from the Housing General Fund for Care Experienced Young People.
- The £0.3m unachieved income budget within the High Needs General Fund budget poses an indirect financial risk to the Safety Valve target should there be a need to offset the £0.3m potential shortfall to support activities or resources (EHCP Coordinators) within the SEND service. The service is exploring all mitigating options available.
- The service is monitoring all the risks associated with the Safety Valve target which includes increasing complexity of needs requiring additional funding for

special schools, increasing placement costs and extra out of borough placements to meet the local needs of some CYP pupils with complex needs.

4.47 Opportunities

- There could be some staffing underspends from periods of vacancy.
- Potential underspend of £0.3m in legal costs, if the lower numbers of care proceedings and UASC age assessment challenges continue.

HOUSING

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Resident Engagement and Allocations	23.9	24.5	23.9	-
Housing Estates and Improvement	-	-	-	-
Total Housing	23.9	24.5	23.9	-

4.48 At period 9, the Housing directorate has a General Fund forecast breakeven position against the budget of £23.9m.

4.49 An allocation of £1.234m has been agreed from the Contain Outbreak Management Fund (COMF) grant, with £1m supporting homelessness costs and £0.234m supporting the clearing of the homelessness casework backlog.

4.50 There is a crisis within the London housing market that is creating significant demand for services, has not levelled out within 2023-24 and is likely to continue to rise into 2024-25. The data available following the changeover of rent account systems to the new NEC IT system is now improving although further improvements to forecasting accuracy can be expected as data quality is addressed, reporting is developed further, and more data analysis is performed.

4.51 Current financial modelling of a worst-case scenario for emergency and temporary accommodation indicates that the 2023-24 overspend could be up to circa £4m and this will be monitored closely over the final months of the financial year to check whether levels of new temporary accommodation placements continue at the current higher level or return to being in line with longer term historical trends. The pressures experienced by Croydon are also being experienced across London and nationally. Government have recognised this pressure with £92k of winter pressures funding to be allocated across the seven South-West London boroughs.

4.52 A top-up to the Homelessness Prevention Grant (HPG) of £1.9m was announced by DLUHC to cover homelessness pressures relating to Ukrainian refugees. This funding may also be used to fund wider homelessness pressures and reporting requirements are in line with the existing HPG requirements. The grant top-up could also help offset

any potential detriment to income collection resulting in the bad debt provision being increased at year end.

Emergency Accommodation (Nightly-paid accommodation)

- 4.53** There are a number of factors that impact expenditure against this budget. Firstly, there has been a demand rise in the number of households that have been placed into Emergency Accommodation (EA). The factors that have pushed up demand include:
- 4.54** A reduction in new private rented sector (PRS) lettings which is down 41% compared to the pre-COVID average (with tenants staying longer in properties and landlords exiting the market) and private rents are now more than 20% higher than pre-COVID levels. Therefore, new lettings affordable within Local Housing Allowance (LHA) levels are increasingly rare. The LHA uprating from April 2024 will provide a significant boost to affordability but will not solve the problem.
- 4.55** Another factor is the number of asylum-seeking households which is adding a pressure on available affordable accommodation. From August 2023 the Home Office accelerated their decision making for asylum claims and give very short notice when people are to be evicted from their accommodation. This is an additional pressure as the Council does not receive any financial assistance for these households.
- 4.56** Family evictions are also increasing, potentially linked to the decrease in availability of affordable housing in the private rented sector (PRS) and the increase in evictions detailed above and subsequent short-term arrangements breaking down.
- 4.57** Additional to the increase in demand is the backlog of circa 2,000 cases identified as part of the Housing Needs restructure. More of those households are now being placed in emergency (nightly paid) accommodation.
- 4.58** There is a shortage of suitable EA to meet the increasing demand, so the Council is relying on expensive commercial hotels and families staying in accommodation with shared facilities for over 6 weeks.

Temporary Accommodation

- 4.59** The factors leading to demand for homelessness accommodation, particularly in London which is bearing 57% of the national homeless placement total, are also impacting the ability for Croydon to secure affordable accommodation to house those households unable to secure affordable accommodation in the private sector.

Risks

- 4.60** There is a Temporary Accommodation scheme, Croylease, which was active in signing on properties between 5 to 10 years ago based on cost effective rents and an agreement for the Council to return properties in a specified condition. Council repairs contractors conduct the void repair work at the point that the contract term finishes, and the landlord requests their property back. Across 2022-23 and 2023-24 landlords

have been withdrawing from this scheme which resulted in significant repair costs of circa £660k in 2022-23 and we are expecting a higher level in 2023-24.

- 4.61** The suitability of housing offered to a person determined as being eligible for homeless assistance has been subject to a number of legal challenges within 2023-24. One such case has been heard in the Supreme Court with an outcome that was, in this particular case, adverse for Croydon but in the long term may have positive implications in reducing the overall level of challenge. A cost, or a provision for cost, will need to be recognised in the 2023-24 accounts at an estimated amount of £300k.
- 4.62** The implementation of the new NEC IT system experienced a delay in setting up the interfaces between NEC and the Oracle finance system. The income interface is now posting income from the NEC system into the Oracle finance system, however there are reconciliations still being carried out. There may be a requirement to increase the loss allowance (bad debt provision) at the end of 2023-24 depending on the level of income collection achieved by year end.
- 4.63** There has been a concerted effort to hold homelessness accommodation costs down across London through partnerships with organisations like Capital Letters and via the agreed Pan-London temporary accommodation rates. The rates can no longer be contained though as demand outweighs available affordable supply. At a Pan London meeting, all boroughs confirmed that they are no longer paying the agreed Pan London rates to ensure they meet their demand challenges. A combination of all these factors has led to an increase in both the average cost of emergency and temporary accommodation that Croydon can secure to meet demand, as well as an increase in the use of nightly paid emergency accommodation to compensate for the loss of some longer-term leased accommodation because of landlords leaving the market.
- 4.64** There is a potential financial risk from the fire at Sycamore House in Thornton Heath depending on the insurance claim settlement not yet finalised. This risk was provided for in the 2022-23 accounts however, if there is any difference from the estimated reimbursement of 70% of costs from the insurers, this would be an extra charge or benefit when settled.
- 4.65** There is a potential budget pressure, above the currently estimated £1.2m for 2023-24 which has been funded through the economic demand pressures budget transfer agreed in Period 3, in relation to housing benefit subsidies for the Guaranteed Rent Scheme for Care Experienced Young People.
- 4.66** There is a pressure within the housing budget due to temporary accommodation management fees of £40/week/unit which are no longer recoverable through Housing Benefit (HB) subsidy from DWP. From 1 April 2017, in line with the government announcement in the 2015 spending review, funding was devolved to Local Authorities through the Homelessness Prevention Grant with the aim of allowing Councils to better manage their temporary accommodation pressures, and this funding is instead of the HB subsidy.

Opportunities

- 4.67** Housing will continue to ensure the use of ringfenced Household Support Fund, Rough Sleeping initiative grants, and asylum seeker & refugee grant funding within the grant terms and to maximise the mitigating effect on general fund spend. This includes supporting households that are in rent arrears.
- 4.68** There are opportunities from accommodation that is coming on stream for placing homelessness clients, which will provide alternative accommodation and reduce the reliance on expensive nightly paid accommodation.
- 4.69** The restructure for Housing Needs has been implemented and is forming the bedrock for process and cultural change and a more cohesive journey for a homeless household. The financial benefits are expected to be realised in the longer term from better practice resulting in reduced spend on homelessness.

RESOURCES

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Commercial Investment	19.3	7.9	16.6	(2.7)
Finance (<i>refer note 1</i>)	17.1	121.6	17.1	-
Legal Services and Monitoring Officer	2.7	3.9	2.7	-
Insurance, Anti-Fraud and Risk	0.6	2.7	0.5	(0.1)
Internal Audit Service	0.5	0.4	0.5	-
Pensions and Treasury	0.4	1.2	0.4	-
Central Resources	(2.3)	0.3	(2.4)	(0.1)
Total Resources	38.3	138.0	35.4	(2.9)

Note 1: The actuals to date are high in the Finance Division owing to Housing Benefits expenditure which will be reimbursed through DWP funding.

- 4.70** At period 9, the Resources directorate has a General Fund forecast underspend of £2.9m (7.6%) against a budget of £38.3m.

Commercial Investment Division – £2.7m forecast underspend

- 4.71** The division continues to forecast decreased utilities costs and improved recharging to external bodies. There are also £0.5m of staffing underspends across the division, mainly in Facilities Management owing to periods of staffing vacancy, which are being offset by a forecast decrease in recharges to capital.

Finance Division – breakeven forecast position

- 4.72** There is a breakeven forecast position for the Finance Division. The Payments, Revenues, Benefits and Debt Service is forecasting a staffing underspend owing to staffing vacancies and increased court costs income, but these are being offset by

decreased Land Charges income and temporarily increased agency staffing in strategic finance to work through historic accounting issues including the prior years' accounts.

- 4.73** A cross Council working group is operating to mitigate Housing Benefit (HB) subsidy risks by maximising HB subsidy income claims, increasing collection of HB overpayments and reducing costs. The actuals to date are high in the Division owing to HB expenditure which will be reimbursed through DWP funding.
- 4.74** The Finance Division has undergone a restructure of the strategic finance service and has commenced recruitment into roles which are currently covered by agency staffing. The capacity and skills levels required in the strategic finance service have been reviewed and extra funding from growth has been requested for 2024-25.

Legal Services and Monitoring Officer Division – breakeven forecast position

- 4.75** There is a £0.1m forecast underspend in the Monitoring Officer service owing to staff vacancies and an underspend against the members allowances budget.
- 4.76** There is a forecast overspend in Legal Services of £0.1m owing to high levels of agency staffing.
- 4.77** The Legal Services and Monitoring Officer Division is reviewing usage of external legal advice, with a view to increasing the inhouse staffing structure (moving budget from external legal expenditure in directorates) to provide more legal services internally and therefore reduce overall legal expenditure for the Council.

Other Service Areas and Central Resources - £0.2m forecast underspend

- 4.78** There is a £0.1m forecast underspend in Insurance, Anti-Fraud and Risk owing to staffing savings and increased income from shared services. In addition, there are small underspends across Pensions and Treasury and Central Resources owing to staffing vacancies.

Risks

- 4.79** There is a risk in the Commercial Investment Division as work continues to identify the net impact of asset disposals including the full cost of property related expenditure and loss of income streams.
- 4.80** There is a risk in the Finance Division in relation to Housing Benefit subsidies including the potential impact of the roll out of Universal Credit (UC). The Council can make a claim to DWP for weekly deductions from UC to recover HB overpayments, however there is a hierarchy of deductions and HB overpayments are not at the top of the hierarchy. There is a risk for housing tenants that are claiming HB and are being migrated onto UC. If tenants do not take action to claim UC in a timely manner, they could lose their transitional protection and have decreased income on UC (which could reduce ability to pay their rent).

SUSTAINABLE COMMUNITIES, REGENERATION & ECONOMIC RECOVERY (SCRER)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Sustainable Communities	56.3	55.0	57.0	0.7
Culture and Community Safety	10.3	4.8	9.4	(0.9)
Planning & Sustainable Regeneration	7.3	3.3	7.5	0.2
Central SCRER	-	0.6	-	-
Total SCRER	73.9	63.7	73.9	-

4.81 At period 9, the SCRER directorate has a General Fund forecast breakeven position against a budget of £73.9m. The main potential risk areas relate to Special Educational Needs & Disabilities (SEND) home to school transport and income relating to parking enforcement, moving traffic offences and planning.

Sustainable Communities Division - forecast £0.7m overspend.

4.82 There is a forecast £2.5m pressure for SEND home to school transport due to increased demand, a forecast £0.6m income pressure in New Roads and Street Works Act (NRSWA) coring inspections, and a £0.5m pressure in Parking Services due to connection and configuration issues with the newly installed ANPR cameras. The pressures are being partially offset through a forecast underspend of (£1.7m) in staffing owing to periods of vacancy and (£1.2m) forecast underspend in waste services owing to reduced tonnage level of waste.

Culture and Community Safety Division – forecast underspend of (£0.9m)

4.83 The division is forecasting an underspend of (£0.9m). This is owing to underspends from reduced utility costs in contracts (£0.3m), periods of staffing vacancy (£0.4m) and underspends across the libraries service while the service is under redesign (£0.2m).

4.84 The Culture and Community Safety Division leads on the London Borough of Culture 2023 activities, funded through external funding sources. This is a year-long celebration of Croydon’s unique identity, diverse communities and rich heritage, culture and creativity. The programme for “This is Croydon” showcases Croydon to the world. It includes major events with international headliners performing alongside emerging home-grown talent, plus hundreds of cultural activities from our communities.

Planning and Sustainable Regeneration Division – forecast overspend of £0.2m

4.85 The division is forecasting an overspend of £0.2m. This is driven by an income under-achievement of £0.6m owing to lower activity levels to date in planning major applications and planning performance agreements. This is being partially offset by a

forecast staffing underspend of (£0.4m) owing to periods of vacancy in the Growth and Regeneration Team and other services.

4.86 The reduction in planning major applications is being experienced across the country and the GLA is reporting the reduction across London. It is these applications which bring in the most significant fees. The reduction in major applications can be attributed to several factors, which include:

- Economic factors such as increased building and material costs and increased interest rates.
- Uncertainty relating to the emerging Building Safety Bill – impacts on design and when a second staircase is required.
- Uncertainty in relation to emerging planning legislation. Implementation details are unknown and could be impacted by when the next general election will take place.

4.87 Risks

- Demand for parking services has not returned to pre-pandemic levels and this is affecting all areas of parking which includes Automated Number Plate Recognition (ANPR), pay and display and on-street parking.
- Parking Services have had delays in connection with the roll out of new ANPR cameras which affect the income levels within the service.
- This past year has seen an unprecedented increase in demand and inflation for Home to School SEND Travel.
- Within the Violence Reduction Network, a further Domestic Homicide Review has been initiated which may add additional costs.

4.88 Opportunities

- The SCRER directorate is actively pursuing several grant applications to further improve the financial position:
 - The Culture and Community Safety division have successfully secured grant funding from Sport England for swimming pool costs.
 - Further communications are being held with public health regarding enhancing the borough's community safety offer with direct funding.
 - Development Management has progressed for the Planning Skills Delivery Fund which will assist the service in clearing backlog of planning applications.
- There are several major schemes that are in development that should generate large fees - however these should not be submitted prematurely as this could result in significant costs.

- There could be further staffing underspends across the directorate depending on the timing, and success, of recruitment into posts.

CORPORATE ITEMS AND FUNDING

Area of Spend	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Economic Demand Pressures	0.9	-	0.9	-
Risk Contingency Budget	5.0	-	5.0	-
Transformation Programme	10.0	-	10.0	-
Other corporate items	(97.1)	(30.2)	(97.1)	-
Total Corporate Items and Funding	(81.2)	(30.2)	(81.2)	-

- 4.89** At period 9, the Corporate directorate has a General Fund forecast breakeven position against a net budget of (£81.2m). The risk contingency budget of £5m is not utilised at period 9 and remains to offset pressures that could be experienced across the Council over the remainder of the year.
- 4.90** The corporate area holds funding streams such as Council Tax, retained share of Business Rates and Core Grants. The corporate budget also holds the Council-wide risk contingency budget (£5m) and the budgets for borrowing and interest received.
- 4.91** The corporate area funds redundancy, severance and pension strain costs which contribute to achieving General Fund MTFS savings.
- 4.92** There is budget of £0.9m held centrally (of the original £5.5m agreed by full Council) for the potential impact of economic demand pressures on Croydon after the allocation of £1.7m budget in Period 3 (Housing Benefit subsidy pressures), £2.2m budget in Period 6 (emergency accommodation pressures) and £0.7m budget in Period 7 (children social worker caseload pressures).
- 4.93** The corporate area also holds the 2023-24 Transformation budget of £10m, which funds work carried out in directorates and cross-Council to achieve MTFS savings and improve services for local residents and businesses. It is expected that any underspend in 2023-24 will be carried forward in an earmarked reserve to fund projects which are being delivered over multiple financial years. The Transformation budget reduces to £5m from 2024-25.
- 4.94** There is £1.5m budget held in Corporate for adjustments to correct General Fund recharge budgets relating to the HRA, Public Health, capitalisation of salaries and corporate support (overhead) recharges, and salary and income budget corrections. The budget agreed by full Council was £7.3m and £5.8m of this was allocated out to service directorates in Period 7. The remaining budget is likely to be needed to align corporate support (SERCOP) recharge budgets, following further work to calculate up to date recharges to non-General Fund areas.

- 4.95** There is a funding risk in the Collection Fund if cost of living pressures impact the collection of Council Tax and Business Rates income, and/or increase the levels of claimants for Council Tax Support. The impact of the Council Tax increase is partially mitigated through the Council Tax Hardship Fund (supporting low income households that cannot afford to pay their full increase in Council Tax).
- 4.96** There is borrowing cost uncertainty from interest rates and the timing of capital receipts from asset disposals.

Transformation Programme

- 4.97** The Transformation Programme has £14m of resources allocated to it, consisting of £10m base revenue budget and £4m earmarked reserve.
- 4.98** In total there is currently £10.2m of the Transformation Programme budget allocated with £3.8m unallocated to date. The Transformation Programme will provide a return on investment through service improvement benefits and the identification and delivery of savings for the MTFS, providing a significant level of savings towards the £20m per annum savings required from 2025-26 onwards.

Transformation Programme Allocations

Project	2023-24 Draft Budget Allocation (£m)	Actuals to Date (£m)	Forecast Expenditure (£m)	Forecast Variance (£m)
Transformation Revenue Budget	10.000			
Transformation Reserve Funding	4.000			
Total Transformation Funding	14.000			
Approach to Strategic Planning and Commissioning	-	-	-	-
Parking Policy Review	0.200	0.113	0.200	-
Community Hubs Programme	0.250	0.001	0.250	-
HR Transformation	0.093	0.108	0.093	-
Digital & Resident Access Review/Digital Workforce	0.080	0.001	0.080	-
SEND Review	0.240	-	0.240	-
Passenger/SEND Transport Transformation	0.100	-	0.100	-
Family Justice Service Review	-	-	-	-
S117 Project	0.178	0.089	0.178	-
Joint Funding Arrangements	0.110	-	-	(0.110)
Sustaining Demand at the Front Door	0.190	0.125	0.190	-
Corporate Parenting Transformation	0.743	0.185	0.513	(0.230)
Dynamic Purchasing System	0.142	-	0.142	-
Calleydown Transformation	0.134	-	-	(0.134)
Income & Debt Review	0.050	0.015	0.050	-
Outcomes Based Domiciliary Care Model	-	-	-	-
Transition Commissioning Care Model	-	-	-	-
Croydon Campus	0.250	0.078	0.250	-

Project	2023-24 Draft Budget Allocation (£m)	Actuals to Date (£m)	Forecast Expenditure (£m)	Forecast Variance (£m)
Customer Access Review	0.200	0.117	0.200	-
Building Control Transformation	0.696	0.043	0.696	-
Planning & CIL Transformation	0.450	0.017	0.450	-
CALAT	0.050	0.029	0.050	-
Housing Needs Restructure	0.260	0.082	0.260	-
Temporary Accommodation Case Review	0.491	-	0.491	-
Housing Occupancy Checks	0.291	-	0.291	-
Rent Accounts and Data Cleanse	0.026	0.040	0.026	-
Housing Association Recharges	0.059	-	0.059	-
Supported Housing Review	0.080	-	0.080	-
Adult Social Care Transformation	1.100	0.424	0.806	(0.294)
Review of Social Care Placements	-	-	-	-
Reablement & Hospital Discharge	-	-	-	-
Strategic Operating Model Design Partner for Adult Social Care and Health	1.134	-	0.601	(0.533)
Housing Benefit Subsidy SEA & EA/TA	-	-	-	-
PFI Contract Manager	-	-	-	-
VCS Review	-	-	-	-
Asset Rationalisation	0.124	-	0.124	-
Business Intelligence Review	0.026	-	0.026	-
Commercial & Income Opportunities	-	-	-	-
Community Equipment Service	0.234	0.168	0.234	-
Croydon Museum	0.170	-	0.170	-
Oracle Improvement Programme	0.915	0.065	0.915	-
Transformation PMO	1.100	0.793	1.100	-
Total Revenue Budget and Reserves Allocated to Date	10.166	2.493	8.865	(1.301)
Unallocated To Date	3.834			

4.99 The Transformation Programme published in November 2022 set out £5.9m of project commitments with recognition that further sums were still to be confirmed. Please note that project plans are under development and following review of these project plans the draft budget allocations to projects as listed above could change through the year.

4.100 The Transformation Board has agreed additional project allocations totalling £3.731m through to December 2023. The allocations are set out in the table below.

Project Allocations	£m
Business Intelligence Review	0.026
Sustaining demand at the front door	0.080
Callydown transformation	0.134
Review of Social Care Placements	-0.005
CALAT (New)	0.050
Strategic operating model design partner for ASCH	1.134
HR Transformation	0.015
Planning & Building Control projects – project delivery support	0.396
Corporate Parenting Transformation (New and subsumes Fostering Transformation Project)	0.650
Community Equipment Service	0.234
Museum Transformation	0.170
Oracle Cloud Improvement (New)	0.915
Asset Rationalisation	0.124
Reablement & Hospital Discharge - transfer to Strategic operating model design partner for ASCH	-0.060
Family Justice Service Review	-0.100
Dynamic Purchasing System	0.050
Housing Needs Restructure	0.200
Temporary Accommodation Case Review	0.200
Outcomes Based Domiciliary Care Model	-0.082
Transition Commissioning Care Model	-0.110
Approach to Strategic Planning and Commissioning	-0.290
Total of Allocations	3.731

4.101 The 'Review of Social Care Placements' project has secured £600,000 alternative funding from the Market Sustainability Grant thereby reducing the funding required from the Transformation budget. The revenue budget also funds the costs of the transformation Programme Management Office currently estimated at £1.1m.

Savings

4.102 The 2023-24 budgets include a challenging new savings target of £33.1m. Together with slippage of £3.0m from 2022-23, the total savings target is £36.1m. The forecast achievement of savings is £32.4m (89.8%). Directorates have identified risks to achievement of individual savings and have made plans to mitigate these risks, or identify alternative savings, if possible.

Table showing 2023-24 forecast savings achievement by directorate

	2023-24					
	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings achievable £'000	Savings slippage £'000	Not yet evidenced or (over delivery)
Directorate						
Adult Social Care & Health	12,243	-	12,243	13,190	-	(947)
Assistant Chief Executive	2,924	-	2,924	2,271	653	-
Children, Young People & Education	6,920	490	7,410	5,148	-	2,262
Housing	2,305	-	2,305	1,309	1,099	(103)
Resources	6,347	-	6,347	6,347	-	-
Sustainable Communities (SCRER)	1,859	2,490	4,349	4,124	225	-
Cross-Directorate / Corporate	500	-	500	-	500	-
Total	33,098	2,980	36,078	32,389	2,477	1,212

Savings achievement not yet evidenced

4.103 Assistant Chief Executive: There is forecast savings slippage of £0.653m owing to:

- Workforce restructure - £0.500m – The saving of £1m has been partially achieved with the remaining £0.5m linked to the End User Service re-procurement and subsequent service transformation which will be achieved in 2025-26 when the current contract extension expires.
- Human Resources management team reorganisation and reduction in previously agreed growth - £0.153m - The payroll restructure was delayed. Savings have been achieved for 2024-25 and the 2023-24 position has been mitigated with underspends elsewhere in the service.

4.104 Children, Young People & Education: There are savings of £2.3m which have not been evidenced to date:

- NHS Funding - £0.5m – Detailed analysis of the spend on health and care for children in the social care system and in schools was undertaken in 2021-22 to inform a more proportionate allocation of costs across the Council and the NHS to be achieved by 2023-24. It has proved challenging to reach agreement on increased health contribution to placement and care package costs.
- Reduce spend on Children Looked After placements - £1.7m – Whilst the number of children in Croydon's care has continued to decrease over 2023-24, the unit costs for residential and semi-independent placements have increased at a faster rate.

- Increase Health contribution to the Integrated Commissioning Team - £0.06m – Whilst not achieved in 2023-24, the recent NHS restructure will inform a review of Council capacity to achieve this saving in 2024-25.

4.105 Housing: There is forecast savings slippage of £1.1m owing to:

- Temporary accommodation case review (discretionary cases) - £0.5m slippage - Posts to undertake the transformation work were filled during 2023-24 and therefore the full year effect of the £0.6m savings target will not be achieved until 2024-25.
- Temporary accommodation occupancy checks - £0.3m slippage - Posts to undertake the transformation work were filled during 2023-24 and therefore the full year effect of the £0.4m savings target will not be achieved until 2024-25.
- Data cleanse and rent accounts (income collection) - £0.3m slippage - Work commenced on this project as part of the implementation of the new NEC IT system. Reconciliation work and improvements to NEC reporting are still underway to evidence these £0.3m savings.

4.106 SCRER: There is forecast savings slippage of £0.225m relating to the saving “Review and reduction of the Neighbourhood Operations (NSO team)”. The change occurred in September 2023, providing a part-year saving in 2023-24 and the full-year saving of £0.450m will be achieved in 2024-25.

4.107 Cross-Directorate: There is forecast savings slippage of £0.5m. The “Business Intelligence” saving of £0.25m has been developed as a transformation project for delivery in 2024-25. For the “Consider new structures through layers and spans review” saving of £0.25m, initial scoping work has been completed including suggestions and options for potential centralisation efficiencies to reduce potential duplication of functions across the Council.

Reserves

4.108 There are no budgeted contributions to, or drawdowns from, the General Fund balances of £27.5m in 2023-24. The current forecast for 2023-24 maintains this reserve.

General Fund Balances	Forecast (£m)
Balance at 1 April 2023	27.5
Forecast Contribution to/(Drawdown from) Reserves	-
Forecast Balance at 31 March 2024	27.5

- 4.109** The General Fund balances serve as a cushion should any overspend materialise by the end of 2023-24. The use of reserves to support the budget is not a permanent solution and reserves must be replenished back to a prudent level in subsequent years if used.

Unresolved Issues

- 4.110** The Council's overall financial position is still subject to a number of unresolved historic legacy issues. The latest position on these was set out in the 22 February 2023 Cabinet report titled 'Revenue Budget and Council Tax Levels 2023-24' which incorporated the findings of the 'Opening the Books' review undertaken in 2022-23. The report stated that a request has also been made of government to provide the Council with a Capitalisation Direction of £161.6m to cover the historic finance issues that have been revealed through the 'Opening the Books' programme.
- 4.111** The Council needs to correct a range of misstatements in its legacy accounts from 2019-20 which are currently still not fully closed. This was more than the £74.6m previously identified in the MTFs Update report to Cabinet in November 2022.
- 4.112** The Council's Provision for Bad Debt was found to be understated by £46m rather than the £20m previously assumed and a prudent decision was made to include the potential £70m gap in the accounts caused by incorrect accounting for Croydon Affordable Homes and Tenures, instead of the £9m previously assumed.
- 4.113** The Capital Programme for 2022-23 included the £161.6m Capitalisation Direction requested, which was in addition to the £25m capitalisation direction previously approved.
- 4.114** The Council has recently been required by an Adjudication Panel to make a payment to a former contractor in relation to a historic claim which dates back to a contract they held during the period 2011-2018. The Council has therefore requested a new Capitalisation Direction of £9.439m for 2019-20 in order to finalise the 2019-20 accounts. This is in addition to last year's request for a Capitalisation Direction of £126m in relation to 2019-20. With four years of accounts still open, there remains a risk that further legacy issues will be uncovered.

HOUSING REVENUE ACCOUNT (HRA)

- 4.115** At period 9, the HRA forecast remains at a revenue overspend of £12.0m owing to resolving a backlog of historic legacy repair work, reducing voids and resolving issues experienced nationally including damp and mould and fire safety. The HRA has a reserve of circa £50m as at the end of 2022-23 and this reserve will fund the 2023-24 overspend, however the HRA budget for 2024-25 will take account of ongoing pressures and priorities.
- 4.116** At Period 5 it was set out how the legacy of repairs, disrepair works and the commissioned works on damp and mould accounts for £8.6m of the pressure against the existing budget. This pressure is a direct result of the significant under-investment over decades in the housing stock which has resulted in the backlogs the teams are now tackling. The implementation of the three new repairs contracts and the commitment to ensuring the Council is meeting its requirements as a landlord are driving this ongoing pressure. Where underspends in other areas are insufficient to cover the pressures outlined above, it will require a draw down from the HRA reserves into the revenue budgets.
- 4.117** The 2024-25 budget will require significant work to ensure that it is capturing and managing ongoing pressure areas within the repairs service. Stock conditions surveys have been commissioned to identify the level of major repairs and maintenance to be programmed into the future years' budgets and these capital improvements should reduce the level of responsive repairs over the medium term.
- 4.118** The remaining £3.4m pressure is attributed to disrepair and reflects the volume of historic legacy disrepair cases being cleared and the legal costs and settlements that have been the outcome.

Repairs

- 4.119** The Period 9 position of £12.0m overspend is made up of £8.6m responsive repairs costs pressure and £3.4m on disrepair costs, legal fees and settlements.
- 4.120** The overspend on responsive repairs is a result of the significant increase in repair requests received from tenants as a consequence of the historical under-investment in the stock including historic legacy issues identified since the implementation of the new contracts in August 2023.
- 4.121** In addition, there has been significant work done to tackle reports of damp and mould, treating the appearances of spores and carrying out works to address the issues.

- 4.122** The Social Housing (Regulation) Act 2023 will enable a rigorous new regime that holds all landlords to account for the decency of their homes and the service they provide. This includes changes from 'Awaab's Law' which follows the death of 2 year old Awaab Ishak in 2020 due to damp and mould exposure in his Rochdale home following repair requests and complaints having been repeatedly ignored. Legislation includes provisions which will require the Council to investigate hazards and fix repairs including damp and mould in their properties within strict new time limits or rehouse residents where a home cannot be made safe. The new rules will form part of the tenancy agreement, so residents can hold landlords to account if they fail to provide a 'decent' home.
- 4.123** Tackling of legacy voids has had a significant financial impact due to the state of disrepair in these properties and the subsequent lack of asset renewal. The team expects to have cleared the backlog of legacy voids within this financial year and the associated cost pressures have been forecasted to reflect that commitment. Financial controls for all voids over £6,500 are in place and there is ongoing management of the work in progress (WIP) and the average weekly voids of 12 voids per week.
- 4.124** Legal disrepair volumes continue to be a challenge operationally and financially. Work is ongoing to tackle the circa 550 disrepair cases in our backlog. The service has proposed a plan to clear this backlog by 31 March 2025 and the details were set out in the separate Repairs Contract Update paper presented to Cabinet in February. This financial year works have been undertaken to circa 303 claims and we have works in progress for 67 cases, however, the number of claims we are receiving each month is increasing from an average of 30 to now 45 new claims being received per month.
- 4.125** The service has introduced controls to manage, monitor and provide assurance on ongoing responsive repairs costs:
- The NEC system allows management of the budget per individual line of activity with a budget set on NEC that cannot be exceeded and no payments can be made without any increase to the budget prior to any new orders being raised. Manager approval is required to increase a budget.
 - A Review Panel has been established since September. Any quotes for works over a value of £5,000 must be presented to the panel and approval sought prior to the works order being raised.
 - A review and approval from the Housing Directorate Management Team will be sought for works on an individual property in excess of £40,000 to allow consideration of value for money and to ensure that there is a link being made to regeneration projects and any other cross-Council projects.

Tenancy and Income

4.126 A breakeven forecast position at period 9 as work continues with the NEC implementation team to validate rental income and voids.

Staffing and other

4.127 A breakeven forecast position at period 9 reflects that additional budget was allocated in 2023-24 to meet known pressures while structural changes are being implemented.

Table showing the 2023-24 HRA forecast

Description	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Rental Income	(82.1)	(61.5)	(82.1)	-
Service Charge Income	(4.6)	(3.3)	(4.6)	-
Concorde, Sycamore & Windsor (rental income for Temporary Accommodation provision)	(3.4)	(1.9)	(3.4)	-
Other Income	(6.0)	(2.2)	(6.0)	-
Subtotal Income	(96.1)	(68.9)	(96.1)	-
Housing Capital Charges	40.9	-	40.9	-
Responsive Repairs & Safety	20.4	29.8	32.4	12.0
Centralised Directorate expenditure	11.3	1.2	11.3	-
Tenancy & Resident Engagement	10.3	4.6	10.3	-
Tenant Support Services	6.7	4.1	6.7	-
Concorde, Sycamore & Windsor expenditure	3.4	2.4	3.4	-
Asset Planning	1.6	1.1	1.6	-
Capital Delivery (Homes & Schools)	1.5	1.0	1.5	-
Subtotal Expenditure	96.1	44.0	108.1	12.0
Total HRA Net Expenditure	-	(24.9)*	12.0	12.0

* Note that no actuals for Housing Capital Charges have been posted as these journals are carried out at year end points.

4.128 The main risks within the HRA are:

- NEC system functionality delays:
 - Although the system went live in June 2023, the system is yet to be used to its full capacity including full reporting functionality. The repairs and income forecasting may yet be impacted once the full integration and functionality is available.

- Repairs and maintenance:
 - pressures from the exit of the Axis repairs contract that ended in August 2023.
 - extra expenditure to deal with the backlog of repairs and maintenance.
 - void and disrepair costs carried out by specialist contractors to reduce void losses and minimise future disrepair claims.
 - settlement of disrepair cases and related legal fees, including those relating to Regina Road.

- Tenancy and income:
 - the impact of cost of living pressures on rent collection (including a potential increase in bad debt cost).
 - loss of income owing to void (empty) residential properties.
 - loss of income owing to voids including void garages.

- Recharge review:
 - General Fund services are producing service level agreements (SLAs) to evidence recharges of costs to the HRA, which could result in increased charges to the HRA.

Capital Programme and Financial Sustainability

- 4.129** The Capital strategy and programme was approved by Council in March 2023. This recognised the complex and challenging financial and operational circumstances in which the Council continues to operate. It showed a 2023-24 Capital Programme that is reduced in scale and cost compared to previous years. With circa £1.4bn of General Fund debt and an environment of rising interest rates, the delivery of an effective Asset Management Plan and an ambitious Asset Disposal Strategy, including reducing the number of buildings used by the Council, will be essential to mitigate rising cost pressures, reduce the overall debt burden and help the Council balance its books.
- 4.130** The strategy reflected the progress made to date by the Council to improve the governance and financial management of the Capital Programme following recommendations from the two Reports in the Public Interest (RIPI). The Council understands that the initial improvements put in place are the foundations of good practice and is focused on building upon these over the coming months and years.
- 4.131** Concerns were highlighted regarding value for money and investment decisions as the Council has incurred debt in investing in assets which have not retained their value and, therefore, the level of debt exceeds the value of the investment assets. In the three years between 2017-20 the Council borrowed £545m with no focused debt management plan in place. The majority of this debt comprises short-term borrowings which has left the Council exposed to current higher interest rates. The debt is anticipated to be refinanced from 2023 onwards and therefore likely to drive significant increases in annual repayment levels.

- 4.132** An estimated circa £66m is required to service this debt from the General Fund which represents around 19% of the Council's net budget. The Council's historic legacy borrowing and debt burden has, therefore, become critical to the non-sustainability of the Council's revenue budget.
- 4.133** The Council has concluded that the expenditure it is anticipated to incur in each year of the period of 2023-27 is likely to exceed the financial resources available and that reaching financial and operational sustainability without further government assistance will not be possible. The Council's 2023-24 budget required capitalisation directions from government of £63m to balance and the MTFS demonstrated an ongoing estimated budget gap of £38m per annum from 2024-25.
- 4.134** Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of historic legacy structural indebtedness to ensure it can deliver sustainable local government services. It must be noted that annual capitalisation directions (transferring revenue cost into capital cost which must be funded over 20 years) increases the Council's debt burden. Also capital receipts from the Asset Disposal Strategy are being used to fund the ongoing capitalisation directions and therefore the Council is not able to reduce its existing historic debt (a situation of "treading water").
- 4.135** Therefore, debt write-off treatment is the Council's preferred option and a request was made to DLUHC in January 2023 for government funding to write-off £540m of the Council's General Fund debt. DLUHC has subsequently asked the Council to propose a wider range of options, and these are currently being worked on.

General Fund Capital Programme

- 4.136** At period 9, the General Fund capital programme has a forecast underspend of £20.0m (16.1%) against the revised budget of £124.0m. The 2023-24 General Fund capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 14 February 2024. This has included re-profiling of budgets to future years and is the main reason for the decrease from the General Fund capital budget of £127.1m at Period 8.

Table showing 2023-24 General Fund Capital Programme budget and forecast

General Fund Capital Scheme	2023-24 Revised Budget	2023-24 Actuals to Date	2023-24 Forecast	2023-24 Forecast Variance
	(£000's)	(£000's)	(£000's)	(£000's)
Bereavement Services	127	6	127	-
My Resources Interface Enhancement	169	58	174	5
ICT	-	4	-	-
Network Refresh	152	11	152	-
Tech Refresh	292	659	285	(7)
Geographical Information Systems	312	-	116	(196)
Laptop Refresh	1,030	-	1,030	-
Cloud and DR	167	26	174	7
People ICT	-	3	-	-
Synergy Education System	858	16	715	(143)
NEC Housing System	2,725	22	2,526	(199)
Uniform ICT Upgrade	56	-	56	-
Public Switched Telephone Network Digital Migration Phase 1	163	-	163	-
Subtotal Assistant Chief Executive	6,051	805	5,518	(533)
Children Home DFE	329	-	104	(225)
Woodlands Family Hub	140	-	140	-
Subtotal CYPE	469	-	244	(225)
Disabled Facilities Grant	3,000	1,471	3,000	-
Empty Homes Grants	400	39	200	(200)
Subtotal Housing	3,400	1,510	3,200	(200)
Asset Strategy - Stubbs Mead	500	-	100	(400)
Asset Strategy Programme	100	-	20	(80)
Clocktower Chillers	15	-	5	(10)
Corporate Property Maintenance Programme	2,780	1398	2,365	(415)
Fairfield Halls - Council	625	4	100	(525)
Former New Addington Leisure Centre	300	-	300	-
Fieldway Cluster (Timebridge Community Centre)	248	-	148	(100)
Contingency	1,000	-	1,000	-
Education - Fire Safety	450	4	450	-
Education - Fixed Term Expansions	225	180	225	-
Education - Major Maintenance	3,411	3,769	3,865	454
Education - Miscellaneous	116	124	116	-
Education - Permanent Expansion	297	1	297	-
Education - SEN	1,600	654	1,309	(291)
Subtotal Resources	11,667	6134	10,300	(1,367)
Growth Zone	15,341	329	2,000	(13,341)
Grounds Maintenance Insourced Equipment	1,200	(602)	-	(1,200)
Highways	8,260	4,864	8,260	-
Highways - flood water management	404	459	404	-
Highways - bridges and highways structures	1,641	1,627	1,641	-

General Fund Capital Scheme	2023-24 Revised Budget	2023-24 Actuals to Date	2023-24 Forecast	2023-24 Forecast Variance
	(£000's)	(£000's)	(£000's)	(£000's)
Highways - Tree works	50	6	50	-
Local Authority Tree Fund	83	148	83	-
Trees Sponsorship	42	10	42	-
Tennis Court Upgrade	75	191	75	-
Leisure centres equipment Contractual Agreement	-	(410)	-	-
Leisure Equipment Upgrade	148	143	148	-
Libraries Investment - General	224	1	224	-
Parking	1,843	916	1,843	-
Cashless Pay & Display	1,463	-	485	(978)
Play Equipment	300	245	245	(55)
Safety - digital upgrade of CCTV	1,540	11	1,540	-
Highway Road Markings/Signs (Refresh)	137	124	137	-
South Norwood Good Growth	773	11	168	(605)
Kenley Good Growth	304	(142)	304	-
Sustainability Programme	300	-	300	-
LIP	3,522	746	1,922	(1,600)
Cycle Parking	106	-	135	29
Electric Vehicle Charging Point (EVCP)	3	-	43	40
Park Asset Management	700	58	700	-
Waste and Recycling Investment	602	1,203	602	-
Ashburton Park Heritage Fund	305	-	305	-
Subtotal SCRER	39,366	9,938	21,656	(17,710)
Capitalisation Direction	63,000	-	63,000	-
Subtotal Corporate Items and Funding	63,000	-	63,000	-
TOTAL GENERAL FUND CAPITAL	123,953	18,387	103,918	(20,035)

Table showing General Fund Capital Programme Financing

General Fund Capital Financing	2023-24 Revised Budget	2023-24 Forecast	2023-24 Forecast Variance
	(£000's)	(£000's)	(£000's)
Community Infrastructure Levy (CIL)	6,600	6,600	-
CIL Local Meaningful Proportion (LMP)	552	552	-
Section 106	1,227	342	(885)
Grants & Other Contributions	14,851	13,872	(979)
Growth Zone	15,341	2,000	(13,341)
HRA Contributions	1,772	1,617	(155)
Capital Receipts	83,610	78,935	(4,675)
Borrowing	-	-	-
Total General Fund Financing	123,953	103,918	(20,035)

4.137 The extra forecast cost of cycle parking and electric vehicle charging points are expected to be funded through the application of Section 106 funding.

HRA Capital Programme

- 4.138** At period 9, the HRA capital programme has a forecast overspend of £1.8m (4.8%) against the revised budget of £37.2m. The 2023-24 HRA capital budget has been updated to reflect the changes agreed through the Capital Programme and Capital Strategy 2023-29 report at the Cabinet meeting on 14 February 2024. The HRA has a reserve of circa £50m as at the end of 2022-23 and this reserve will be the source of financing the 2023-24 capital overspend.
- 4.139** The HRA budget for 2024-25 and the HRA business plan has taken account of ongoing pressures and priorities. Stock conditions surveys have been commissioned to identify the level of historic legacy major repairs and maintenance to be programmed into the future years' budgets and these capital improvements should reduce the level of responsive repairs over the medium to long term.
- 4.140** There are pressures relating to damp and mould related repairs and historic legacy legal disrepair and void cases where significant updating to properties is occurring.
- 4.141** The Executive Mayor in Cabinet is requested through this report to approve within the multi-year HRA capital budget, the re-profiling of £2.071m budget from 2024-25 to 2023-24. This is to align the budget with the acquisition of the Belgrave and Grosvenor site and freehold of the previous Printworks site on Portland Place from Brick By Brick in March 2024.
- 4.142** The overall HRA capital programme budget remains the same as agreed by Full Council in March 2024 and the acquisition continues to be funded through HRA reserves. The acquisition was agreed by Cabinet on 26 July 2023 through the "Brick by Brick Croydon Ltd Update Report and land acquisition by HRA - July 2023" report (link: <https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=3573>). The earlier acquisition from Brick By Brick in 2023-24 (instead of 2024-25) provides better value for money in terms of cashflow and debt implications for the Council.

Table showing 2023-24 HRA Capital Programme budget and forecast

HRA Capital Scheme	2023-24 Revised Budget (£000's)	2023-24 Actuals to Date (£000's)	2023-24 Forecast (£000's)	2023-24 Forecast Variance (£000's)
Major Repairs and Improvements Programme	21,355	10,865	37,180	15,825
NEC Housing System	1,772	-	1,772	-
Regina Road	1,500		-	(1,500)
Building Safety Works	3,735		-	(3,735)
Repairs Referrals	8,800		-	(8,800)
Total HRA Capital	37,162	10,865	38,952	1,790

Table showing 2023-24 HRA Capital Programme Financing

HRA Capital Financing	2023-24 Revised Budget (£000's)	2023-24 Forecast (£000's)	2023-24 Forecast Variance (£000's)
Major Repairs Reserve (MRR)	15,457	15,457	-
Revenue	13,900	13,900	-
Other Reserves	5,687	7,477	1,790
Right To Buy (RTB) Receipts	2,118	2,118	-
Total HRA Capital Financing	37,162	38,952	1,790

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 None.

6 CONSULTATION

6.1 None.

7. CONTRIBUTION TO COUNCIL PRIORITIES

7.1 The monthly financial performance report supports the Mayor's Business Plan 2022-2026 objective one "The council balances its books, listens to residents and delivers good sustainable services".

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1** Finance comments have been provided throughout this report.
- 8.1.2** The Council continues to operate with internal spending controls to ensure that tight financial control and assurance oversight are maintained. A new financial management culture is being implemented across the organisation through increased communication on financial issues and training for budget managers.
- 8.1.3** The Council currently has a General Fund Reserve of £27.5m which serves as a cushion should any overspend materialise by the end of 2023-24. The use of reserves to support the budget is not a permanent solution and reserves must be replenished back to a prudent level in subsequent years if used.
- 8.1.4** The Council's historic legacy borrowing and debt burden continues to be critical to the non-sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of structural indebtedness to ensure it can deliver sustainable local government services.

Comments approved by Allister Bannin, Director of Finance (Deputy s151 Officer).

8.2 LEGAL IMPLICATIONS

- 8.2.1** The Council is under a statutory duty to ensure that it maintains a balanced budget and to take any remedial action as required in year.
- 8.2.2** Section 28 of the Local Government Act 2003 provides that the Council is under a statutory duty to periodically conduct a budget monitoring exercise of its expenditure and income against the budget calculations during the financial year. If the monitoring establishes that the budgetary situation has deteriorated, the Council must take such remedial action as it considers necessary to deal with any projected overspends. This could include action to reduce spending, income generation or other measures to bring budget pressures under control for the rest of the year. The Council must act reasonably and in accordance with its statutory duties and responsibilities when taking the necessary action to reduce the overspend.
- 8.2.3** In addition, the Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The Council's Chief Finance Officer has established financial procedures to ensure the Council's proper financial administration. These include procedures for budgetary control. It is consistent with these arrangements for Cabinet to receive information about the revenue and capital budgets as set out in this report.

- 8.2.4** The monitoring of financial information is also a significant contributor to meeting the Council's Best Value legal duty. The Council as a best value authority "must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness" (Section 3 Local Government Act (LGA) 1999). The Best Value Duty applies to all functions of the Council including delivering and setting a balanced budget, providing statutory services such as adult social care and children's services and securing value for money in all spending decisions.
- 8.2.5** The Council is the subject of Directions from the Secretary of State requiring the Council to, amongst others, improve on the management of its finances. This report serves to ensure the Council is effectively monitoring and managing its budgetary allocations in accordance with its Best Value Duty.
- 8.2.6** The Council's budget and policy framework procedure rules (Part 4C of the Constitution) provides that the Executive may only take decisions which are in line with the budgetary envelop approved by Full Council.

Comments approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer, 29/02/2024.

8.3 HUMAN RESOURCES IMPLICATIONS

- 8.3.1** There are no immediate workforce implications arising from the content of this report, albeit there is potential for a number of the proposals to have an impact on staffing. Any mitigation of budget implications that may have direct effect on staffing will be managed in accordance with relevant human resources policies and, where necessary, consultation with the recognised trade unions.
- 8.3.2** The Council is aware that many staff may also be impacted by the increase in cost of living. Many staff are also Croydon residents and may seek support from the Council including via the cost of living hub on the intranet. The Council offers support through the Employee Assistance Programme (EAP) and staff may seek help via and be signposted to the EAP, the Guardians' programme, and other appropriate sources of assistance and advice on the Council's intranet, including the trade unions.

Comments approved by Dean Shoesmith, Chief People Officer, 12/02/2024.

8.4 EQUALITIES IMPLICATIONS

8.4.1 The Council has a statutory duty to comply with the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010. The Council must therefore have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.4.2 The aim of the duty is to ensure public authorities and those carrying out a public function consider how they can positively contribute to a fairer society through advancing equality and good relations in their day-to-day activities. The duty ensures equality considerations are built into the design of policies and the delivery of services and that they are kept under review.

8.4.3 In setting the Council's budget for 2023-2024, colleagues responsible for key projects or savings proposals were required to complete Equality Impact Assessments (EQIAs) to support them to make such considerations. Likewise, any new policy or change to Council services across the financial year undergoes the same process.

8.4.4 As officers deliver against the approved budget, including their delivery of savings, as monitored through this report, they will continue to monitor for any equality impacts.

Comments approved by Helen Reeves, Head of Strategy & Policy, 20/02/2024.

9. APPENDICES

9.1 None.

10. BACKGROUND DOCUMENTS

10.1 None.

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET
DATE OF DECISION	27th March 2024
REPORT TITLE:	PROCUREMENT PIPELINE
CORPORATE DIRECTOR / DIRECTOR:	JANE WEST, CORPORATE DIRECTOR OF RESOURCES
LEAD OFFICER:	SCOTT FUNNELL, HEAD OF STRATEGIC PROCUREMENT AND GOVERNANCE Email: scott.funnell@croydon.gov.uk
LEAD MEMBER:	CLLR CUMMINGS, CABINET MEMBER FOR FINANCE
KEY DECISION?	No
CONTAINS EXEMPT INFORMATION?	No
WARDS AFFECTED:	N/A

1 SUMMARY OF REPORT

- 1.1** This paper recommends the approval of a structured Procurement Pipeline to enhance strategic planning, improve resource allocation, and streamline procurement processes. The implementation of a procurement pipeline aligns with the council's commitment to fiscal responsibility, efficiency, and transparency.
- 1.2** This report sets out the current Procurement Pipeline for the 18-month period following 1st April 2024 and contains a list of all planned procurements, permitted extensions and contract variations for contracts that have a total value that exceed the threshold established within the Agreement on Government Procurement (GPA) of £179,087 (ex-VAT).

2 RECOMMENDATIONS

For the reasons set out in the report [and its appendices], the Executive Mayor in Cabinet is recommended:

- 2.1** to approve the 18-month Procurement Pipeline as set out in Appendix A.

- 2.2** to approve the delegated decisions over £500,000 in value within the Procurement Pipeline to those Lead Members or Officers as stated in Appendix A, that includes the procurement strategy and award decisions, the duration of the contracts and contract values.
- 2.3** that delegated decisions shall only be exercised following recommendations from the Contracts & Commissioning Board, which include approval from both the Lead Cabinet Member and the Cabinet Member for Finance.
- 2.4** to allow for minor changes to proceed whilst retaining the agreed delegation so long as none of the following thresholds for changes are exceeded:
- i. Contract value exceeds that proposed in the Procurement Pipeline, by the lesser of £500K or 25%, or the new aggregate value exceeds £1m and it becomes a key decision
 - ii. Substantial / material changes to procurement from that defined in the Procurement Pipeline e.g. material risks are identified
- (Should either of those thresholds be exceeded, the delegation cannot be exercised, and the decision shall be recommended to the Executive Mayor, unless a further delegation is approved. Where a delegated decision is a Key Decision to Officers, it must be made in consultation with the Lead Cabinet Member).
- 2.5** to note the improvements to the pipeline format as set out in section 4.4 of the report.

3 REASONS FOR RECOMMENDATIONS

- 3.1** An 18-month Procurement Pipeline provides transparency for forthcoming tender opportunities and the decisions that will be taken in relation to Council contracts.
- 3.2** Effective management of a Procurement Pipeline provides the following benefits:
- **Improved Planning:** Allows for strategic planning of procurement activities, helping to align purchasing with overall business goals.
 - **Efficient Resource Allocation:** Enables better allocation of resources by forecasting procurement needs and ensuring timely availability of necessary resources.
 - **Cost Control:** Helps control costs through early identification of procurement needs and efficient budget management.
 - **Risk Management:** Provides an opportunity to identify and address potential risks in the procurement process, minimising the impact of unforeseen events.

- **Streamlined Processes:** Facilitates the creation of standardised procurement processes, reducing complexity and promoting consistency across various procurement activities.
- **Compliance and Governance:** Assists in ensuring compliance with regulations and organisational policies, enhancing transparency and accountability.
- **Faster Decision-Making:** Enables quicker decision-making by having a clear overview of upcoming procurement needs.
- **Strategic Alignment:** Helps align procurement activities with the overall organisational strategy, allowing procurement decisions to contribute to broader business objectives.
- **Performance Monitoring:** Allows for the monitoring and evaluation of procurement performance, enabling the identification of areas for improvement.
- **Budget Forecasting:** Supports accurate budget forecasting by providing insights into future procurement requirements and associated costs.
- **Supplier Relationship Management:** Allows for better management of relationships with suppliers and early identification of procurements for the market to allow sufficient time to prepare bids.
- **Voluntary, Community and Faith Sector (VCFS) engagement:** Enhances transparency and accountability in the procurement process for VCFS organisations, facilitating better planning and resource allocation. This will also enhance the VCFS's capacity for long-term sustainability and growth through predictable funding opportunities.

4 BACKGROUND AND DETAILS

- 4.1** Croydon Council operates in a dynamic environment characterized by evolving community needs, regulatory changes, and budgetary constraints. As a local authority responsible for delivering a wide range of services to residents, effective procurement plays a crucial role in achieving the council's objectives while ensuring value for money and promoting transparency and accountability.
- 4.2** Over recent years, the council has faced significant challenges, including financial pressures, increasing demand for services, and the need to adapt to new legislative requirements. In response to these challenges, the council has undertaken various initiatives to streamline processes, enhance efficiency, and improve service delivery.
- 4.3** In November 2022, Croydon Council introduced its first Procurement Plan for procurements planned for the remainder of the financial year. This was followed in March 2023 by a full year's Annual Procurement Plan, with quarterly updates thereafter to introduce new or amend existing entries onto the plan.
- 4.4** This Annual Procurement Plan process introduced delegations to Cabinet Members and Officers for procurement strategies and contract award decisions. This makes the governance process more efficient.

4.5 With the benefit of learning gained through the Annual Procurement Plan process, the following improvements to the format are now recommended:

- To extend the pipeline period from 12 months to 18 months to provide a further strategic view of the Councils forthcoming contracts.
- To replace the quarterly updates with a rolling 18-month pipeline on a quarterly basis to improve visibility of current and live projects.
- Starting from the next rolling Procurement Pipeline in June 2024, to report against adherence of previous Procurement Pipeline entries to increase transparency of progress on individual procurements.
- To extend the Pipeline entry value down to the threshold established within the Agreement on Government Procurement (GPA) of £179,087 (ex-VAT) to increase transparency (although retaining the £500,000 threshold requirement for specific delegated decisions).
- To split the pipeline into the following three sections to improve clarity of project type:
 - Procurement (either new procurement or re-procurements)
 - Contract extensions that are permitted under the PCR (Public Contract Regulation) 2015 regulations
 - Contract variations
- To include a copy of the Councils Contracts Register to increase transparency

4.6 It is important to note that procurement intentions are indicative and subject to change. For example, it may be the Council's intention to take up a permitted contract extension before the Council has agreed this with the incumbent provider, and subsequently the intention may change. In particular, where the Contracts register indicates a potential future intention to decommission, this is a potential proposal only and always subject to any required consultation and relevant decision-making processes.

4.7 The Procurement Pipeline does not contain any risk analysis on individual projects. These, however, are considered within the individual reports for decision.

4.8 Entries on the Forward Plan, including all procurements, contract extensions and contract variations, will be included within all relevant service plans with a view to reducing the number of contract variations that may occur.

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 The changes to the format are as a result of learning from what was a new process for the Council last year and are intended to improve the process and increase visibility and transparency of the Council's procurement plans. The alternative option would be to keep to the same format as in the previous year, but this would not achieve the benefits intended by the changes.

6 CONSULTATION

- 6.1** Services across the Council have been consulted to ensure the accuracy of the Procurement Pipeline updates. There is no requirement for external consultation as this is an internal process.

7. CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1** The Executive Mayor's Business Plan set out a requirement to review and manage Council contracts better. A proactive forward plan of procurements enables the Council to ensure that contracts are re-procured in a timely manner which is essential to managing a programme of activity, ensuring value for money and supporting the Council priority of balancing the books.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1** The amendments to the Annual Procurement Plan set out in appendix A the list of contracts that total:

- for procurements £750,353,751 (98 projects)
- for permitted extensions £927,510,385 (28 projects)
- for contract variations £55,838,349 (20 projects)

- 8.1.2** The existing governance processes need to be complied with to provide assurance that value for money will be delivered from these procurements.

- 8.1.3** Comments approved by Lesley Shields, Head of Finance for Assistant Chief Executive and Resources on behalf of the Director of Finance. 15/02/2024

8.2 LEGAL IMPLICATIONS

- 8.2.1** The Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000 and has the power to delegate those functions. This report seeks relevant delegations to exercise executive functions.

- 8.2.2** In relation to any contract and procurement strategy/ award/ variation decisions that are key decisions, any delegations to officers shall be limited to "Chief Officers" as defined in the Council's Constitution, meaning: a) the Head of Paid Service; b) the Chief Finance Officer; c) the Monitoring Officer; d) a Statutory Chief Officer; e) a Non-Statutory Chief Officer. Corporate Directors fall within the definition of "Non-statutory Chief Officer", which has the same meaning as in section 2(7) the Local Government and Housing Act 1989 and includes officers who directly report to the Head of Paid Service/ Chief Executive.

8.2.3 At present the delegations in the Council's Tenders and Contracts Regulations have been superseded by the Executive Mayor's Scheme of Delegation following the introduction of the Mayoral Model.

8.2.4 Comments approved by the Head of Commercial & Property Law on behalf of the Director of Legal Services and Monitoring Officer (14/03/2024).

8.3 EQUALITIES IMPLICATIONS

8.3.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 of the Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:

- a. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
- b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.3.2 When a service is contracted out both the contractor and the public authority that commissioned the service must give due regard to the three principles of the General Duty as set out above. Any supplier that is exercising public functions also has an obligation to fulfil the general duty.

8.3.3 The Equalities Strategy are provided to all bidders during the tendering stage of the procurement process. Social Value objectives also mirror the Council's commitments to equalities and diversity.

8.3.4 Where necessary, EQIAs will be completed for individual contracts during the procurement process, therefore no EQIA is required with this report.

8.3.5 Comment approved by Denise McCausland, Equalities Programme Manager (13/02/2024).

OTHER IMPLICATIONS

8.3 HUMAN RESOURCES IMPLICATIONS

There are no immediate Human Resources implications arising from the content of this report. Should matters arise these will be managed under the Council's HR policies and procedures.

Approved by: Gillian Bevan, Head of HR Resources and Assistant Chief Executives Directorates on behalf of the Chief People Officer (13.2.24).

9 APPENDICES

Appendix A – Pipeline: New Procurement & Reprocure

Appendix B – Pipeline: Permitted Extension

Appendix C – Pipeline: Contract Variation

Appendix D – Contract Register

10 BACKGROUND DOCUMENTS

N/A

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Procurement Pipeline: New Procurement & Reprocare											
Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Procurement Strategy	Recommended Approver for Award / Extension	Stage
Establishment of DPS for Emergency Accommodation	Housing	New Procurement	£270,000,000	120		01/05/2024	01/11/2024	30/10/2034	Cabinet Member for Homes	Corporate Director Housing	Planned
PFI Older People Residential & Nursing Care Homes - Homes for the Future as Centres of Excellence	ASCH	Reprocare	£81,900,000	120		15/05/2024	01/03/2025	28/02/2035	Cabinet Member for ASCH	Corporate Director ASCH	Planned
Cyclical Redecoration Contact	Housing	New Procurement	£40,581,501	84		01/05/2024	01/10/2024	30/09/2031	Cabinet Member for Homes	Corporate Director Housing	Planned
Section 75 Public Health Nursing	CYPE	Reprocare	£37,100,000	60		01/09/2024	01/04/2025	31/03/2030	Cabinet Member for CYPE	Corporate Director PH	Planned
Utilities contract - Unmetered street lighting supply Half hourly metered electricity supply	Resources	Reprocare	£25,135,443	48		31/07/2024	01/04/2025	31/03/2029	Cabinet Member for Finance	Corporate Director Resources	Planned
Regina Road Professional Services - Residual	Housing	New Procurement	£20,000,000	48		01/04/2024	01/09/2024	31/08/2028	Cabinet Member for Homes	Corporate Director Housing	Live
Levelling up fund infrastructure investment	SCRER	New Procurement	£19,900,000	18		13/05/2024	30/09/2024	31/03/2026	Cabinet Member for Streets and Environment	Corporate Director SCRER	Planned
Joint Children's Speech and Language Therapy and Occupational Therapy	CYPE	Reprocare	£19,881,554	83		01/04/2024	01/05/2024	31/03/2031	Cabinet Member for CYPE	Corporate Director CYPE	Planned
Fire Risk Assessment Work Delivery & Remedial Delivery	Housing	New Procurement	£19,500,000	60		01/09/2024	01/12/2024	30/11/2029	Cabinet Member for Homes	Corporate Director Housing	Planned
Integrated Drug & Alcohol Engagement, Treatment & Recovery Service for Adults and Young People	ASCH	Reprocare	£14,777,500	60		01/04/2025	01/10/2026	30/09/2031	Cabinet Member for ASCH	Corporate Director PH	Planned
End User Services	ACE	Reprocare	£13,000,000	60		31/03/2024	12/03/2025	11/03/2030	Cabinet Member for Finance	Corporate Director ACE	Planned
PSTN switchover Migration	ACE	New Procurement	£12,000,000	25		31/07/2024	01/12/2024	31/12/2026	Cabinet Member for Finance	Corporate Director ACE	Planned
Disabled Facilities Grant works (Private Sector)	Housing	Reprocare	£10,400,000	48	0	01/11/2024	01/04/2025	31/03/2029	Cabinet Member for Homes	Corporate Director Housing	Planned
Heating Systems - Domestic Decarb	Housing	New Procurement	£10,000,000	60	60	01/01/2025	01/10/2025	30/09/2030	Cabinet Member for Homes	Corporate Director Housing	Planned
EMERGENCY LIGHTING INSTALLS & UPGRADES: Including Self Testing Capability (Includes FRA Remedials Actions)	Housing	New Procurement	£8,000,000	36	12	01/01/2025	01/10/2025	30/09/2029	Cabinet Member for Homes	Corporate Director Housing	Planned
Floating Support for LD, ASD and MH	ASCH	Reprocare	£7,820,000	120		14/05/2024	01/01/2025	30/12/2034	Cabinet Member for ASCH	Corporate Director ASCH	Planned
Accommodation Based Residential Care for Young People	CYPE	New Procurement	£7,000,000	84		01/07/2024	01/12/2024	30/11/2031	Cabinet Member for CYPE	Corporate Director CYPE	Planned
Alternative Education	CYPE	Reprocare	£6,102,062	60		01/11/2024	01/12/2025	30/11/2030	Cabinet Member for CYPE	Corporate Director CYPE	Planned
Microsoft Enterprise Licensing Agreement including Azure	ACE	Reprocare	£6,000,000	36		28/02/2025	01/07/2025	30/06/2028	Cabinet Member for Finance	Corporate Director ACE	Planned
Door Entry, MED's Doors and Automatic Gates, FOBS	Housing	New Procurement	£6,000,000	48	24	01/04/2025	01/08/2025	31/07/2029	Cabinet Member for Homes	Corporate Director Housing	Planned
LIFTS: Servicing, Repair and Upgrades, Domestic & Communal	Housing	New Procurement	£6,000,000	48	24	01/04/2025	01/08/2025	31/07/2029	Cabinet Member for Homes	Corporate Director Housing	Planned
Regina Road Demolition	Housing	New Procurement	£6,000,000	36	0	01/06/2024	01/09/2024	31/08/2027	Cabinet Member for Homes	Corporate Director Housing	Planned
College Green (CG2)	Housing	New Procurement	£5,000,000	36		01/06/2024	01/09/2024	31/08/2027	Cabinet Member for Homes	Corporate Director Housing	Planned

Procurement Pipeline: New Procurement & Reprocare												
Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Procurement Strategy	Recommended Approver for Award / Extension	Stage	
Primary Care Contracts	ASCH	Reprocure	£4,921,000	84		01/04/2024	01/04/2025	31/03/2032	Cabinet Member for ASCH	Corporate Director PH	Planned	
Gillett Road & Garnet Road Blocks	Housing	New Procurement	£4,500,000	24		01/09/2024	01/04/2025	31/03/2027	Cabinet Member for Homes	Corporate Director Housing	Planned	
Single Homelessness Service	Housing	Reprocure	£4,200,000	48	12	01/08/2024	01/01/2025	31/12/2028	Cabinet Member for Homes	Corporate Director Housing	Planned	
Utilities Contract - Gas supply	Resources	Reprocure	£4,014,610	48		31/07/2024	01/04/2025	31/03/2029	Cabinet Member for Finance	Corporate Director Resources	Planned	
AOV's Renewal and New Installations	Housing	New Procurement	£4,000,000	24		01/06/2024	01/10/2024	30/09/2026	Cabinet Member for Homes	Corporate Director Housing	Planned	
Materials Recyclates	SCRER	New Procurement	£3,937,500	36	48	01/09/2024	01/04/2025	31/03/2028	Cabinet Member for Streets and Environment	Corporate Director SCRER	Planned	
Supervised Contact	CYPE	Reprocure	£3,752,000	60	24	01/04/2024	01/01/2025	31/12/2029	Cabinet Member for CYPE	Corporate Director CYPE	Planned	
Housing Professional Consultancy Services (Fire Safety)	Housing	New Procurement	£3,700,000	36		01/04/2024	01/10/2024	30/09/2027	Cabinet Member for Home	Corporate Director Housing	Planned	
Utilities - Water supply	Resources	Reprocure	£3,200,000	36		31/10/2024	01/05/2025	30/04/2028	Cabinet Member for Finance	Corporate Director Resources	Planned	
Minor energy efficiency improvements / sustainability resource	Housing	New Procurement	£3,000,000	24	12	01/09/2024	01/04/2025	31/03/2028	Cabinet Member for Homes	Corporate Director Housing	Planned	
CCTV Supply, Installation & Maintenance	SCRER	Reprocure	£2,889,000	60	24	01/03/2024	01/06/2024	31/05/2029	Cabinet Member for CYPE	Corporate Director SCRER	Live	
Audit & Anti-Fraud	Resources	Reprocure	£2,772,000	60		01/06/2025	01/04/2026	31/03/2031	Cabinet Member for Finance	Corporate Director Resources	Planned	
Joint Adults & Childrens Advocacy Services	ASCH	Reprocure	£2,770,250	84		29/02/2024	01/10/2024	30/09/2031	Cabinet Member for ASCH	Corporate Director ASCH	Live	
Respite for Adults with LD and Autism	ASCH	New Procurement	£2,633,186	60		01/05/2024	01/08/2024	31/07/2029	Cabinet Member for ASCH	Corporate Director ASCH	Planned	
Passenger Transport Minibus Contract Lot 3 (Various Routes)	SCRER	Reprocure	£2,432,120	48		02/05/2024	01/09/2024	31/08/2028	Cabinet Member for Streets and Environment	Corporate Director SCRER	Planned	
Croydon Direct Payments Service	ASCH	New Procurement	£2,300,000	132		01/05/2024	01/10/2024	30/09/2035	Cabinet Member for ASCH	Corporate Director ASCH	Planned	
Pest Control Procured through Collaboration Agreement through Councils	Housing	Reprocure	£2,250,000	24		01/06/2025	01/11/2025	31/10/2027	Cabinet Member for Homes	Corporate Director Housing	Planned	
Oracle Cloud Services	ACE	Reprocure	£2,139,782	120		30/05/2024	16/09/2024	15/09/2034	Cabinet Member for Finance	Corporate Director Resources	Planned	
Housing works	Housing	New Procurement	£2,000,000	24	12	01/09/2024	01/04/2025	31/03/2027	Cabinet Member for Homes	Corporate Director Housing	Planned	
Abestos Removal Contractor	Housing	New Procurement	£2,000,000	48	24	01/09/2024	01/01/2025	31/12/2029	Cabinet Member for Homes	Corporate Director Housing	Planned	
Legionella Compliance Contract	Housing	New Procurement	£1,500,000	60		01/05/2024	01/10/2024	31/09/2029	Cabinet Member for Homes	Corporate Director Housing	Planned	
Ground Source Heat Pump Responsive Repairs Contractor	Housing	New Procurement	£1,500,000	36		01/06/2024	01/09/2024	31/08/2027	Cabinet Member for Homes	Corporate Director Housing	Planned	
Strategic Partner for CYPE services	CYPE	New Procurement	£1,500,000	24	0	03/04/2024	10/06/2024	09/06/2026	Cabinet Member for CYPE	Corporate Director CYPE	Planned	

Procurement Pipeline: New Procurement & Reprocare											
Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Procurement Strategy	Recommended Approver for Award / Extension	Stage
Enforcement Agents	Resources	Reprocure	£1,500,000	36		29/02/2024	31/08/2024	30/08/2027	Cabinet Member for Finance	Corporate Director Resources	Planned
M&E Consultancy including: General Consultancy	Housing	New Procurement	£1,500,000	48	24	01/06/2024	01/11/2024	31/10/2028	Cabinet Member for Homes	Corporate Director Housing	Planned
Housing Consultancy (Smaller projects)(structural engineers, mechanical M&E engineers, architects/building surveyors)	Housing	New Procurement	£1,500,000	36	12	01/06/2024	01/01/2025	31/12/2027	Cabinet Member for Homes	Corporate Director Housing	Planned
Coring	SCRER	New Procurement	£1,425,000	60		01/05/2024	01/08/2024	31/07/2029	Cabinet Member for Streets and Environment	Corporate Director SCRER	Planned
Information, Advice and Guidance	ACE	Reprocure	£1,300,000	24	24	01/06/2024	01/04/2025	31/03/2027	Cabinet Member for ASCH	Corporate Director ASCH	Planned
Street Homelessness Outreach and Resettlement Service	Housing	Reprocure	£1,263,680	49	24	01/05/2024	01/11/2024	30/11/2028	Cabinet Member for Homes	Corporate Director Housing	Planned
Structural Surveying General - Strategic	Housing	New Procurement	£1,200,000	48	24	01/06/2024	01/11/2024	31/10/2028	Cabinet Member for Homes	Corporate Director Housing	Planned
Young People and Care Leavers	Housing	Reprocure	£1,132,000	24		01/04/2024	01/05/2024	31/04/2026	Cabinet Member for Homes	Corporate Director Housing	Planned
347 Grange Road Southbank	Housing	New Procurement	£1,000,000	6		01/01/2025	01/06/2025	31/11/2025	Cabinet Member for Homes	Corporate Director Housing	Planned
Whitgift Centre Professional Services - Legal	SCRER	Reprocure	£900,000	47		01/07/2024	01/10/2024	30/08/2028	Cabinet Member for Streets and Environment	Corporate Director SCRER	Planned
Structural LPS - Phase 2 15 LPS Blocks.	Housing	New Procurement	£900,000	36	24	01/05/2024	01/08/2024	31/07/2027	Cabinet Member for Homes	Corporate Director Housing	Planned
Libraries - Bookstock	SCRER	Reprocure	£740,000	24		31/03/2024	01/06/2024	31/05/2026	Cabinet Member for Culture & Communities	Corporate Director SCRER	Planned
Supported Housing Service for Ex-Offenders	Housing	Reprocure	£728,000	48	12	01/04/2024	01/11/2024	31/10/2028	Cabinet Member for Homes	Corporate Director Housing	Planned
LGPS Global Custody Services	Resources	Reprocure	£700,000	120		29/02/2024	01/04/2024	31/03/2034	Cabinet Member for Finance	Corporate Director Resources	Planned
Cycle Training for Children, Young People and Adults	SCRER	Reprocure	£675,000	36		01/06/2024	01/10/2024	30/09/2027	Cabinet Member for Streets and Environment	Corporate Director SCRER	Planned
CCTV fibre connectivity	SCRER	Reprocure	£675,000	60		01/03/2024	01/06/2024	31/05/2029	Cabinet Member for Streets and Environment	Corporate Director SCRER	Planned
Transportation of Bodies to Public Mortuaries Contract for Sutton & Croydon	ACE	Reprocure	£616,000	48		01/01/2025	01/07/2025	30/06/2029	Cabinet Member for Finance	Corporate Director ACE	Planned
Mortuary and post mortem services	SCRER	Reprocure	£600,000	60		29/03/2024	01/06/2024	30/05/2029	Cabinet Member for Finance	Corporate Director Resources	Planned
Telecoms Consultancy Support	Housing	New Procurement	£600,000	48	12	01/05/2024	01/09/2024	31/08/2028	Cabinet Member for Homes	Corporate Director Housing	Planned
Short Breaks	CYPE	New Procurement	£600,000	54		01/07/2024	01/04/2025	30/09/2029	Cabinet Member for CYPE	Corporate Director CYPE	Planned
Housing Feasibility / Design development Consultancy Works	Housing	New Procurement	£510,000	36	12	01/06/2024	01/09/2024	31/08/2027	Cabinet Member for Homes	Corporate Director Housing	Planned
CRA - Credit Reference Agents Multiple contracts	Resources	New Procurement	£500,000	36		29/03/2024	01/05/2024	30/04/2027	Cabinet Member for Finance	Corporate Director Resources	Planned
Technology Enabled Care	ASCH	New Procurement	£500,000	18		29/02/2024	30/06/2024	31/12/2025	Cabinet Member for ASCH	Corporate Director ASCH	Live

Procurement Pipeline: New Procurement & Reprocure											
Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Procurement Strategy	Recommended Approver for Award / Extension	Stage
New Servers and switches	ACE	New Procurement	£500,000	36		08/08/2024	01/09/2024	31/08/2027	Cabinet Member for Finance	Corporate Director ACE	Planned
Chequers Court - subsidence	Housing	New Procurement	£500,000	6		01/01/2025	01/06/2025	31/11/2025	Cabinet Member for Homes	Corporate Director Housing	Planned
Compliance Support - Big 6 Asbestos, Electrical, Gas, Fire, Water Lifts	Housing	New Procurement	£500,000	48	24	01/06/2024	01/11/2024	31/10/2028	Cabinet Member for Homes	Corporate Director Housing	Planned
Principal Designer Services - HRB	Housing	New Procurement	£500,000	48	12	01/06/2024	01/11/2024	31/10/2028	Cabinet Member for Homes	Corporate Director Housing	Planned
Telecare	ASCH	Reprocure	£475,000	84		01/07/2024	01/01/2025	31/12/2031	CCB	Chair of CCB	Planned
Streets IT system - CONFIRM On Demand Hosted Service	SCRER	Reprocure	£450,000	36		01/02/2025	01/10/2025	30/09/2028	CCB	Chair of CCB	Planned
Pension Investment Consultancy Services	Resources	Reprocure	£430,000	48		01/09/2024	01/04/2025	31/03/2029	CCB	Chair of CCB	Planned
Young People Supported Lodgings	Housing	Reprocure	£400,000	48		01/07/2024	01/12/2024	30/11/2028	CCB	Chair of CCB	Planned
Private Rented Access Scheme Ex-Offenders	Housing	Reprocure	£400,000	48		01/03/2024	17/06/2024	16/06/2028	CCB	Chair of CCB	Planned
Occupational Health Provision	ACE	Reprocure	£380,000	24		01/07/2024	01/05/2025	30/04/2027	CCB	Chair of CCB	Planned
Principal Designer Services - CDM	Housing	New Procurement	£350,000	48	24	01/06/2024	01/11/2024	31/10/2028	CCB	Chair of CCB	Planned
Parking Traffic Management Order System	SCRER	Reprocure	£312,095	72		01/05/2024	01/01/2025	31/12/2030	CCB	Chair of CCB	Planned
Housing Quantity Surveyor/ Clerk of Works Services	Housing	New Procurement	£300,000	24		01/06/2024	01/01/2025	31/12/2027	CCB	Chair of CCB	Planned
Mobile Telephony	ACE	Reprocure	£288,000	36	0	01/10/2024	01/04/2025	31/03/2028	CCB	Chair of CCB	Planned
HIV Prevention and Support	ACE	New Procurement	£280,000	24	24	30/03/2024	01/04/2024	31/03/2026	CCB	Chair of CCB	Live
SENDIASS	CYPE	Reprocure	£255,000	60	0	01/10/2024	13/07/2025	12/07/2030	CCB	Chair of CCB	Planned
Property Management Software	Resources	Reprocure	£250,000	60		31/03/2024	01/07/2024	30/06/2029	CCB	Chair of CCB	Planned
Building Surveying Services	Housing	New Procurement	£250,000	24	12	01/05/2024	01/06/2024	31/05/2026	CCB	Chair of CCB	Planned
Libraries - Library Management System	SCRER	Reprocure	£246,527	36		28/02/2024	01/04/2024	31/03/2027	CCB	Chair of CCB	Planned
Corporate Banking Services	Resources	Reprocure	£244,671	36		31/10/2024	01/04/2025	31/03/2028	CCB	Chair of CCB	Planned
Managed Print services (desktop MFDs)	ACE	Reprocure	£241,890	60		01/04/2025	27/03/2026	26/03/2031	CCB	Chair of CCB	Planned
Appropriate Adults	CYPE	Reprocure	£240,000	48		01/06/2024	01/10/2024	30/09/2028	CCB	Chair of CCB	Planned
Croydon Film Office	ACE	Reprocure	£240,000	48		01/06/2024	01/11/2024	30/10/2028	CCB	Chair of CCB	Planned
PSTN switchover Discovery	ACE	New Procurement	£225,000	12		15/02/2024	01/04/2024	31/03/2025	CCB	Chair of CCB	Live
External Audit Contract	Resources	New Procurement	£224,000	36		29/03/2024	01/05/2024	31/04/2027	CCB	Chair of CCB	Planned
Reprographic Equipment -2 colour copiers including software, support, maint, rental	Resources	Reprocure	£212,380	72		01/01/2025	01/08/2025	31/07/2031	CCB	Chair of CCB	Planned
VOIDS and Fire Safety Compliance works NON COMPLIANT CONTRACT	Housing	Reprocure	£200,000	18		29/02/2024	01/04/2024	30/09/2025	CCB	Chair of CCB	Planned
Enforcement Agent Manager	Resources	Reprocure	£200,000	36		29/03/2024	31/04/2024	30/04/2027	CCB	Chair of CCB	Planned
Thomson Reuters Subscriptions	Resources	New Procurement	£185,000	60		01/12/2024	28/02/2025	27/02/2030	CCB	Chair of CCB	Planned

Procurement Pipeline: Permitted Extension

Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Award / Extension
PMI General Building Works	Housing	Extend	£210,000,000	36		31/03/2024	01/04/2024	01/04/2027	Corporate Director Housing
DPS1, Lot 1 - Domiciliary Care	ASCH	Extend	£147,504,000	12		12/01/2025	12/06/2025	11/06/2026	Corporate Director ASCH
Next Generation of Highways Contract	SCRER	Extend	£130,000,000	36		01/05/2025	01/10/2025	30/09/2028	Corporate Director SCRER
PFI Older People Residential & Nursing Care Homes - Homes for the Future as Centres of Excellence	ASCH	Extend	£91,616,251	6		01/04/2025	01/10/2025	31/03/2026	Corporate Director ASCH
SLCP Approved Provider Panel Agreement for IFA and Residential	CYPE	Extend	£89,000,000	24	60	01/09/2024	01/04/2025	31/03/2027	Corporate Director CYPE
DPS 3 Lot 3 - Semi-independent Accommodation	CYPE	Extend	£80,000,000	60	60	01/09/2025	08/03/2026	09/03/2031	Corporate Director CYPE
Household Waste and Recycling Centres	SCRER	Extend	£42,830,077	66		01/06/2024	01/04/2025	15/09/2030	Corporate Director SCRER
PMI Electrical Works	Housing	Extend	£26,010,000	12		01/05/2024	02/05/2024	31/03/2025	Corporate Director Housing
Unmetered street lighting supply	Resources	Extend	£25,135,443	12		30/03/2024	01/04/2024	31/03/2025	Corporate Director Resources
PMI Windows Installation & Associated works	Housing	Extend	£12,000,000	24		01/12/2024	01/04/2025	31/03/2027	Corporate Director Housing
Contract Extension									
PMI Lift and Escalator	Housing	Extend	£10,995,000	12		01/05/2024	02/05/2024	31/03/2025	Corporate Director Housing
Enhanced Learning Provisions - mainstream primary & secondary	CYPE	Extend	£10,335,000	60		02/06/2024	01/12/2024	30/11/2029	Corporate Director CYPE
Children's Social Care Assessments	CYPE	Extend	£10,049,000	36		01/07/2024	01/08/2025	31/07/2028	Corporate Director CYPE
FM- Cleaning Services	Resources	Extend	£10,000,000	24		01/03/2025	01/04/2026	31/03/2028	Corporate Director Resources
DPS 1, Lot 2 Active Lives & Day care provision	ASCH	Extend	£6,414,000	12	12	12/01/2025	12/06/2025	11/06/2026	Corporate Director ASCH
ANPR camera supply, installation, and maintenance of Cameras and supporting software	SCRER	Extend	£4,387,000	36		01/04/2025	14/09/2025	13/09/2028	Corporate Director SCRER
Utilities Contract - Gas supply	Resources	Extend	£4,014,610	12		30/03/2024	01/04/2024	31/03/2025	Corporate Director Resources
Passenger Transport Minibus Contract Lot 2 - St Giles & Rutherfords	SCRER	Extend	£3,978,162	12		01/04/2025	01/09/2025	31/08/2026	Corporate Director SCRER
Adults & Childrens Social Care System	ASCH	Extend	£2,989,000	36		01/11/2024	01/04/2025	31/03/2028	Corporate Director CYPE
FM - Security	Resources	Extend	£2,400,000	24		01/03/2025	01/09/2026	31/08/2028	Corporate Director Resources
DPS 3 Lot 1 - Call off for Supported Living for Adults with Disabilities and Autism	ASCH	Extend	£1,905,492	24		01/07/2024	14/11/2024	13/11/2026	Corporate Director ASCH

Procurement Pipeline: Permitted Extension

Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Award / Extension
DPS 1, Lot 3 -Outreach Services	ASCH	Extend	£1,800,000	12	12	12/01/2025	12/06/2025	11/06/2026	Corporate Director ASCH
Low Code Platform	ACE	Extend	£877,350	60		01/07/2025	01/02/2026	31/01/2031	Corporate Director ACE
Occupational Health Provision	ACE	Extend	£760,000	12		31/03/2024	01/05/2024	30/04/2025	Corporate Director ACE
Fleet & Bodywork Repairs	SCRER	Extend	£750,000	36	24	01/05/2024	01/03/2025	01/03/2028	Corporate Director SCRER
Domestic Violence Call off from IFA	Housing	Extend	£660,000	48		01/11/2024	01/05/2025	30/04/2029	Corporate Director Housing
YPO supply of Two Cremators (Lot 1) and Maintenance Contract (Lot 2)	ACE	Extend	£600,000	24		01/03/2024	01/04/2024	31/03/2026	Corporate Director ACE
Pest Control Procured through Collaboration Agreement through Councils	Housing	Extend	£500,000	20	24	01/03/2024	04/03/2024	31/10/2025	Corporate Director Housing

Procurement Pipeline: Contract Variation

Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Award / Extension
Integrated Drug & Alcohol Engagement, Treatment & Recovery Service for Adults and Young People	ASCH	Extend & Vary	£18,174,033	24	01/07/2024	01/10/2024	30/09/2026	Corporate Director PH
Section 75 Public Health Nursing	CYPE	Extend & Vary	£6,900,000	12	31/03/2024	01/04/2024	31/03/2025	Corporate Director PH
Alternative Education APPA	CYPE	Extend & Vary	£6,102,062	20	31/03/2024	01/04/2024	30/11/2025	Corporate Director CYPE
Best Start	CYPE	Extend & Vary	£4,856,682	12	30/03/2024	01/04/2024	31/03/2025	Corporate Director CYPE
Supervised Contact	CYPE	Extend & Vary	£3,205,000	11	31/03/2024	01/04/2024	28/02/2025	Corporate Director CYPE
Passenger Transport Minibus Contract Lot 3 (Various Routes)	SCRER	Extend & Vary	£2,918,544	4	01/03/2024	01/05/2024	31/08/2024	Corporate Director SCRER
Croydon Carers Assessment Health and Wellbeing Service	ASCH	Extend & Vary	£2,497,130	12	31/03/2024	01/04/2024	31/03/2025	Corporate Director CYPE
Tier 2 Emotional Wellbeing and Mental Health Services	CYPE	Extend & Vary	£1,921,500	12	31/03/2024	01/04/2024	31/03/2025	Corporate Director CYPE
Royal Mail - Postal Charges	Resources	Extend & Vary	£1,850,000	36	31/03/2024	14/09/2024	13/09/2027	Corporate Director Resources
Information, Advice and Guidance	ACE	Extend & Vary	£1,625,000	12	31/03/2024	01/04/2024	31/03/2025	Corporate Director ACE
Primary Care Contracts	ASCH	Extend & Vary	£1,406,000	12	31/03/2024	01/04/2024	01/04/2025	Corporate Director PH
GP and Pharmacy Health checks delivery	ASCH	Extend & Vary	£1,043,840	12	30/04/2024	01/08/2024	31/07/2025	Corporate Director PH
Azure management and monitoring Variation	ACE	Extend & Vary	£800,000	12	31/03/2024	01/05/2024	30/04/2025	CCB
Children's Advocacy Services	CYPE	Extend & Vary	£629,650	6	30/03/2024	01/04/2024	30/09/2024	Corporate Director CYPE
Appropriate Adults	CYPE	Extend & Vary	£575,000	6	31/03/2024	01/04/2024	30/09/2024	Corporate Director CYPE
SENDIASS	CYPE	Extend & Vary	£345,902	15	01/04/2024	14/04/2024	11/07/2025	CCB
Short Breaks (Lot 3)	CYPE	Extend & Vary	£324,000	12	30/03/2024	01/04/2024	31/03/2025	CCB
Extra Care Housing Solution Domiciliary Care IT system	ASCH	Extend & Vary	£280,000	12	01/03/2024	01/04/2024	31/03/2025	CCB

Procurement Pipeline: Contract Variation

Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Award / Extension
Coroners IT System	ACE	Extend & Vary	£192,344	36	01/04/2024	01/08/2024	31/07/2027	CCB
FM - Lift maintenance services	Resources	Extend & Vary	£191,662	35	30/04/2024	01/05/2024	31/03/2027	CCB

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000210	SCRER	Viridor	SLWP Waste Disposal - Energy Recovery Facility	Reprocure	£540,000,000	44	0	04/03/2019	01/03/2044
LBC_C-000627	Housing	Mears Limited Wates Property Services Limited	Housing Responsive Repairs	Extend	£221,000,000	80	48	01/08/2023	31/03/2030
LBC_C-000208	SCRER	Veolia Environmental Services Ltd	Waste Collection, Street Cleansing, Vehicle Maintenance Services	Reprocure	£216,000,000	97	192	01/04/2017	31/03/2025
LBC_C-000094	ASCH	Spot Purchase - Various Supplier	Residential / Nursing under 65	Under Review	£212,525,522	48	0	01/04/2020	31/03/2024
LBC_C-000197	Housing	Mulalley and Company Ltd	PMI General Building Works	Extend	£210,000,000	97	36	01/04/2016	31/03/2024
LBC_C-000195	ASCH	Caring 4 Croydon Ltd	PFI Caring for Croydon (Homes for the Future)		£187,000,000	132	0	12/08/2006	20/07/2038
LBC_C-000331	SCRER	BH Live	Fairfield Hall Operator Contract	Reprocure	£180,000,000	121	60	22/07/2019	22/07/2029
LBC_C-000283	SCRER	Greenwich Leisure Limited	Sport, Physical Activity and Leisure Services - Leisure Operator	Reprocure	£160,000,000	182	60	01/03/2018	28/02/2033
LBC_C-000206	SCRER	SKANSKA LAING	Street Lighting PFI	Reprocure	£150,000,000	304	0	01/08/2011	31/07/2036
LBC_C-000207	SCRER	FM Conway	Next Generation of Highways Contract	Extend	£130,000,000	84	36	01/10/2018	30/09/2025
LBC_C-000093	ASCH	Spot Purchase - Various Supplier	Residential / Nursing over 65	Under Review	£105,142,752	48	0	01/04/2020	31/03/2024
LBC_C-000512	ACE	Adecco	Managed Service Provider for Temporary Agency Resources	Reprocure	£100,000,000	48		01/11/2022	01/11/2026
LBC_C-000089	ASCH	Care UK	PFI Older People Residential Care Homes and Extra Care Housing Care Services	Extend & Vary	£97,500,000	148	19	23/06/2011	31/10/2023
LBC_C-000060	CYPE	Framework Agreement	SLCP Approved Provider Panel Agreement for IFA and Residential	Extend	£89,000,000	36	60	01/07/2020	31/03/2025
LBC_C-000067	CYPE	DPS - multiple providers	DPS 3 Lot 3 - Semi-independent Accommodation	Extend	£80,000,000	60	60	09/03/2021	09/03/2026
LBC_C-000179	SCRER	Various	Passenger Transport DPS	Extend	£64,000,000	48	48	01/09/2019	31/08/2027
LBC_C-000187	Resources	Atalian Servest Ltd	HardFM - Mechanical and Electrical maintenance (Atalian Servest)	Reprocure	£45,000,000	84	24	03/07/2016	31/03/2024
LBC_C-000628	Housing	K&T Heating Services Limited	Heating servicing, repair and replacement	Reprocure	£41,900,000	80	48	01/08/2023	31/03/2030
LBC_C-000075	Housing	Various	Emergency Accommodation Spend	Reprocure	£33,000,000	48	0	01/04/2020	31/03/2024

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000200	Housing	Anglian Building Products	PMI Windows Installation & Associated works Contract Extension	Extend	£30,357,138	96	108	01/04/2017	31/03/2025
LBC_C-000054	CYPE	Spot Purchase	Spot purchasing of residential children's care		£27,927,986	122	0	01/04/2020	30/04/2030
LBC_C-000196	Housing	AJS Ltd	PMI Electrical Works	Extend	£26,000,000	60	108	01/04/2017	31/03/2022
LBC_C-000053	CYPE	The Beckmead Trust	Specialist Education provision (Beckmead)	Extend & Vary	£25,756,000	60	0	01/09/2019	31/08/2024
LBC_C-000254	Resources	Npower	Unmetered street lighting supply Half hourly metered electricity supply and additional services Non half hourly metered electric supply and additional services	Extend	£25,135,443	36	12	01/01/2021	31/03/2024
LBC_C-000063	CYPE	Ashburton Services LTD	Ashburton Learning Village PFI	Extend & Vary	£23,616,667	104	0	27/05/2004	26/05/2034
LBC_C-000498	SCRER	Reed in Partnership	Work and Health Programme	Decommission	£23,517,633	105	24	01/03/2018	30/11/2026
LBC_C-000069	ASCH	Croydon Health Services	Integrated Sexual Health Service	Reprocure	£21,707,000	60	24	01/04/2022	31/03/2027
LBC_C-000192	Housing	Wilmott Dixon Construction	Design and Build of St Nicholas School	Decommission	£21,324,087	183	144	18/10/2018	30/10/2033
LBC_C-000209	SCRER	Veolia Environmental Services Ltd	Household Waste and Recycling Centres	Extend	£21,000,000	115	66	01/10/2015	31/03/2025
LBC_C-000062	CYPE	Spot Purchase	Spot purchasing of Semi-independents		£20,581,522	122	0	01/04/2020	30/04/2030
LBC_C-000057	CYPE	Croydon Health Services	Section 75 Public Health Nursing	Extend & Vary	£17,571,000	24	12	01/08/2021	31/07/2023
LBC_C-000186	Resources	Graham Facilities Management Ltd	HardFM - Building Maintenance (Graham FM)	Reprocure	£17,500,000	93	24	03/07/2016	31/03/2024
LBC_C-000008	SCRER	Ide Verde	Grounds Maintenance Vehicles & Equipment	Reprocure	£16,875,000	135	0	01/02/2019	30/04/2030
LBC_C-000257	Resources	Browne Jacobson LLP	Legal Services Contract - Corporate	Decommission	£14,434,524	84	0	01/01/2018	31/12/2024
LBC_C-000121	ASCH	Various	Out of Area Sexual Health & Contraceptive activity		£13,636,919	122	0	01/04/2020	30/04/2030
LBC_C-000132	ASCH	Change, Grow, Live (CGL)	Integrated Drug & Alcohol Engagement, Treatment & Recovery Service for Adults and Young People	Extend & Vary	£13,248,200	60	24	01/10/2021	30/09/2026
LBC_C-000212	SCRER	City Suburban	Trees and Woodlands	Reprocure	£11,980,250	182	0	01/08/2008	31/10/2023

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000051	CYPE	Spot purchased across 90 providers, all on national special schools contract	SEN NMI placements	Extend	£11,600,000	121	0	01/09/2015	31/08/2025
LBC_C-000198	Housing	Guideline Ltd	PMI Lift and Escalator	Extend	£11,000,000	96	108	01/04/2017	31/03/2023
LBC_C-000659	CYPE	Approx 15 schools	Enhanced Learning Provisions - mainstream primary & secondary	Extend	£10,335,000	48	24	01/12/2020	30/11/2024
LBC_C-000042	CYPE	Spot Purchase - Approved Provider Panel	Children's social care assessments	Extend	£10,049,000	24	24	01/08/2019	31/07/2023
LBC_C-000185	Resources	Churchill Services Ltd	FM- Cleaning Services	Extend	£10,000,000	48	24	01/06/2022	31/05/2026
LBC_C-000308	ACE	Littlefish	End User Services	Reprocure	£8,500,000	60		12/03/2019	11/03/2024
LBC_C-000005	ASCH	Community Equipment Services (CES)	Section 75 Croydon Wheelchair Service		£7,500,000	36	24	01/04/2022	31/03/2025
LBC_C-000190	Resources	Profile Security Ltd	FM Security	Extend	£6,453,333	48	24	01/06/2022	31/05/2026
LBC_C-000177	Housing	CAYSH	Young People and Care Leavers	Reprocure	£5,858,750	117		01/10/2013	31/03/2023
LBC_C-000061	CYPE	Spot Purchase	Spot purchasing of IFAs	Extend	£5,516,490	36	24	01/04/2020	31/03/2025
LBC_C-000253	Resources	Corona Energy	Utilities Contract - Gas supply	Reprocure	£5,018,263	60	0	01/01/2021	21/03/2024
LBC_C-000058	CYPE	Croydon Health Services	Joint Children's Speech and Language Therapy and Occupational Therapy	Reprocure	£4,956,500	36	30	31/08/2018	31/01/2024
LBC_C-000066	CYPE	Multiple - Approved Provider Panel (13 providers)	Alternative Education APPA	Extend	£4,921,388	12	36	01/12/2020	16/10/2023
LBC_C-000266	Resources	Pay 360	Income Management System (AIMS) Pay 360	Reprocure	£4,814,137	125	4	05/01/2019	30/04/2029
LBC_C-000646	SCRER	Yunex Ltd	ANPR camera supply, installation, and maintenance of Cameras and supporting software	Extend	£4,387,000	24	36	14/09/2023	13/09/2025
LBC_C-000180	SCRER	HATS Group	Passenger Transport Minibus Contract Lot 2 - St Giles & Rutherfords	Extend	£3,978,162	36	12	01/09/2022	31/08/2025
LBC_C-000251	Resources	FDM PLC	Bulk Printing & Mailing Contract	Reprocure	£3,791,667	146	36	30/10/2014	31/10/2026
LBC_C-000055	CYPE	Swanstaff	Supervised contact	Extend & Vary	£3,752,000	36	27	01/11/2019	31/10/2023

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LBC_C-000683	ASCH	Hestia	Mental Health Supported Housing		£3,697,220	60		02/08/2022	01/08/2027
LBC_C-000090	ASCH	Keyring	Floating Support for LD & ASD	Reprocure	£3,385,354	48	23	01/11/2018	30/09/2024
LBC_C-000306	ASCH	Liquid Logic	Adults & Childrens Social Care System	Extend	£3,326,583	72	84	01/04/2019	31/03/2025
LBC_C-000517	ACE	Bytes Software Services Ltd	Microsoft Enterprise Licensing Agreement including Azure	Reprocure	£3,200,000	36		01/07/2022	30/06/2025
LBC_C-000256	Resources	Mazars	Audit & Anti-Fraud	Reprocure	£3,168,000	97	0	01/04/2018	31/03/2026
LBC_C-000181	SCRER	London Hire Ltd	Passenger Transport Minibus Contract Lot 3 (Various Routes)	Reprocure	£2,918,544	60	0	01/09/2019	31/08/2024
LBC_C-000712	ASCH	London Care	Extra Care Services at Fellows Court	Extend	£2,882,880	60	120	01/10/2023	30/09/2028
LBC_C-000255	Resources	Castle Water Ltd	Utilities - Water supply	Reprocure	£2,858,333	49	0	01/04/2020	30/04/2024
LBC_C-000133	Housing	Evolve Housing & Support	Single Homelessness Service	Reprocure	£2,698,719	12	12	01/07/2021	30/06/2023
LBC_C-000199	Housing	Echelon Consultancy Ltd	PMI Partnering Advisory	Extend	£2,680,000	60	108	01/01/2018	01/01/2023
LBC_C-000083	Housing	Various	Disabled Facilities Grant works (Private Sector)	Reprocure	£2,600,000	60	0	01/04/2020	31/03/2025
LBC_C-000182	SCRER	London Hire Ltd	Mini Competition ESPO framework LOT 218 - Minibus Contract Hire	Reprocure	£2,424,000	60	0	01/09/2019	31/08/2024
LBC_C-000558	Housing	Southwark Council	Pest Control Procured through Collaboration Agreement through Councils	Extend	£2,250,000	60	48	01/11/2018	01/11/2023
LBC_C-000101	ASCH	Advocacy for All (+ Mind)	Adults Advocacy Services	Reprocure	£2,232,824	48	48	01/05/2018	30/09/2024
LBC_C-000664	Resources		ILC Leaseholder Right to Buy (RTB) insurances	Reprocure	£2,196,320	60		01/04/2023	31/03/2028
LBC_C-000551	ASCH	Whitgift Foundation	Croydon Carers Assessment Health and Wellbeing Service	Extend & Vary	£2,048,228	12	36	01/04/2023	31/03/2024
LBC_C-000205	SCRER	Flowbird/Parkeon	Pay and Display Machines	Decommission & Stop	£2,000,000	48	0	01/07/2020	30/06/2024
LBC_C-000059	CYPE	Off the Record Croydon Drop In	Tier 2 Emotional Wellbeing and Mental Health Services	Extend	£1,921,250	36	24	01/04/2020	31/03/2023

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LBC_C-000521	ASCH	Arundel Care	DPS 3 Lot 1 - Call off for Supported Living for Adults with Disabilities and Autism	Extend	£1,905,492	24	24	10/10/2022	09/10/2024
LBC_C-000495	Resources	Royal Mail	Royal Mail - Postal Charges	Extend & Vary	£1,850,000	36	24	14/09/2021	13/09/2024
LBC_C-000081	ASCH	Various GPs	DPS -LARC Provision	Reprocure	£1,792,000	24	0	01/04/2022	31/03/2024
LBC_C-000616	Resources	Zurich Municipal	ILC Casualty Insurance	Reprocure	£1,785,740	60		01/04/2022	31/03/2027
LBC_C-000709	ACE	Littlefish	End User Services	Reprocure	£1,700,000	12		12/03/2024	11/03/2025
LBC_C-000508	ACE	Wavenet Limited	Telephony System	Reprocure	£1,600,000	60	0	08/02/2022	07/02/2027
LBC_C-000316	Housing	NEC SOFTWARE SOLUTIONS UK LIMITED (was Northgate Public Services (UK) Ltd)	Housing and Asset Management System	Extend	£1,600,000	120	60	01/04/2021	31/03/2024
LBC_C-000291	Resources	Heywood Ltd	Pensions Admin Software	Extend & Vary	£1,552,452	60	12	31/03/2021	31/03/2026
LBC_C-000523	SCRER	Conduent	Parking Management Information System	Reprocure	£1,550,000	120		17/03/2022	16/03/2032
LBC_C-000334	CYPE	Servelec	Education Management System	Extend	£1,500,000	36	84	28/04/2019	28/03/2025
LBC_C-000471	CYPE	Crosfield Nursery School	Best Start - Lot 1a & 1b North and Central Locality Children's Centre Hubs	Extend & Vary	£1,432,000	27		01/01/2022	31/03/2024
LBC_C-000436	Resources	LIMITED (was Northgate Public Services (UK) Ltd)	Hosted IT Solution for Revenue and Benefits	Reprocure	£1,350,000	85	24	01/05/2021	30/04/2028
LBC_C-000638	ACE	CAB - Croydon	Information, Advice and Guidance	Extend & Vary	£1,300,000	48		01/04/2020	31/03/2024
LBC_C-000174	Housing	Thames Reach	Street Homelessness Outreach and Resettlement Service	Reprocure	£1,296,420	36	24	01/01/2018	31/12/2022
LBC_C-000092	ASCH	Hestia Housing	Floating Support for MH	Reprocure	£1,250,000	36	24	01/04/2018	30/09/2024
LBC_C-000684	Resources	Hymans Robertson LLP	Actuarial Services - Pensions	Reprocure	£1,250,000	72		01/08/2023	31/07/2029
LBC_C-000620	ACE	Bytes Software Services Ltd	Microsoft SCE Azure APA Agreement	Reprocure	£1,246,000	24		01/07/2023	30/06/2025
LBC_C-000183	Resources	Zip Car UK	Pool Cars	Reprocure	£1,242,000	73	36	01/07/2020	30/06/2026

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LBC_C-000294	CYPE	Capita Business Services Ltd	Capita ONE Support	Decommission	£1,200,000	108	48	01/04/2015	31/03/2025
LBC_C-000449	Resources	Cappemini	One Oracle Archiving	Extend & Vary	£1,143,333	98	0	01/03/2018	31/03/2026
LBC_C-000505	housing	Millwood Servicing Ltd	Provision of Fire Risk Assessment Surveying	Reprocure	£1,130,000	74		01/09/2022	31/10/2028
LBC_C-000324	ACE	Oracle Corporation UK Ltd	Oracle Cloud Services	Reprocure	£1,091,420	24	0	22/09/2022	21/09/2024
LBC_C-000649	Resources	Bank of New York Mellon	LGPS GLOBAL CUSTODY SERVICES	Reprocure	£1,000,000	84		01/04/2017	31/03/2024
LBC_C-000085	Housing	Various	Framework for Private Sector Property Refurbishment		£1,000,000	122	0	01/04/2020	30/04/2030
LBC_C-000617	Resources	Protector Insurance Ltd	ILC Corporate Property Insurance	Reprocure	£885,815	60		01/04/2022	31/03/2027
LBC_C-000027	CYPE	HENRY	Healthy Behaviours (Weight Management for children)	Extend	£880,000	48	0	01/08/2022	31/07/2026
LBC_C-000434	ACE	Sofcat PLC	Low Code Platform	Extend	£877,350	73	0	31/01/2020	30/01/2026
LBC_C-000647	Resources	Clyde & Co. LLP DAC Beachcroft LLP Kennedys Law LLP Weightmans LLP	Legal Panel Contract for the Insurance London Consortium (ILC)	Reprocure	£850,000	48		30/09/2023	29/09/2027
LBC_C-000175	Housing	Hestia Housing	Domestic Violence Call off from IFA	Extend	£825,000	60	24	01/05/2020	30/04/2025
LBC_C-000107	ASCH	Centra	Call centre for Careline (telecare)	Decommission	£820,000	96	24	01/04/2016	31/03/2024
LBC_C-000711	Resources	Gowlings	Legal support for Litigation	Extend	£787,000	36		15/08/2022	15/08/2025
LBC_C-000021	ASCH	Allan White Motors	Vehicles for CES	Reprocure	£780,000	60	0	06/01/2020	06/01/2025
LBC_C-000586	ACE	Public Voice CIC	Healthwatch	Reprocure	£775,000	36	24	02/04/2023	31/03/2026
LBC_C-000687	Housing	Riverside Environment Services Ltd	Asbestos Surveying Services	New Procurement	£775,000	60		01/09/2021	31/08/2026
LBC_C-000605	Resources	Protector Insurance Ltd	ILC Commercial Property Insurance	Reprocure	£762,420	60	0	01/04/2023	31/03/2028
LBC_C-000245	ACE	Medigold	Occupational Health Provision	Reprocure	£760,000	48	0	01/05/2020	30/04/2024

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LBC_C-000020	SCRER	L & M Bodyrepairs	Fleet & Bodywork Repairs	Reprocure	£750,000	36	24	01/03/2022	01/03/2025
LBC_C-000134	Housing	8 suppliers currently	PLA Framework		£747,704	183	0	01/04/2015	30/04/2030
LBC_C-000219	SCRER	Askews and Holt Ltd	Libraries - Bookstock	Reprocure	£740,000	44	24	01/08/2020	31/03/2024
LBC_C-000248	SCRER	Cyclinginstructor.com	Cycle Training for Children, Young People and Adults	Reprocure	£675,000	60	24	01/04/2019	31/03/2024
LBC_C-000191	Housing	Elliot's Group Ltd	St Giles SEN School: Modular Build	Decommission	£669,807	35	0	01/04/2021	10/03/2024
LBC_C-000173	Housing	Thames Reach	Housing First - Rough Sleeping Initiative	Extend	£663,530	60	36	01/10/2018	30/09/2023
LBC_C-000544	SCRER	RAMS EUROPE LTD	RAMS EUROPE waste management IT system Settlement agreement	Decommission	£663,211	48		01/07/2022	30/06/2026
LBC_C-000718	SCRER	CIA Fire & Security Limited Spadeoak/Aggregate Industries UK Ltd	Parks Tennis Investment	Decommission	£600,000	3		01/10/2023	31/12/2023
LBC_C-000261	ACE	Facultatieve Technologies	YPO supply of Two Cremators (Lot 1) and Maintenance Contract (Lot 2)	Reprocure	£600,000	58	24	01/06/2019	31/03/2024
LBC_C-000072	ASCH	Various GPs and Community Pharmacy	GP and Pharmacy Health checks delivery	Extend & Vary	£595,000	18	0	01/04/2022	30/09/2023
LBC_C-000293	ACE	Education Software Services (ESS)	CALAT 5 year Unit-E AFD Postcode Address Software Maintenance; UNIT-e Annual Maintenance	Extend & Vary	£578,000	146	0	01/08/2015	31/07/2027
LBC_C-000619	ACE	LGFL	LGFL	Reprocure	£557,054	61		01/07/2023	31/07/2028
LBC_C-000023	SCRER	IDOX Software Ltd	IT system for for planning, building control, regulatory services, residential premises	Reprocure	£550,000	60	0	01/11/2021	31/10/2026
LBC_C-000296	SCRER	Brightly Software Ltd previously called Precisely	Streets IT system - CONFIRM On Demand Hosted Service	Reprocure	£549,000	89	24	25/05/2018	28/09/2025
LBC_C-000104	ASCH	Independent Lives	Health and Care Personal Assistance Support	Extend & Vary	£537,000	48	16	02/12/2019	31/03/2025
LBC_C-000041	CYPE	Barnardos	Children's Advocacy Services	Extend & Vary	£528,000	36	12	01/10/2018	30/09/2023
LBC_C-000065	CYPE	TAAS	Appropriate Adults	Extend & Vary	£525,000	36	6	01/12/2020	30/12/2023
LBC_C-000427	ACE	Elcom (TBC)	Community Equipment Service back office system (got no other details for now so need a holding entry)	Reprocure	£508,333	122	0	01/04/2020	30/04/2030

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LBC_C-000742	Housing	Interim Partners Ltd (t/a New Street Consulting Group)	New Street Consulting Group	Extend & Vary	£490,000	15		01/01/2023	31/03/2024
LBC_C-000016	SCRER	Deloitte	Whitgift Centre Professional Services - Commercial & Surveying	Reprocure	£487,960	48	0	01/07/2022	30/06/2026
LBC_C-000550	ACE	Adept Technology Group	IT Network Contract	Reprocure	£475,000	60		02/01/2023	01/01/2028
LBC_C-000660	ACE	LGFL	London Grid for Learning for Libraries	Reprocure	£474,000	60		30/11/2023	29/11/2028
LBC_C-000202	Housing	Elliott Group Holdings	Redgate Primary School: Modular Unit 1 & 2	Decommission	£454,734	37	0	09/07/2021	30/07/2024
LBC_C-000543	SCRER	Croydon Health Services NHS Trust	Mortuary and post mortem services	Reprocure	£450,000	60		01/05/2019	30/04/2024
LBC_C-000286	ACE	MASTEK	MyResources systems support	Reprocure	£440,360	24	0	01/09/2022	31/08/2024
LBC_C-000244	Resources	Mercer Ltd	Pension Investment Consultancy Services	Reprocure	£435,119	85	0	01/06/2018	31/05/2025
LBC_C-000242	ACE	Rowland Brothers Ltd	Transportation of Bodies to Public Mortuaries Contract for Bromley & Bexley	Reprocure	£432,000	84	0	01/07/2018	30/06/2025
LBC_C-000461	Resources	Lambeth Council	Lambeth anti fraud support	Decommission	£425,000	60	0	01/11/2022	31/10/2027
LBC_C-000549	ACE	CSC Ltd	ServiceNow ITSM TESM	Reprocure	£418,475	60		01/02/2023	31/01/2028
LBC_C-000088	ASCH	Various Community Pharmacy	DPS -Enhanced Sexual Health	Extend & Vary	£418,000	18	0	01/04/2022	30/09/2023
LBC_C-000499	SCRER	Chroma Vision Ltd	CCTV Supply, Installation & Maintenance	Extend & Vary	£392,042	98	0	01/04/2015	31/05/2023
LBC_C-000607	Resources	Zurich Municipal	ILC Engineering Insurance and Inspection	Reprocure	£390,988	60	60	01/04/2018	31/03/2028
LBC_C-000531	SCRER	Pinsent Masons	Whitgift Centre Professional Services - Legal	Reprocure	£385,000	24		01/10/2022	30/09/2024
LBC_C-000044	CYPE	PIP UK (Parents in Parnership)	CWD Family Support	Reprocure	£383,960	36	12	01/04/2021	31/03/2024
LBC_C-000384	SCRER	Cleveland Potash	Gritting/Salt Framework	Reprocure	£360,000	51	0	13/10/2020	31/12/2023
LBC_C-000230	Resources	Banner Group Ltd	Office Supplies Contract	Reprocure	£350,000	48	24	17/08/2020	16/08/2024
LBC_C-000529	Resources	Wilks Head & Eve LLP	Annual Asset Valuations	Reprocure	£350,000	60		02/07/2018	01/07/2024

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LBC_C-000611	Resources	Savills	Asset Disposals - (Agency)	Decommission & Stop	£350,000	18		01/05/2023	30/10/2024
LBC_C-000176	Housing	Home Group Ltd	Supported Housing Service for Ex-Offenders	Extend	£349,972	12	12	01/07/2021	30/06/2023
LBC_C-000382	Resources	The Royal Bank of Scotland (RBS)	Corporate Banking Services	Reprocure	£342,538	84	0	01/04/2018	31/03/2025
LBC_C-000556	ACE		Salary Finance	Reprocure	£300,000	48	0	01/03/2023	28/02/2027
LBC_C-000243	Resources	BDI Securities UK Ltd	Cash Counting, Collection & Cash in Transit	Extend	£300,000	49	0	01/03/2020	31/03/2024
LBC_C-000029	Housing	CAYSH	Young People Supported Lodgings	Reprocure	£300,000	36	0	01/04/2020	31/08/2023
LBC_C-000509	ACE	Gamma	Mobile Telephony	Reprocure	£288,000	36	0	01/04/2022	31/03/2025
LBC_C-000137	ASCH	LB Lambeth	London HIV Prevention Prog		£286,789	73	0	01/04/2016	31/03/2023
LBC_C-000379	SCRER	Sirsi Ltd	Libraries - Library Management System	Reprocure	£279,160	60	12	01/04/2019	31/03/2024
LBC_C-000500	SCRER	BT	CCTV fibre connectivity	Reprocure	£270,000	24	0	01/04/2021	31/03/2023
LBC_C-000281	ASCH	ecco	Extra Care Housing Solution Domiciliary Care IT system	Extend & Vary	£260,002	63	0	11/01/2019	31/03/2024
LBC_C-000493	SCRER	Bibliotheca	Library Kiosks and Support and Maintenance 2022.-27	Reprocure	£260,000	60	0	30/04/2022	29/04/2027
LBC_C-000428	SCRER	Char.gy	EVCP GULCS2	Under review	£258,000	60	0	01/04/2021	31/03/2026
LBC_C-000052	CYPE	KIDS	SENDIASS	Extend	£252,931	24	12	01/06/2021	12/06/2023
LBC_C-000310	ACE	Midland Software (Midland HR)	Oracle Database Enterprise Midland read only system	Extend & Vary	£251,263	182	0	01/04/2016	31/03/2031
LBC_C-000043	CYPE	National Autistic Society	CWD Autism Support	Reprocure	£243,000	36	0	01/04/2021	31/03/2024
LBC_C-000587	ACE	Xerox	Managed Print services (desktop MFDs)	Reprocure	£241,890	36		27/03/2023	26/03/2026
LBC_C-000343	Resources	Technology Forge	Property management software TF Cloud	Reprocure	£241,511	42	12	07/01/2020	30/06/2023
LBC_C-000127	ASCH	SWL ICB	Recharge costs for Public Health Services		£240,000	195	0	01/04/2014	30/04/2030

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LBC_C-000240	ACE	Rowland Brothers Ltd	Transportation of Bodies to Public Mortuaries Contract for Sutton & Croydon	Reprocure	£231,000	64	0	01/07/2018	30/06/2025
LBC_C-000224	ACE	Rowland Brothers Ltd	Public Health Funerals (Statutory Funerals)	Extend	£225,000	36	24	01/10/2020	30/09/2023
LBC_C-000273	CYPE	Servelec	IYSS CCIS and Youth Justice	Reprocure	£223,713	48	0	01/05/2020	30/04/2024
LBC_C-000743	ACE	FilmFixer	Croydon Film Office	Reprocure	£220,000	120		01/11/2014	30/10/2024
LBC_C-000487	Resources	Rapleys LLP	Property Condition Survey	Extend	£217,176	12	12	06/04/2023	05/04/2024
LBC_C-000073	ASCH	GPs and Community Pharmacy	DPS -Chlamydia screening	Extend & Vary	£216,000	18	0	01/04/2022	30/09/2023
LBC_C-000412	ACE	Oracle Corporation UK Ltd	Support Service No: 2673948 - From 5 Feb until 4 Feb	Extend	£214,378	84	0	05/02/2017	04/08/2024
LBC_C-000231	Resources	Xerox Ltd	Reprographic Equipment -2 colour copiers including software, support, maint, rental	Reprocure	£212,380	60	0	01/10/2020	30/09/2025
LBC_C-000263	SCRER	Buchanan computing ltd	Smarter parking Traffic Management Order SAAS	Reprocure	£209,667	74	0	15/10/2017	31/12/2024
LBC_C-000568	Housing	Home and Dry Maintenance	Voids and Fire Safety Compliance works NON COMPLIANT CONTRACT	Reprocure	£200,000	18		26/04/2022	21/10/2023
LBC_C-000009	SCRER	Days Fleet JCB	Fleet Hire Contracts	Reprocure	£198,084	122	0	01/04/2020	30/04/2030
LBC_C-000386	ASCH	BES Healthcare Ltd	CES Cleaning Machine	Reprocure	£193,803	60	0	12/01/2021	11/01/2026
LBC_C-000275	ACE	Civica	Coroners IT System	Extend & Vary	£192,344	59	24	31/08/2022	31/07/2024
LBC_C-000184	Resources	Mitsubishi	FM - Lift maintenance services	Extend & Vary	£191,662	41	0	06/01/2019	31/05/2022
LBC_C-000390	SCRER	TBC	Landlord (Selective) and HMO Licensing system	Reprocure	£180,000	60	36	13/10/2021	12/10/2026
LBC_C-000668	SCRER	We Made That LLP	Croydon Town Centre Regeneration Strategy	Decommission	£177,897	12		05/09/2023	04/09/2024
LBC_C-000598	Resources	One Source	Enforcement Agents	Reprocure	£175,000	12		30/09/2023	30/09/2024
LBC_C-000597	Resources	One Source	One Source Pilot	Decommission	£175,000	6		01/07/2023	31/12/2023
LBC_C-000233	Resources	Iron Mountain	Document Storage & Retrieval	Reprocure	£174,000	24	12	30/09/2022	29/09/2024

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LBC_C-000594	SCRER	Ambient People	Ambient People agency NON COMPLIANT	Decommission & Stop	£173,333	16		13/03/2023	30/06/2024
LBC_C-000625	Resources	CCS Media Limited	190 Lenovo Laptops and Support	Reprocure	£172,949	12		31/07/2023	30/07/2024
LBC_C-000317	Resources		NEC (was Northgate) M3 land charges M3 hosted solution	Extend & Vary	£170,100	84	0	01/01/2020	31/12/2026
LBC_C-000313	SCRER	Quadiant Ltd	Mail Fulfilment NON COMPLIANT CONTRACT	Reprocure	£166,636	82	0	09/01/2016	26/10/2022
LBC_C-000750	Housing	London Hotel Group	Hotel Block Booking for rough Sleepers	New Procurement	£165,000	6		01/02/2024	31/07/2024
LBC_C-000577	ASCH	iESE Innovation Ltd	Carecubed	Reprocure	£162,650	36	12	01/04/2023	31/03/2026
LBC_C-000547	Resources	AVC Wise	SAVC shared additional voluntary contributions scheme AVC Wise	Extend & Vary	£162,000	36		01/04/2023	31/03/2026
LBC_C-000527	ASCH	Jake Williams ICT Ltd	Adults & Children's Social Care System extension	Extend & Vary	£160,000	22	0	31/10/2022	31/08/2024
LBC_C-000677	Resources	Insight Direct (UK) Limited	210 Lenovo Laptops	Decommission	£158,760	12		05/09/2023	04/09/2024
LBC_C-000606	Resources	Risk Management Partners	ILC Crime Insurance	Reprocure	£154,000	60	0	01/04/2023	31/03/2028
LBC_C-000604	Resources	Zurich Municipal	ILC Motor Insurance	Reprocure	£150,005	60	0	01/04/2023	31/03/2028
LBC_C-000444	Resources	Liberata	Pensions Enquiry Service	Extend	£150,000	24	0	01/04/2021	31/03/2023
LBC_C-000629	Resources	Liverpool City Council	Election payroll services	Reprocure	£150,000	60		01/07/2023	30/06/2028
LBC_C-000729	Housing	Access (UK) Ltd	DPS Software for Emergency Accommodation	Under review	£150,000	36		01/12/2023	30/11/2026
LBC_C-000459	Resources	Stiles Harold Williams	London Borough of Croydon (Agency Disposals)	Extend & Vary	£150,000	43	0	05/06/2021	31/12/2024
LBC_C-000448	CYPE	Meggs Costoya Attfield (MCA)	Family Space	Decommission	£150,000	36	0	27/11/2021	30/11/2024
LBC_C-000749	SCRER	T Loughman & Co	Norbury Park Footpath works	New Procurement	£149,354	2		08/02/2024	29/03/2024
LBC_C-000478	CYPE	Croydon Drop In	Best Start - Croydon Drop-in (PIP)	Extend & Vary	£144,000	27		01/01/2022	31/03/2024
LBC_C-000292	Housing	HOME CONNECTIONS LETTINGS LIMITED	Choice-based lettings support and maintenance Home Connections. Housing Mobility	Decommission & Stop	£143,550	87	0	19/12/2016	31/03/2024

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Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000339	ACE	eSpatial	GIS system e-spatial	Reprocure	£143,000	48	0	16/05/2020	15/05/2025
LBC_C-000311	ACE	Civica	Electoral management system	Reprocure	£140,000	84	0	01/04/2017	31/03/2024
LBC_C-000567	CYPE	Allen Speech and Language Ltd	Additional Capacity for Speech and Language Therapy In Croydon	Decommission	£140,000	4		20/03/2023	30/04/2024
LBC_C-000123	ASCH	ThriveTribe	ThriveTribe - IT solution for statutory NHS Health Checks	Reprocure	£138,600	36	12	01/01/2019	31/12/2021
LBC_C-000578	ASCH	Public Consulting Group UK Ltd	Adult Social Care Direct Payments (Virtual Wallet Contract)	Reprocure	£136,000	24		01/04/2023	31/03/2025
LBC_C-000479	Resources	Lexis Nexis	Visual Files software for legal	Reprocure	£135,000	60	0	01/12/2019	30/11/2024
LBC_C-000309	ACE	Gower	Bereavement Cemeteries Management System	Extend & Vary	£134,376	75	0	04/01/2017	31/03/2023
LBC_C-000639	SCRER		London Borough of Culture - Marketing Agency	Decommission & Stop	£132,000	15		03/01/2023	31/03/2024
LBC_C-000624	Resources	Insight Direct (UK) Limited	150 Lenovo i7 Laptops and Support	Decommission & Stop	£131,982	12		25/05/2023	24/05/2024
LBC_C-000579	SCRER	Vivacity Labs	Croydon School Streets Monitoring sensors, install, monitor, maintain, data feeds, analysis	Reprocure	£131,000	12		31/03/2023	31/03/2024
LBC_C-000602	ASCH	Croydon Hearing Resource	Croydon Environmental Equipment Assessment and Support Contract For Hearing Impairment	Reprocure	£129,940	24		01/08/2023	31/07/2025
LBC_C-000068	CYPE	EGOV Ltd	EPEP / Statistics & Monitoring	Reprocure	£129,863	36	0	01/09/2021	31/08/2024
LBC_C-000483	Resources	CLA	CLA Copyright licence agency public administration licence	Extend	£127,302	36	0	30/09/2020	30/09/2024
LBC_C-000222	Resources	Quadiant Ltd	Mailroom Equipment - Franking Machines / Folder Inserters and Associated Software	Reprocure	£126,000	61	0	01/08/2020	30/08/2025
LBC_C-000050	CYPE	Global Mediation	SEN Mediation Services	Extend	£125,000	36	48	01/04/2020	31/03/2025
LBC_C-000229	Resources	AON Hewitt Ltd	Pension Consultancy	Reprocure	£124,000	84	12	01/04/2017	31/03/2024
LBC_C-000087	Housing	Various	Staying Put - Re-ablement Service	Reprocure	£122,000	122	0	01/04/2020	30/04/2030
LBC_C-000656	ACE	CACI	ACORN Geodemographic tool, household and wellbeing. Data and analysis	Renew	£120,000	180		03/01/2012	02/01/2027
LBC_C-000548	ACE	Health Assured	Employee Assistance Programme	Reprocure	£120,000	48		01/04/2023	31/03/2027

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LBC_C-000618	Resources	Charles Taylor Consulting	ILC Terrorism Insurance	Reprocure	£120,000	60		01/04/2022	31/03/2027
LBC_C-000728	Resources	CPI Ltd	RV Finder	New Procurement	£120,000	24	12	11/12/2023	10/12/2025
LBC_C-000576	ACE	J3MS Consulting Ltd	Trauma Informed Practice Program	New Procurement	£118,600	24		31/03/2023	30/03/2025
LBC_C-000698	CYPE	Prentis Solutions Limited	Recruitment Partner For Public Social Housing	Decommission	£117,390	6		04/12/2023	03/06/2024
LBC_C-000724	ASCH	Age UK Croydon	Adult Social Care Advice and Guidance Service	Extend & Vary	£116,700	8		01/02/2024	30/09/2024
LBC_C-000580	ACE	BT	BT Telephone Lines	Reprocure	£113,008	12		27/05/2023	26/05/2024
LBC_C-000593	Resources	LG Futures	LG Futures Financial Intelligence Toolkit Subscription	Extend	£112,000	84		01/04/2017	31/03/2024
LBC_C-000680	ASCH	PreventX Ltd	Online Chlamydia Testing call off under the G-Cloud 13 Framework (RM1557.13) Lot 2	New Procurement	£110,500	17		01/11/2023	31/03/2025
LBC_C-000725	CYPE	AV Outcomes Ltd	Triple Lock Project	New Procurement	£109,850	8		01/01/2024	31/08/2024
LBC_C-000706	ACE	Capita	Capita WAN circuits	Decommission	£109,000	57		27/05/2019	27/02/2024
LBC_C-000325	ACE	Phoenix Software Services	Adobe Cloud Subscriptions	Reprocure	£107,178	36	0	29/11/2022	28/11/2025
LBC_C-000267	Resources	Altantic Data	Electronic Disclosure and Barring Service (DBS Checks)	Reprocure	£103,054	84	12	09/10/2017	08/10/2024
LBC_C-000373	CYPE	Idox	SEND Local offer website	Extend & Vary	£102,763	50	0	01/04/2020	31/05/2024
LBC_C-000584	ACE	BH Live	Fairfield Halls hire Election count venue May 2024	Decommission	£102,702	1		02/05/2024	06/05/2024
LBC_C-000466	CYPE	CAMHS	Early Intervention Parenting SLA	Reprocure	£102,341	110	0	01/04/2021	30/04/2030
LBC_C-000346	Resources	JC Applications Development Ltd (JCAD)	LACHS system and CORE strategic risk management system.	Reprocure	£101,450	60	0	01/06/2023	31/05/2028
LBC_C-000736	ACE	Oviva	Tier 2 Adult Weight Management	Under review	£100,000	12		24/04/2023	23/04/2024
LBC_C-000003	CYPE	Psychology First Consultants Ltd	Educational Psychology Support (SEND)	Decommission & Stop	£100,000	12	0	01/09/2022	31/08/2023
LBC_C-000541	Resources	Civico Ltd	Web casting of council meetings	Reprocure	£100,000	12	9	01/01/2023	30/12/2023

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LBC_C-000002	CYPE	Love to Communicate	Speech and Language Support (SEND)	Extend	£100,000	12	0	01/09/2022	31/08/2023
LBC_C-000236	Resources	G4S Cash Solutions (UK) Ltd	Cash Collection & Cash in Transit Lot 1 Corporate Service	Decommission	£100,000	48	0	31/03/2020	31/03/2025
LBC_C-000155	Housing	The Forward Trust	Private Rented Access Scheme Ex-Offenders	Reprocure	£99,990	36	6	22/11/2021	01/12/2024
LBC_C-000726	ACE	OrbitaCX Limited trading as Insight now	Additional School Health & Wellbeing survey delivery	Extend & Vary	£99,500	100		01/12/2023	31/03/2032
LBC_C-000662	Resources	Copping Joyce	General Valuation Advice	Reprocure	£99,050	24	12	24/07/2023	23/07/2025
LBC_C-000432	ACE	Digital Interactive Ltd	Complaints system Infreemation	Reprocure	£99,000	60	0	08/03/2021	07/03/2026
LBC_C-000599	SCRER		Croydon Design Review Panel	Reprocure	£98,000	48		01/09/2023	31/08/2027
LBC_C-000416	ACE	Digital Devices Ltd	Forcepoint Web Security R with Essential Support for 2 Years	Reprocure	£97,958	24	0	30/04/2022	30/04/2024
LBC_C-000486	Resources	DJS Research	Resident Survey	Reprocure	£97,800	36	0	06/09/2022	05/09/2025
LBC_C-000723	ACE	Phoenix Software Ltd	Appsense - DesktopNow SSP Gold Support Ivanti	Reprocure	£97,680	24		28/03/2024	27/03/2026
LBC_C-000518	ACE	Insight Direct (UK) Ltd	Citrix XenApp Service XenDesktop Service Per User/Device x1 Transition From XenDesktop Platinum User/Device	Reprocure	£97,578	12		22/09/2022	21/09/2023
LBC_C-000676	ACE	Insight Direct (UK) Ltd	Citrix XenApp Service XenDesktop Service Per User/Device x1 Transition From XenDesktop Platinum User/Device	Reprocure	£97,578	12		22/09/2023	21/09/2024
LBC_C-000135	Housing	Notting Hills/ Genesis	Notting Hill HALS		£97,000	183	0	01/04/2015	30/04/2030
LBC_C-000650	ASCH	Appello	Telecare	Reprocure	£97,000	12		01/03/2024	28/02/2025
LBC_C-000288	Resources	Fiscal Technologies Ltd	AP forensics software	Extend & Vary	£96,086	70	24	11/01/2019	30/10/2024
LBC_C-000301	ACE	Egress Software Technologies Ltd	Renewal of Egress Premier Support but reducing users to 2,263. Using the current functionality in use only. Also moving infrastructure to Egress Cloud Hosted Option	Decommission	£90,520	24	0	23/02/2022	22/02/2025
LBC_C-000304	ACE	learning pool	e-learning System	Reprocure	£90,248	42	0	24/03/2021	23/09/2024

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LBC_C-000610	ACE	OLMEC Black on board	Black on Board	Decommission	£90,000	9		31/07/2023	31/08/2024
LBC_C-000476	CYPE	National Autistic Society	Best Start - Lot 2e Group support for families who have children with additional need in relation to speech and communication delay	Extend & Vary	£90,000	27		01/01/2022	31/03/2024
LBC_C-000475	CYPE	Home-Start Croydon	Best Start - Lot 2d Parent champion programme	Extend & Vary	£90,000	27		01/01/2022	31/03/2024
LBC_C-000733	ACE		Registrars system	Decommission	£90,000	68		09/01/2019	31/08/2024
LBC_C-000474	CYPE	Home-Start Croydon	Best Start - Lot 2c Peer to peer home visiting support	Extend & Vary	£90,000	27		01/01/2022	31/03/2024
LBC_C-000347	SCRER	TCV	Landscape & Conservation - Park Volunteering	Reprocure	£90,000	24	12	25/11/2021	24/11/2024
LBC_C-000341	Housing	CDP SOFT LTD	SHARP Client Record Management System	Extend	£89,854	48	0	01/05/2020	30/04/2024
LBC_C-000335	ASCH	Signis. Antser	People Policy System Tri-X	Reprocure	£89,000	23	0	01/05/2021	20/04/2024
LBC_C-000392	CYPE	ALPS	KS4 and 5 dashboard services	Extend & Vary	£88,000	36	12	01/04/2020	31/03/2023
LBC_C-000626	ACE	Concept Energy Solutions Limited	Utility Bureau Management Service	Reprocure	£86,538	48	12	30/06/2023	29/06/2027
LBC_C-000455	ACE	Penna plc	Recruitment Advertising	Reprocure	£85,417	41	0	01/04/2020	01/09/2023
LBC_C-000658	Resources	Civica	Modern.gov committee and decisions management system	Reprocure	£80,000	60		30/09/2023	29/09/2028
LBC_C-000685	SCRER	The Relief Group	Family Justice Centre (FJC) Creche Service	Reprocure	£80,000	36	24	01/08/2023	31/07/2026
LBC_C-000086	Housing	Various	Staying Put - Hospital Discharge Service		£80,000	122	0	01/04/2020	30/04/2030
LBC_C-000748	SCRER	Playcubed LTD	Addiscombe Railway Park-Lloyd Park Footpath Improvement	New Procurement	£79,169	2		01/02/2024	27/03/2024
LBC_C-000330	ACE	Bytes Software services Ltd	Appsense - DesktopNow SSP Gold Support Ivanti	Reprocure	£77,200	24	0	28/03/2022	27/03/2024
LBC_C-000351	Resources	Zylpha	Court bundling for digital courtrooms. Digital Courtroom.	Extend & Vary	£77,000	84	12	02/11/2017	01/11/2024
LBC_C-000260	Resources	Bottomline	Bacs system support	Extend & Vary	£76,949	48	0	01/08/2022	31/07/2026

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LBC_C-000612	ACE	KD Consultancy and Coaching Ltd	HR Consultancy Support for the Transformation Programme	Decommission	£75,000	12		12/07/2023	12/07/2024
LBC_C-000131	ASCH	Royal association of deaf	Information for People being Hard of Hearing (BSL)	Reprocure	£75,000	48	0	01/04/2020	31/03/2024
LBC_C-000028	CYPE	Frontline Data Ltd	SLA ONLINE	Extend & Vary	£73,440	36	0	01/04/2023	31/03/2026
LBC_C-000022	SCRER	Cyclehoop Ltd	Cycle Hangars	Reprocure	£72,000	48	0	01/04/2020	31/03/2024
LBC_C-000287	ASCH	NEC SOFTWARE SOLUTIONS UK LIMITED	Blue Badges	Extend & Vary	£72,000	48	0	01/01/2023	31/12/2026
LBC_C-000636	ASCH		Advice Services Croydon	Reprocure	£70,000	12	0	01/02/2024	31/01/2025
LBC_C-000671	SCRER	Activist Group	Community Hubs Development Support	Decommission	£69,160	12	9	05/09/2023	04/09/2024
LBC_C-000485	Resources	Thomson Reuters	Thomson Reuters Subscriptions	Reprocure	£68,000	24	0	01/03/2022	28/02/2024
LBC_C-000477	CYPE	South London & Maudsley Nhs Trust	Best Start - Lot 2f Peer led Parenting programmes	Extend & Vary	£67,500	27		01/01/2022	31/03/2024
LBC_C-000472	CYPE	Croydon Voluntary Action	Best Start - Lot 2a Community Capacity Building	Extend & Vary	£67,500	27		01/01/2022	31/03/2024
LBC_C-000739	CYPE		Delivering Sustained Improvement for Croydon Care Leavers	New Procurement	£67,000	3		11/01/2024	31/03/2024
LBC_C-000696	CYPE	Eden Brown Limited	Recruitment Partner for Public Social Housing	Decommission	£64,935	6		13/11/2023	10/05/2024
LBC_C-000381	ACE	Introworld Technology Limited	Software Support & Maintenance Agreement of the LangServ Translation System	Reprocure	£64,800	60	12	01/04/2020	31/03/2025
LBC_C-000401	ACE	Blackburn IT Services	Love Clean Streets Service for Croydon Council	Extend	£64,680	72	12	01/06/2018	31/05/2024
LBC_C-000492	SCRER	Iorensbergs	Netloan PC booking system for public	Reprocure	£64,000	48	0	01/04/2023	31/03/2027
LBC_C-000572	CYPE	Education Support Systems	SIMS facilitation support agreement	Extend	£63,000	60		01/04/2022	31/03/2027
LBC_C-000319	Housing	Hub Solutions	ASB Caseworks system	Decommission	£61,700	60	0	01/04/2019	31/03/2024
LBC_C-000080	Housing	David Phillips, Maurisley	Mattresses and furnishings for CSW buildings	Extend & Vary	£60,000	39	0	18/12/2018	31/03/2022
LBC_C-000305	Resources	Whyte and Co	Enforcer workflow system for bailiffs	Extend & Vary	£59,850	48	0	01/06/2020	31/05/2024

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LBC_C-000070	ASCH	Pinnacle Healthcare	Pharm Outcomes	Reprocure	£59,378	63	24	01/10/2016	31/12/2021
LBC_C-000460	Resources	Huggins Stuart Edwards	Letting of vacant space on ground, 2nd, 6th and 7th floors, Davis House	Decommission	£57,500	23	0	01/02/2022	31/12/2023
LBC_C-000108	ASCH	Quality Medical Solutions Ltd (QMS)	Healthcheck invitations	Reprocure	£56,546	24	12	01/06/2022	01/06/2024
LBC_C-000473	CYPE	Phase 1 Enterprise Training CIC	Best Start - Lot 2b Employability Support	Extend & Vary	£56,250	27		01/01/2022	31/03/2024
LBC_C-000731	Resources		MPLC Copyright licence	Renew	£56,000	36	0	22/07/2021	22/07/2024
LBC_C-000519	ACE	Code Enigma Limited	Web site hosting and support (in azure)	Reprocure	£55,800	36		01/11/2022	31/10/2025
LBC_C-000367	SCRER	Barbour Logic	ResponseMaster	Decommission	£55,620	122	0	01/04/2020	30/04/2030
LBC_C-000592	ACE	BH Live	Fairfield Halls hire Election count venue May 2026	Extend & Vary	£54,405	0		07/05/2026	09/05/2026
LBC_C-000285	ACE	everbridge	Incident Management Mass Messaging	Extend & Vary	£53,750	60	36	01/03/2020	28/02/2025
LBC_C-000673	SCRER	The Circus	Croydon Museum Trail Exhibition	Decommission	£51,001	6	4	09/10/2023	09/04/2024
LBC_C-000566	ACE	Liverpool City Council	Election payroll services	Reprocure	£50,000	60		01/08/2023	31/07/2028
LBC_C-000538	Resources	K&L Gates LLP	Specialist Housing Legal Advice for CAH/CAT Transaction with L&G	Extend	£50,000	12		13/12/2022	12/12/2023
LBC_C-000631	SCRER	Reach Shared Services	MARKETING AGENCY (for CALAT print, digital and social media)	Decommission	£50,000	21		14/07/2023	14/04/2025
LBC_C-000387	ASCH	Prepaid Financial Services (PFS)	Prepaid Card	Decommission	£49,180	65	0	01/04/2021	31/08/2026
LBC_C-000389	Resources	Aligned Assets	Contract for Land and Property Gazeteer LLPG	Reprocure	£48,400	48	0	21/03/2020	20/03/2024
LBC_C-000545	ACE	TMI Systems Limited	Enterprise PMO Solution	Extend & Vary	£47,751	36		09/01/2023	08/01/2026
LBC_C-000510	ACE		Engagement Platform	Extend & Vary	£46,500	36		20/09/2021	20/09/2024
LBC_C-000279	ACE	Ebase Technology Ltd	Ebase Xi Electronic Forms Maintenance and Support	Extend	£45,528	48	0	02/04/2020	31/03/2025
LBC_C-000710	SCRER	Art & Assembly	Fabrication and installation for Urban Room shop unit	New Procurement	£45,000	3		11/12/2023	28/02/2024

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LBC_C-000640	SCRER		London Borough of Culture - Press & PR Agency	Decommission & Stop	£45,000	15		03/01/2023	31/03/2024
LBC_C-000084	Housing	Pellings	Building Surveying Services for Disabled Adaptations		£45,000	117	0	01/09/2020	30/04/2030
LBC_C-000747	ASCH		Croydon Deaf Access	Reprocure	£45,000	24		01/04/2024	31/03/2026
LBC_C-000744	ACE	Morgan Law	Oracle HR Consultant	Decommission	£45,000	3		01/01/2024	31/03/2024
LBC_C-000439	SCRER	Overdrive	Libraries e-stock	Reprocure	£44,073	36	0	01/04/2021	31/03/2024
LBC_C-000670	ACE	London Borough of Sutton	Secondment of electoral services senior specialist from Sutton	Decommission	£42,803	10		17/07/2023	31/05/2024
LBC_C-000573	SCRER	Man And Machine Ltd	AutoCad Licences	Reprocure	£42,660	36		24/01/2023	23/01/2026
LBC_C-000600	SCRER	Roadworks Information Ltd T/A One Network	One Network Traffic Management Tool Subscription	Extend	£42,600	36		01/04/2023	31/03/2026
LBC_C-000226	ASCH	Word Source Ltd	Interpretation & Translation	Reprocure	£42,516	12	0	01/09/2020	31/08/2021
LBC_C-000583	CYPE	Studybugs Lt	Studybugs	Reprocure	£41,590	18		01/09/2022	31/08/2024
LBC_C-000679	ACE	Restore Harrow Green	Electoral Logistics Services	Reprocure	£41,107	60		01/09/2023	31/08/2028
LBC_C-000697	ACE	Restore Harrow Green	Election Equipment Delivery and removal	Reprocure	£41,107	63		01/03/2021	01/06/2026
LBC_C-000506	ACE	Microsoft Ltd	Microsoft: Microsoft Unified Enterprise Support (Duration: 2 years, From 1 Jun 2022 until 31 May 2024)	New Procurement	£40,456	24	0	01/06/2022	31/05/2024
LBC_C-000415	ACE	Form.io	FORM IO online forms platform	Decommission	£40,071	48	12	24/01/2020	23/01/2024
LBC_C-000651	Resources	Kennedy Cater LLP	Barrister Call Off Contract from LBLA Framework	Extend	£40,000	48		01/04/2022	31/03/2026
LBC_C-000755	Housing	Housing Review Ltd Shelter Training	Housing Needs Training Programme	New Procurement	£40,000	3		30/01/2024	30/04/2024
LBC_C-000652	Resources	Digital Courtrooms Ltd	Digital Courtrooms Bundling Project Fusion	Extend & Vary	£40,000	58	24	07/02/2019	06/12/2025
LBC_C-000440	SCRER	Bolinda	Libraries e-stock	Reprocure	£39,699	36	0	01/04/2021	31/03/2024

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LBC_C-000355	Resources	Macro 4 PLC	Annual maintenance and support for the Software Columbus DW	Extend & Vary	£39,000	60	12	01/09/2017	31/08/2023
LBC_C-000596	ACE	Influential Software Services Limited	SAP Business Objects licences	Reprocure	£38,850	24		01/05/2023	30/04/2025
LBC_C-000328	ACE	Compass Computer Consultants Ltd.	ProAchieve Core; 9/1 ProAchieve Learner Responsive 9/1; ProAchieve Employer Responsive 24/6; ProAchi	Extend & Vary	£38,000	36	0	09/01/2021	08/01/2025
LBC_C-000354	SCRER	Surrey County Council	Landscape & Conservation - Sanderstead to Whyteleafe Countryside and Downlands Partnership	Reprocure	£38,000	18	0	02/04/2020	30/09/2021
LBC_C-000413	ACE	Siteimprove	Siteimprove: Website Auditing Tool - Quality Assurance and Accessibility Services for 10,000 Web Pages - From 27 Feb until 26 Feb	Extend & Vary	£37,758	60	12	27/02/2019	26/02/2025
LBC_C-000571	ASCH	Barclays Bank Plc	Bank Accounts for Appointee and Deputy Clients Within Croydon	Reprocure	£37,056	36	0	13/03/2023	12/03/2026
LBC_C-000613	ACE	ACAS	ACAS Disciplinary and Investigation Training	Extend	£36,000	24		01/08/2023	31/07/2025
LBC_C-000507	CYPE	London Hire Ltd	Calleydown Minibus	Reprocure	£36,000	36	0	01/09/2022	30/09/2025
LBC_C-000737	Resources		Oracle HR Resource temp contractor	Decommission	£35,750	2		30/11/2023	31/01/2024
LBC_C-000740	Housing	Homeless Link	Consultancy support to carry out a review of Supported Housing Services	New Procurement	£35,496	12		01/02/2024	01/02/2025
LBC_C-000642	SCRER	IHS Global Ltd	Online Technical Library for Croydon Building Control	Extend	£35,490	36	36	01/04/2023	31/03/2026
LBC_C-000695	SCRER	Festival and Events International	Fairfield Hall Review of the Business Plan	New Procurement	£35,070	5	6	15/11/2023	14/05/2024
LBC_C-000024	Housing	Policy in Practice	LIFT Dashboard Tool and Benefit Calculator tool	Extend & Vary	£35,000	12	0	31/05/2021	30/05/2022
LBC_C-000391	Housing	Docusign	Docusign contract sw for Housing	Reprocure	£34,800	24	12	03/10/2022	02/10/2024
LBC_C-000735	SCRER	RASASC	Independent Sexual Violence Advocate	New Procurement	£34,500	12		01/04/2023	31/03/2024
LBC_C-000574	SCRER	Four Communications Ltd	London Borough of Culture - Website	Decommission & Stop	£34,244	18		08/02/2023	07/08/2024
LBC_C-000280	SCRER	Transoft (was Keysoft) Solutions Ltd	Autocad Plugins	Extend & Vary	£34,135	96	0	01/12/2016	30/11/2024

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000453	SCRER	IHS Global	Subscription to CIS Core	Reprocure	£33,870	36	0	01/04/2021	01/04/2024
LBC_C-000663	SCRER	Allies & Morrison	Tall Buildings	Decommission	£33,428	2		25/09/2023	31/12/2025
LBC_C-000634	SCRER	Ig9	Waddon Leisure Consultancy Service	Decommission	£31,100	1	1	11/09/2023	31/03/2024
LBC_C-000270	ACE	Protocol Policy Systems Ltd	Protocol Policy	Extend & Vary	£30,600	72	0	14/12/2017	13/12/2025
LBC_C-000282	ACE	Entrust	SSL certificates	Reprocure	£30,494	60	0	23/12/2020	22/12/2025
LBC_C-000643	SCRER	Trans-Support Ltd	Vehicle Removals	Extend	£30,000	12	24	27/07/2023	31/07/2024
LBC_C-000622	Resources	In-tend	E-procurement system In-Tend	Extend	£30,000	60		14/07/2023	13/07/2028
LBC_C-000746	SCRER	London Hire Ltd	Extension of Youth Engagement Team minibus lease.	Extend	£30,000	60		10/06/2024	09/06/2029
LBC_C-000441	SCRER	CitySprint	London Libraries Consortium Courier Services (CitySprint)	Reprocure	£30,000	36	0	01/04/2021	31/03/2024
LBC_C-000011	Housing	Housing Partner Ltd	HomeSwapper Annual Subscription	Reprocure	£29,913	12	24	01/04/2021	31/03/2024
LBC_C-000752	SCRER	T Loughman & Co Ltd	South Norwood Country Park Footpath Improvement with drainage	New Procurement	£29,203	1		18/02/2024	29/03/2024
LBC_C-000565	CYPE		Non-Violent Resistance Training (Lots 1 & 2)	New Procurement	£29,167	14		01/02/2023	31/03/2024
LBC_C-000322	CYPE	Peoplesafe Skyguard	Lone Worker Alarm Devices	Extend	£28,600	24	12	10/11/2022	09/11/2024
LBC_C-000047	CYPE	The Tavistock	Pan London FDAC		£27,310	24		01/01/2022	31/12/2024
LBC_C-000340	ACE	ESRI (UK) Ltd	Croydon Observatory LIS	Reprocure	£26,910	36	0	18/05/2022	17/05/2025
LBC_C-000686	SCRER	Nexus Planning	Open Spaces Study	New Procurement	£26,545	27		02/10/2023	31/12/2025
LBC_C-000048	CYPE	Rutherford Special School	Special School - Play Schemes	Reprocure	£25,000	12	0	01/04/2022	31/03/2024
LBC_C-000727	Resources	Huw Gray Ltd	Oil Filled Radiators	Decommission	£25,000	12	24	03/11/2023	02/11/2024
LBC_C-000666	SCRER	BNP Paribas Real Estate	Review of the community infrastructure levy charging schedule	Decommission	£24,990	13		18/08/2023	17/09/2024

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000480	SCRER	Bytes	SIMSI Risk Terrain Modelling Software new requirement	Renew	£24,093	28	0	12/04/2022	18/07/2024
LBC_C-000297	CYPE	Oxford Computer Consultant (OCC)	Controcc Children Record Bank Details Maintenance	Extend & Vary	£24,041	82	0	01/04/2017	12/02/2025
LBC_C-000601	Resources		NFI Fraud Hub	Renew	£23,632	84		01/07/2018	30/06/2025
LBC_C-000272	ACE	Phoenix Software Ltd	VMWare renewal & VMWare vSphere 5 Essentials kit	Reprocure	£23,473	24	0	22/04/2022	22/04/2024
LBC_C-000655	ASCH	Allpay	Pre-Paid Cards for Appointee and Deputy Clients within Croydon	New Procurement	£22,180	24	12	01/09/2023	31/08/2025
LBC_C-000632	SCRER	BNP Paribas Real Estate	Lot 5: Whole Plan Viability Appraisal Update Partial Review of the Croydon Local Plan 2023: New and Updated Evidence Lot 5	Decommission	£21,250	2		04/09/2023	31/12/2025
LBC_C-000665	SCRER	Nexus Planning	Partial Review of the Croydon Local Plan 2023: New and Updated Evidence Lot 3 Retail Need Study	Decommission	£21,150	2		04/09/2023	31/12/2025
LBC_C-000657	Resources	Improvement and Development Agency for Local Government (IDeA)	NGDP Finance Scheme	Renew	£21,000	36		01/10/2023	30/09/2026
LBC_C-000559	ACE	Sodexo	Employee Benefits 1 Childcare vouchers, cycles and lifestyle discounts Season tickets for travel	Reprocure	£20,000	48	0	28/02/2023	27/02/2026
LBC_C-000720	SCRER	Speed Admin	Music school CMA database	Extend	£20,000	24		01/04/2023	31/03/2025
LBC_C-000530	ACE		SolarWinds Licences	Reprocure	£20,000	60		20/12/2022	19/12/2027
LBC_C-000635	SCRER	Iceni Projects	PartialReview of the Croydon Local Plan 2023: New and Updated Evidence Lot 4: Strategic Housing Market Assessment (SHMA) update	Decommission	£19,612	2		04/09/2023	31/12/2025
LBC_C-000454	ACE	Me Learning	Me Learning Subscription	Reprocure	£18,288	12		01/09/2023	31/08/2024
LBC_C-000754	ACE		Election Count Project Management Support	Reprocure	£18,036	25		01/12/2023	31/12/2025
LBC_C-000688	ACE	Think Events London	Election Count Project Management Support	Reprocure	£18,036	5		01/12/2023	06/05/2024
LBC_C-000018	SCRER	Playle & Partners LLP	Architectural, Contract Administrator and Principle Design Consultant - Kenley Community Hub	Decommission	£17,790	122	72	01/04/2020	30/04/2030
LBC_C-000682	SCRER	AECOM	Sustainability Appraisal	New Procurement	£16,500	27		02/10/2023	31/12/2025

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000004	CYPE	Learning Labs Ltd	Online Learning Tuition Platform	Extend	£16,500	24	24	01/08/2022	31/07/2024
LBC_C-000614	ACE	Procyon	Digital Signage	Extend	£16,308	35		15/08/2023	14/08/2026
LBC_C-000404	ACE		Sharegate Desktop 1 users - 24 months (SKU: SHG-P-239-1-24)	Reprocure	£15,954	84	0	12/06/2018	12/06/2025
LBC_C-000362	Housing	Trojan Consultants Ltd	Trojan Caspar licences	Extend & Vary	£15,140	25	0	14/12/2021	14/12/2024
LBC_C-000046	CYPE	National Autistic Society	CWD NAS Short Breaks	Reprocure	£15,000	12	0	01/04/2022	31/03/2024
LBC_C-000079	Housing	Facelift Maintenance	Fixes Saniflow at Windsor		£15,000	155	0	17/07/2017	30/04/2030
LBC_C-000588	CYPE		VR Headsets Engage	Extend	£15,000	12		30/06/2023	29/06/2024
LBC_C-000717	Resources	New Court Chambers	Legal counsel New Court Chambers NAI matter	Decommission & Stop	£14,725	1		02/11/2023	01/12/2023
LBC_C-000552	SCRER	Tyco	Sim card reactivation in cameras on 7 construction sites for air quality monitoring	Decommission	£13,721	1		01/02/2023	28/02/2024
LBC_C-000338	SCRER	ROCC Computers Ltd	ROCC Uniclass includes the following: Asset DB, Lanlord Services, mobile support, survey forms & interface to symology	Renew	£13,216	48	0	13/11/2020	12/11/2024
LBC_C-000681	Housing	ReLondon	Recycling Project Consultancy	New Procurement	£13,000	2		20/11/2023	19/01/2024
LBC_C-000741	Resources	Philips Surveyors	Town Hall and Central Library Access Control external consultant	New Procurement	£12,740	14		12/02/2024	31/03/2025
LBC_C-000674	SCRER	Jen Kavanagh	Music Heritage Trail	Decommission & Stop	£12,600	7		04/09/2023	31/03/2024
LBC_C-000223	ASCH	Cosmic Europe Ltd	Interpretation & Translation	Reprocure	£11,414	11	0	01/09/2020	21/08/2021
LBC_C-000694	SCRER	STM Environmental	Review planning consultations for contaminated land assessments	Reprocure	£11,391	12		02/04/2023	31/03/2024
LBC_C-000745	Housing	Potterraper	Grant Advisor for Regina Road	New Procurement	£10,000	12		30/01/2024	30/01/2025
LBC_C-000557	SCRER		Music Heritage Trail APP	Decommission & Stop	£9,993	36		01/04/2023	31/03/2026
LBC_C-000320	ACE	Cadcorp_c	Cadcorp mapping licences (used for GIS and Symology mapping)	Renew	£9,900	60	0	01/09/2019	31/08/2024

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000377	ASCH	Language Bank	Interpretation & Translation	Reprocure	£9,852	11	0	01/09/2020	21/08/2021
LBC_C-000751	SCRER	Transoft Ltd	Auto Turn Pro	Extend & Vary	£9,510	36		23/01/2022	22/01/2025
LBC_C-000323	Resources	HUB solutions	DebtSys System Support	Reprocure	£9,258	12	0	01/04/2021	31/03/2022
LBC_C-000344	Resources	ProcessFlows UK Ltd	RightFax	Decommission & Stop	£9,169	36	0	29/06/2021	28/06/2024
LBC_C-000621	SCRER	PLMR Group	Press support for Coroner for Ratana Inquiry	Extend	£9,000	12		31/08/2023	30/08/2024
LBC_C-000463	ACE	New World technology	Secure FTP for MyResources	Extend	£8,625	23	0	01/09/2022	31/07/2024
LBC_C-000672	Resources	marathon energy Ltd	EPC Energy performance certificate provider	Reprocure	£8,000	3		21/10/2023	31/01/2024
LBC_C-000516	Housing		Provision of Broadband to 3 Housing offices i.e. The Temporary Accommodation Offices (Concord, Sycamore, Windsor)	Reprocure	£6,900	36		01/04/2022	31/03/2025
LBC_C-000491	Housing	Community Fibre Broadband	Internet/communications service to CSW	Reprocure	£6,900	36	0	01/04/2022	31/03/2025
LBC_C-000217	ASCH	Daniela Languages Ltd	Interpretation & Translation	Reprocure	£6,414	11	0	01/09/2020	21/08/2021
LBC_C-000278	ACE	Cylix Ltd	Equality & Diversity elearning	Extend & Vary	£6,320	36	12	16/06/2021	15/06/2024
LBC_C-000462	ACE	Freshworks	Freshdesk service desk sw for oracle support team	Reprocure	£6,048	24	0	28/05/2022	28/05/2024
LBC_C-000678	SCRER	DTN	Weather forecasting	New Procurement	£6,000	12		01/10/2023	30/09/2024
LBC_C-000371	ACE	NEC SOFTWARE SOLUTIONS UK LIMITED (was Northgate Public Services (UK) Ltd)	Hosting Charges for Govtech Server LBCGTAPP01	Extend & Vary	£5,758	43	0	01/10/2020	30/04/2024
LBC_C-000515	SCRER	Lone Worker Solutions Ltd	Library SOS Fobs	Reprocure	£4,984	36	0	18/03/2022	17/03/2025
LBC_C-000374	Resources	Twofold Limited	Scanner contract renewal	Extend & Vary	£4,573	36	0	01/11/2021	31/10/2024
LBC_C-000271	ACE	FARONICS	Deep Freeze Enterprise Perpetual License	Extend	£4,191	108	0	13/04/2018	12/04/2027
LBC_C-000403	ACE	Littlefish (Previously purchased via CCS Media)	NetSupport Annual Maintenance & Support	Extend & Vary	£3,973	72	0	01/08/2018	31/07/2024

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000216	ASCH	Clarion	Interpretation & Translation	Reprocure	£3,732	11	0	01/09/2020	21/08/2021
LBC_C-000411	ACE	Optimal Workshop	Annual Subscription to "The Suite" UX S/w	Extend	£3,079	49	0	13/01/2020	31/01/2024
LBC_C-000402	ACE	Littlefish (Previously purchased via CCS Media)	Smart Learning Suite - Technology Software Maintenance	Extend & Vary	£2,753	72	0	01/08/2018	31/07/2024
LBC_C-000581	ACE	Visual Synergy	Audio Visual equipment support in BWH and council chamber Maintenance	Extend	£2,650	12		16/01/2023	15/01/2025
LBC_C-000295	ACE	Littlefish	Toad for Oracle Professional plus Toad for Oracle Expert	Reprocure	£2,429	49	0	15/06/2020	15/07/2024
LBC_C-000383	ASCH	RNIB	Interpretation & Translation	Reprocure	£2,288	122	0	01/04/2020	21/08/2021
LBC_C-000591	CYPE	CloudCoco Connect Ltd	Youth Centre Broadband for Waddon	Decommission	£2,268	12		01/04/2023	31/03/2024
LBC_C-000274	ACE	Lexis Nexis (was Snowflake Software)	GO Loader Standard (2 Proc) Prod	Extend & Vary	£2,164	24	0	01/01/2022	31/12/2024
LBC_C-000608	Resources	Risk Management Partners	ILC Business Travel / Personal Accident Insurance	Reprocure	£1,500	60	0	01/04/2023	31/03/2028
LBC_C-000489	Resources	staysafe	Lone Worker app for malcolm bell	Renew	£1,350	48	0	30/06/2022	30/09/2026
LBC_C-000424	ACE	Phoenix Software Ltd	25 adobe creative cloud licences for calat	Renew	£1,001	12	0	03/01/2023	04/01/2025
LBC_C-000555	ACE	Incorpore	Gymflex employee benefit	Renew	£800	24		28/02/2023	27/02/2025
LBC_C-000420	ACE	Capita Secure Information Solutions Ltd	VisualCron Maintenance for 1-Server for 1 Licence	Reprocure	£675	62	0	01/04/2020	12/06/2025
LBC_C-000369	ACE	TBC	Food Surveillance System (NO INFO ON CONTRACT)	Under review	£0	122	0	01/04/2020	30/04/2030
LBC_C-000153	Housing	CAYSH	Out of hours concierge to hostels		£0	122	0	01/04/2020	30/04/2030
LBC_C-000442	SCRER	TBC	Museum of Croydon Database	New Procurement	£0	122	0	01/04/2020	30/04/2030
LBC_C-000144	Housing	Now Medical	Independant medical advisors for homelessness		£0	122	0	01/04/2020	30/04/2030
LBC_C-000136	Housing	TBC	Real Lettings/St Mungo's		£0	183	0	01/04/2015	30/04/2030
LBC_C-000019	SCRER	One Consulting Group	Appointment of consultant to provide professional services	Reprocure	£0	122	0	01/04/2020	30/04/2030

Contract Register

Contract Reference	Contract Title	Directorate	Supplier	Procurement Intention	Total Contract Value	Contract Length	Extension Period	Contract Start Date	Contract End Date
LBC_C-000149	Housing	Circuit Laundry	Laundrett Service	Reprocure	£0	122	0	01/04/2020	30/04/2030
LBC_C-000364	ACE	TBC	Hoot Suite	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000154	ASCH	Various P&V - 28 providers	Day Centre provision (historic)		£0	122	0	01/04/2020	30/04/2030
LBC_C-000359	ACE	Moodle	Moodle Calat web site	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000203	SCRER	ParkNow/Ringgo	Telephone Parking	Reprocure	£0	24	24	11/04/2022	10/04/2024
LBC_C-000147	Housing	TBC	CCTV at Hostels		£0	122	0	01/04/2020	30/04/2030
LBC_C-000452	ACE	NEC SOFTWARE SOLUTIONS UK LIMITED (was Northgate Public Services (UK) Ltd)	Northgate Citizen access contract	Reprocure	£0	122	0	01/04/2020	30/04/2030
LBC_C-000146	Housing	Marlow Fire & security Limited	Fire alarms		£0	122	0	01/04/2020	30/04/2030
LBC_C-000361	ACE	Sage 200?	Sage 200	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000357	ACE		VIPER V-Pay	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000470	ASCH	TBC	Angel Lodge - MH Step down service	New Procurement	£0	122	0	01/04/2020	30/04/2030
LBC_C-000143	Housing	London Borough of Ealing	IBAA Fee 2021/22		£0	122	0	01/04/2020	30/04/2030
LBC_C-000152	Housing	NPS Europe	Security locks for CSW		£0	122	0	01/04/2020	30/04/2030
LBC_C-000096	ASCH	DPS 1, Lot 1 - 27 providers	DPS1, Lot 1 - Domiciliary Care	Extend	£0	122	60	01/04/2020	30/04/2030
LBC_C-000358	ACE	TBC	Monarch Pro 7	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000098	ASCH	DPS 1, Lot 3 - various	DPS 1, Lot 3 -Outreach Services	Extend	£0	122	0	01/04/2020	30/04/2030
LBC_C-000145	Housing	Best Water Technology	Drinking water at CSW		£0	122	0	01/04/2020	30/04/2030
LBC_C-000227	Resources	Aon	Insurance Brokers	Reprocure	£0	72	0	01/04/2018	31/03/2024

Contract Register

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LBC_C-000435	ACE	Adept Technology Group	Telephone line for libraries lifts - Adept	Reprocure	£0	122	0	01/04/2020	30/04/2030
LBC_C-000010	ACE	TBC	Dumper Truck	Reprocure	£0	122	0	01/04/2020	30/04/2030
LBC_C-000366	ACE	Vsmart	Vsmart	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000099	ASCH	DPS 1, Lot 2 - various	DPS 1, Lot 2 Active Lives & Day care provision	Extend	£0	122	0	01/04/2020	30/04/2030
LBC_C-000360	Resources	Oyez?	Oyez legal forms	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000097	ASCH	Various P & V - various	Outreach Services (historic)	Reprocure	£0	195	0	01/04/2014	30/04/2030
LBC_C-000148	Housing	TBC	Furnishings at Hostels		£0	122	0	01/04/2020	30/04/2030
LBC_C-000142	Housing	London Borough of Ealing	STS project (2021-22)		£0	122	0	01/04/2020	30/04/2030
LBC_C-000363	ACE	TBC	Vuelio	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000150	Housing	Scewfix	DIY tools for fixes at CSW		£0	122	0	01/04/2020	30/04/2030
LBC_C-000365	ACE	TBC	Symphony	Extend & Vary	£0	122	0	01/04/2020	30/04/2030
LBC_C-000215	Resources	Oxygen Finance Ltd	Early Payment Programme Scheme (PSP)	Extend	-£4,000,000	60	36	01/10/2022	30/09/2027
LBC_C-000433	SCRER	Valo Smart City Corporation	Digital advertising, street furniture, bus shelters.	Reprocure	-£6,554,167	121	0	01/04/2021	31/03/2031
LBC_C-000268	SCRER	Various - bristow and Sutor	Enforcement Agency Services	Reprocure	-£9,000,000	24	24	17/08/2020	16/08/2024

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27 March 2024	
REPORT TITLE:	Oracle Improvement Programme Business Case	
CORPORATE DIRECTOR	Jane West, Corporate Director of Resources (S151 Officer)	
LEAD OFFICER:	Jane West, Corporate Director of Resources (S151 Officer) jane.west@croydon.gov.uk	
LEAD MEMBER:	Cllr Jason Cummings, Cabinet Member for Finance	
KEY DECISION? 0724EM	Yes	Reason: Key Decision – Decision incurs expenditure, or makes savings, of more than £1,000,000 or such smaller sum which the decision-taker considers is significant having regard to the Council’s budget for the service or function to which the decision relates
CONTAINS EXEMPT INFORMATION?	No	Public Grounds for the exemption: N/A
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

- 1.1 This report seeks approval to the Oracle Improvement Programme business case. This will initiate a two-year programme of work to ensure the council makes the most of its investment in its Oracle platform and drive significant improvements to key business processes.
- 1.2 The improvement programme which this investment supports is required to enable the transformation ambitions of the Council and support the priorities in the Mayor’s Business Plan 2022-2026 as detailed below.

2 RECOMMENDATIONS

For the reasons set out in the report, the Executive Mayor in Cabinet, is recommended to approve the recommendations below to:

- 2.1 Approve the Oracle Improvement Programme Business Case attached as appendix A.

- 2.2 Approve the addition to the capital programme of the budget requested of £3.922m funded through earmarked reserves.
- 2.3 Note that the HR business case will be subject to a separate report to Cabinet in June.

3 REASONS FOR RECOMMENDATIONS

- 3.1 To provide the Council with the confidence that it has a robust Oracle platform for Finance, HR, Payroll and Procurement systems that reflects best practice and enables further council transformation.
- 3.2 To improve the user experience of Oracle by promoting greater self-service functionality for line managers, budget managers and promote simplification and exploit the automation of processes.

4 BACKGROUND AND DETAILS

- 4.1 The Oracle Enterprise Resource Planning (ERP) application (Oracle's Cloud Fusion and referred to at Croydon as My Resources) is one of the most critical IT systems used across the council. It is a suite of inter-dependant modules that cover finance, HR, procurement, and supply chain operations. It enables the payment of staff and suppliers, the collection of income and management of the Council's finances and employees. It went live in May 2019 replacing several disparate systems.
- 4.2 The council has a contract with Oracle for licences to use their Fusion product and a separate contract with Mastek (previously called Evosys), who both implemented the system and provide ongoing support.
- 4.3 Since 2019, with the implementation team disbanded after going live with the system, little investment has been made to further develop the system and it is now, in its current configuration, holding back further changes to back-office services and the wider transformation of the council.
- 4.4 As reported to Cabinet in September 2023 Oracle were commissioned to undertake a review of the My Resources system to understand where improvements can be made to align the system with Oracle best-practice and ensure the Council maximises the benefits it can achieve from its investment.
- 4.5 The review involved over 70 key users across the council with over 12 workshops held.
- 4.6 The review measured the council's systems process maturity against four levels:
 - Stage 1: Marginal
 - Stage 2: Stable
 - Stage 3: Best Practice
 - Stage 4: Transformational

- 4.7** Regarding the HR processes they were assessed at Stage 1 maturity and are characterised by several off-system activities and functionality gaps with consequent human-intensive effort.
- 4.8** In Finance the majority of the processes they assessed at Stage 2 maturity with the major problems highlighted pertaining to establishment data sync issues and a lack of automation in collections.
- 4.9** Procurement was assessed as consistently at maturity level 2 but with key issues highlighted on supplier set up and user compliance.
- 4.10** Oracle conclude that it should be realistic to aim for a best practice level of maturity and identified illustrative, best practice process changes, ranging from quick wins using reporting and functionality already in place to utilising functionality we have available but not deployed or where we have potential configuration/process design issues.
- 4.11** Cabinet in September 2023 agreed to a six-month programme of work to construct detailed improvement plans and a business case. To enable this, funding of £0.915m was agreed as an initial upfront investment to undertake this planning and put in place a core resource complement through to March 2024.

Business Case

- 4.12** The principal objective of the Oracle Improvement Programme is to provide the Council with confidence that it has a robust Oracle platform for Finance, HR, Payroll and Procurement systems that reflects best practice and enables further council transformation. The business case sets out further objectives, an important one being that it should provide a single version of the truth for all council finance and HR data.
- 4.13** The following design principle have been developed to guide the improvement plan:
- Start with the Oracle recommended “best practice” processes and configuration.
 - “Adopt not Adapt” this may mean changing our process to work with the system – don’t bespoke the system to match our process.
 - Move to “on system” processes where we can.
 - The system should record sufficient detail to support processes.
 - Data not to be stored outside of the system (e.g. on spreadsheets).
 - Management and Business Information to be made available through dashboards.
 - Avoid the need to re-key data.
 - We need to become a “Best Value” Council.
 - Increasing value from the investment in the system.
- 4.14** The work to produce the business case for the Finance and Procurement elements of the project is complete and reflected in this report and attached Programme Business Case document. Due to delays in securing suitable resources to undertake the HR planning and business case work, the HR business case work only commenced in early 2024. The final key resource needed to lead the design joined the Council on 22

February. The HR business case is now moving at pace and will be presented to Cabinet in the early summer for consideration. This does not hold up the implementation of the Procurement and Finance proposals although the Finance revenue forecasting improvement will be dependent on the expected HR establishment improvements. However, the short delay to HR business case will not materially impact the delivery.

Procurement Business Case

4.15 The procurement business case has been informed by extensive consultation with other councils as well as workshops with Oracle and partners to assess functionality. This work aligns with the service led procurement and contract management improvement plan.

4.16 The key proposed deliverables for the purchasing improvement plan are:

Guided Learning within Oracle Fusion will be piloted across the purchasing process to provide guidance on specific activities within the system as people are about to undertake them.

Documentation/materials used in the purchasing process will be updated to reflect key compliance messages (internally and for suppliers).

Blanket Purchasing Agreements (BPAs) will be introduced to enable better control of spend, contract expiry dates and more efficient approval flows. This will also support improved control of waivers.

E-invoicing for the remaining invoices entered manually will be introduced via the Fusion i-Supplier portal.

Dashboard reporting will be developed, drawing on systems across purchasing, procurement and contract management to support Procurement and Directorates in decision making.

A variety of other enhancements to the process within Fusion will be adopted such as **self-service registration for new suppliers**.

A new role is being created with responsibilities including analysis of the reporting data, delivering improvements, enforcing compliance, and developing/delivering ongoing learning.

4.17 Due to a lack of take-up of other specific Oracle functionality within Croydon and across other councils, the viability including a cost/benefit assessment of Oracle's offering versus other available systems has been made. The key non-Oracle business case recommendations are as follows:

The existing system in place for e-tendering (**In-tend**) is recommended to be developed for **pipeline management, e-tendering and contract management** requirements. This is due to a combination of functionality, costs and feedback from other councils.

E-signature functionality will be introduced. The aim is to integrate this into In-tend to support a more complete contract repository.

Finance Business Case

4.18 The three priority areas of Planning & Budgeting, Receivables & Collections and Expenses including Purchase Cards were identified for the Finance activity. These priority areas are considered as a part of the business case. However, the discovery phase has looked at all core finance processes which are associated with Oracle, to ensure that we can maximise the benefits from this improvement programme.

4.19 The review of the current processes and systems has identified a significant number of improvements which should be implemented to improve financial processes and systems. The improvements are grouped under the following themes:

Theme	Function	Enhancements Proposed
Financial Management	Accounts receivable and collections	<ul style="list-style-type: none"> • SMS messages to be sent to customers to request the payment of debt • Refine the customer statements to provide more information • Robotic automation • Paperless direct debits
	Cash management	<ul style="list-style-type: none"> • New bank file integration • Automatic reconciliation • Timely management review process
	General ledger	<ul style="list-style-type: none"> • Automation of sub ledger reconciliations • Automation of key control account reconciliations • Key reconciliation dashboard
	Expense reimbursement and p-cards	<ul style="list-style-type: none"> • Entry securely via personal devices • Mileage claim enhancements • Improve violation rules • Improve audit & reporting functionality
	Project costing	<ul style="list-style-type: none"> • Move capital budgeting and forecasting on to the system • Develop associated training
Enterprise Performance Management	Revenue forecasting	<ul style="list-style-type: none"> • Improved user experience. • Corrections to staff costs to be automatically incorporated into forecast. • Cost centre summary information and commentary introduced. • User access to historical forecasts. • Predictive planning technology to improve forecasting. • Improve the access to transaction detail. • Key finance reports to be produced directly from the system, including commentary. • Budget holder training and guidance.
	Capital forecasting	<ul style="list-style-type: none"> • Move capital forecasting on system from Excel • Move to whole life forecasting

		<ul style="list-style-type: none"> • User access to historical forecasts. • Key finance reports to be produced directly from the system, including commentary. • Project manager training and guidance to ensure that all project managers
	Capital budgeting	<ul style="list-style-type: none"> • Move capital budgeting on system from Excel • Move to multi year/whole life budgeting • Move virements on system
	Support service allocations and recharging	<ul style="list-style-type: none"> • Move internal recharge model to on system from Excel • Automate recharge journaling
System Compliance and Risk Management	Advanced access controls	<ul style="list-style-type: none"> • Identify areas segregation of duties issue.
	Advanced financial controls	<ul style="list-style-type: none"> • Monitor key processes to ensure that they are operating effectively, and anomalies are quickly identified. • For key processes to identify areas of non-compliance and take action to resolve. • Audit of transactions and configurations to detect error, fraud, and waste.

Change Management

- 4.20** The Oracle improvement programme system improvements will only be successful if the business process improvements enabled by the programme are thoroughly embedded into the business. We have invested in a dedicated change manager to ensure this happens.
- 4.21** The business case sets out the approach we will be taking to Change Management. There will not only be training, communication, and engagement, but we will also focus on embedding the change in the longer term by developing key metrics, pathways and escalation routes for addressing behaviour where organisational procedures are not being followed.
- 4.22** There will be a strong focus on building a continuous improvement culture, providing training and development to enable employees to identify opportunities for improvement in their day-to-day processes and building resource to enable the organisation to support the delivery of this activity.
- 4.23** Change activity will be undertaken at both a workstream (Procurement, Finance and HR) and programme level.
- 4.24** To address the known issues at Croydon such as change fatigue, a lack of engagement and issues with compliance around new processes/procedures, the change activity for the programme has been split into three main parts:
- Oracle Improvement Programme Change Activity
 - Metrics and KPI Activity
 - Continuous Improvement Activity

4.25 Change activity will be undertaken at both a workstream (Procurement, Finance and HR) and programme level.

Programme Management

4.26 Given the importance of these changes to the Council and the pace of the change required appropriate programme management and leadership to deliver the programmes' objectives has been built into the business case. Aside from leadership, programme management and Change Management resources, the budget proposed includes temporary extra capacity in the system support team to recognise the additional burden on this team that keeps the system functioning, testing capacity and funding for technical design authority. Some of this resource will be required throughout the life of the programme other resources are planned to be required during critical implementation phases.

Financial Cost

4.27 The costs for the Finance and Procurement workstreams as well as programme management and change are set out in the table below.

4.28 As the HR business case is yet to be constructed, it will be reported in the early summer. The cost of the work to build the HR business case is included, however, as this activity has slipped, it is funded from the carried forward 2023-24 budget previously approved. It is prudent to assume, given the scale of the improvement work envisaged for HR, that the HR business case could cost up to a further £4m.

4.29 A contingency budget has been included based on best practice for this type of project.

4.30 The total cost (excluding the full HR business case) is £4.5m which is reduced by the £0.5m balance remaining from the 2023-24 transformation budget previously approved. The extra capital programme budget requested at this stage is £3.9m.

	2024/25 (£000's)	2025/26 (£000's)	2026/27 (£000's)	Total (£000's)
Procurement workstream	620.7	120.0	0	740.7
Finance workstream	829.5	400.5	0	1,230.0
HR & Payroll workstream (Design)	113.0	0	0	113.0
HR Workstream business case	TBC	TBC	TBC	TBC
Programme & Change Management workstream	1,113.7	904.7	0	2,018.4
Contingency (c10%)				350.0
Total	2,676.9	1,425.2	0	4,452.1
Remaining budget previously approved				(530.0)
Net funding requested				3,922.1

Benefits

4.31 The business case is designed to provide the Council with confidence that it has a robust Oracle platform for Finance HR and Procurement processes that reflects best practice, optimises business efficiency and enables the Council's transformation ambitions. The improvements will ensure key data is held on system, producing a single version of the truth from one system, strengthening data retention, data security and improving audit trails.

4.32 The business case goes into detail on the expected benefits for the 'Finance and Procurement workstream elements. The key features of which are:

Finance:

- Improved revenue and capital budgeting and forecasting
- Improved income collection
- Stronger financial controls

Procurement:

- Improved control of purchase orders
- Improved compliance with purchasing processes
- More effective sourcing and management of contracts

Cashable Benefits

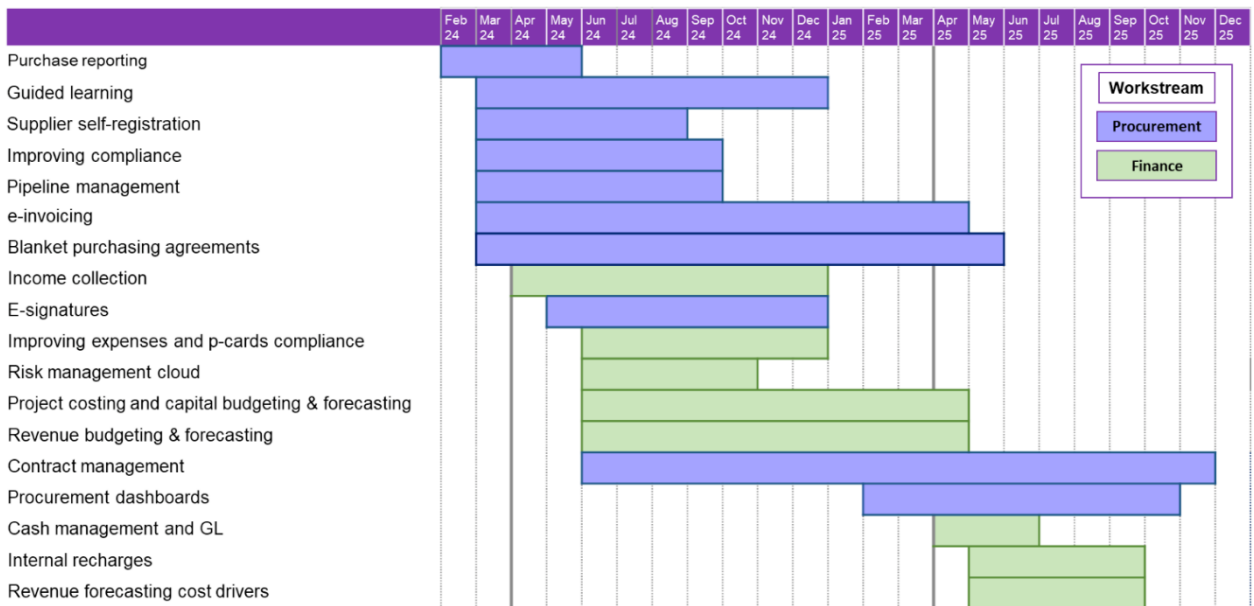
4.33 The improvements set out in the business case will be key enablers of future cashable efficiency savings for the Council. The current Medium Term Financial Strategy and existing Transformation Plan have provision for cashable savings relating to the transformation of the HR, Finance and Procurement functions which will rely on major improvements to the Oracle platform. A procurement and contract management improvement plan will set out savings to be delivered through business improvements enabled by the Oracle business case proposals. The significant savings ambitions implied by the council changing its operating model set out in the updated Transformation Strategy will rely on the major changes proposed to the Procurement and Finance workstreams and the future changes coming forward in the HR workstream.

4.34 This improvement programme should be seen as the start of a journey to fully exploiting the capabilities that the Oracle Fusion platform provides now and will offer in the future. At the completion of this improvement, arrangements will be put in place to ensure the council continues to improve the system and associated business processes.

Milestones

4.35 This improvement is planned as an 18-month programme of work. Although it is likely the HR business case will require slightly longer. The table below indicates the

Finance and Procurement timescales planned. This reflects the amount of work involved, the sequencing of the tasks, alignment with complementary business improvement plans and the timing of implementation to fit outside of key business process times, such as financial year end.



Risk

4.36 The business case sets out five priority risks for the programme to manage. While mitigating actions are planned, most of these risks will remain Amber and will require regular monitoring by the programme board. The red risks are:

- There is a risk that our scope and ambition of the programme is not widely understood.
- The key business changes enabled by the programme are not understood and fully adopted across the Council.
- Competing demands across the organisation

Commercial Considerations

Mastek support

4.37 Mastek as our support partner are required to continue with the current support arrangements for a further two years from the current contract expiry in August 2024 and be engaged to deliver the technical solutions set out in the Finance and Procurement plans and when ready the HR improvement plans. The appropriate procurement processes via a compliant framework are being pursued,

Oracle Licence

4.38 The council currently spends c£500,000 pa on its Oracle license. This is of a similar level to other London Boroughs that use Oracle Cloud. The license period is up for renewal in September 2024. The licence covers a large number of modules of the

software and the extent of their use and cost, largely driven by active user numbers, is part of the consideration of the project. There are potentially modules we are not currently making use of that we may wish to use more expansively and similarly there may be modules that we conclude are not required or we can re-engineer the extent of the volume needed.

- 4.39** The outcome of these determinations will feed into the license renewal commercial discussion with Oracle and the intention of the project is to limit growth in the license fee.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** A discussion paper was presented to the Corporate Management Team in November 2021 outlining the plans for the My Resources (Oracle Fusion) system. There was unanimous approval to continue to leverage the Oracle Fusion platform rather than undertake a costly and distracting re-tendering exercise to replace it and implement an alternative system.
- 5.2** Also considered was operating with no further investment in Oracle Cloud and to work within the constraints of the current system footprint. This was considered as suboptimal as it would hinder further service improvements and is impractical given the Oracle Cloud system as a modern cloud application is constantly evolving and will always require development.

6 CONSULTATION

- 6.1** Engagement has been undertaken with HR and Payroll, Finance and Procurement business owners both separately and via several workshops facilitated by Oracle. The workshops were well attended with more than 70 users from inside the council attending 12 workshops, cumulating in more than 20 hours of discussion. Following on from this during the development of the business case proposal there has been ongoing consultation with business owners. The proposals presented in this report have the support of the business owners.
- 6.2** This level consultation and engagement has meant that there is a comprehensive view of the requirements and ambitions of Croydon to not only improve business processes but also adopt improved cultures and behaviours.

7. CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1** This programme of work directly contributes to the following outcome and supporting priorities in the Mayor's Business Plan 2022-2026:

Outcome 1 - The council balances its books, listens to residents, and delivers good sustainable services.

Priority: Get a grip on the finances and make the Council financially sustainable.

Priority: Ensure good governance is embedded and adopt best practice.

Priority: Develop our workforce to deliver in a manner that respects the diversity of our communities.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 This is an important project to enhance our key corporate Finance, Procurement and HR systems which we are not currently making the best use of. The cost of the Finance and Procurement work and associated programme and change management is set out in paragraph 4.30 and is forecast to be an extra cost of £3.922m above currently agreed transformation budget. It should be noted that this does not yet include the HR improvement cost which will follow in a report to Cabinet in June.

8.1.2 The £3.922m budget is requested through this report to be added into the capital programme and will be funded from earmarked reserves. Ongoing annual revenue licencing costs should be maintained within the current funding level, however if through the project there are savings or growth identified then these need to be taken into account in the Council's Medium Term Financial Strategy (MTFS).

Comments approved by Allister Bannin, Director of Finance (Deputy S151 Officer)
(21/02/2024)

8.2 LEGAL IMPLICATIONS

8.2.1 The Council as a best value authority "must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness" (Section 3 Local Government Act (LGA) 1999). The Best Value Duty applies to all functions of the Council.

8.2.2 On 20th July 2023, the Secretary of State for Levelling Up, Housing and Communities ("the SoS") issued Directions under Section 15(5) of the LGA to the Council on the basis that the Council was failing to comply with its Best Value Duty and setting out actions to be taken by the Council to comply the duty. The SoS Directions require the Council to, amongst others, continue to address the culture of poor financial management and to restore public trust and confidence by transforming the Council's activities, practices, and omissions to ensure that

they are compatible with the best value duty. In addition, the Council is required to secure as soon as practicable that all its functions are exercised in conformity with the best value duty thereby delivering improvements in services and outcomes for the people of Croydon.

8.2.3 The Council's budget and policy framework procedure rules (Part 4C of the Constitution) provides that the Executive may only take decisions which are in line with the Budget and Policy Framework and the budgetary allocation is set out in the financial implications section above.

8.2.4 In respect of projects which form part of the proposed programme, officers will be undertaking the necessary Data Protection Impact Assessments to support the Council's data protection duties, including in relation to ensuring privacy by design as part of the projects and their implementation. Under the UK GDPR and Part 3 (section 57) of the Data Protection Act 2018, the Council has a general obligation to implement appropriate technical and organisational measures to show that it has considered and integrated the principles of data protection into its processing activities.

Comments approved by the Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (05/03/24)

8.3 EQUALITIES IMPLICATIONS

8.3.1 Under The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in Section 149 of the Equality Act 2010. The Council must, in the performance of its functions, have due regard to its duty to:

- eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.3.2 Though at business case stage the impact for equalities is likely to be minimal, as the project rolls out, it will be important for colleagues to consider implications for accessibility and to keep this in review as the project progresses.

Comments provided by: Helen Reeves, Head of Strategy & Policy (20/02/2024)

8.4 HUMAN RESOURCES IMPLICATIONS

8.4.1 It is noted that the HR business case will be subject to a separate report to Cabinet in mid- 2024. HR will continue to be involved at all stages of the programme. There are no other immediate HR implications that are not already identified in the body of this report.

Comments approved by Gillian Bevan, Head of HR Resources and Assistant Chief Executive's directorates on behalf of the Chief People Officer. (Date: 6/2/24)

9 APPENDIX

Appendix A - Oracle Improvement Programme Business Case.

10 BACKGROUND DOCUMENTS

N/A

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Oracle Improvement Programme Business Case

February 2024

1 DOCUMENT CONTROL

1.1 Approvals

Name	Position	Approved	Date
Alan Layton	Project Sponsor	YES	06 February 2024
Paul Golland	Interim Chief Digital Officer & Director of Resident Access	YES	06 February 2024
Jane West	Corporate Director of Resources & S151 Officer	YES	06 February 2024

1.2 Change Record

Date	Author	Version	Change reference
29 January 2024	Mark Moody	0.1	Initial draft of business case
06 February 2024	Mark Moody	0.2	Incorporating approver and consultees feedback and feedback from the Finance and HR Systems Steering Group Meeting on 02 February 24.
06 February 2024	Mark Moody	1.0	Version 1.0.
09 February 2024	Mark Moody	1.1	Updated Procurement costs to reflect phasing - no change to overall costs.
27 February 2024	Mark Moody	1.2	Updated following comments from Mayor's Advisory Board.

1.3 Document Consultees

Name	Position	Date
Elaine Jackson	Interim Assistant Chief Executive	29 January 2024
Allister Bannin	Director of Finance (Deputy S151)	29 January 2024
Dean Shoesmith	Chief People Officer	29 January 2024

Name	Position	Date
Huw Rhys-Lewis	Interim Director of Commercial Investment and Capital	29 January 2024
Dave Phillips	Head of Internal Audit	29 January 2024
Scott Funnell	Head of Strategic Procurement and Governance	29 January 2024
Jon Martin	Head of Strategic Systems	29 January 2024
Jason Martin	Independent Consultant	29 January 2024
Tina Rekhi	Acting Head of HR Systems & Payroll	29 January 2024
Jonathan Ross	Interim Transformation Financial Analyst	29 January 2024
Corinne Clay	Change Manager - Oracle Improvement Programme	29 January 2024
Ross Duguid	Procurement Systems Development Manager	29 January 2024
Adam Kendall	Finance Workstream Lead - Oracle Improvement Programme	29 January 2024

1.4 Abbreviations

Abbreviation	Description
EPM	Enterprise Performance Management (Strategic financial management)
ERP	Enterprise Resource Planning
HCM	Human Capital Management
SoD	Segregation of Duties
AI	Artificial Intelligence
RPA	Robotic Process Automation

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3 STRATEGIC CASE

3.1 Programme Aims and Objectives

3.1.1 Scope

The scope of this business case is to deliver Finance and Procurement Improvements to Oracle Cloud Fusion. The HR and Payroll improvements business case will follow for approval in June 2024 and will be fully incorporated into the delivery programme. The programme begins a renewal of Croydon's continuous improvement journey with the Oracle system and the associated business processes.

3.1.2 Background

The Oracle Enterprise Resource Planning (ERP) application (Oracle's Cloud Fusion and referred to at Croydon as My Resources) is one of the most critical IT systems used across the council. It is a suite of inter-dependant modules that cover finance, HR, procurement, and supply chain operations. It enables the payment of staff and suppliers, the collection of income and management of the Council's finances and employees. It went live in May 2019 replacing several disparate systems.

The council has a contract with Oracle for licences to use their Fusion product and a separate contract with Mastek (previously called Evosys), who both implemented the system and provide ongoing support.

Since 2019 little investment has been made to further develop the system and it is now, in its current configuration, holding back further changes to back-office services and the wider transformation of the council.

As reported in September 2023 Oracle were commissioned to undertake a review of the My Resources system to understand where improvements can be made to align the system with Oracle best-practice and ensure the Council maximises the benefits it can achieve from its investment.

The review involved over 70 key users across the council with over 12 workshops held.

The review measured the council's systems process maturity against four levels:

- Stage 1: Marginal
- Stage 2: Stable
- Stage 3: Best Practice
- Stage 4: Transformational

Regarding the HR processes they assessed at Stage 1 maturity and are characterised by several off-system activities and functionality gaps with consequent human-intensive effort.

In Finance, the majority of the processes they assessed at Stage 2 maturity with the major problems highlighted pertaining to establishment data sync issues and a lack of automation in collections.

Procurement was assessed as consistently at Stage 2 maturity but with key issues highlighted on supplier set up and user compliance.

Oracle conclude that it should be realistic to aim for a best practice level of maturity and identified illustrative, best practice process changes, ranging from quick wins using reporting and functionality already in place to utilising functionality we have available but not deployed or where we have potential configuration/process design issues.

Cabinet in September 2023 agreed that it was essential that the improvement plans are properly constructed and in sufficient detail, are fully costed and proper engagement is undertaken with business process owners to ensure buy-in. To achieve this Cabinet agreed initial funding of £0.9m as an initial upfront investment to undertake this planning and put in place a core resource complement through to March 2024.

3.1.3 Context

Croydon is home to 390,800 people - more than any other borough in London – and the council spends around £300m a year providing them with a huge range of essential services. Croydon Council has been facing serious financial challenges and requires a change in direction to enable it to deliver financially sustainable services. The Mayoral Business Plan states that getting a grip on the finance is a top priority.

The Council's total spend with suppliers for 22-23 was £377m. We have 492 contracts in place with a total contract spend of just over £3bn. 9073 Purchase orders were raised in 22-23:

- During this period over 3000 invoices needed to be returned to suppliers prior to being processed due to various errors.
- 70% of these returns were due to either no purchase order number being included on the invoice or to 'overbilling' against the purchase order value.
- This data infers a significant number of purchase orders being raised retrospectively or not being amended in a timely manner.

3.1.4 Aims and Objectives

The aims and objectives of the Oracle Improvement Programme are:

- To provide the Council with confidence that it has a robust Oracle platform for Finance, HR, Payroll and Procurement systems. To reflect best practice and enable further council transformation.
- A single "version of the truth" for all Council Finance, and HR data.
- Promote greater simplification of processes and exploit the automation of these.
- A reduction of multiple hand-over between teams through the expansion of self-service.
- Address known culture and behaviour issues within the organisation through business change activity.
- Users have access to quality information to support timely and effective decision making.
- Improve user experience.
- Embed and proactively promote a continuous improvement approach across the Organisation that includes placing greater emphasis upon business partnering and promoting how the service areas can be better customers.

3.1.5 Design Principles

A set of design principles have been agreed to support the aims and objectives of the programme. These design principles take into account the technology and business change requirements of the programme. An essential component of our design principles is to ensure a simplified, common, and engaging user experience across all modules. There will be an emphasis on reducing excel spreadsheets and third-party solutions within our business processes.

- Start with the Oracle recommended "best practice" processes and configuration.
- "Adopt not Adapt" this may mean changing our process to work with the system – don't bespoke the system to match our process.
- Move to "on system" processes where we can; to support Oracle as a "single version of the truth".
- The system should record sufficient detail to support processes.
- Data not to be stored outside of the system e.g. on spreadsheets.
- Management and Business Information to be made available through dashboards.
- Avoid the need to re-key data.
- We need to become a "Best Value" Council.

- Increasing value from the investment in the system.

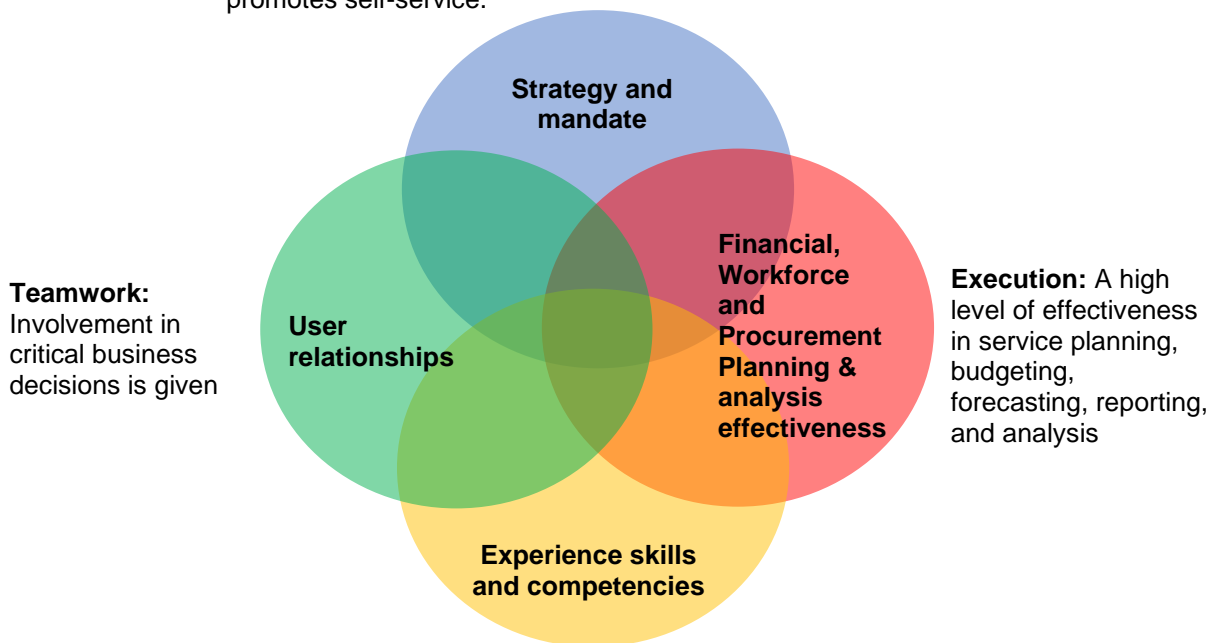
3.1.6 Enabling the Customer with effective Business Partnering

Though the concept of business partnering for Finance, HR and Procurement has been in place for many years, there is a continued drive to identify ways to evolve and ultimately be a more effective “business partner”. To achieve this, it requires a shift away from transactional and historically focused activities, that are aligned with basic “scorekeeper” role, and towards more analytical and forward-looking activities that help drive better service outcomes.

Effective self-service is essential to the success of a business partnering model; therefore we will be working closely with self-service users, with added engagement for hard-to-reach teams to help ensure that they understand how to use the solution and get the most benefit from it. The business change plan also heavily emphasises the importance of improving self-service and embedding it into the Council’s culture.

There is often a perceived gap between the role that Finance, HR and Procurement plays in the Council, and how the service perceives the roles they play. To assist in ensuring that the understanding of what is meant by ‘business partnering’ means, the following framework has been developed.

Alignment: Finance, HR, and Procurement professionals have a strategy and mandate to take on a business partnering role that promotes self-service.



Teamwork: Involvement in critical business decisions is given

Execution: A high level of effectiveness in service planning, budgeting, forecasting, reporting, and analysis

Talent: Appropriate business experience and skills are in place

There are four key enablers for effective business partnering, covering alignment, teamwork, talent, and execution. This business case focuses upon the “execution” of the business partnering model, with the aim of removing any barriers that would prevent high quality budgeting, forecasting, reporting, and analysis from being undertaken.

3.2 Business Requirements and Outcomes

3.2.1 Business Requirements

This section sets out the business requirements which have been considered when the business case has been developed.

Finance Workstream

Planning and Budgeting:

Developing and implementing tools and processes that will enable better planning and budgeting. As part of the review, it was identified that there are several system capabilities that we can take advantage of that will deliver improved budget management, by supporting budget managers to produce accurate and reliable forecasts, whilst reducing the manual effort of finance to report the information they need.

The aim, which the plan is predicated to deliver is to streamline our existing business processes, promote and rigorously apply processes that will support data driven decision making. As part of the Plan, there are three main areas of focus:

- Improved user experience
- Automation of forecasting
- Reduction in the reliance on Excel

By taking advantage of new functionality within the system, we will implement and deliver new operating procedures that will allow budget managers to take more control of Council resources. We will deliver further training for budget managers to help predict, forecast, and identify finance related risks earlier.

Receivables and collections:

The council aims to collect all the £820m of income it bills annually, however some debt is not paid on time and requires action from officers to ensure collection is achieved. We continue to look for ways to improve our collection rates and ensure that collection officers can focus upon value-add activities. As part of the Plan, there are three main areas of focus:

- Reduction of manual effort managing customer
- Improved collection process
- Improved income collection

Expenses (including P-Cards):

Promoting better discipline with the management of employee expenses which will ensure that guidance is followed and will reduce the number of audit enquiries.

System Controls:

External audit reports have identified concerns over the overall security management of 'My Resources'. As part of the business plan, there will be a focus on identifying a solution for

- Enhanced functionality to support the management of user access.
- Automatic identification of segregation of duties issues.

Procurement Workstream

The procurement requirement can be broken down into two distinct areas: the purchasing process (covering requisitions through to invoice entry) and the strategic procurement and contract management process (covering the pipeline planning stage through to management of the contract delivery).

Purchasing Process:

These requirements can be further sub-divided into 3 key themes:

- Process enhancements: to simplify the purchasing process, reduce manual entry (particularly invoices) and to provide additional controls better monitor contract spend.
- Improved learning and training: to reinforce good practice for new and existing users and to embed guidance within the system.
- Effective reporting: to help identify specific areas of non-compliance & bottlenecks in the purchasing process; to aid procurement decision making and improved value for money.

Procurement and Contract Management:

The requirement is best described against each of the steps in the process, recognising also the need to integrate/interface the stages to allow the efficient transfer of information from one to the next.

- Pipeline Management: an improved ability to plan future procurements, publish key data to support early market engagement and track the progress of procurements through a pipeline plan.
- Sourcing: to support the tender process from advertising an opportunity through to awarding a contract (including electronic signatures) in line with legislative requirements.
- Contract Management: the ability to maintain, report & publish key contract data. Also to support the monitoring of contract/supplier performance.

Continuous Improvement

To develop a sustainable environment and culture that supports:

- The evolution of new system processes that are aligned with the Oracle quarterly release of new features.
- Process owner led forums to assess and exploit new functionality.
- Regular training and communication about new features.
- Develop a new sustainable, support model that meets the organisations needs for the future:
 - Sufficient resources to support the improved solutions.
 - Procurement of a revised third-party support model.

3.2.2 Outcomes

The primary outcome of the programme is to deliver a set of processes and operating procedures that is based upon a single version of the truth, removal of third-party solutions that don't talk to each other, and to reduce the reliance upon excel based dual monitoring.

Managers will proactively use the systems and tools provided because it will support data led decision making across the Council. Optimised processes and increased efficiency are essential outcomes of this programme. This will be achieved by developing clear process maps, user-training, and the removal of duplication of processes across teams.

Workstream	Business Process	Outcome
Finance	Revenue Planning & budgeting	Operational income and expenditure (revenue) and Capital Projects are effectively managed by those with delegated responsibility. Income and expenditure is managed within the allocated budgets, and where variances occur, they are forecast accurately and explained to senior leaders on a timely basis.
Finance	Capital Planning & budgeting	<p>Capital Forecasting Capital Projects are effectively managed by those with delegated responsibility. The total project costs are managed within the approved budget and where variances occur, they are forecast accurately and explained to senior leader on a timely basis.</p> <p>Capital Budgeting The process for creating capital budgets is robust, enabling senior officers and councillors to make informed decisions as what is affordable and make tough decisions as to which projects to prioritise in the forthcoming year. Officers are clear of the funding available to deliver projects they are responsible for.</p>
Finance	Accounts receivables and collections	The process for raising and creating income is robust enabling debt to be collected on a timely basis. Where the debt is not paid on time there is an effective process for attempting to recover the income.
Finance	Expenses – including Purchase Cards	The process for submitting expenses is robust, enabling officers to be reimbursed for expenses which have been incurred. Expenses (which are claimed) and purchase card transactions are consistent with the appropriate policy and are supported by the appropriate documentation. Non-compliance with the policy is minimised via automated validation checks on entering the claim or audit checks.
Finance	Cash management	The process for completing bank reconciliations is robust and is completed on a timely basis. Any differences between the cash books and the bank's records are investigated, understood and any issues identified are rectified. Management review and confirm the effectiveness of the reconciliation process.
Finance	General Ledger	All financial transactions are accurately recorded within the general ledger, all sub ledgers and feeder systems are fully loaded into the general ledger and are fully reconciled.
Finance	Support Service Allocation and Recharging	The process for recharging support service costs is accurate and enables the true cost of providing services to be understood (in accordance with the CIPFA code of proactive), and costs are efficiently allocated to front line services.
Finance	System compliance and risk management	System access, roles and key processes are actively monitored to ensure that any non-compliance issues are identified and resolved. This reduces the risk of fraud or errors occurring in the system.
Procurement	Purchasing Process	Purchase requisitions/orders are raised 'right first time' without further information having to be added later. They are raised at the 'right time' to provide appropriate visibility and control of expenditure.

Workstream	Business Process	Outcome
		<p>Approvals are also done in a timely fashion, preventing delays in the process.</p> <p>Unnecessary duplication and manual working are eliminated speeding up the supplier registration and invoicing process.</p> <p>Users are clear on the importance of adhering to the process and consequences if they do not. Similarly, suppliers also have an understanding of the risks of undertaking work without the appropriate purchase order.</p> <p>Management reporting is used to identify areas of non-compliance to the process with resource in place to address this through support, training, and where appropriate escalation.</p>
Procurement	Pipeline Management	<p>Future procurement projects are entered onto the pipeline to provide an overview of all upcoming procurement activity. This allows effective resource planning to support delivery of these procurements and where necessary to prioritise them. A comprehensive published pipeline also provides visibility to the market to enable them to plan for upcoming procurements and to engage early with the council in inputting into the development of future strategies.</p> <p>Reactive procurements are significantly reduced. Instead, effective planning ensures that the options to deliver requirements are thoroughly researched and robust commercial strategies are in place.</p>
Procurement	Contract Management	<p>The speed of contract award approvals/signatures is increased due to the removal of unnecessary manual processes.</p> <p>All key contract data is accessible in one location.</p> <p>Risks and contract performance are reported on at the contract, Directorate and Corporate level.</p> <p>Contract spend is monitored and controlled against what has been agreed in the contract and 'early warnings' are provided to support the planning process. Similarly, users are alerted in good time to upcoming contract expiry dates.</p>
Programme	Support Model	<p>The improvement programme will develop a new sustainable, support model that aligns with the council's aspirations supporting:</p> <ul style="list-style-type: none"> • Redesigned self-service processes for managers and employees. • A data led organisation by ensuring that reference data is accurate and timely. • A framework to understand, review and deploy process enhancements and technical updates at pace. • Process automation and guided learning to reduce the demand on the support team.

3.3 Workstream Summary

The discovery phase of the Oracle Improvement Programme considered the existing processes and technology relating to the Oracle systems (more commonly known at Croydon as 'My Resources' and 'My Finance').

In addition to discussions with Oracle and partners, we have had extensive consultation with other councils as to assess functionality and best practice.

The review of the current processes and systems has identified a significant number of improvements which should be implemented to improve our processes and systems. This section sets out the key improvements which are recommended to be implemented.

3.3.1 Finance Workstream

The **finance** workstream will deliver the following:

- Improvements to the Accounts Receivable and Collections processes and systems to reduce the manual effort required by officers, whilst providing them with additional tools and information to improve likelihood of the delinquent debt being collected. The key enhancements are:
 - Introduce the ability to trigger SMS messages to be sent to customers to request the payment of debt.
 - Introduce the ability to trigger a debt to be transferred to an Enforcement Agent (EA) or Debt Collection Agent (DCA).
 - Refine the customer statements to provide more information and ensure that it is clear to the recipient as to what debt is due for payment.
 - Utilise robotics to automate the creation of collection notes in the system. This will enable the team to have a full picture of the interaction with the customer.
 - Update the interface to automate the creation and maintenance of customers (including adult social care customers). The current process requires the receivables team to manually enter some of the details.
 - Collection strategies will be managed at invoice level, rather than by customer, providing greater flexibility over how the collection of debt for each invoice is managed.
 - Create a new smart form to enable the business to register a new customer, which will be subject to review of approval by the receivables team before becoming available for use.
 - Enable paperless direct debits to be initiated from the system allowing the team to easily set up a reliable payment method.
 - Engage with business intelligence teams to determine best solution to provide a single view of the customer and the debt. Develop outbound reporting feeds to support the solution.
- Improvements to the process supporting the reconciliation of bank accounts. The General and Payroll bank accounts will be brought into the system to enable the auto-reconciliation functionality to be utilised, improving the timeliness and completeness of the bank reconciliations.
- Detailed review of the overall control environment will be completed, enabling reconciliation processes to be strengthened.
- Non-compliance with expense and p-card claims is a significant issue which leads to many claims being rejected when they are subject to audit. There are several improvements which will remove barriers to utilising the system, improve compliance and ensuring that audits are focused on high-risk claims. The key enhancements proposed are:
 - Enable expense claims to be entered via an individual's personal device, including mobile phone, providing greater flexibility to the user when claims are submitted.

- Enhance the mileage claim template removing the need for the user to record each individual journey outside of the system. Incorporate mapping within the mileage template to enable the user to calculate the total miles to be claimed within the application.
- Refine the expense validation rules to notify the user, if the claim they are going to submit, is in violation of the expenses policy.
- Refine the expense audit criteria to focus on high-risk claims.
- Develop guided learning where the user can obtain advice and support whilst completing their claim.
- Enhanced functionality to enable vehicle checks to be stored in the system.
- Develop new reporting to provide greater oversight of the expense and p-card approval process.
- Redefine the role of project costing on the basis that capital budgeting and forecasting will be undertaken in My Finance. Develop training to ensure that users are effectively utilising the functionality with the module.
- Refine the revenue forecasting forms to improve the user experience and improve the quality of the forecasts being produced. The key enhancements proposed are:
 - Change the basis of identifying actuals in salary forecasting, to ensure they align to the costs recorded in the general ledger.
 - Introduce a salary journal category to enable corrections to staff costs to be automatically incorporated into the forecast.
 - Total cost centre commentary is to be a mandated field to provide an overall view of the current financial position.
 - Cost centre summary form to be developed to provide senior managers and finance with an overview by cost centre. This will include the total cost centre commentary.
 - Users will be able view historical forecasts and the commentary previously entered.
 - Utilise predictive planning technology to produce a statistically robust system forecast.
 - Develop revenue forecast cost driver models for high risk/high value forecasts.
 - Improve the access to transaction detail underpinning the actuals.
 - Reallocation of cost centres to ensure those responsible for completing the forecasts are influencing the spend and can explain the financial position.
 - Enhance the reporting so that key finance reports can be produced directly from the system, including the updating of commentary.
 - Develop budget holder training and guidance to ensure that all budget holders have the skills and knowledge to complete the forecast on a timely basis.
- Develop capital forecasting within the planning application, removing the need to produce the capital forecasts in excel. The key enhancements proposed are:
 - Create capital forecasting forms to capture project forecast and commentary.
 - Develop capital finance forecasts to ensure that the funding sources are effectively managed.
 - Capital forecasts will cover both the current financial year and the whole life of the project.
 - User will be able view historical forecasts and the commentary previously entered.
 - Reallocation of projects to ensure those responsible for completing the forecasts are influencing the spend and can explain the financial position.
 - Enhance the reporting so that key finance reports can be produced directly from the system, including the updating of commentary.
 - Develop project manager training and guidance to ensure that all project managers have the skills and knowledge to complete the forecast on a timely basis.

- Develop capital budgeting within the planning application, removing the need to produce the capital budgets in excel. The key enhancements proposed are:
 - Develop capital budgeting within the planning application, removing the need to produce in excel.
 - Develop capital financing sources budgeting within the planning application, removing the need to produce in excel.
 - Capital budgets will cover both the current financial year and the whole life of the project.
 - Capital budget virements are to be managed within the application, providing a clear audit trail of changes to the budget.
- Develop a support service allocation and recharge model within the planning application, removing the need for these to be calculated in excel.
- My Resources processes a high volume of transactions across a complex set of modules. It is important that there is a robust compliance framework in place to ensure that processes are operating effectively, and the risk of fraud and error is minimised. The key enhancements proposed are:
 - Implement functionality to identify areas where individuals access and permissions is identified as a segregation of duties issue. This will reduce the risk of fraud and prevent external audit failures.

3.3.2 Procurement Workstream

The **purchasing process** workstream will deliver the following:

- Guided Learning within Oracle Fusion will be piloted across the purchasing process to provide guidance on specific activities within the system as people are about to undertake them.
- Documentation/materials used in the purchasing process will be updated to reflect key compliance messages (internally and for suppliers).
- Blanket Purchasing Agreements (BPAs) will be introduced to enable better control of spend, contract expiry dates and more efficient approval flows. This will also support improved control of waivers.
- E-invoicing for the remaining invoices entered manually will be introduced via the Fusion i-Supplier portal.
- Dashboard reporting will be developed, drawing on systems across purchasing, procurement and contract management to support Procurement and Directorates in decision making.
- A variety of other enhancements to the process within Fusion will be adopted such as self-service registration for new suppliers.
- A new role is recommended to be created with responsibilities including analysis of the reporting data, delivering improvements, enforcing compliance, and developing/delivering ongoing learning.

While the purchasing process improvements focused on enhancements to Oracle Fusion, the **Strategic Procurement and Contract Management** business case (due to a lack of take-up of this functionality within Croydon and across other councils) reviewed the viability of Oracle's offering in this area and included comparisons to other available systems (costs/benefits). The key business case recommendations are as follows:

Fusion is not recommended for pipeline management, e-tendering, and contract management requirements. This is due to a combination of functionality, costs, and feedback from other councils.

The existing system in place for e-tendering (In-tend) is recommended to be developed for the above.

E-signature functionality will be introduced. The aim is to integrate this into In-tend to support a more complete contract repository. This will also form part of a wider corporate initiative to introduce e-signatures across the council; the scoping and procurement of this will be led by the Procurement workstream.

Required support for developing Contract Management skills will be addressed ahead of contract management system implementation.

3.4 Interdependencies

The realisation of the benefits which the potential enhancements could deliver is dependent on several factors which need to be effectively managed. The key dependencies and interdependencies are as follows:

3.4.1 Finance restructure and improvement plan

The finance leadership team has been heavily reliant on individuals acting up and temporary resource over recent years. The Director of Finance is currently actively recruiting to positions in the finance leadership team. Once the permanent individuals are in post, it is critical that they buy into the proposed improvements to ensure that they become embedded in the business.

3.4.2 Establishment management and data

The cost of staff is a major cost driver for the Council; therefore, it is important that we can accurately forecast this expenditure type. The current 'My Finance' solution provides functionality to support budget managers in preparing a salary forecast for each employee in their team, however in some areas, it is difficult to complete this accurately, as the current staff list is not always up to date. The cause of this is that the employee information is obtained from the HCM system, which is known not to be up to date.

A key enhancement for the HR workstream is addressing the issue with establishment data, improving the accuracy. This will directly impact on the ability to accurately forecast and how the forecasting enhancements are received.

3.4.3 Finance core activities

The detailed planning for the delivery of the key enhancements will need to consider the timeline for core finance activities. For example, the capital budgeting functionality would ideally be deployed before the commencement of the development of the 2025/26 capital programme, or income collection changes would not want to be made during the council tax billing window.

3.4.4 Procurement improvement plan

A Procurement and Contract Management programme of improvements is being developed in parallel to the system improvements. Its aim is to develop a strategic Procurement Service that provides expert commercial input throughout the procurement lifecycle. It is dependent on the improved management information that the system improvements will provide to support its success.

The plan also looks to ensure effective contract management is in place across the council. Any implementation of a contract management system needs to take careful account of the extent to which the appropriate contract management skills and resources are already in place. The implementation plan will prioritise those areas where the contract management of key contracts can be evidenced to be at agreed minimum standards.

3.5 Business Change Summary

3.5.1 Business Change

Croydon has a history of poor Change Implementation, although previous projects have included structured Change Management activity and approaches, issues around embedding change within the Organisation persist. As with many Organisations the programme of improvement and change within Croydon has been vast over recent years, due to both financial saving targets and ever-changing technology landscapes, which has led to change fatigue and a lack of engagement from staff. Additionally, Croydon has undergone a period of high staff turnover particularly at Senior Levels and there has been a strong focus on Financial Management and Compliance in recent years due to the Organisations financial issues, both of which may have contributed to the lack of buy-in that

currently exists. Often during times of intense change, employees feel as though change is being done to them instead of feeling that they are an important part of driving the change forward.

There is a significant issue around non-compliance across the whole organisation with regard to Oracle based processes and procedures. Significant activity will be required to understand the drivers behind non-compliance so that they can be rectified in the appropriate way and clear structured processes will need to be implemented to prevent this non-compliance moving forward.

The Business Change Approach for the Oracle improvement Programme aims to address these key issues by not only undertaking Change Activity to support and embed the identified improvements as part of the Oracle Improvement Programme but also undertaking significant activity to address the cultures and behaviours across the organisation, working closely with HR around the People and Culture strategy.

Data, Metrics and Continuous improvement processes will be introduced that will be embedded into BAU activity going forward, which will not only target behavioural issues but will empower staff to take control of their own processes and procedures going forward.

Transparency is key throughout the programme and therefore there will be a strong focus on communication and engagement delivered through innovative approaches, so that there is a change in feel to what has been delivered before. There will be strong alignment to key organisation comms and other transformation / improvement programmes to ensure that messaging is clear, concise and relevant.

The Change element of the Programme will be a significant and complex undertaking that will require dedicated resource, focussing not only on the large volume of activity involved in the Programme itself but also fundamentally changing Croydon's approach and adoption of change going forward.

3.5.2 Change Challenges

The following are examples of specific business change challenges for Croydon:

- Inaccurate establishment data
- This is due in part to poor compliance with off-system processes.
- Issues with self-service processes
- Self Service is not being fully utilised both at an Employee and Manager Level, with off system processes being undertaken.
- Poor absence records
- This is linked to the lack of self-service activity and is often managed off system with manual processes
- Lack of My Resources skills and competence across the organisation
- Although training material is readily available, it is not being fully utilised and there is little knowledge of end-to-end processes and the impact of non-compliance on other areas of the business.
- Poor engagement from managers and staff across the organisation
- Change fatigue and a high level of senior manager turnover in recent years have caused poor engagement across the Organisation.
- Lack of ownership and usability of some business processes
- This is due to some processes not being fit for purpose and a lack of ownership around the responsibility for updating and amending processes where required to align with Organisational need.
- Lack of awareness of the capabilities of the system - not exploiting the full potential of Oracle
- This is linked to the lack of My Resources skills and competence, which has led to the Organisation not fully understanding how to best use Oracle and there is no method, capability, or capacity to explore Oracles full potential.

3.5.3 Change Activities

The following table shows examples (and is not exhaustive) of some of the business change activities that can be applied to some of the specific issues facing Croydon.

Challenge	What will we do?	How will we do it?	How will we track and monitor?	What does good look like?	What does it mean?
Establishment Control – inaccurate data due to process and behaviour issues	Implement clear on system starters, leavers and movers processes. Develop targeted training materials for line managers around managing their establishment.	Train managers, provide support and mentoring for line managers.	Formulate report to identify starters, leavers and movers processes undertaken.	Managers reflecting changes within their teams on the system to ensure that Establishment data is accurate.	Establishment data is accurate, and managers take accountability for managing their own team structure and information within the system.
Manager self-service - not fully utilised due to compliance issues	Analyse current information to identify areas of non-compliance and why.	Improve self - service Training for Managers. Address any issues around Manager self-service processes.	Formulate reports to monitor Manager self-service. Monitor and address non-compliance.	All managers using manager self-service including "hard to reach".	Team information is accurate and up to date. Staff personal and employment information is correct.
Recruitment – Use of off system processes and workarounds	Technical implementation of ORC, clear process guidance, develop targeted training materials for line managers that promotes self-service. Clearly define roles and responsibilities within ORC.	Train managers, provide support and mentoring for line managers.	Metrics and KPI's put in place to monitor recruitment process compliance. Formulate system reports to monitor compliance.	Managers undertaking self-service for recruitment processes, which are completed on system.	Recruitment processes are streamlined and auditable. Candidate experience is improved and time to hire process is optimal.
Budget Management – issues around usability of the system to manage and monitor budgets	Implementing a new tool for budget managers. Ensure that budget management is part of induction for budget managers.	Training for budget holders and finance managers on how to use the new tools and processes and their responsibilities.	Formulate metrics and reports to monitor budget management. Regular reviews of budgets by finance managers.	Improved budget management and ownership of Council resources by budget holders.	Improved forecasting and budget Management. Accurate and up to date view of financial landscape of the Organisation.

Challenge	What will we do?	How will we do it?	How will we track and monitor?	What does good look like?	What does it mean?
P2P – Lack of compliance around no PO no Pay	Training of key staff, brief suppliers on process.	Online training, review supplier portal and existing materials.	Develop reports to identify compliance issues, understand exceptions e.g. utility bills.	No PO No Pay policy fully embedded to ensure that POs are raised before invoices.	Tighter control of spend, less payment delays, requisitioners will understand importance of receipting correct amount.

3.6 Programme Risks

We are detailing the risks in the table below that we believe are current. Croydon over the last 10 years have embarked upon many organisation-wide programmes and the poor cultures and behaviours persist. As a result, it is only prudent to identify these as current risks within the organisation. This will require an approach that recognises the need for change, identifies and shows the organisation what good look like and is led by the Board, OD professionals and leadership networks.

Risk	Impact	Initial score (likelihood x impact)	Mitigating Action	After Mitigation score (likelihood x impact)
There is a risk that our scope and ambition of the programme is not widely understood.	Increased cost. The ambition of the programme will not be met. Wider transformation programmes will be severely hampered.	4x5=20	Ensure that the scope and ambition is clear and agreed with suppliers and business owners. Business owners must take ownership of outcomes and ambition of the programme. Key suppliers to attend programme governance meetings.	2x5=10
The key business changes enabled by the programme are not understood and fully adopted across the Council.	The ambitions and objectives of the programme will be partially met therefore poor compliance and manual interventions will continue to prevail.	4x5=20	Business change is effectively planned, resourced, delivered and agreed by all. Continuous improvement and a sustainable support model will be developed as part of the core objectives of the programme. The People and Cultural Change Strategy must be inextricably	2x5=10

Risk	Impact	Initial score (likelihood x impact)	Mitigating Action	After Mitigation score (likelihood x impact)
			<p>linked with the Programme's Business change activity.</p> <p>The consequences of non-compliance must be unambiguous with support from appropriate training materials.</p>	
Competing demands across the organisation	<p>Competing demands may not allow the Organisation to deliver the programme milestones on time.</p> <p>Competing priorities timescales may clash and cause confusion and anxiety.</p>	5x4=20	<p>The Programmes key milestones are developed, and inter-dependencies confirmed, following wide consultation across the organisation.</p> <p>Programme board will keep this risk under constant review and will work with the Corporate Management Team to manage any inter-dependencies.</p>	3x3=9
There is a risk that knowledge may not be transferred from the programme team to Croydon Staff	<p>Unable to sustain improvements.</p> <p>Increased costs.</p>	4x4=16	<p>Backfill of key Croydon resources to allow them to work on the programme.</p> <p>Updated documentation and training is delivered as part of the programme.</p>	3x3=9
HR Workstream Business case delivery delayed	<p>Negatively impact cross-cutting initiatives.</p> <p>Delays wider HR improvement programmes.</p>	3x5=15	<p>Develop detailed action plan.</p> <p>Additional resources onboarded from mid-February 2024.</p> <p>Two-weekly workstream progress report to board.</p>	2x3=6

3.7 Constraints

As with any Programme of this size and complexity, we expect to encounter challenges. We will be delivering robust project management that will enable us to manage the task and the key factors listed below will be incorporated within the planning assumptions:

- Finance and HR Year end.
- Capacity and capability of Croydon staff.
- Oracle Quarterly Updates, including mandatory user interface changes and enhancements.
- Absences work and other changes to infrastructure, configuration, and interfaces requested through “Business as Usual” initiative pipeline.
- Payroll cycle and deadlines.

4 ECONOMIC CASE

4.1 Options Appraisal

Croydon Council embarked upon an Oracle Cloud implementation which can be regarded as a successful implementation. Therefore, we are focusing our resource on optimising what we already have and ensuring that the users use the solution as intended, as opposed to using local workarounds or spreadsheets. In September 2023, the Cabinet considered the options which included “do nothing”, “change the platform”, or “enhance what we already have”.

Cabinet concluded that the Council should improve and extend their Oracle Cloud Platform and develop a detailed business case, which recognised the high level of business change required to meet the Council’s future ambition.

The use of the support provider has been considered, alongside several other factors. This includes: the firsthand knowledge of the incumbent supplier, as well as the highly complex changes associated with payroll and absence management. The decision has been taken to continue with the Mastek, based upon the risks and likelihood of success.

4.2 Recommended Option

As agreed by Cabinet in September 2023, the Council is pursuing a detailed planning exercise around the improvements its needs to make to the Oracle Cloud Platform. The proposals in this business case present the recommended options coming from the detailed planning which is being undertaken.

5 COMMERCIAL CASE

5.1 Commercial Summary

5.1.1 Summary

In October 2023, the Finance and HR Systems Steering Group considered and approved the following recommendations for a 10-year strategy to support the day to day running of the system and delivery of the Oracle Improvement Programme.

The recommended procurement activities together with the rationale for the decisions are set out below. The detailed case for the route to market is documented in the Oracle Cloud Fusion (My Resources) Licence and Support Strategy Report submitted to the Procurement Board.

Licences

Procure Oracle Fusion Software as a Service (SaaS) licences required for the next 5 years with an optional extension for a further 5 years (**via a direct award to Oracle using a compliant framework**).

Rationale:

- Confirms the long-term commitment to remain with Oracle.
- Provides the basis for a discount on licence costs at renewal.
- The business case currently being developed will confirm licences required so that licence volumes can be set at the appropriate level.

Universal Credits

Procure an Oracle Fusion PaaS Universal Credits Agreement required to for the next two years and renew this agreement to end co-terminus with the Oracle Fusion SaaS licence agreement (**via a direct award to Oracle using a compliant framework**).

Rationale:

- Provides essential services required to support the interfaces with other Council systems and other pay as you use services, for example data storage to facilitate reporting using Azure BI services.
- Renewing every two years ensures that the appropriate number of Universal Credits can be matched to requirements to support the services that will be consumed.

Support Partner

Retain Mastek (who now own Evosys) as Support Partner for two years from the end of the current contract, August 2024 (**via a compliant framework**).

Rationale:

- Maintain Continuity of support for Finance, Procurement, HR, and Payroll through the improvement programme.
- Retain Mastek knowledge and skills for modules that they configured e.g. Planning and Budgeting.
- Retain Mastek support for components they have developed e.g. Interfaces.
- Short term contract which allows time to prepare for a major re-procurement for a new support services contract to start from 2026.

Technical Implementation Partner

Engage Mastek to deliver the technical solutions required by the Oracle Improvement (**via a compliant framework**).

Rationale:

- Mastek know the Croydon configuration.
- Time required for another systems integrator to understand the Croydon solution would slow the pace of delivery.
- The business case currently being developed will confirm.

Ongoing Support Partner

Let a new support contract, that provides break points in line with the overall Oracle licence agreement, by August 2026 (**via an open tender**).

Note this will be the subject of a future strategy report and will be listed in the Annual Procurement Plan for 2025/26.

Rationale:

- Market test of support providers.
- Allows for support to be based on transformed solution.
- Arrangements will be co-terminus with Oracle licence.
- Let a new support contract, that provides break points in line with the overall Oracle licence agreement, by August 2026 (via an open tender).

5.1.2 Form of Contract

The contracts with Oracle and Mastek will be via Crown Commercial Services compliant frameworks as set out in the Oracle Cloud Fusion (My Resources) Licence and Support Strategy Report submitted to the Procurement Board.

5.1.3 Social Value

We will seek to secure social value from our contractual discussions with suppliers.

6 FINANCIAL CASE

The workstream costs for Finance and Procurement as well as programme management and change are set out in the table below. The HR business case is yet to be constructed, and when known it will be reported. However, the cost of the work through to June to build the HR business case is included, noting this is effectively funded from the carried forward 2023/2024 approved budget. A prudent contingency has been included based on best practice for this type of project.

The total cost (excluding HR business case) is **£4.5m** which is reduced by the £0.5m balance remaining from the 2023-24 budget of £0.915m. The budget requested at this stage to deliver the Finance and Procurement improvements is **£3.9m**. Noting that a further request to fund the HR business case will be presented later in the Summer.

	2024/25 (£000's)	2025/26 (£000's)	2026/27 (£000's)	Total (£000's)
Procurement workstream	620.7	120.0	0	740.7
Finance workstream	829.5	400.5	0	1,230.0
HR & Payroll workstream (Design)	113.0	0	0	113.0
HR Workstream business case	TBC	TBC	TBC	TBC
Programme & Change Management workstream	1,113.7	904.7	0	2,018.4
Contingency (c10%)				350
Total	2,676.9	1,425.2	0	4,452.1
Remaining budget previously approved				(530.0)
Net funding requested				3,922.1

7 MANAGEMENT CASE

7.1 Programme and Project Management Arrangements

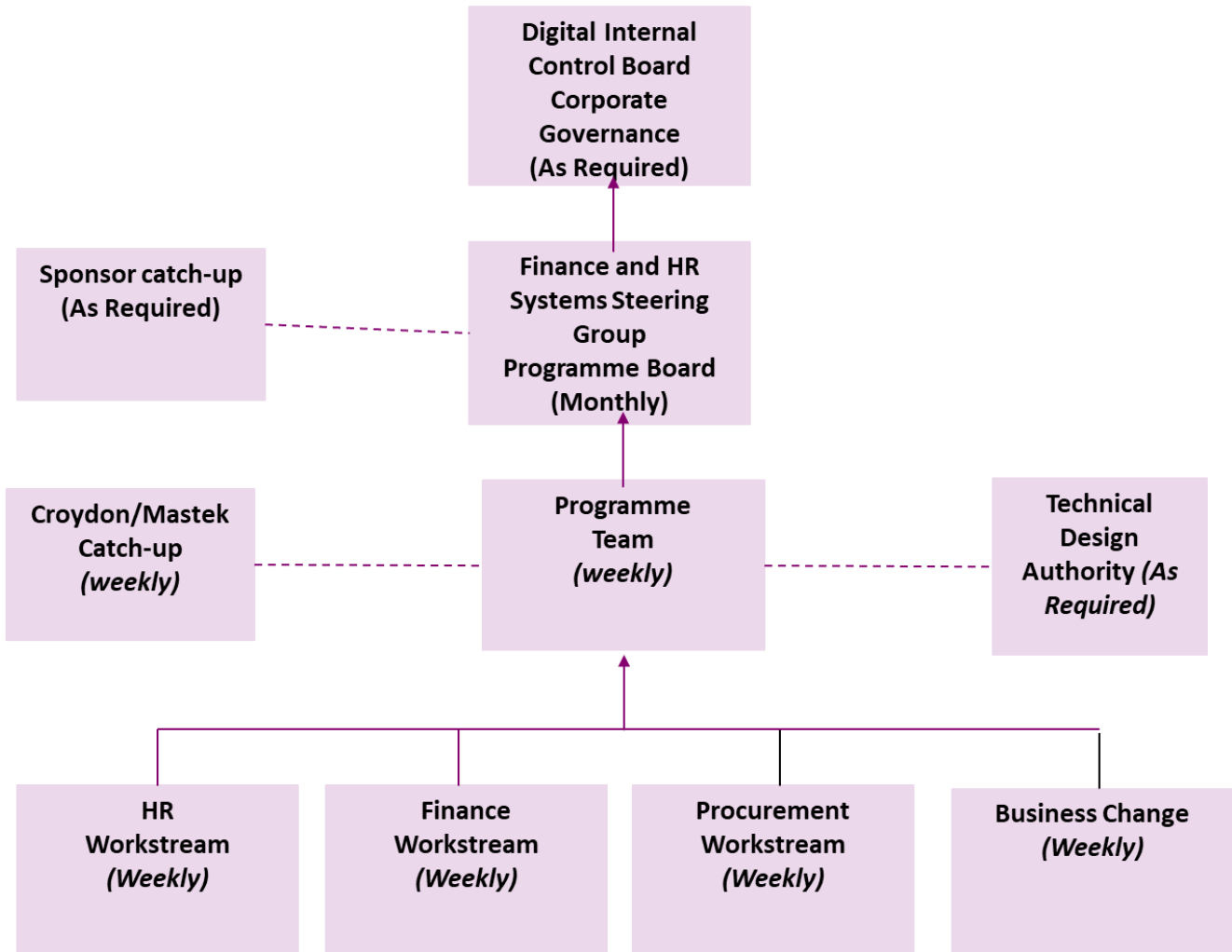
7.1.1 Programme Governance

The following Programme Governance arrangements have been put in place.

Finance and HR Systems Steering Group (Programme Governance Board)

The Finance and HR Systems Steering Group is the main decision-making body of the Oracle Cloud Improvement Programme. This governance board, chaired by the Senior Responsible Owner (SRO) will include representation by nominated Directors and other senior members of staff and representatives from the system integrator, Mastek and Oracle.

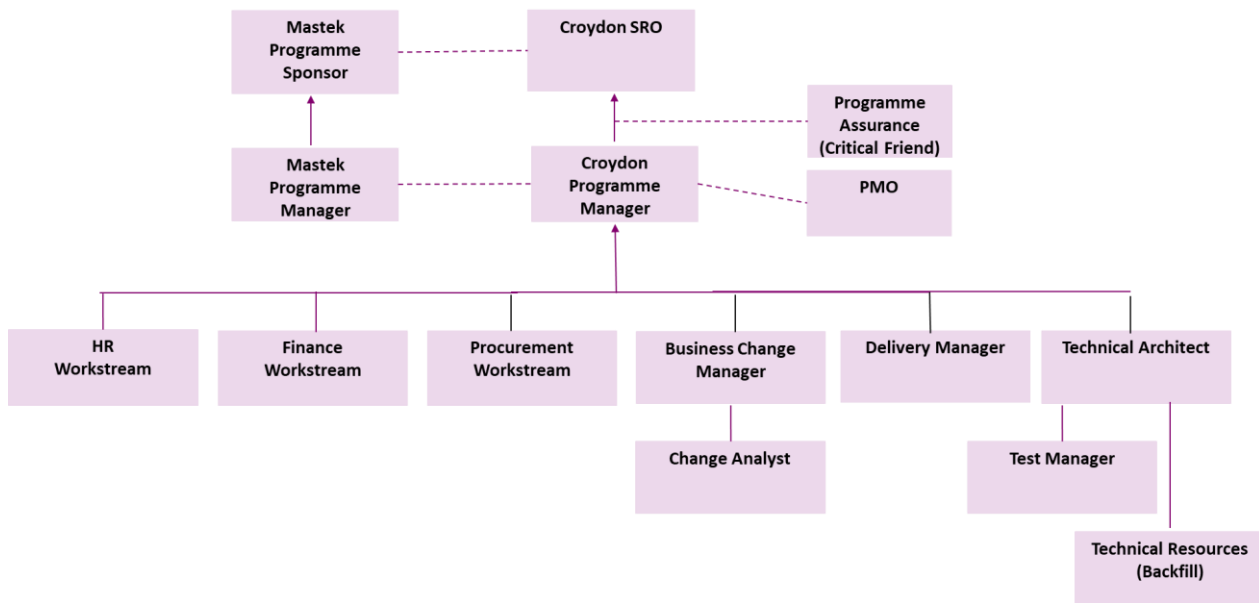
Oracle Cloud Implementation Governance Model



7.1.2 Programme Roles

The proposed structure and roles to support the effective delivery of the programme are as follows:

Oracle Cloud Implementation Programme Roles



Role	Key Responsibilities
Senior Responsible Owner	<ul style="list-style-type: none"> Owner of the programme, a vocal and visible champion who defines and drives the programme's vision and target outcomes. Accountable for the successful delivery of the programme. Responsible for objectives, specification, budget, finished product.
Programme Assurance (Critical Friend)	<ul style="list-style-type: none"> Providing project and programme assurance including advice on aligning Oracle best-practice in a local authority context. Advise on improvements and critically review solutions. Contribute lessons learned from other local authority projects.
Programme Manager	<ul style="list-style-type: none"> Communicates and engages with senior members of staff and builds buy-in and support within the business community to drive the programme forward. Overall responsibility for the delivery of the programme and achievement of target business outcomes. Manages the overall programme plan, risks, and issues to ensure accuracy and alignment with workstreams and dependencies are managed. Establishes a collaborative programme working environment, ensuring all team members (including suppliers) can operate effectively and deliver their obligations.
PMO	<ul style="list-style-type: none"> Support the programme team by maintaining a governance structure and associated activities such as ongoing risk assessments and mitigation across all workstreams, capturing actions and minutes at governance board meetings. Provide management reporting support such as status of milestones and deliverables across the programme, financial information about the budget, forecast, actuals.

Role	Key Responsibilities
	<ul style="list-style-type: none"> Reporting on project risks and progress on mitigating these risks.
Delivery Manager	<ul style="list-style-type: none"> Facilitates a collaborative team working environment between the programme team and supplier throughout the project. Creates, maintains and manages the programme delivery plan, and client and supplier deliverables to ensure effective delivery. Ensures a common understanding across all key users of the programme's critical path and key decision points.
Change Manager	<ul style="list-style-type: none"> Overall lead for business change and communication for the programme. Produces the Communication and Engagement Approach and Plan for the programme. Develops the Business Change Approach for the programme to ensure consistency of approach, techniques and templates used across all impacted service areas.
Change Analyst	<ul style="list-style-type: none"> Work with business teams to ensure they are listened to and the impact on their work is understood. Support workstream leads to carry out change impact assessments and gather requirements. Engage with Key users, business teams and staff to Work with Implement change initiatives.
Workstream Leads (Finance and Procurement)	<ul style="list-style-type: none"> Lead the design and delivery of appropriate technology and process solutions to support improvements to Croydon Finance and Procurement business processes. Engage and manage users to build buy-in and support within service departments and the wider Council, to drive improvement. Lead improvement processes and ensure these are reflected in the Oracle or other technical solutions as well as "joining up" with the other relevant organisation processes.
Technical Architect	<ul style="list-style-type: none"> Oversee the design and delivery of technical aspects of the programme, working closely with the programme team, third party technical teams, and implementation consultants to ensure quality solutions are implemented. Plan, manage and coordinate the release and deployment of new solutions to ensure that "business as usual" is not adversely impacted. Liaise with the Council's technical and support teams to ensure solutions are documented, understood and supportable.
Test Manager	<ul style="list-style-type: none"> Leads the coordination of Systems Integration and User Acceptance Testing across the programme. Responsible for defining the Test Strategy and Plan for the programme. Keeps the programme team and business leads, and subject matter experts, informed of the progress and results of the testing activities.

Role	Key Responsibilities
Technical Resources (Backfill)	<ul style="list-style-type: none"> • Work closely with Mastek implementation consultants implement new solutions, interfaces, and reports. • Ensures hand over to support of new technical solutions and processes is effective and appropriately documented, understood and supportable. • Prepare environments to support configuration and testing.

7.2 Change Management Arrangements

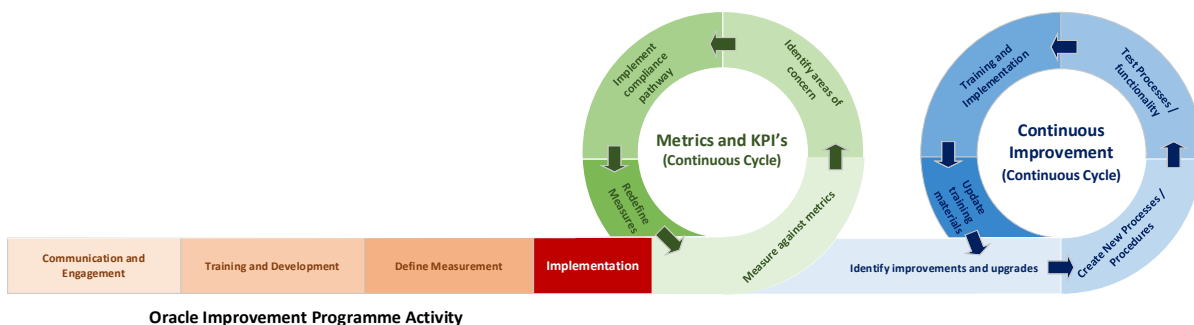
Whilst the Programme focuses heavily on technological improvement to ensure the Council makes better use of its Core Systems, there is a recognition that Change Management will not only help to drive and deliver these improvements, through training, communication and engagement, but will also focus on embedding the change in the longer term by developing key metrics, pathways and escalation routes for addressing behaviour where organisational procedures are not being followed.

There will be a strong focus on building a Continuous Improvement culture within the organisation, providing training and development to enable employees to identify opportunities for improvement in their day-to-day processes and building resource to enable the organisation to support the delivery of this activity.

Change Activity will be undertaken at both a workstream and Programme level to ensure that we not only focus on activity that will deliver the workstream outcomes but also to ensure that we identify cross cutting activity and work with end-to-end processes that impact multiple workstreams.

As with any Organisation that has undertaken a large volume of improvement activity over recent years Croydon has experienced change fatigue, a lack of engagement and issues with compliance around new processes / procedures. To address some of these issues the change activity for the programme has been split into three main parts:

- Oracle Improvement Programme Change Activity
- Metrics and KPI Activity
- Continuous Improvement Activity



7.2.1 Oracle Improvement Programme Activity

As the Improvement Programme progresses, detailed change impact assessments will be undertaken at both a workstream and programme level to capture all the change activity required to support the implementation of the improvements identified.

The Impact Assessments will capture all communication, engagement and training activity required, which will then feed into detail communication / engagement plans and Training Impact Assessments. Measures will be identified for each workstream to enable the development of metrics and KPIs to monitor and address compliance, alongside the capture of any reporting requirements that will be required to enable us to report against these.

Due to the issues identified around change fatigue and lack of engagement, there needs to be an innovative approach to this activity so that it is not seen as a rework of the original implementation and shows that the programme is adapting to our culture and people.

7.2.2 Metric and KPI Activity

A Metric and KPI Cycle will be developed to monitor compliance and improve accountability across the organisation. This will enable the identification of key areas of concern, which can then be targeted for further investigation and intervention.

A further support and escalation process will be developed, which will clearly define the steps and actions to be taken where there is non-compliance, including additional training, 1:1 support and escalation routes if the behavioural issues persist.

This will be a continuous cycle of activity undertaken at an agreed frequency and will enable Croydon to oversee compliance at an organisation level. The metrics should be redefined at regular intervals to ensure they reflect priority areas and any system or process changes.

7.2.3 Continuous Improvement Activity

A Continuous Improvement Cycle will be introduced to empower employees to identify issues and potential improvements within their own areas.

A training and development approach will be defined along with the development of key tools to enable staff to challenge their own processes to continually improve and update the way we work.

A process for raising these issues will need to be introduced so that they can be investigated and supported by the appropriate team. This approach will encourage employees and teams to identify how processes can be improved and developed rather than defaulting to utilising off system workarounds.

This will be a continuous cycle of activity that will eventually be embedded into everyday working, encouraging staff to challenge their processes and determine more efficient and effective ways of working.

7.3 Benefits Realisation

7.3.1 Cashable Benefits

While not immediately able to deliver a payback on the investment being made, the improvements set out in the business case will be key enablers of future cashable efficiency savings for the Council and directly support the Mayoral business plan priorities:

- Priority: Get a grip on the finances and make the Council financially sustainable.
- Priority: Ensure good governance is embedded and adopt best practice.

The significant savings ambitions implied by the council changing its operating model set out in the updated Transformation Strategy will rely on the major changes proposed to the Procurement and Finance workstreams and the future changes that will come forward in the HR workstream.

There are in the current Medium Term Financial Strategy and existing Transformation Plan evidence of a return from this investment, through cashable savings relating to the transformation of the HR, Finance and Procurement functions which will rely on major improvements to the Oracle platform. A procurement and contract management improvement plan will set out savings to be delivered through business improvements enabled by the Oracle business case proposals.

The key non cashable benefits which will be realised through the delivery of the improvements set out in the programme are as follows:

7.3.2 Finance Workstream Benefits

Business Process	Benefit	Success Measures
Income Collection	<ul style="list-style-type: none"> • Reduces manual effort to enable officers to focus on collection activities and improves the income recovery. • Provide additional tools to collection officers to improve collection rates. • Improved connections between finance and operational business area, ensure key information is shared. 	<ul style="list-style-type: none"> • Increase in the outstanding debt collected. • Reduction in the % of debt which becomes overdue.
Planning & Budgeting (Revenue & Capital)	<ul style="list-style-type: none"> • Enabling budget managers to complete reliable forecasts on a timely basis. • Improve reporting productivity by reducing the amount of time spent on gathering and manipulating data, delivering reports faster, with greater data integrity and more accurate insights. • Utilise the system to reduce the manual effort to produce forecasts, and target individuals not completing the forecasts. • Utilise the system to generate a more accurate forecast. • Utilise the system to reduce the input required by finance to support the generation of the financial forecasts. 	<ul style="list-style-type: none"> • % of budget managers completing forecast within the budget monitoring timeframe. • Reduce # of finance reports generated manually. • Increase % of Financial Reports published on-time. • Reduce % of time taken for data gathering, consolidation and reporting. • Reduce average cycle time to produce monthly forecasts. • % reduction in monthly forecasts variance. • % reduction in outturn forecast variance.

Business Process	Benefit	Success Measures
		<ul style="list-style-type: none"> Reduce % of time spent on routine finance activities vs % time spent on strategic activities.
Expenses – including Purchase Cards	<ul style="list-style-type: none"> Utilise the system to assist staff in only making claims which comply with the policy. Enable staff who do not have access to Croydon IT equipment to make online claims. 	<ul style="list-style-type: none"> Reduce % of expense claims which are rejected when subject to audit. Reduce the number of paper expense claims submitted.
Cash management	<ul style="list-style-type: none"> Utilise system functionality to automatically reconcile further bank accounts. 	<ul style="list-style-type: none"> Increase % of bank account reconciliations which are automatically reconciled.
General Ledger	<ul style="list-style-type: none"> Utilise the system functionality to automatically complete reconciliations and provide greater transparency over completeness. 	<ul style="list-style-type: none"> Increase % of control reconciliations which are fully reconciled and reviewed.
Support Service Allocation and Recharging	<ul style="list-style-type: none"> Automate the support service allocation and recharge model. 	<ul style="list-style-type: none"> Reduce the time spend completing the internal recharges.
System compliance and risk management	<ul style="list-style-type: none"> Utilise the system to reduce the number of role conflicts. This will prevent segregation of duty issues occurring. 	<ul style="list-style-type: none"> Reduce number of role conflicts.

7.3.3 Procurement Workstream Benefits

Business Process	Benefits	Success Measures
Purchase Order Creation	<ul style="list-style-type: none"> Self-service supplier registration reduces the time to raise a purchase order. A more efficient requisition approval process reduces delays of commencement of work by suppliers. Improved control of purchase order spend against agreed contract value (via blanket Purchase Agreements) supports reduced instances of contracts expired and unapproved cost overruns. Improved reporting of retrospective POs supports creation of POs at the right time to ensure the Council is adequately legally protected and separation of duties are enforced. 	<ul style="list-style-type: none"> Reduction in average time to register a new supplier. Reduction of average requisition approval time. Increase in contracted spend as a % of total Purchase Order spend. Increase in number of suppliers used in agreed classifications (e.g. micro & SMEs, VCSEs). Reduction in the number and value of retrospective purchase orders.

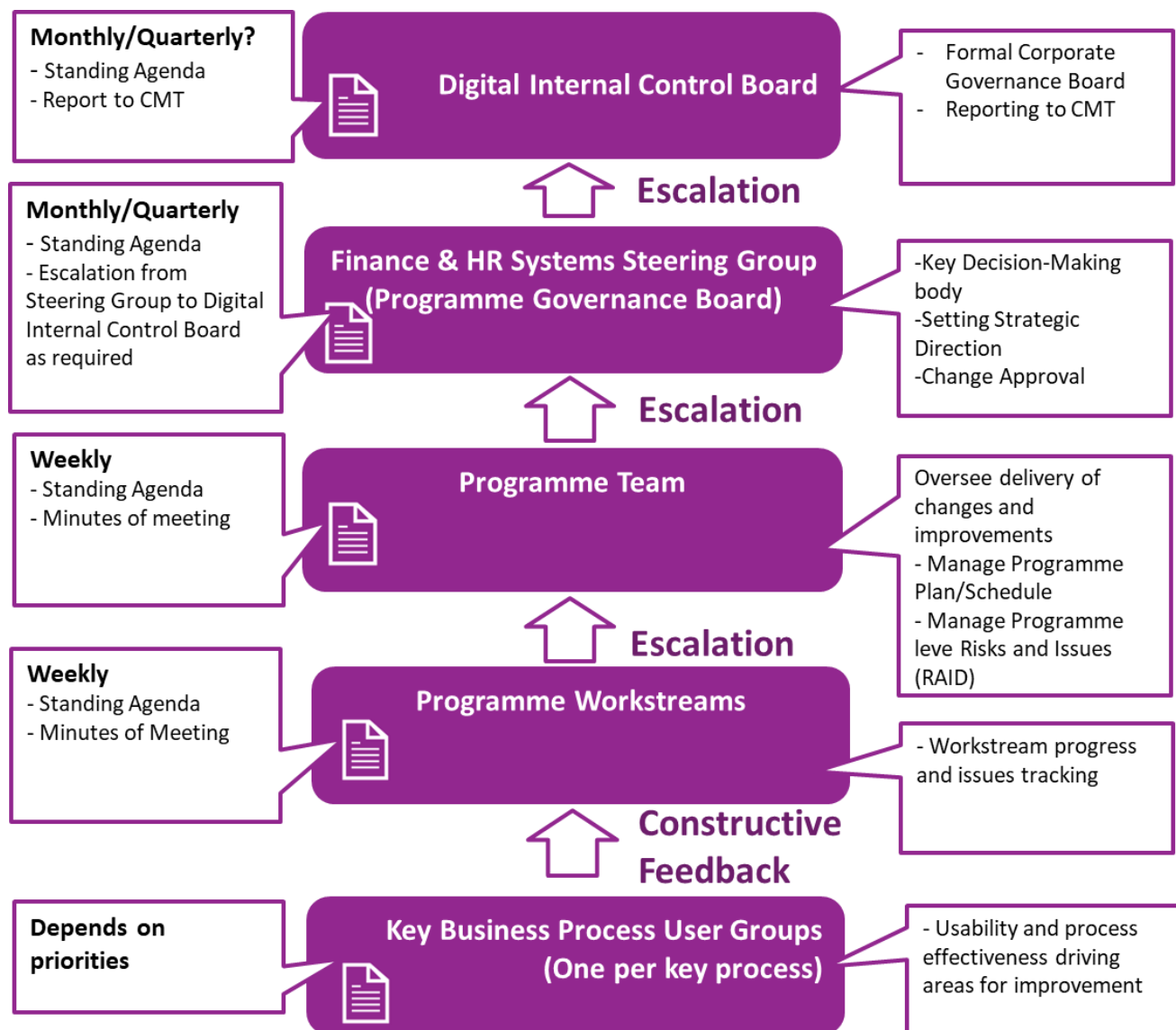
Business Process	Benefits	Success Measures
	<ul style="list-style-type: none"> Improved reporting of supplier spend by classification will support the Mayor's Priorities and allow us to report progress against these. Improved training/learning supports compliance to the process so reducing unnecessary effort to resolve issues and reputational damage with suppliers due to payment delays. 	
Receipting	<ul style="list-style-type: none"> Improved learning and reporting support greater accuracy of the spend that appears on the general ledger due to individuals receipting the right amount at the right time. 	<ul style="list-style-type: none"> Reductions in instances where total receipted amounts incorrectly exceed invoiced amounts per annum.
Invoice entry	<p>Introduction of e-invoicing leads to:</p> <ul style="list-style-type: none"> Less manual inputting - freeing up Accounts Payable staff for other activities. Improved supplier experience – better visibility of status of invoices. More invoices presented 'right first time'. 	<ul style="list-style-type: none"> Reduction in number of invoices entered manually.
Pipeline Management and Reporting	<ul style="list-style-type: none"> Supports improved visibility of future requirements with our supply base, enabling them to plan for upcoming procurements. Ensures appropriate time for development of procurement strategies and evaluation of potential options. Supports effective resourcing of procurements. Reduces instances of contract extension requests due to poor planning. 	<ul style="list-style-type: none"> Reductions in unplanned additions to the pipeline. Reductions in waivers.
Contract Award	<ul style="list-style-type: none"> The introduction of e-signatures improves the time for contract signature, reducing risk of delay in commencement of service. The contract repository supports the creation of an easily accessible, complete record of all contract documentation to help ensure that terms are visible & complied with. 	<ul style="list-style-type: none"> Reductions in average time taken for procurements. Re-audit of completeness of contract documents for contracts awarded after implementation of repository.
Contract Management	<ul style="list-style-type: none"> Supports Contract Managers in contract administration, performance & risk management to the required standards. 	<ul style="list-style-type: none"> Percentage of contracts with up-to-date performance status captured via the system.

7.4 Implementation and Post Implementation arrangements

This Improvement programme will be delivered by a joint programme team that includes Croydon and Mastek resources.

The council has invested in a dedicated Programme Delivery Manager to monitor and manage the delivery schedule and a Business Change Manager to drive improvements and embed organisational change.

The following diagram shows the approach and governance to monitor progress and manage any issues during implementation:



7.4.1 Progress Monitoring

Progress towards delivery of the outcomes and milestones will be reported to the programme governance board monthly.

Audit and Governance Committee oversight

The programme will provide regular updates to the Audit and Governance Committee.

Programme Scope Changes

If during the delivery phase of the programme it becomes apparent that the scope of what will be delivered differs significantly from what has been agreed in the business case, then a change control request will be submitted to the Programme Manager and SRO for consideration. The governance board will either approve the change or provide a solution so that the project can be delivered within the original parameters.

As the improvement programme progresses there may be potential to consider using Oracle Cloud solutions to replace third-party solutions. These potential changes to scope will be assessed and considered using the programmes change process. An example of a solution currently out of scope is the Facilities Management Helpdesk solution.

7.4.2 Post-Implementation Arrangements

Programme Closure

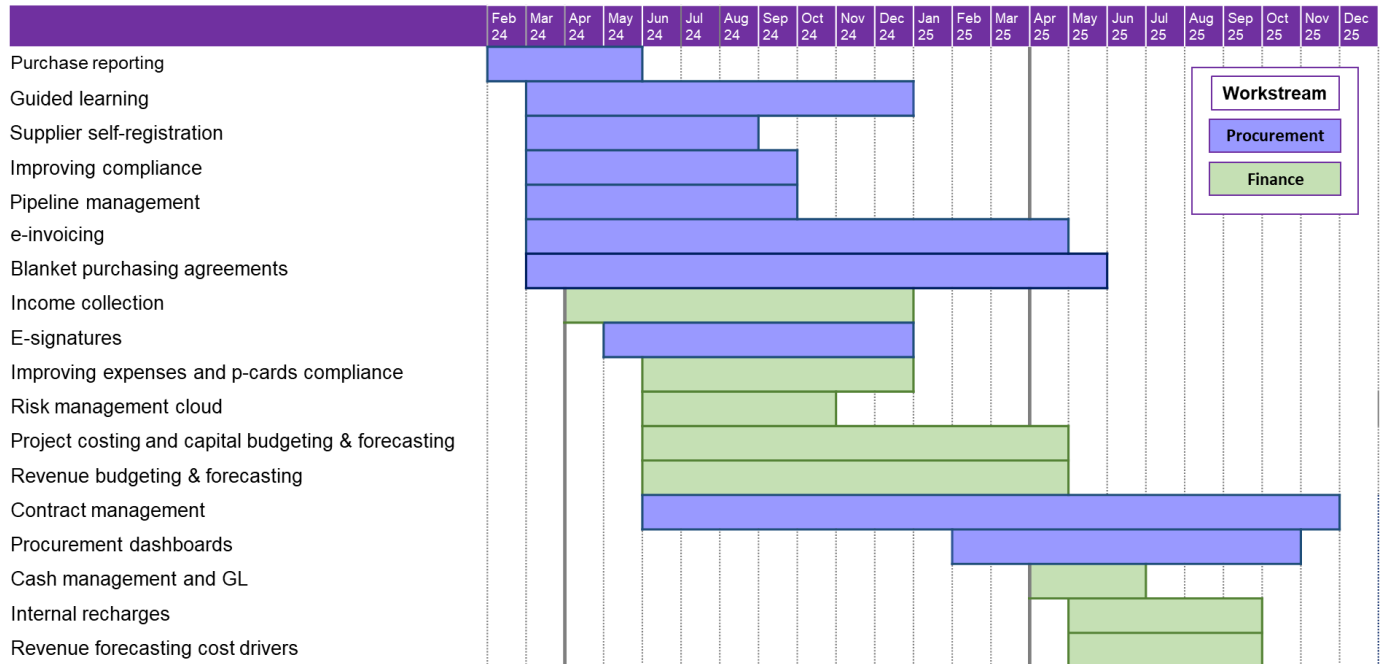
Once the delivery activity has been completed a Programme Closure Report will be completed and submitted for approval by the governance board.

The focus of the project closure report is:

- Status of the delivery of outcomes and benefits.
- Assessment of the health of the programme.
- Final report on risks and issues.
- A report of lessons learned.

7.5 Milestone Plan

The projects key milestones and their indicative delivery dates are included in the table below.



Workstream	Milestone Title	Milestone Description	Indicative End Date
Procurement	Purchasing Reporting	Deliver Purchasing reporting to support compliance & decision making.	May-24
Procurement	Guided Learning	Deliver embedded guidelines to support the purchasing process within Fusion.	Dec-24
Procurement	Supplier Self Registration	Go live with supplier self-registration to speed up the supplier set up process.	Aug-24
Procurement	Improving Compliance	Complete implementation of a range of activities to improve compliance to the purchasing process and measure impact.	Sep-24
Procurement	Pipeline Management	Go live with pipeline management system to support procurement planning process.	Sep-24
Procurement	e-invoicing	Complete implementation of e-invoicing to improve efficiency of invoice entry.	Apr-25

Workstream	Milestone Title	Milestone Description	Indicative End Date
Procurement	Blanket Purchase Agreements	Complete implementation of Blanket Purchasing Agreements to support control of contract spend.	May-25
Finance	Income Collection	Delivery of Improvements to account receivables and collections solution to reduce manual effort and provide tools to help Income collection.	Dec-24
Procurement	E-signatures	Complete roll out of electronic signatures for all contracts to aid process efficiency and lodging of contracts.	Sep-25
Finance	Improving expenses and P-cards compliance	Delivery of improved expenses solution and associated business process.	Dec-24
Finance	Risk Management Cloud	Delivery of a solution to give improve system controls.	Oct-24
Finance	Project Costing and Capital Budgeting & Forecasting	Delivery of an improved solution to manage capital project finances.	Apr-25
Finance	Revenue budgeting & forecasting	Delivery of an improved solution to manage revenue budget and financial monitoring.	Apr-25
Procurement	Contract management	Complete contract management system roll-out to support improved contract management practices and reporting (this will form part of a wider corporate implementation of e-signature functionality).	Nov-25
Finance	Cash Management and GL	Delivery of process improvements to the financial reconciliation and control environment.	Jun-25
Finance	Internal Recharges	Delivery of a solution to better manage internal recharges.	Sep-25
Finance	Revenue Forecast Cost Drivers	Delivery of a solution to automate the creation of high risk/high value financial forecasts.	Sep-25

Workstream	Milestone Title	Milestone Description	Indicative End Date
Procurement	Procurement Dashboards	Implement Purchasing, Procurement & Contract Management Dashboard to aid improved decision making (using data from multiple systems)	Oct-25

LONDON BOROUGH OF CROYDON

REPORT:	CABINET
REPORT TITLE:	<p>Local Government & Social Care Ombudsman Decision Finding of Fault Causing Injustice and Action Plan to Prevent Reoccurrence</p> <p>Report by the Monitoring Officer under section 5A of the Local Government and Housing Act 1989</p>
CORPORATE DIRECTOR / DIRECTOR:	<p>Debbie Jones, Corporate Director Children, Young People & Education</p> <p>Shelley Davies, Director of Education Stephen Lawrence Orumwense, Director of Legal Services and Monitoring Officer</p>
LEAD OFFICER:	<p>Shelley Davies, Director of Education Stephen Lawrence Orumwense, Director of Legal Services and Monitoring Officer</p>
KEY DECISION?	No
CONTAINS EXEMPT INFORMATION?	No
WARDS AFFECTED:	N/A

1. SUMMARY OF REPORT

- 1.1 On 4th August 2023, the Local Government & Social Care Ombudsman (LGSCO) informed the Council of its decision in respect of Child B and his mother Ms M. The LGSCO found the Council to be at fault which caused injustice in that: *“The Council did not consider its duty under s19 of the Education Act 1996 to make alternative arrangements for B’s education when Ms M said he was too ill to attend school.”*
- 1.2 The purpose of this report is to advise Cabinet of the LGSCO findings and recommendations, and the actions taken to date to address the issues raised in the recommendations.

2. RECOMMENDATIONS

For the reasons set out in this report and its appendices the Executive Mayor in Cabinet is asked to:

- 2.1 Note the LGSCO findings and recommendations in respect of Child B in Appendix 1.
- 2.2 Endorse the Action Plan in response to the recommendations including the measures already in place as set out in Appendix 2.
- 2.3 Adopt the report as the Executive's formal response as required by section 5A of the Local Government and Housing Act 1989 for distribution to all members and the Monitoring Officer.

3 REASONS FOR RECOMMENDATIONS

- 3.1 Ms M complained that the Council's failure to act caused Child B injustice because it had failed to consider whether or not he was receiving a suitable education between September 2021 and September 2022.
- 3.2 The LGSCO concluded there had been fault on behalf of the Council that had caused Child B injustice. Further, the LGSCO stated that it had investigated a previous complaint made to the Council of a similar nature and despite being assured "lessons were learnt" it was not convinced that they had been.
- 3.3 On that basis the LGSCO has recommended that its decision of 4th August 2023 be put to the relevant scrutiny committee to ensure the Action Plan is "embedded" and that the scrutiny committee monitor the implementation of the action plan. The LGSCO findings and recommendations and action plan in response is being considered by Cabinet on route to the relevant scrutiny committee.

4 BACKGROUND AND DETAILS

- 4.1 What follows is a brief chronology of what happened.
- 4.2 In September 2021 Child B transferred to his secondary school.
- 4.3 Between September 2021 and October 2021 Ms M states Child B's school attendance started to decline as he was struggling with the transition from primary to secondary school. Ms M telephoned the Council's Attendance Service in September 2021 and October 2021 to ask for help because B was refusing to go to school.
- 4.4 Child B is said not to have attended school after November 2021. Ms M produced a letter to the school from her GP and sent it to the school stating Child B could not

attend school. This was not accepted by the school and consequently Child B's absence was considered as unauthorised.

- 4.5 In November 2021, Ms M made an application to the Council for an Education, Health and Care (EHC) Needs Assessment for Child B. The Council declined the request for an EHC Needs Assessment and this was communicated to Ms M in December 2021.
- 4.6 A Team Around the Family (TAF) meeting took place in December 2021, which was also attended by Child B's GP. Ms M appealed the Council's decision to refuse an EHC Needs Assessment. The appeal was registered by the SEN Tribunal in February 2022.
- 4.7 In February 2022 the school contacted Child B's GP to suggest next steps for B to receive interim education.
- 4.8 A further TAF meeting took place in February 2022 which was attended by Ms M and the school. Ms M mentioned interim tuition and the school explained the information required for that to take place as discussed with Child B's GP.
- 4.9 In April 2022 the Council conceded the Tribunal appeal and agreed to undertake an EHC Needs Assessment for Child B.
- 4.10 The school then made a referral to an interim education provider which was accepted. Child B started attending Springboard (interim tuition service) in July 2022.
- 4.11 On 20th September 2022 Ms M made a Stage 1 complaint to the Council. In early November 2022 Child B started attending a new school placement. On 4th November 2022 the Council issued a response to the Stage 1 complaint. On 15th November 2022 Ms M escalated her complaint to a Stage 2 complaint. On 15th February 2023 the Council issued a response to the Stage 2 complaint. Unhappy with the response Ms M referred the matter to the LGSCO who has made a finding of failure.
- 4.12 The Ombudsman's findings found failings including:
- a) That the Council does not appear to have considered its duty under s19 of the Education Act 1996 to make alternative arrangements for Child B's education. The Council should have assessed whether B was receiving suitable education when Ms M reported concerns in September 2021. The Council should have contacted Child B's school to find out what arrangements the school had made and decided whether or not they were suitable.
 - b) That Child B was clearly having a difficult time, and without the assessments the Council should have conducted at the time, it is difficult to say now whether he would have benefitted from alternative education provided by the Council. This uncertainty is a further injustice.

- c) That from September 2021, when Ms M first reported problems to the Council, until September 2022 when he transferred to an independent special school, the Council failed to consider whether Child B was receiving suitable education.

4.13 To remedy the injustice caused, the LGSCO has made the following recommendations:

- a) *“The Council apologises to Ms M and B for its failure to consider whether B was receiving suitable education between September 2021 and September 2022”.*
- b) *“Offers a symbolic payment of £5,000 to recognise the Council’s failure to ensure B received suitable education”.*
- c) *“Refers my decision to the relevant scrutiny committee and develops an action plan to ensure the lessons learned from this and the previous complaint are ‘embedded’. The scrutiny committee should monitor the implementation of the Council’s action plan.”*
- d) *“I recommended the Council makes the apology and payment within six weeks of my final decision. The Council should refer my final decision to the next meeting of the relevant scrutiny committee and provide evidence (such as the minutes of the meeting) showing the action the Council plans to take.”*

ACTIONS UNDERTAKEN AND NEXT STEPS

4.14 Following receipt of the Ombudsman report the following actions have been taken in response to the recommendations:

- a) *The Council apologises to Ms M and B for its failure to consider whether B was receiving suitable education between September 2021 and September 2022”.*

The Council has undertaken this action.

- b) *Offers a symbolic payment of £5,000 to recognise the Council’s failure to ensure B received suitable education.*

The Council has undertaken this action.

- c) *Refers my decision to the relevant scrutiny committee and develops an action plan to ensure the lessons learned from this and the previous complaint are ‘embedded’. The scrutiny committee should monitor the implementation of the Council’s action plan.*

This action is in the process of being completed now with this report and referral. Please see attached Appendix 2 for actions that have also taken place since the LGSCO’s decision which are designed to embed lessons learnt.

In summary:

Upon receipt of the draft LGSCO findings the Council immediately uploaded its *children not being able to attend school due to medical needs or otherwise* policy to the Council's Local Offer. This is now on the Council's website available for the public to view.

The week after the draft LGSCO findings were received the above noted policy was sent to all staff within the Children, Young People and Education directorate to ensure they were all aware of it.

In September 2023 a member of the Access to Education service starts attending the Council's SEN Statutory Assessment Group's meetings to ensure the relevant service would be made aware as soon as the Council is of pupils who may not be in school due to medical reasons or otherwise. This is an ongoing practice.

4.15 An explanation as to why the fault reoccurred following the decision of 12th August 2021 is set out below.

4.16 In the previous complaint, of 12th August 2021, the Council was found to be at fault for not acting as it should have done to ensure the child in that case had an appropriate offer of education pursuant to its responsibilities under Section 19 of the Education Act 2019. In that instance, the child's parent had to fund online tuition for the child whilst the child could not attend an educational placement due to mental health difficulties. The LGSCO found that the Council, although aware the child was not attending a school, was unable to evidence that it had offered an appropriate education in that interim period and that if an offer was made that it was not kept under review by a named officer. The LGSCO recommended the Council put together an action plan to prevent this situation from reoccurring which was accepted and was completed. The actions following on from the previous decision were:

- Ensuring that an officer in the Access to Education team has key oversight of the *children not being able to attend school due to medical needs or otherwise* policy.
- Ensuring that all schools have the updated *children not being able to attend school due to medical needs or otherwise* policy.
- Ensuring that all key teams and officers where this may be relevant are aware of the *children not being able to attend school due to medical needs or otherwise* policy and practices and their steps. Ongoing comms and training cycle.
- Ensuring that the Springboard provision is accessible via referrals (form available centrally) and that all schools and internal officers know this process and the relevant statutory guidance.
- Ensure *children not being able to attend school due to medical needs or otherwise* is available on website as part of local offer.
- Re-establish two-way communication with Springboard so that we have registers of all new starters and are able to list at any time, young people who are known to the authority as being on school roll but are being educated otherwise than at school.
- Ensure that any parent/carer whose child is not attending school due to medical reasons or other otherwise knows the provision contact and has a named council contact to check in with monthly.

4.17 Despite the action plan in place following the decision of 12th August 2021, the fault reoccurred, however the reasons as to why it reoccurred were different. In the previous decision (12th August 2021), the relevant department, Access to Education, *was aware*

there was a child out of education but was unable to prove that it had made offers to provide interim tuition meaning the child's parent had to fund it. In the current decision (4th August 2023) the issue was that the same department *was not made aware* that a child was out of education. The fault in the latter instance occurred because the SEN department upon being notified that Child B was not in school, did not advise the Access to Education team of this which meant they were not able to take appropriate action.

5 CONTRIBUTION TO COUNCIL PRIORITIES

Children and young people in Croydon have the chance to thrive, learn and fulfil their potential.

6 OPTIONS CONSIDERED

Approach as prescribed in law, please see legal implications.

7 IMPLICATIONS

7.1 FINANCIAL IMPLICATIONS

The financial recommendations made by the LGSCO were a symbolic payment to the complainant of £5,000 to recognise the Council's failure to ensure B received suitable education.

Approved by: Ian Geary, Interim Head of Corporate Finance on behalf of the Director of Finance (15/3/2024)

7.2 LEGAL IMPLICATIONS

7.2.1 Under the Local Government Act 1974 (the Act), the LGSCO has the power to investigate the complaint and to issue a report under section 30(1) where there has been maladministration causing injustice; a failure in a service that it was the Council's function to provide; and a total failure to provide such service. If, after the investigation of a matter is completed, the LGSCO decides - (a) that he is satisfied with action which the authority concerned have taken or propose to take, and (b) that it is not appropriate to prepare and send a copy of a report under section 30(1), the LGSCO may instead prepare a statement of reasons for the decision and send a copy to each of the persons concerned.

7.2.2 The LGSCO has the power to make recommendations to the Council on how to improve its services and to put things right for the complainant. These recommendations are not mandatory, and the Council does not have to accept or follow them. However, in this instance the Council has notified the Ombudsman that they accept and will action the recommendations and this is reflected in the Ombudsman statement of reasons for decision issued under section 30(1B) of the Act.

- 7.2.3** Where a finding of ‘maladministration’ is made the Council’s Monitoring Officer is obliged to prepare a report for the Executive following the LGSCO findings and to consult with the Head of Paid Service and Chief Finance Officer for this purpose. This report must also be sent to each member of the Council and the Executive must meet within 21 days thereafter (s.5A Local Government and Housing Act 1989). The Executive is required to consider this Monitoring Officer report on the findings of and response to the LGSCO’s decision.
- 7.2.4** Section 19 of the Education Act 1996 places a duty on as follows:
- 7.2.5** Each local authority shall make arrangements for the provision of suitable education at school or otherwise than at school for those children of compulsory school age who, by reason of illness, exclusion from school or otherwise, may not for any period receive suitable education unless such arrangements are made for them.
- 7.2.6** Local authorities must arrange suitable full-time education (or as much education as the child’s health condition allows) for children of compulsory school age who, because of illness, would otherwise not receive suitable education.
- 7.2.7** Local authorities should: Provide such education as soon as it is clear that the child will be away from school for 15 days or more, whether consecutive or cumulative. They should liaise with appropriate medical professionals to ensure minimal delay in arranging appropriate provision for the child.
- 7.2.8** Ensure that the education children receive is of good quality, as defined in the statutory guidance.
- 7.2.9** Schools must provide support for their pupils with medical needs under their statutory duties as set out in ‘Supporting pupils with medical conditions at school’ (Department for Education, 2015). In failing to make arrangements for the provision of suitable education for B as set out in the report, it would appear the Local Authority are in breach of its duty under s.19 Education Act 1996. In addition, section 19 of the Children and Families Act (CFA) 2014 sets out the principles underpinning the legislation and the guidance in the SEND Code of Practice in particular paragraph 10.39 which states that 'Local authorities must make arrangements where, for any reason, a child of compulsory school age would not otherwise receive suitable education. Section 19 CFA makes clear that local authorities, in carrying out their functions under the Act in relation to disabled children and young people and those with special educational needs (SEN), must also have regard to:
- The views, wishes and feelings of the child or young person, and the child’s parents.
 - The importance of the child or young person, and the child’s parents, participating as fully as possible in decisions, and being provided with the information and support necessary to enable participation in those decisions.
 - The need to support the child or young person, and the child’s parents, in order to facilitate the development of the child or young person and to help them achieve the best possible educational and other outcomes, preparing them effectively for adulthood.

Approved by: Doutimi Aseh, Head of Social Care & Education Law and Sandra Herbert, Head of Litigation & Corporate Law, on behalf of the Director of Legal Services and Monitoring Officer (21/02/2024).

7.3 EQUALITIES IMPLICATIONS

7.3.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in Section 149 of the Equality Act 2010. The Council must, in the performance of its functions, have due regard to its duty to:

- a. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
- b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.3.2 Access to education has a great bearing on life outcomes for young people. There are clearly equalities implications for this case, which will be nuanced and require some thought as the Council undertakes scrutiny of its own actions and works to develop its action plan in response.

7.3.3 This may include but not be limited to consideration of relevant protected characteristics as they pertain to the individuals involved, as well as consideration how the Council exercises its duty to advance equality of opportunity, particularly in terms of access to services.

7.3.4 Equalities considerations will need to underpin any recommendations or actions arising from Scrutiny and be kept under review as the Council learns from this judgement and improves its approach and/or services.

Approved by: Helen Reeves, Head of Strategy & Policy (20/02/2024)

8 APPENDICES

1. LGSCO's Decision of 4th August 2023
2. Council's Action Plan
3. LGSCO's previous Decision of 12th August 2021

9 BACKGROUND DOCUMENTS

N/A

10 URGENCY

N/A

The Ombudsman's final decision

Summary: the Council did not consider its duty under s19 of the Education Act 1996 to make alternative arrangements for B's education when Ms M said he was too ill to attend school. Further, this appears to be a wider problem as we have investigated a similar complaint before. The Council has accepted our recommendations.

The complaint

1. Ms M complains her son, B, did not receive suitable education when he became too ill to attend school in September 2021.
2. Ms M complains the Council did not obtain the specialist advice she requested to inform B's Education, Health and Care (EHC) Plan.

The Ombudsman's role and powers

3. We investigate complaints about 'maladministration' and 'service failure'. In this statement, I have used the word fault to refer to these. We must also consider whether any fault has had an adverse impact on the person making the complaint. I refer to this as 'injustice'. If there has been fault which has caused an injustice, we may suggest a remedy. (*Local Government Act 1974, sections 26(1) and 26A(1), as amended*)
4. We cannot investigate a complaint if someone has appealed to a tribunal about the same matter. (*Local Government Act 1974, section 26(6)(a), as amended*)
5. The First-tier Tribunal (Special Educational Needs and Disability) considers appeals against council decisions regarding special educational needs. We refer to it as the SEND Tribunal in this decision statement.
6. If we are satisfied with an organisation's actions or proposed actions, we can complete our investigation and issue a decision statement. (*Local Government Act 1974, section 30(1B) and 34H(i), as amended*)

How I considered this complaint

7. I considered information provided by Ms M and information provided by the Council. I invited Ms M and the Council to comment on my draft decision.

What I found

8. Ms M's son, B, found the transfer to secondary school in September 2021 very difficult and his attendance declined rapidly.
9. In November 2021, B's doctor said he was unfit to attend school.
10. Ms M asked the Council to undertake an EHC needs assessment in November 2021. The Council declined. Ms M appealed to the SEND Tribunal. During the appeal, the Council changed its mind and agreed to carry out the assessment.
11. The Council undertook an assessment and issued an EHC Plan. The Plan says B will attend an independent special school. He joined the school in September 2022.
12. Ms M is unhappy with the Plan and has appealed to the Tribunal. Ms M has appealed section B (the description of B's special educational needs) and section F (the special educational provision required to meet them). The final hearing was scheduled for July 2023.

Ms M's complaint to the Council

13. Ms M complained to the Council on 20 September 2022, shortly before the Council issued B's final EHC Plan. She complained the Council had not obtained the specialist advice she requested to inform B's EHC needs assessment. She was concerned the Plan would not reflect B's needs.
14. The Council responded to Ms M's complaint at the first stage of its complaints process on 4 November 2022. The Council explained why it had not obtained the advice Ms M requested.
15. Unhappy with the response, Ms M asked the Council to respond at the second stage of the complaints process on 15 November 2022. She explained why she disagreed with the Council's response. She also complained the Council had not fulfilled its legal duty to provide education for B for many months.
16. The Council responded by letter on 15 February 2023. The Council offered further explanation for its decisions concerning the advice Ms M had requested for B's EHC needs assessment. The Council acknowledged that B had been out of education 'for some time' but said this was a matter for a different service. The Council said it would ask the Education Welfare Service to respond separately.
17. Unhappy with the Council's response, Ms M complained to the Ombudsman.

Complaint 1: B's education from September 2021

18. Ms M complained the Council failed to make alternative arrangements for B's education when he became too ill to attend school.

What happened

19. Ms M says she telephoned the Council's Attendance Service in September and October 2021 to ask for help because B was refusing to go to school. She says she told the Council's SEN service that B was not attending school when she asked the Council to carry out an Education, Health and Care Needs assessment in November 2021. Ms M says the Council did not offer any help.
20. In response to Ms M's complaint, the Council explained the education welfare service in Croydon is a 'traded service' and operates independently from the Council. The Council explained that schools commission education welfare services themselves. The Council said Ms M should complain directly to the school, not the Council.

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21. This caused me concern.
 22. Schools have a significant role to play, but they are not solely responsible. The Council has a duty, outlined below, to arrange suitable education for children who would not otherwise receive suitable education. The Council is – in effect – a “safety net”.
 23. The Education Act 1996 says every council shall “make arrangements for the provision of suitable education at school or otherwise than at school for those children of compulsory school age who, by reason of illness, exclusion from school or otherwise, may not for any period receive suitable education unless such arrangements are made for them.” (*Education Act 1996, section 19(1)*)
 24. The Government has issued statutory guidance which Councils must follow unless they have good reason. (*Ensuring a good education for children who cannot attend school because of health needs, issued by the Department for Education in January 2013*)
 25. The Local Government Ombudsman has also issued guidance to councils on how we expect them to fulfil their responsibilities to provide education for children who, for whatever reason, do not attend school full-time. (*Out of school... out of sight? Ensuring children out of school a good education, published in July 2022*)
 26. I made further enquiries to find out how the Council fulfils this duty.
 27. I asked how the Council identifies pupils to whom it owes the duty.
 28. I asked whether the Council had satisfied itself B’s school had made suitable arrangements for his education when he was too ill to attend school.
 29. This is important since the Government guidance says Councils must work closely with schools to identify children who need the Council to make alternative arrangements for their education. Councils must consider the individual circumstances of each particular child and be able to demonstrate how they made their decisions.
 30. The Council told me again that education welfare was a traded service and suggested I ask the school for information about B’s case.
 31. The Council said the only involvement it had with B’s case was in May 2022 when an *early help worker* made a referral to the Access to Education team asking for support. The Council met with B’s school, but decided the Access to Education team would not ‘add value’ since there were already 17 professionals involved. The Council invited the school to make a fresh referral once the number of professionals involved had decreased. The Council says the school did not make further contact.
 32. This did not answer my questions, so I asked the Council to send any policies the Council has concerning provision for children who are unable to attend school due to medical or health needs. I asked for information and policies for both parents and schools since there was no information on the Council’s website.
 33. The Council sent two documents. The first, the terms of reference for the “Missing Monday” panel, concerns children who go missing from education. The emphasis is on safeguarding children from harm and making referrals to the Police. The second, “Croydon Council. A staged approach to improving school attendance” sets out a three-stage approach for schools to manage poor attendance. The process culminates in prosecution by the Council.

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34. Neither document mentions children who are unable to attend school regularly because of illness or health reasons. Neither mentions the Council's duty in s19 of the Education Act to make alternative arrangements for a child's education.
35. While the Council has responded helpfully to my enquiries, it does not appear the Council has considered its duty under s19 of the Education Act 1996 to make alternative arrangements for B's education.
36. This is fault.
37. Further, the officers dealing with B's absence from school, and responding to my enquiries, do not appear to have been aware of the Council's policy and procedures relating to this duty. The Council sent its policy in response to my draft decision and confirmed it had recently published the policy on its website and circulated a copy to the relevant officers. I welcome the Council's response.
38. Where we find fault, we consider the impact on the complainant. We refer to this as the injustice. We may recommend a remedy for injustice that is the result of fault by the Council.
39. The Council should have assessed whether B was receiving suitable education when Ms M reported concerns in September 2021. The Council should have contacted B's school to find out what arrangements the school had made and decided whether or not they were suitable.
40. B was clearly having a difficult time, and without the assessments the Council should have conducted at the time, it is difficult to say now whether he would have benefitted from alternative education provided by the Council. This uncertainty is a further injustice.
41. From September 2021, when Ms M first reported problems to the Council, until September 2022 when he transferred to an independent special school, the Council failed to consider whether B was receiving suitable education.
42. I understand B was referred to "Springboard", a medical needs tuition service funded by the Council, where he received some tuition from July 2022. The Council does not appear to have been involved in the referral.
43. The Council has a duty to make alternative arrangements for a young person's education if he would not otherwise receive suitable education. The Council remains responsible even if it relies on others, such as a school, to act on its behalf. We drew attention to this in the [report](#) of our investigation of a complaint against Cornwall Council.
44. I have recommended a remedy for the injustice caused by the Council's failure to ensure B received a suitable education when he was too ill to attend school. My recommendations are at the end of this statement.

Complaint 2: advice to inform B's EHC Plan

45. Ms M complains the Council failed to obtain advice she requested to inform B's Education, Health and Care (EHC) Plan. As a result, she does not believe the Plan adequately describes B's special educational needs in section B or the provision required to meet them in section F.
46. Since making her complaint, Ms M has appealed these points to the Tribunal. She made a detailed submission in which she set out evidence to support her view the assessments she requested are necessary.
47. We cannot investigate a complaint if someone has appealed to a tribunal about the same matter.

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48. As Ms M has appealed to the Tribunal about the assessments she requested, we cannot investigate her complaint. The Tribunal will decide whether the assessments are necessary.

Agreed action

49. We have published guidance to explain how we recommend remedies for people who have suffered injustice as a result of fault by a council. Our primary aim is to put people back in the position they would have been in if the fault by the Council had not occurred. When this is not possible, as in the case of Ms M and B, we may recommend the Council makes a symbolic payment.
50. We can also make recommendations to ensure similar faults do not happen in the future. The Council assured us in August 2021 that it would “learn lessons” following our investigation of a similar complaint. Regrettably, that does not appear to have improved matters for B.
51. I recommended the Council:
- a) apologises to Ms M and B for its failure to consider whether B was receiving suitable education between September 2021 and September 2022;
 - b) offers a symbolic payment of £5,000 to recognise the Council’s failure to ensure B received suitable education.
 - c) refers my decision to the relevant scrutiny committee and develops an action plan to ensure the lessons learned from this and the previous complaint are ‘embedded’. The scrutiny committee should monitor the implementation of the Council’s action plan.
52. I recommended the Council makes the apology and payment within six weeks of my final decision. The Council should refer my final decision to the next meeting of the relevant scrutiny committee and provide evidence (such as the minutes of the meeting) showing the action the Council plans to take.
53. The Council should provide us with evidence it has complied with the above actions.
54. The Council accepted my recommendations.

Final decision

55. I have completed my investigation as the Council accepts my recommendations.

Investigator’s decision on behalf of the Ombudsman

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Action plan following LGO decision - 22 014 644

In the above decision the LGO recommended that the Council:

- 1) Develops an action plan to ensure the lessons learned from this and the previous complaint (referred to below) are 'embedded'.
- 2) Refers the investigators' decision to the relevant scrutiny committee. The scrutiny committee should monitor the implementation of the Council's action plan.

Issues highlighted in the LGSCO's decision

- The Council's *children not being able to attend school due to medical needs or otherwise* policy (the policy) had not been available to the public on the Council's website meaning those seeking support could not obtain the information they required. It should have been available.
- All schools should have the policy and should be regularly reminded through all key forums of the next steps to take when a child is unable to attend school for 15+ days.
- Some staff members within the education directorate were not aware of the policy when they should have been.
- Procedures were not effective in ensuring that when a child was made known to one service within the education department that they passed the information on to the relevant team within the Council so that the right support could be delivered. Communication was not good enough within the department to ensure this didn't happen.

Action Plan (includes the action plan following the previous complaint)

What will Happen?	By who/when	Outcomes/updates
<ul style="list-style-type: none"> • Ensure that an officer in the Access to Education team has key oversight of the policy and practice around children not being able to attend school due to medical needs or otherwise is kept updated. This needs to be saved centrally and known by at least 2 key officers and the 2 Head of Service (HOS) for Access to Education and SEND, in case of absence/staff changes. • Ensure the <i>children not being able to attend school due to medical needs or otherwise</i> policy is available on the Council's website as part of the Local Offer. • Ensure that all staff within the Education directorate are aware of the <i>children not being able to attend school due to medical needs or otherwise</i> policy and in addition to the above ensure that this is circulated biannually. • Ensuring that all schools have the updated policy and are regularly reminded through all key forums of the next steps to take when a child is unable to attend school for 15+ days. 	<p>Head of Access to Education by 01.11.21</p> <p>SEND Strategy and Improvement Manager to ensure this policy is included in the Croydon Local Offer and to do so immediately.</p> <p>Head of Access to Education to ensure the policy is circulated biannually.</p> <p>Head of Access to Education by 01.11.21</p>	<p>Key officers- Head of Service Access to Education Documents saved on S/P in inclusion and SEND areas under Education Otherwise Than At School (EOTAS) heading.</p> <p>Policy was uploaded to the Local Offer site on 25.07.23.</p> <p>Policy was sent to all staff on 03.08.23. Policy will need to be sent again by February 2024.</p> <p>All update and referral pathways sent to schools in the November 2021 bulletins.</p>

<ul style="list-style-type: none"> • Ensuring that the Springboard provision is accessible via referrals (form available centrally) and that all schools and internal officers know this process and the relevant statutory guidance. • Ensure that any parent/carer whose child is not attending school due to medical reasons or other otherwise knows the provision contact and has a named council contact to check in with monthly. • To ensure that the relevant team within the directorate is made aware when a child is not attending school due to medical reasons or otherwise a member of the Access to Education service will attend the SEN Statutory Assessment Group (SAG) panel. This will ensure that if such a request comes in and it is clear the child is not attending school the relevant team is made aware immediately and can take the relevant action to support the child. 	<p>Head of Access to Education by 01.01.2021</p> <p>Head of Access to Education/Head of SEN by 31.10.21.</p> <p>SEN department to ensure a member of Access to Education service is invited to SAG Panel meetings. The member of the Access to Education service to ensure they attend these meetings. This is already taking place but must now continue.</p>	<p>A member of the Access to Education service started attending the SAG panel from September 2023 and will continue to do so.</p>
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Approved by: Director Education
Head of Service for Special Educational Needs
Head of Service for Access to Education

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The Ombudsman's final decision

Summary: Ms C complained about the Council's failure to ensure her child was provided with a suitable education when she was unable to attend school for health reasons. We find there were several faults in the Council's actions in this matter, leading to injustice for Ms C. A remedy has been agreed.

The complaint

1. The complainant, whom I shall call Ms C, complained the Council failed to arrange education for her child, B, from 23 March 2019 when she became too unwell to attend school due to anxiety. Ms C reports that in addition to lack of education this caused B's mental health to suffer because of uncertainty, and the family has been caused considerable stress and worry, as well as financial expenditure on online tuition, plus time and trouble seeking to have the matter satisfactorily resolved.

What I have investigated

2. I have exercised discretion to investigate the Council's action in respect of the provision of education for B since April 2019. While Ms C did not complain to the Ombudsman until September 2020, there is evidence Ms C was trying to reach agreement with the Council in the preceding period, and the impact of Covid-19 restrictions during this time was also an appropriate consideration.

The Ombudsman's role and powers

3. We investigate complaints about 'maladministration' and 'service failure'. In this statement, I have used the word fault to refer to these. We must also consider whether any fault has had an adverse impact on the person making the complaint. I refer to this as 'injustice'. If there has been fault which has caused an injustice, we may suggest a remedy. (*Local Government Act 1974, sections 26(1) and 26A(1), as amended*)
4. If we are satisfied with a council's actions or proposed actions, we can complete our investigation and issue a decision statement. (*Local Government Act 1974, section 30(1B) and 34H(i), as amended*)
5. We cannot investigate late complaints unless we decide there are good reasons. Late complaints are when someone takes more than 12 months to complain to us about something a council/care provider has done. (*Local Government Act 1974,*

sections 26B and 34D, as amended). In this case, as set out above, I have exercised discretion to investigate.

6. The law says we cannot normally investigate a complaint when someone can appeal to a tribunal. However, we may decide to investigate if we consider it would be unreasonable to expect the person to appeal. (*Local Government Act 1974, section 26(6)(a), as amended*)
7. We cannot investigate a complaint if someone has appealed to a tribunal. (*Local Government Act 1974, section 26(6)(a), as amended*)
8. The First-tier Tribunal (Special Educational Needs and Disability) considers appeals against council decisions regarding special educational needs. We refer to it as the SEND Tribunal in this decision statement.

How I considered this complaint

9. I considered all the information provided by Ms C about her complaint. I made written enquiries of the Council and took account of the information it provided in response.
10. Ms C and the Council had an opportunity to comment on my draft decision.

What I found

Legal and administrative information

11. The Education Act 1996 (Section 19) provides the basis for statutory guidance. This states that education authorities must make suitable educational provision for children of compulsory school age who are absent from school because of illness, exclusion or otherwise. The provision can be at a school or otherwise, but must be suitable for the child's age, ability, and aptitude, including any special needs.
12. Statutory guidance, 'Alternative Provision', published in January 2013, sets out that such provision should start as quickly as possible and enable pupils to achieve on a par with mainstream children. Further statutory guidance, 'Education for children with health needs who cannot attend school' published in May 2013, states that, while there is no legal deadline to start provision, it should be arranged as soon as it is clear a child will be absent for health reasons for more than 15 days. It also states that some forms of provision, such as one-to-one provision, which is intensive, need not be full-time.
13. The Council's policy in relation to the education of pupils with medical needs includes the following:

"The school's co-ordinator for children with medical needs will take an active and continuing role in their educational, social and emotional progress. The school will at all times aim to work in partnership with parents to ensure the best possible outcomes and a return to school as soon as possible. Where a child's health condition requires an extended period of absence from school, the school may need to seek the assistance of the Springboard Service. Staff at the service, including hospital tutors, will support pupils who are temporarily unable to attend classes on a full-time basis. These pupils may be:

 - (a) Children who have been deemed by a medical practitioner as being too ill to attend the school for more than 15 days or who have conditions which lead to recurrent absences from school which becomes significant in the longer term;
 - (b) Pupils with mental health problems who are unable to attend school.

.... The aim of Springboard will be to support the school in its work to reintegrate pupils into full time education at the earliest possible opportunity. In the greatest number of cases this means a return to mainstream education....The school will do all that it can to fully implement Croydon's policy on the education of children and young people with medical needs".

14. The Council commissions Springboard to provide services for schools in cases of education other than at school.

What happened in this case

B stops attending school

15. Ms C's child, B, was diagnosed with autistic spectrum disorder in February 2019. when she was in Year 9 at school. From 25 March 2019 she was unable to attend school due to anxiety. In light of this, on 9 April 2019 Ms C complained to her MP that she was worried about B's education. She referred to the fact that B had been out of school since 25 March.

The Council is advised B is out of school

16. The MP passed the complaint to the Council on 17 April, and it replied to the MP the same day, but made no reference to what it would put in place in terms of education for B.
17. Ms C then approached a councillor and her enquiry was passed to relevant officers at the Council on 8 July. When it responded the Council said it had first been aware that B was out of school when Ms C had emailed it on 30 April saying B had been unable to attend school since 25 March due to anxiety. That was not correct however as the Council had received this information from the MP on 17 April. The Council made a further error in respect of this when, in the first stage complaint response, it said that Ms C had not informed it until 8 May that her child was out of school. These errors were fault.

Referral for alternative provision

18. The Council says that on 3 May 2019 Ms C met with its officers, and following this it liaised with the school which arranged for an educational psychologist to carry out an assessment. On 21 May there was a further meeting at which it was agreed a referral would be made to Springboard for alternative provision from Provider X, which the Council says is a long-term full-time education provision for young people who want to attend school regularly, but whose mental health is such that makes their regular attendance at a mainstream school not possible. The referral was not made until 9 July 2019.
19. The Council has set out the following chronology:
 - On 9 July 2019 there was a meeting at which Springboard set out a proposed integration plan for September. The Council says this included some tuition online over the 'end of summer term', but the academic year was almost at a close at this point.
 - On 16 September 2019 the school noted that due to a need for a more careful integration and a slower start, B was still only looking to complete online provision.
 - On 27 September 2019 Ms C advised Springboard she did not want to accept the online tuition offered because she had already paid for an online package, which B was engaging well with.

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- On 24 October 2019 Springboard advised the school that the referral for services had not been progressed due to Ms C refusing what had been offered. The Council says the school should have liaised with Ms C at this point to support next steps.
20. The Council says it has seen evidence held by Springboard to support the above chronology. It has not provided such evidence to me despite requests to do so, and responsibility for this remains with the Council since Springboard is carrying out services on its behalf.
21. In July 2019 Ms C asked the Council to assess B for an Education, Health and Care (EHC) plan. I will deal with this issue separately, later in this statement.

Ms C arranges and pays for online GCSE tuition

22. From September 2019 Ms C arranged and paid for online GCSE tuition for B, on the basis that no suitable education programme had been offered or provided by the Council. She asked for financial reimbursement for this, which was refused. She reports that in September 2020 she was offered a one-hour weekly maths tutorial with a learning support assistant. Around the same time in a response to Ms C's MP the Council said that Ms C had refused services from Provider X, and that the school did not believe B should be at home and did not agree to fund her online courses or a link programme to a college (from which the available offer was only one day a week, in animal care).

The Council's duties in respect of education other than at school

23. The Council's view was that as B remained on the school roll, and did not have an Education, Care and Health plan, she remained the responsibility of her school. However, as noted in the Ombudsman's published focus report 'Out of School...out of mind?':
- “Section 19 of the Education Act 1996 says that if a child of compulsory school age (between 5 and 16 years old) cannot attend school for reasons of illness, exclusion from school or otherwise, the local authority must make arrangements to provide 'suitable education' either at school or elsewhere – at home, for example. The term 'suitable education' is defined as efficient education suitable to the child's age, ability, and aptitude and to any special educational needs he or she may have. The education to be arranged by the local authority should be on a full-time basis, unless, in the interests of the child, part-time education is considered to be more suitable. This would be for reasons relating to the child's physical or mental health....
- Local authorities need to ensure children with health problems are not without education for more than 15 working days. So, if a child cannot attend school because of a health problem, after 15 days the council must intervene and provide suitable education for a minimum of five hours a week. The teaching must be of a similar quality to that which the child would receive in school, based on a broad and balanced curriculum. Where a council contracts out the service, it remains accountable for the quality of education. Councils must also regularly review what is being offered and adjust the number of teaching hours if necessary. Children's needs change and their education should reflect this. So, as a child's health improves, the hours can normally be increased”.

No evidence of appropriate action taken

24. For the avoidance of doubt the Council was asked to provide a chronology setting out all educational provision offered to B in the period from April 2019 to September 2020, identifying whether the provision was at home or on a site, the number of hours and frequency. Responding, the Council set out the actions

referred to in paragraph 19 above, which refer only to the period ending October 2019, and nothing beyond this. The Council has noted there should have been liaison between itself and the school, and says it does not appear that there was a named officer responsible for this over the past year. The lack of evidence of steps taken by the Council to ensure that any education offered was suitable in terms of quality, quantity, and the needs of the child, is fault.

Information security issue

25. The Council has indicated that some relevant information, which cannot currently be accessed, may be held on the personal emails of one of its officers. This would be fault, and calls into question the Council's information security practices.

The question of funding the online tuition

26. Throughout the 2019/2020 academic year B received her education via the online programme Ms C had arranged and paid for.
27. In November 2020, the Council's education resource panel considered Ms C's request for a package of funding for B to complete her online GCSE tuition programme. The record from the panel meeting sets out the view that the Council was not responsible for funding until an EHC plan was completed, and that as the school had delegated funding it should be able to support B's education. This was an opportunity for the Council to look at whether it had fulfilled its responsibilities in the previous academic year, but there is no evidence that it did so.

The Education, Health and Care plan

28. As noted in paragraph 21 above, Ms C had asked for assessment for an EHC plan for B in July 2019. That request was refused. Ms C had the right of appeal to the SEND Tribunal, but did not exercise that right.
29. In May 2020 a further request for assessment was made, and this was again refused. On this occasion Ms C exercised her right of appeal. However, in July 2020 the submission of advice from an educational psychologist was treated as a new request for assessment and the Council then agreed to assess.
30. The final amended EHC plan was issued in February 2021, naming B's current school until the end of July 2021 and a college from September 2021. Ms C has appealed to the SEND Tribunal in respect of this EHC plan.

Some funding is agreed

31. In December 2020 the Council agreed to fund B's online tuition from September 2020. It says it did so as a gesture of goodwill, having no responsibility to fund provision put in place before the date of the EHC plan.

Analysis

32. When considering complaints, if there is a conflict of evidence, we make findings based on the balance of probabilities. This means that we will weigh up the available relevant evidence and base our findings on what we think was more likely to have happened.
33. As identified in this statement there were several faults by the Council in this matter. Most significantly the Council is unable to evidence that it acted as it should have done to ensure B had an appropriate offer of education and that this was kept under review, and on balance it is more likely than not that it did not take such action.
34. In the circumstances, Ms C took reasonable action to arrange and fund her daughter's GCSE tuition in 2019/20. That incurred costs. In addition, Ms C was

caused distress and inconvenience and was put to avoidable time and trouble in pursuing the matter.

Agreed action

35. In recognition of the injustice arising from the identified faults in this case, I recommended that within four weeks of the date of complaint the Council:
- Refunds Ms C the cost of the online tuition she paid for in respect of the 2019/20 academic year;
 - Considers a claim for verified costs incurred in purchasing materials required to support that tuition, documents that consideration, and provides a refund for any such costs deemed reasonably incurred;
 - Pays Ms C a further £500 in acknowledgment of distress and time and trouble; and
 - Issues her with a formal written apology.
36. In addition, I recommended that within three months of the date of the decision on this complaint the Council:
- reviews lessons learned from the complaint;
 - draws up and implements a plan, with timescales, to ensure so far as possible that the faults identified by this investigation do not recur.
37. The Council should provide evidence of the above actions to the Ombudsman.
38. The Council has agreed to my recommendations.

Final decision

39. I have completed my investigation on the basis set out above.
40. Under the information sharing agreement between the Local Government and Social Care Ombudsman and the Office for Standards in Education, Children's Services and Skills (Ofsted), we will share [this](#) final decision with Ofsted.

Parts of the complaint that I did not investigate

41. For the reasons set out on paragraphs 6-8 above I did not investigate the Council's refusal to conduct an EHC assessment in 2019 or in 2020. This is because Ms C had a right of appeal to the SEND tribunal about those decisions. Although she did not exercise that right in 2019, it would have been reasonable for her to have done so, and in 2020 when the second decision to refuse was given, she exercised that right.

Investigator's decision on behalf of the Ombudsman