

# **Croydon Local Plan: Detailed Policies and Proposals**

Detailed Policies (Preferred and Alternative  
Options)

*October 2013*



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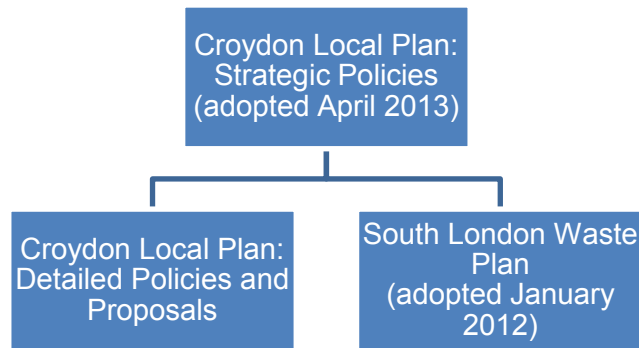
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# 1. Introduction

**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 is split into two documents, the Strategic Policies (formerly known as the Core Strategy) which was subject to independent examination by a planning inspector in September 2012 and adopted on 23 April 2013; and this document, the Croydon Local Plan – Detailed Policies and Proposals (CLPDPP). Added to these two plans is the South London Waste Plan adopted in 2012 which provides detailed policies for determining applications for waste facilities.



**1.3** The Croydon Local Plan - Strategic Policies sets out the issues that Plan as a whole is addressing and the strategic policy framework. Detailed planning policies that will help put the strategic policy framework into practice when determining planning applications will be set out in the CLPDPP. In addition,

the CLPDPP will allocate specific sites for development up to 2031 to meet the requirements of the Strategic Policies.

**1.4** The CLPDPP will assist the regeneration of the borough through the setting of firm planning framework that will provide certainty to the community and developers. It will also enable the compulsory purchasing of sites needed to bring forward new development in Croydon.

## Preparing the Croydon Local Plan – Detailed Policies and Proposals

**1.5** This document, the Detailed Policies (Preferred and Alternative Options) report, is the second stage of preparing the CLPDPP and follows on from the “Call for Sites” that took place in Spring 2012<sup>1</sup>. Following on from the consultation on these policy options the council will prepare its Preferred and Alternative Options for sites (the Detailed Proposals) followed by the Proposed Submission document which will then be subject to independent examination by a Planning Inspector. The full timetable is shown below.

**Table 1.1 Timetable for preparing the CLPDPP**

What?	When?
“Call for Sites”	Spring 2012
Consultation on Detailed Policies (Preferred and Alternative Options)	October/November 2013
Consultation on Detailed Proposals (Preferred and Alternative Options)	Summer 2014

<sup>1</sup> The “Call for Sites” was when the Council asked developers, landowners and other interested parties to send in sites that they wished to see developed or safeguarded to be assessed by the Council.



What?	When?
Publication for comments of the CLPDPP that Council intends to submit to Secretary of State	Winter 2015
Submission of the CLPDPP to the Secretary of State	Summer 2015
Independent examination	Late 2015
Adoption of CLPDPP as the council's planning policies	Summer 2016

## About the Preferred and Alternative Options

**1.6** The Preferred and Alternative Options set out the council's preferred planning policies that it would like to include in the final version of the plan. It also includes alternative policies which could also fulfil the requirements of the Croydon Local Plan – Strategic Policies but which the council does not believe to be the best approach.

**1.7** The next section of this document explains how the options are presented.

## 2. Using and commenting on this document

### Using this document

**2.1** This document is set out in the same order as the Croydon Local Plan – Strategic Policies. In this section you can find a guide to how to understand how the options are presented, both for proposed policies and for proposed site allocations.

**2.2** Chapters 4 to 10 contain proposed development management policies on various topics from Homes to Transport. Chapter 11 contains Place-specific policies.

### Guide to the development management policies

**2.3** For each proposed development management policy (except the Place-specific policies) the following information is provided:

- Strategic Objectives and related Croydon Local Plan strategic policies
- Unitary Development Plan policies to be replaced by this policy
- Why we are proposing this policy
- Key Evidence
- What the evidence says
- Proposed policy wording
- Why we are proposing this approach
- How the preferred option would work

**2.4** For each proposed policy 'Option 1' is always the preferred option and is highlighted with a light green background for ease of use.

### Commenting on this document

**2.5** The Preferred and Alternative Options report is being published for a six week consultation period. During this consultation the Council is seeking your views on our preferred options and the alternative options that are presented in this consultation document.

**2.6** For each policy or subject we are asking you to answer the questions a) to c) below and for Heritage & Conservation, Community Facilities and Biodiversity we are specifically asking questions d) to g):

Key Questions
a) Do you think that the preferred policy approach is the most appropriate for Croydon to help us meet our Strategic Objectives set out in section 3?
b) Do you think that the preferred policy approach is deliverable?
c) Do you think the preferred policy approach enables sustainable development?
d) As part of the preparation of the emerging Croydon Local Plan – Detailed Policies and Proposals the Council will be reviewing local heritage areas (designated as Local Areas of Special Character in the Croydon Local Plan: Strategic Policies). Are you aware of any areas of heritage significance within the borough that may be worthy of local designation?

### Key Questions

e) It is intended for the council to undertake periodic reviews of the local list of buildings of architectural or historic significance. Do you have any recommendations for inclusion on this list?

f) During 2013 the Council has assessed the borough's local list of Sites of Nature Conservation Importance. Are you aware of any sites that are not currently protected that may be worthy of protection due to their nature conservation value?

g) Do you think that the Council's preferred approach to the protection of existing and enabling the development of new community facilities as detailed in paragraph 7.7 of the Community Facilities section is the most appropriate?

**2.7** Any comments should be received by the Council by **xx November 2013**. You may make a comment by e-mail or in writing to the addresses below:

Email: [ldf@croydon.gov.uk](mailto:ldf@croydon.gov.uk)

Post: Croydon Local Plan – Detailed Policies and Proposals  
Spatial Planning  
Bernard Weatheril House  
8 Mint Walk  
Croydon  
CR0 1EA

### 3. Strategic Context

#### We are Croydon

**3.1** 'We are Croydon' is the vision for where Croydon will be in 2040 and the work of 20,000 people imagining the borough in the future.

**3.2** The 'We are Croydon' vision is used by Croydon Council's partners as the basis for future strategies and plans, including the Croydon Local Plan's own spatial vision.

**3.3** 'We are Croydon' has informed the Croydon Local Plan's spatial vision and strategic objectives. These are used to guide the overall strategy and spatial choices about where developments should go in broad terms and how development should take place.

The We are Croydon Vision
<b>We are Croydon:</b> 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
<b>An Enterprising City:</b> A place renowned for its enterprise and innovation with a highly adaptable and skilled workforce and diverse and responsive economy
<b>A Learning City:</b> A place that unleashes and nurtures local talent, is recognised for its culture of lifelong learning and ambitions for children and young people

The We are Croydon Vision
<b>A Creative City:</b> A place noted for its health, culture and creativity – one of the best incubators of new artistic and sporting talent in the country
<b>A Connected City:</b> A place defined by its connectivity and permeability; with one of the best digital, communications and transport networks in the country
<b>A Sustainable City:</b> A place that sets the pace amongst London boroughs on promoting environmental sustainability and where the natural environment forms the arteries and veins of the city
<b>A Caring City:</b> A place noted for its safety, openness and community spirit where all people are welcome to live and work and where individuals and communities feel empowered to deliver solutions for themselves.

## Croydon Local Plan's spatial vision

In 2031, 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 city, a Metropolitan Centre, a learning city, a creative city, a connected city, a sustainable city, and a caring city.

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. Newer development in our borough has been respectful of this historic legacy, including enhancement of Croydon's distinctive district centres and suburbs.

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. 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 full scale department store), 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. 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.

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 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.

In 2031, the borough's District and Local centres still possess their unique characteristics. Enterprise and leisure facilities in these areas contribute to diverse local economies. The richness of character of Croydon's suburbs have been respectfully enhanced 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.

## Strategic Objectives

**3.4** The strategic objectives form the link between the spatial vision and the Croydon Local Plan. They are the objectives needed to fulfil the spatial vision.

### 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.

## 4.Homes

Private and communal outdoor amenity space for new residential development

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7
- Strategic Objective 10
- Policy SP1.2
- Policy SP2.6

- Policy SP4.1
- Policy SP4.2
- Policy SP4.4
- Policy SP4.5

### Unitary Development Plan policies to be replaced by this policy

- UD8- Protecting Residential Amenity

### Why we are proposing this policy

**4.1** Croydon has strategic objectives to ensure that high quality new development both integrates respects and enhances the borough's natural environment and built heritage, 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 a security of Croydon's community.

### Key evidence

- The London Plan (2011)
- Croydon's Borough Character Appraisal (2011)
- The Mayor Of London's Housing Supplementary Guidance (2012)



- GLA SPG – Shaping Neighbourhoods: Children and Young People’s Play And Informal Recreation (2012)

### What the evidence says

**4.2** The National Planning Policy Framework (NPPF) in paragraph 50 encourages local authorities to plan for the delivery of a wide choice of high quality homes and sustainable communities. It advises that in doing so, development plans should be based on evidence of local needs and demands. The notions of balance and risk are also recognised in the NPPF, which states that the cumulative impact of standards and policies should not put the implementation of the plan at serious risk (paragraph 174).

**4.3** The London Plan’s Policy 3.2D introduces an additional requirement for new development to be mindful of health issues.’ New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities’. The provision of communal outdoor amenity space will provide opportunities for increased outdoor activity and social interaction.

**4.4** The London Plan (in Policy 3.5B) also requires that “all new housing developments should enhance the quality of local places, taking into account physical context, local character, density; tenure and land use mix; and relationships with, and provision of public, communal and open spaces, 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 SPG for sites in the borough to reflect local character or where there is a deficiency in open space.

**4.5**,. The Mayor of London’s Housing Supplementary Planning Guidance (SPG) expands on London Plan 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.

**4.6** The Mayor of London’s Housing SPG in Annex 1 ‘Summary of the Quality and Design Standards for private outdoor space’ has a minimum standard of 5m<sup>2</sup> of private outdoor space for 1-2 person dwellings and an extra 1m<sup>2</sup> to be provided for each additional occupant. This is used to produce Table 4.1 below. This may not be applicable to some sites in Croydon in terms of potential impact on character, but is the minimum requirement.

**4.7** Paragraph 4.10.2 of Annex 1 of the Mayor of London’s Housing SPG 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.

**4.8** The minimum standard of 10m<sup>2</sup> per child of children’s play space, where there are 10 or more children living in the development is from the Mayor’s Housing SPG (2.16) and, although it applies to publicly funded housing development and that on GLA land it is considered best practice. The Mayor’s SPG ‘Providing for Children and Young People’s Play and Informal Recreation also recommends a minimum benchmark of 10m<sup>2</sup> of dedicated play space per child.

**4.9** The Mayor’s Housing SPG 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 and in 2.2.8 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.

**4.10** The Croydon Housing Typology Study, in paragraph 6.1 states that good family housing should have generous amenity space and refers to the London Housing Design Guide for standards. Amenity space is defined in terms of balconies, roof terraces, decks and gardens. The London Housing Design Guide was referred to for minimum areas and the Study assumed back gardens to be 9m deep, with gardens that end at a communal space to be 5m deep and front privacy zones 1.5m deep. This evidence is considered in the alternative option and why it is not the preferred option is explained in 1.17.

**4.11** 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”. Hence the preferred option has not used this dimension.

**4.12** The Borough Character Appraisal – Annex 2 Residential Character Typology identifies the distance between opposing housing is an average of 6.6m for cottages, 30m for terraced houses, 31m for large houses on relatively small plots, 36.5m for local authority built with public realm, 63m for semi-detached, and 80.5m for large detached houses on large plots. With such variances it is difficult, if not meaningless to set a dimension for length of garden or communal outdoor amenity space and the preferred option therefore relies on local character and surroundings to be considered on a site by site basis.

**Policy DM1: Private and communal outdoor amenity space for new residential development**

<b>Option 1</b>	<b>Option 2</b>	<b>Option 3</b>	<b>Option 4</b>
Preferred option	No additional amenity policy	<p>A policy with dimensions for private outdoor amenity space based on the Borough Character Appraisal and the Mayor of London's Housing Supplementary Planning Guidance.</p> <p>This policy links to Croydon Local Plan - Strategic Policies SP1.2, SP4.1, SP4.2, SP4.4 and SP4.5.</p>	A policy which includes minimum private amenity space standards based on the London Plan and Mayor of London's Housing Supplementary Planning Guidance, and guidance for communal outdoor amenity space, but does not specify the minimum required communal outdoor amenity space.

<p><b>DM1.1</b> The Council will support proposals for new development, which includes private amenity space that:</p> <ul style="list-style-type: none"> <li>a) Is of high quality design that enhances and respects the local character of the surrounding area;</li> <li>b) Is safely accessible to occupants</li> <li>c) Complies with SPD3 Designing for Community Safety;</li> <li>d) Is designed to take advantage of sunlight and daylight;</li> <li>e) Is sited to ensure private amenity can be adequately screened and</li> <li>f) Provides a functional space having regard to the mix of housing/types to be provided.</li> </ul> <p><b>DM1.2</b> All flatted developments should, in addition, provide communal outdoor amenity space that meets the requirements of DM1.1 and is</p>		<p><b>DM1.1</b> Outside of the Croydon Opportunity Area the Council will support proposals for new development, which includes private and communal amenity space that:</p> <ul style="list-style-type: none"> <li>a) Is of high quality design, enhancing and respecting local character of the surrounding area;</li> <li>b) Is safely accessible to occupants a</li> <li>c) Complies with SPD3 Designing for Community Safety;</li> <li>d) Is designed to take advantage of sunlight and daylight</li> <li>e) Is sited to ensure private amenity can be adequately screened and</li> <li>f) provides a functional space having regard to the mix of housing/types to be provided and</li> <li>g) Provides private amenity outdoor space of a minimum of 45m<sup>2</sup> per residential</li> </ul>	<p><b>DM1.1</b> In addition to the minimum private amenity standards in Table 4.1, flatted development should provide communal amenity spaces which respects the character of the surrounding area, is accessible to all, is overlooked by surrounding development to ensure natural surveillance, and is useable.</p>
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<p>overlooked by surrounding areas and, or development.</p> <p><b>DM1.3</b>The minimum private amenity space standards that new residential development must meet are in Table 4.1.</p>		<p>dwelling;</p> <p>h) Communal outdoor amenity space for flatted developments of 50m<sup>2</sup> plus an additional 5m<sup>2</sup> per additional unit; and</p> <p>i) A minimum distance of 18m between rear facing windows.</p> <p><b>DM1.2</b>Within the Croydon Opportunity Area the minimum standards of the Mayor of London's Housing Supplementary Planning Guidance will be applicable</p> <p><b>DM1.3</b>Where only the minimum standard of private amenity space is met permitted development extensions rights may be removed to ensure the minimum private amenity provision.</p>	
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**Table 4.1 Minimum private amenity and play space standards**

Residential units bedroom/persons	Minimum private amenity space, not accessible to the public. For individual dwellings in all areas	Minimum children's play space –10 or more children living in the development)
1p	5m <sup>2</sup>	n/a
1b2p	5m <sup>2</sup>	10m <sup>2</sup> per child
2b3p	6m <sup>2</sup>	

Residential units bedroom/persons	Minimum private amenity space, not accessible to the public. For individual dwellings in all areas	Minimum children's play space –10 or more children living in the development)
3b4p	7m <sup>2</sup>	
3b5p	8m <sup>2</sup>	
3b6p	9m <sup>2</sup>	
4b5p	8m <sup>2</sup>	
4b6p	9m <sup>2</sup>	
	The minimum width and depth of balconies 1.5m for flats	

## Why we are proposing this approach

### Option 1 (Preferred Option)

**4.13** The preferred option is a policy for private and communal outdoor amenity space that recognises the need for flexibility to respect local character and that the Mayor's minimum dimensions may need to be exceeded (where the typical garden size, a local characteristic of an area, is larger). It provides clarity on the minimum dimensions for private outdoor amenity space (adhering to the London Plan and Mayor of London's Housing Supplementary Planning Guidance). The design of the communal outdoor amenity space is important to ensure it is useable and is not just 'window dressing' and contributes to the wellbeing and health of the residents. No dimensions are provided for the communal outdoor amenity space for residential developments as there is a lack of robust evidence to support a standard, and with the need to respect character in many cases 'a standard' would not be justified.

### Option 2

**4.14** Option 2 proposes not having a policy for private and communal amenity space and relies on the NPPF, London Plan and the Mayor of London's Housing Supplementary Planning

Guidance (SPG) Standards, Croydon Local Plan: Strategic Policies and Development Management policy on Urban Design and Local Character. This approach would provide general guidelines and could rely on the Housing SPG for space requirement for balconies.

**4.15** However, the absence of guidance on communal amenity space would perpetuate difficulties of providing sufficient shared amenity space that is useable, considers the privacy of adjacent private amenity space, and ensures that bedrooms and living rooms are not overlooked.

### Option 3

**4.16** This alternative option proposes a minimum private amenity space standard of 45m<sup>2</sup> is based on the Borough Character Appraisal – Residential Typology's findings of the average size of plots and rear gardens for different types of housing form. The majority of housing types' rear gardens falls in the average of 8 to 35m in length by 5 to 10m in width. With a need to deliver 20,200 homes, the lowest range is adopted for the policy, but with distance between opposing windows considered as well, so a 9m length by 5m width which equals 45m<sup>2</sup>. This also aligns with

Croydon's Housing Typology Study in which back gardens are assumed to be 9m deep<sup>2</sup>. However with a great variance in building plots and lengths of rear gardens, selecting an average is unlikely to be meaningful to the majority of individual sites and does not assist the sensitivity of development to local character. Basing the dimension on residential typology evidence may lead to some discrepancies with local character as the residential typology considered groups of street's predominant character and a range of plot sizes.

**4.17** The 18m minimum distance between the rear elevations of back to back dwellings is based on the lowest figure in London Housing Design Guide, a best practice 'yardstick of 18-21m' but without formal status in the planning system (paragraph 2.1.6 in the Mayor of London's Housing SPG). The lowest figure in the range is selected in reflection of the borough's housing need and the NPPF's aim to provide sustainable development. However it should be noted that the London Housing Design Guide also states that adhering too rigidly to this can limit the variety of urban spaces and housing types and can sometimes unnecessarily restrict density.

**4.18** A 50m<sup>2</sup> plus an additional 5m<sup>2</sup> per additional unit for flatted developments comes from the Council's Draft Housing Standards SPD – but no evidence has been found to support this, other than the example of a 'good example' planning application which provided functional communal space of 45m<sup>2</sup> per flat in addition to private gardens, balconies and roof garden.

#### Option 4

**4.19** The Mayor of London's Housing SPG private open space standard works out at 8m<sup>2</sup> for a household of 5 people. This is

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<sup>2</sup> '7.2 Base Assumptions, Building Layout'

acceptable for balconies but in order to respect local character in Croydon most gardens will need to be larger than this standard. Whilst guidelines and the need to respect local character will be considered for communal outdoor amenity space for flatted developments, with this option there will not be a minimum standard with a need for more detailed site by site negotiation.

#### **How the preferred option would work**

**4.20** Private amenity space is defined as space which is accessible only to, useable for and screened for the purposes of the residents of the dwellings at the rear or in the case of flatted schemes within. Exceptionally the amenity space may be at the side of the dwelling. It excludes front gardens.

**4.21** Communal amenity space is defined as shared accessible to all within the development and could be for their exclusive use.

**4.22** This policy will apply to all residential developments and conversions. Local standards for private and communal amenity space are not provided, other than the Mayor of London's standards in Table 4.1, as local character is the leading consideration on the quantum of amenity space to be provided for developments. There is also a lack of robust evidence to provide a local standard. The standards in the Table 4.1 reflect the need to provide sustainable development in the borough, with efficient use of land and to provide for Croydon's housing need of 20,200 homes, including 7,300 net additional homes expected in Croydon Opportunity Area. However these *minimum* standards for private space may need to be exceeded in order to achieve a design solution that respects local character. When calculating the amount of private outdoor amenity space to be provided the following elements should be excluded:

- footpaths,

- driveways
- vehicle circulation areas
- parking areas
- cycle parking areas
- refuse areas

**4.23** Balconies/winter gardens/roof terraces may be included as private outdoor amenity space provision where they are not detrimental to the privacy of adjoining occupiers and may be an innovative way of providing private/communal amenity space in areas of high density. The minimum width and depth of balconies and other private external spaces is 1.5m.

**4.24** The minimum standard of 10m<sup>2</sup> per child, where there are 10 or more children living in the development is from the Mayor of London's Housing SPG, and the Mayor's SPG 'Providing for Children and Young People's Play and Informal Recreation'. The SPG provides guidance on estimating child occupancy and it, or its equivalent replacement should be referred to.

#### What the policy does

**4.25** The policy recognises the need for flexibility in providing flatted development with amenity space that is private for individual units with screening, and larger communal amenity space for play that has natural surveillance, and is in keeping with local character and surroundings.

**4.26** Local character is referred to as development sites' context will vary and the amenity space may need to increase accordingly to ensure building to plot ratio respects local character.

**4.27** In exceptional cases, in Croydon Opportunity Area, where it is impossible as part of new flatted development to provide all dwellings with sufficient private amenity space, up to 5% of the units may instead be provided with more internal floor area (within

the principal living areas) equivalent to the under provision of the minimum private amenity space standards in line with the Mayor of London's Housing SPG.

**4.28** To ensure that private and communal outdoor amenity spaces can be successfully integrated within the proposal, the design, layout, function, usability and accessibility should be considered as an integral part of the design at an early stage.

**4.29** 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 outdoor amenity space as part of development proposals.

**4.30** A planning condition may require a management plan to provide the Council with some assurance that the communal outdoor 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.

#### Practicalities of layout and design

**4.31** Amenity, including sunlight and daylight need to be considered in the layout of private and communal outdoor amenity space and Building Research Establishment Guidelines referred to.

**4.32** The Supplementary Planning Document, SPD3 Designing for Community Safety, should be referred to for aspects of safety in layout and design, and natural surveillance enabled by requiring communal amenity space to be overlooked by surrounding areas.

## Housing choice for sustainable communities

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 3
- Policy SP2.1
- Policy SP2.5

- Policy SP2.6
- Policy SP4.1

### Unitary Development Plan policies to be replaced by this policy

- H7 Conversions
- H11 Retaining Small Houses

### Why we are proposing this policy

**4.33** The Council seeks the provision of a mix and range of housing as set out in the Croydon Local Plan Strategic Policy SP2.5 and the aim of Strategic Objective 3. This will assist in building sustainable communities, in line with paragraph 50 of the National Planning Policy Framework. The Council also recognises that there is a need to provide a stock of affordable non self-contained and self-contained housing units in the borough.

**4.34** The need for homes for families in Croydon was identified in Croydon Local Housing Market Assessment (LHMA). Whilst the growth in single person households is driving the requirement for smaller homes, Croydon has large numbers of households that are overcrowded.

**4.35** Three bedroom residential units are needed to house families and the existing stock retained to assist provision. The London Plan defines family housing as 'generally having three or more bedrooms'. In line with London Plan Policy 3.14 the retention of residential units originally designed with three or more bedrooms is supported by the Council.

**4.36** In the past homes designed for occupation by one person and, or referred to as studio homes and granted planning permission as they met the London Plan standards for 1 bed, one person residential units have been subsequently marketed and sold as 1bed two person units resulting in over occupancy of sub-standard size units. The potential cumulative adverse impact on existing services and planning for the future needs of



infrastructure is a concern, particularly in the Croydon Opportunity Area where there will be major growth.

### Key evidence

- Croydon Local Housing Market Assessment (2008)
- Strategic Housing Land Availability Assessment (2009)
- London Plan Policy (2011)
- Croydon Housing Typologies (2010)
- Croydon Opportunity Area Planning Framework (2013)
- London Development Database
- Mayor's Housing SPG (2012)
- Croydon Metropolitan Centre Retail Strategy (2009)

### What the evidence says

#### Homes with three or more bedrooms

**4.37** Croydon's Local Housing Market Assessment 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 notably fallen. Existing three bed residential units should therefore be retained, and any conversions ensure that there is no net loss of three bed homes.

**4.38** London Plan Policy 3.4 Optimising Housing Potential provides the basis of Table 1.2 and the definitions of Suburban, Urban, and Central.

**4.39** Croydon's Opportunity Area Planning Framework (paragraph 4.46) identifies percentages for levels of family 3 bed housing in six 'character areas' in Croydon Opportunity Area.

**4.40** The Croydon Housing Typologies Study has found that the strongest opportunities for homes suitable for families will be

associated with the lower and moderate density sites in the Croydon Metropolitan Centre (including the inner residential area in the Croydon Opportunity Area<sup>3</sup>). It indicates that there will be more opportunities for studio, one and two bedroom units on the higher density sites in the Croydon Metropolitan Centre.

#### Sub divisions, conversions and change of use houses in multiple occupation

**4.41** The Local Housing Market Assessment identifies a need for 24% one bed homes from 2010 to 2031. With the identified need for 27,000 new homes and the strategic policy requirement for 20,200 homes, making more efficient use of existing housing stock is required including sub divisions, conversions, and change of use to residential.

**4.42** Croydon Local Plan Strategic Policy SP2.2 seeks to return 910 vacant homes back into use by 2021 and provide 200 additional non self- contained bed spaces, (including hostel bed spaces and student halls of residence). This comes from the London Plan which seeks to reduce the long-term private sector vacancy rate to 1% of stock.

**4.43** The Croydon Metropolitan Centre Retail Strategy identified a trend of vacant retail premises on upper floors of the shopping areas. These along with premises above shops in District and Local Centres have the potential to be converted to residential use.

**4.44** The projected level of non self- contained homes (such as bedsits and student halls of residence bedrooms) in Croydon over the ten years between 2011 and 2021 was based on past rates of

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<sup>3</sup> Paragraph 9.12 of the Croydon Opportunity Area Planning Framework Jan 2013

development. Looking at these the Strategic Housing Land Availability Assessment projected that 197 homes would come from these sources up to 2021. Whilst this is a relatively small number of homes, the Council is seeking to encourage a university or multiversity to Croydon, (Policy SP5.12 and 13 refers to this), and Croydon College has established links with Sussex University. This could lead to a rise in demand for non- self-contained units and hostels. Following the marketing of self-contained accommodation within the recently built Saffron Square and other developments in Croydon to overseas students this may also act as a catalyst and increase demand, particularly in the Croydon Opportunity Area.

Studio, 1 and 2 bedroom Homes providing adequate internal space for the number of occupants

**4.45** The London Plan and the Mayor's Housing Supplementary Planning Guidance (SPG) 2012 sets minimum space standards for one bed, one person, occupancy at 37m<sup>2</sup> and 50m<sup>2</sup> as the minimum for one bed two person occupancy. Paragraph 3.36 of the London Plan states the minimum gross internal floor area required for new homes must be 'relative to the number of occupants' and that 'developers should state the number of bed spaces/occupiers a home is designed to accommodate'.

**4.46** The Croydon Opportunity Area Planning Framework (COAPF) identifies six character areas with the 'Retail Core' area for new residential homes with the highest density and lower levels of larger homes (three or more bedrooms)<sup>4</sup>. The 'Retail Core', along with 'New Town', 'West Croydon', and 'Mid Croydon' and 'Fairfield' has Public Transport Accessibility Levels of 6a and 6b and corresponds to the definition of 'Central' in the London

Plan. The COAPF does not identify the quantum of studio homes, one bed, one person occupancy for these character areas. However, it does identify that these areas are opportunities for taller buildings to differing degrees and with lower percentages of 3-bed family housing.

**4.47** The Retail Core area would be particularly suitable for a housing mix and building form of taller buildings which could include a percentage of studio flats in the housing mix, with 5% three bed family homes identified for the Retail Core by the Croydon Opportunity Area Planning Framework SPD.

**4.48** For the alternative option, past planning permissions of the last ten years, 2002-12 from the London Development Database have been assessed for the percentage of studio homes granted planning permission in individual developments in the Croydon Opportunity Area to establish a viable and optimum percentage of five per cent.

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<sup>4</sup> Croydon Opportunity Area Planning Framework January 2013 paragraph 4.46 and Figure 4.9 page 38

Policy DM2: Housing choice for sustainable communities

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>
<p>The Council will seek to enable housing choice for sustainable communities by:</p> <p>a) Requiring the minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings as shown in Table 4.2; and</p> <p>b) Permitting the sub division of the residential units where the original size of the unit is greater than 115m<sup>2</sup> and where the sub division does not result in a net loss of 3 bedroom or greater residential units in the development.</p>	<p>The Council will seek to enable housing choice for sustainable communities by:</p> <p>Requiring sites of 10 or more dwellings to provide a minimum of 60% three-bed units in suburban areas, a minimum of 40% three-bed units in urban areas, a minimum of 20% three-bed units in central areas, 10% in New Town and East Croydon areas and a minimum of 5% three-bedroom units in the Retail Core area of the Croydon Opportunity Area;</p> <p>Define the minimum space for retention of small residential units based on the London Plan’s minimum space requirement for a two storey 3 bedroom 4 person house (87m<sup>2</sup>).</p> <p>Permitting residential conversions into self contained flats and houses in multiple occupation where they do not result in a concentration or clustering of conversions within a street of more than 20% and</p> <p>Limiting the inclusion in the mix of homes a maximum of 5% of studio homes in Croydon Opportunity Area in areas where there is a Public Transport Accessibility Level of 6a and 6b Area.</p>

**Table 4.2 Minimum percentage of three bedroom or larger units on sites with ten or more dwellings**

<b>Setting<sup>5</sup></b>	<b>PTAL<sup>6</sup> of 0, 1a or 1b</b>	<b>PTAL of 2 or 3</b>	<b>PTAL of 4, 5, 6a or 6b</b>
Suburban – areas with predominantly lower density development such as , for example, detached and semi-detached houses, predominantly residential, small building footprints and typically 2 to3 storeys	80%	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.	70%	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	This location does not exist in Croydon	20% (minimum of 5% in Retail Core area of Croydon Opportunity Area and 10% in ‘New Town’ and East Croydon as defined by the Croydon Opportunity Area Planning Framework)

<sup>5</sup> The definition of each setting is the same as that in the London Plan, Table 3.2.

<sup>6</sup> Public Transport Accessibility Level – a rating of accessibility provided by Transport for London

## Why we are proposing this approach

### Option 1 (Preferred option)

**4.49** The preferred option will assist in the aim to provide a choice of housing. It will ensure the number of existing three bedroom residential units is retained and will provide clarity as to what housing mix the council expects on development sites in different locations and enable development.

**4.50** Where the policy refers to the “original size” this means the unit as built or as it was on 1st July 1948, whichever is the later.

**4.51** Setting a minimum proportion of 3 bed and larger homes based on the dwelling type, need, character and accessibility of a site will assist in the delivery of strategic targets for larger homes in the borough and provide greater certainty to developers and local communities.

**4.52** The preferred option allows for flexibility in the mix of housing whilst considering urban design and local character.

**4.53** A policy on residential conversions is in line with Policy 3.8 of the London Plan to provide Housing Choice. This policy is linked to the Croydon Local Plan Strategic Policies SP2.2, SP2.5, and SP2.6 and provides clarity on residential conversions. Individual sites with their own attributes will need to be assessed to consider the benefits for conversion. This will include assessment of potential adverse impacts as part of the planning application process.

### Alternative option

**4.54** The alternative option for three bedroom or larger residential units is an approach based on character alone and does not consider local transport accessibility. This approach does not recognise that suburban and urban locations with less

accessibility will not be so compatible for accommodating smaller units with a lower car ownership more likely.

**4.55** The alternative option for subdivision of dwellings to the Mayor’s minimum standards would not provide the protection of many smaller three-bedroom homes in the borough as a substantial number are larger than 87m<sup>2</sup>. This could lead to conflict with the requirement to respect local character in the strategic policies and also conflict with proposed policies on Urban Design and Local Character regarding impact on street scene with sub divisions that could disrupt the street façade with the need for additional front doors.

**4.56** The option to have no policy for the provision of larger homes and to rely solely on the strategic policy SP2.5 will provide a strategic target, but not the detail to assist the delivery of the strategic policy.

**4.57** The option to consider the cumulative effect and set a 20% maximum number in any street does not have robust evidence backing. There are also existing streets with 80% already converted and there may be streets and roads where a single flat conversion is not acceptable as it would detract from local character. The definition of street would also need to be reassessed as there are ‘streets’ such as London Road and Brighton Road that are extremely long. It would not be reasonable to apply this percentage to these streets, and to calculate when the 20% is reached.

**4.58** The alternative option limits the impact of over occupancy of one bed one person homes in high density areas by limiting the number of studio homes. This would however, reduce flexibility and choice and would still incur the risk of over occupancy of 1 bed one person homes. The London Plan in Policy 2.7h recognises the appropriateness of higher density housing around

town centres and the Croydon Opportunity Area Planning Framework SPD indicates the decreasing percentages of 3 bed homes through the six character areas to the 'retail core' as the area where studio homes would be appropriate. However it does not identify a specific percentage of studio homes for Croydon Opportunity Area.

**4.59** The alternative option for studio homes of 5% is proposed to reduce the risk of over occupancy of this particular size accommodation of 37m<sup>2</sup>.and the cumulative impacts on the existing and future services in the Croydon Opportunity Area. The percentage also considers the need to provide a balanced community, housing need and affordability. However there is insubstantial evidence for this option, with a lack of historical evidence that overcrowding of studio flats has been a particular problem in Croydon and market setting the quantum has not been an issue in the past. The proposed 5% is also reliant on one piece of evidence- looking back 10 years at what percentage of studio homes were submitted for planning permission and it could restrict future opportunities for developments including those of mixed housing sizes in the Croydon Opportunity Area.

### **How the preferred option would work**

#### Providing and protecting three-bedroom homes

**4.60** The Croydon Local Plan Strategic Policy SP2.5 sets a target for 60% of all new homes outside the Croydon Opportunity area up to 2031 to have three or more bedrooms and the aspiration to have 20% of all homes within the Croydon Opportunity Area having three or more bedrooms in the same period. This policy applies to both market and affordable housing.

**4.61** To meet the need for three bedroom homes the Council will require a minimum proportion of homes to have three bedrooms or more. This will vary across the borough based on existing

character and public transport accessibility and is based upon the London Plan's density matrix<sup>7</sup>. The approach recognises that more central locations with higher density development will not be so compatible for accommodating larger units. In line with the Welfare Reform which is intended to make work pay, the council's housing allocations scheme gives more priority to households that are working. The use of local letting schemes and the level of housing need should help to balance any issues arising regarding the viability of providing family homes.

**4.62** Changes to the benefits system in England could result in less demand and less need for larger affordable units and could also mean it is not viable for a Registered Provider to provide larger units. If there is agreement between the Council and a Registered Provider that it is neither viable nor is there need or demand for larger affordable units on a particular site then the Council may consider a reduced provision of affordable homes with three or more bedrooms.

**4.63** Conversion of homes with less than 115m<sup>2</sup> of floor space will not be permitted. This derives from the need to provide small family homes in the borough and the London Plan's minimum space standards under which the minimum area needed to provide two one-bedroom flats<sup>8</sup> including a staircase<sup>9</sup> to the upper flat is 115m<sup>2</sup>.

#### Conversions and houses in multiple occupation

**4.64** Residential conversions into self-contained and non- self-contained will assist in providing homes. Conversions to residential can come from offices and retail as well as the

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<sup>7</sup> London Plan Policy 3.4

<sup>8</sup> The minimum size of a one-bedroom flat is 50m<sup>2</sup>

<sup>9</sup> A staircase requires at least 15m<sup>2</sup> of floor space

subdivision of existing residential dwellings. Conversions above retail are welcomed as assisting the regeneration and sense of community and social cohesion of the Croydon Metropolitan Centre, District and Local Centres.

**4.65** All conversions will be expected to provide a high standard of accommodation and should achieve the minimum space standards of the London Plan and LHDG.

**4.66** The Council will assess whether the conversion or house in multiple- occupation will affect local character and street scene and whether this will impact adversely on amenities of neighbouring properties through change of appearance, noise and disturbance or parking issues.

**4.67** In line with paragraph 51 of the NPPF, the London Plan and Croydon Local Plan Strategic Policy SP2.2 this policy seeks to enable the provision of residential units from conversions and change of use, providing there are not strong economic reasons why such residential development would be inappropriate.

#### Studio homes

**4.68** The preferred option allows the quantum of studio homes to be decided by the market with reference to the guide to the percentage mix for 3 bed homes, (and therefore an indication of the quantum of other sized homes) in the Croydon Opportunity Area Planning Framework SPD alongside the application of SP 2.5 and urban design and local character policy. The preferred option relies on policy SP2.6a, which requires all proposed residential developments to achieve the Mayor's Housing SPG and London Plan's minimum internal space standards. The standards apply to all residential development including new build, conversions and change of use schemes where new dwellings are created.

## Development on garden land

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 10
- Policy SP1.2
- Policy SP2.1

- Policy SP2.2
- Policy SP4.1
- Policy SP7.3 and 7.4

### Unitary Development Plan policies to be replaced by this policy

- H5 Back Land and Back Garden Development

### Why we are proposing this policy

**4.69** The NPPF prioritises brownfield or previously developed land for development. Private residential gardens are classified as greenfield. This policy aligns with paragraph 53 which states that Local Planning Authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example, where development would cause harm to the local area; and the Local Plan's Strategic Objectives 5 and 10, ensuring new development integrates, respects and enhances the borough's natural environment, and the protection and enhancement of biodiversity.

**4.70** The London Plan, in policy 3.5 supports the presumption against garden land development where it can be locally justified by a sound local evidence base.

### Key evidence

- The Borough Character Appraisal (2011)
- Strategic Housing Land Availability Assessment (2009)

### What the evidence says

**4.71** The Borough Character Appraisal includes the Annex – the Residential Character Typologies which identifies the predominant type of building form and range of plot sizes in a group of streets or area. Development of garden land in the past has adversely impacted on local biodiversity, amenity, and character, noise and visual intrusion to neighbouring property, interruption to dominant building lines along streets, weakening of the dominant built form and architecture, and weakening of the landscape character with loss of trees including street trees for new access roads.



**4.72** The protection of gardens will not impact on meeting Croydon's housing needs as the Strategic Housing Land Availability Assessment does not include this land in the assessment.

**4.73** The Mayor's Housing SPG November 2012 provides guidance on private garden land development (paragraph 1.2.17) and the implementation of London Plan Policy 3.5 Quality and

Design of Housing Developments. It advises boroughs 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.

**Policy DM3: Development on garden land**

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative option
The Council will protect gardens by only permitting new dwellings within the curtilage of an existing dwelling where there will be no demonstrable negative impact on local character, amenity, or biodiversity and, where a new dwelling will be visible from the street, it must respect the street scene.	Rely on the NPPF, the London Plan and the Croydon Local Plan-Strategic Policy SP4.

**Why we are proposing this approach**

Option 1 (preferred option)

**4.74** The policy aligns with the NPPF, and Croydon Local Plan Strategic Policy SP4.1 which states that development will need to be "of a high quality, which respects and enhances Croydon's varied local character". Development in back gardens may weaken and or have an adverse impact on local character and can impact on the amenity of neighbouring property. Potential impacts need to be considered and assessed to ensure a proposed development within the curtilage of an existing dwelling complements the street scene and does not cause harm to the local area and its character.

**4.75** Back gardens all together account for more green space in London than anything else and are an important part of the city's ecosystems, providing both habitat and wildlife corridors. Croydon's Local Plan Strategic Policy SP 2.2 states that delivery of homes will be achieved by 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. Policy SP7.4 on Biodiversity states the Council and its partners will enhance biodiversity across the borough and by protecting and enhancing sites of importance for biological and geological diversity and by enhancing connection between or joining up sites,

through direct physical corridors, or a series of linked sites. The potential impact on local biodiversity and habitat needs to be assessed for proposals within the curtilage of an existing dwelling to ensure there is no detrimental impact on national, regional or local biodiversity. This is supported by the London Plan's presumption against garden land development where it can be locally justified.

#### Option 2

**4.76** With a presumption against development of garden land and back land in the London Plan, the local justification and guidance derives from the Croydon Local Plan: Strategic Policies, and urban design & local character policies in the Detailed Policies of the Croydon Local Plan for development of garden land and back land.

**4.77** The Code for Sustainable Homes Level 4 or equivalent is referred to in the Croydon Local Plan Strategic Policy SP6.3 as the minimum level required for new-build development. Potential impact on the local wildlife and ecology is considered as part of this and there is the option to provide an ecology report for any development. As this report is not mandatory, this is not the preferred option.

**4.78** Innovative solutions to provide more homes, and adaption for extended families could be restricted by a policy requiring an assessment that demonstrates no negative impacts. The opportunity to provide innovative solutions that have some negative impacts, but have positive as well, and provide new homes may be lost with Option 1.

#### **How the preferred option would work**

**4.79** Proposed new development needs to ensure that existing infrastructure has the capacity to support additional people living

in the area in order to deliver sustainable communities in line with the NPPF.

**4.80** The Strategic Housing Land Availability Assessment did not include gardens in its calculations and the need to deliver 20,200 homes does not outweigh the need to respect the local character, and amenity and to protect biodiversity.

**4.81** Proposed development of back gardens and within the curtilage of a dwelling will need to take account of the Borough Character Appraisal considering:

- The residential character of the Place;
- The existing building and street patterns;
- Plot to building ratios;
- The dominant housing type in the surrounding streets; and
- The potential impact on neighbouring property.

**4.82** Gardens are important sources of vegetation and open space for wildlife. Housing in parts of Croydon have long gardens with mature planting which may be part of wildlife corridors or adjoin local open space in the borough and provide valuable habitats. It is important that any proposed development ensures the mature vegetation is kept to ensure retention of habitats or wildlife corridors' ecological value. Croydon Local Plan: Strategic Policy SP6.3 requires that Code 4 of Sustainable Homes or equivalent is complied with by new-build development.

**4.83** Whilst the Code includes a voluntary requirement for an ecology report on the potential impact of any development, where the council consider it necessary, the council will require an ecology report to be submitted as part of a planning application for development within the curtilage of a dwelling. The applicant will be required to pay for an independent assessment to be carried out on behalf of the local authority.

## Residential annexes

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 3
- Policy SP2.2
- Policy SP2.5

- Policy SP2.6

### Unitary Development Plan policies to be replaced by this policy

- None

### Why we are proposing this policy

**4.84** The London Plan Policy 3.8 requires that boroughs should ensure new development offer a range of housing choices in terms of mix of housing sizes and types, with all new housing built to Lifetime Homes standards. Policy for residential annexes will assist in allowing for accommodating changes in the needs of occupiers, in line with the Strategic Objective 3, providing a choice of housing for people at all stages of life whilst ensuring the local character is protected. This aligns with the NPPF paragraph 58 regarding the quality of development that will function well.

### Key evidence

- Housing Technical Paper (2012)
- Strategic Housing Land Availability Assessment (2009)
- Local Housing Market Assessment (2009)
- SPD 2 Residential Extensions and Alterations (2006)
- London Plan (2011)

### What the evidence says

**4.85** Making more efficient use of existing housing stock with adaptable and efficient use of space to provide extra room for extended families, and caring for elderly, may enable some larger homes to become available for younger families.

**4.86** A policy for residential annexes will assist in providing guidance on where they will be acceptable, and thereby assisting in delivery.

**4.87** In the past poor design of residential annexes weakened local character. SPD2 Residential extensions and alterations sought to address this with comprehensive design guidance. A policy is needed to refer to the SPD to ensure it has sufficient weight for consideration in assessment of applications for residential annexes.

Policy DM4: Residential annexes

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>	<p><b>Option 3</b></p> <p>No policy</p>
<p><b>DM4.1</b> Residential annexes, where part of an existing unit will be permitted where they:</p> <ul style="list-style-type: none"> <li>a) Are ancillary to the main residence;</li> <li>b) Are not self-contained, share communal facilities within the main dwelling, retain internal linkages with the main dwelling;</li> <li>c) Have a single shared entrance with the main dwelling;</li> <li>d) Comply with Lifetime Homes Standards;</li> <li>e) Are capable of re-integration; and</li> <li>f) Do not have an adverse impact on the street scene and local character, individually or cumulatively.</li> </ul> <p><b>DM4.2</b> SPD2 Residential Extensions and Alterations or equivalent should be referred to for guidance.</p>	<p><b>DM4.1</b>, The Council will permit residential annexes where they:</p> <ul style="list-style-type: none"> <li>a) Are ancillary to the main residence;</li> <li>b) Retain internal linkages with the main dwelling, including a staircase, if 2 storey;</li> <li>c) Are not fully self-contained; and</li> <li>d) Do not have adverse impact on the street scene and local character individually or cumulatively.</li> </ul> <p><b>DM4.2</b> Residential annexes have their own front door when:</p> <ul style="list-style-type: none"> <li>a) There is no detrimental impact on the street scene and local character; and</li> <li>b) Are capable of re-integration.</li> </ul> <p><b>DM4.3</b> SPD2 Residential Extensions and Alterations or equivalent should be referred to for guidance</p>	<p>Rely on the NPPF, London Plan, and Croydon Local Plan Strategic Policy SP2.</p>

## Why we are proposing this approach

### Option 1 (preferred option)

**4.88** This policy recognises the need for homes to adapt and provide for changes in peoples' circumstances and evolving different requirements over time.

**4.89** A residential annex is defined as accommodation ancillary to the main dwelling within the residential curtilage

**4.90** The preferred option policy is included to ensure that the annex does not:

- Evolve into a self-contained unit that is a separate dwelling from the main abode;
- May not be compliant with Code for Sustainable Homes;
- May have possible adverse impacts on local character and street scene; and
- May have possible adverse impacts on the residential amenity of the neighbouring properties, as a result of separate access/front door, refuse storage and car parking.

**4.91** The preferred option for residential annexes has specific criteria on requirements, including compliance with Lifetime Homes and the need to assess the cumulative impact of annexes in a street/neighbourhood as significant consideration. It provides clarity and detail on all that the Council is seeking in relation to the design of annexes.

### Option 2

**4.92** The alternative option has less criteria than the preferred option, and is not so clear on what is required, however it could be argued it is thus more flexible as it recognises that it is not always possible to build to Lifetimes Homes standards and may not always be required. It also allows for the possibility of a separate

front door, dependent on an assessment of the impact on the street scene and local character. However, with its own front door it would be more difficult to ensure the annex did not become an independent dwelling and, as an annex, it is not required to meet the Code for Sustainable Homes. For these reasons it is not the preferred option.

## How the preferred option would work

**4.93** Residential annexes that assist households to adapt to changing circumstances are to be encouraged so long as they form part of an existing residential unit with shared facilities including the kitchen and internal circulation to include a shared staircase. The annex must not become a complete subdivision, or be capable of self-containment, or adversely impact local character through intensification. The changing circumstances of the residents are not material to any proposal for an annex under this policy.

**4.94** The conversion of outbuilding to self-contained units or the use for primary living accommodation such as a bedroom, bathroom, or kitchen is not normally permitted under the Town and Country Planning (General Permitted Development) Order 1995 and changes by the Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2008. Planning permission would be required to convert outbuildings to be self-contained units.

## Commuted sums for provision of affordable homes

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 3
- Policy SP2.4

### Unitary Development Plan policies to be replaced by this policy

- None

### Why we are proposing this policy

**4.95** Croydon has a strategic objective to provide a choice of housing for people at all stages of life.

**4.96** Croydon's strategic policies SP2.3 and SP2.4 set out how affordable housing will be provided in the borough. Policy SP2.4 requires a commuted sum for the provision of affordable housing on residential schemes with less than 10 units. Overall just over a third of all new homes will need to be affordable rent, social rent or intermediate low cost shared ownership in order to meet the overall need for affordable housing.

### Key evidence

- Affordable Housing Viability Assessment – Additional Analysis (2011)
- Affordable Housing Viability Study (2010)
- Housing Technical Paper (2012)

### What the evidence says

**4.97** The Affordable Housing Viability Assessment – Additional Analysis (2011) sets out an analysis of the value of a development with no affordable housing compared to the same development with the borough's minimum requirement for affordable homes.

Policy DM5: Commuted sums for the provision of affordable homes

<b>Option 1</b>	<b>Option 2</b>
Preferred option	Alternative option
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	Calculating the commuted sum based on the cost of providing the equivalent affordable housing on another site.

<p>affordable homes by:</p> <p>a) On residential developments with nine or fewer units requiring a commuted sum as shown in Table 4.3 to cover the cost of providing the equivalent of the borough minimum requirement for affordable homes set in Policy SP2.4 elsewhere in the borough; and</p> <p>b) In the Croydon Opportunity Area where a commuted sum or review mechanism is agreed in lieu of on-site provision of affordable housing negotiating the value of each affordable unit as shown in Table 4.3.</p>	
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**Table 4.3 Calculating the commuted sum to cover the cost of providing the equivalent of the borough minimum percentage of affordable homes**

The Council will...	On residential development with nine or fewer units...	Within the Croydon Opportunity Area where a commuted sum or review mechanism is agreed...
Charge a commuted sum based on...	A fixed value for each net additional unit proposed	A negotiated value for each affordable unit not provided on site
The value per unit will be...	£4,170 for the first year of the plan	For the first year of the Plan a minimum of £27,800 per affordable unit
Each year...	The fixed value for each unit proposed will change in line with the national All-in Tender Price Index published by the Building Cost Information Service of the Royal Institution of Chartered Surveyors (as at 1st November of the preceding year) and the borough minimum percentage of affordable homes set in Policy SP2.4 <sup>10</sup>	The minimum value per affordable unit will change in line with the national All-in Tender Price Index published by the Building Cost Information Service of the Royal Institution of Chartered Surveyors (as at 1st November of the preceding year) <sup>11</sup>

<sup>10</sup> This figure will be published on the council's website each April.

<sup>11</sup> As above

The Council will...	On residential development with nine or fewer units...	Within the Croydon Opportunity Area where a commuted sum or review mechanism is agreed...
In the event of Social Housing Relief for the Community Infrastructure Levy charge being granted...	Waive the commuted sum for any unit subject to Social Housing Relief	Waive the commuted sum for any additional affordable unit subject to Social Housing Relief

## Why we are proposing this approach

### Option 1 (Preferred option)

**4.98** Commuted sums for off-site provision of affordable housing can be calculated in two principle ways.

**4.99** A commuted sum can be derived from the difference in value of a development with affordable housing compared to the same development without affordable housing. This is known as the ‘uplift value’. Across the borough the median uplift value per unit is £27,800<sup>12</sup>.

**4.100** The preferred policy calculates the sum based on the uplift value of a development that has no or reduced provision of affordable homes. Commuted payments for affordable homes will be used to help finance the provision of affordable homes on other developments in the borough, though the provision of grant funding to Registered Providers of affordable housing or to support the Council's own New Building Housing Programme.

**4.101** The Affordable Housing Viability Assessment – Additional Analysis and evidence from negotiations with developers indicate

<sup>12</sup> Details of how this value was calculated can be found in the Affordable Housing Viability Assessment - Additional Analysis (2011)

that the ‘uplift value’ of a market unit in the Croydon Opportunity Area is often higher than the borough wide average. Therefore, a different approach is proposed for developments within the Croydon Opportunity Area. Here, where a commuted sum or review mechanism is agreed the value of the commuted sum per affordable unit will be subject to negotiation.

### Option 2

**4.102** Alternatively a commuted sum can be calculated based on the full cost of providing affordable homes on another site which takes account of the cost of acquiring a site, constructing the homes and all professional fees associated with a development. The cost of providing affordable housing this way can be considerably higher (up to ten times as much)<sup>13</sup>. The Council does not propose to use any money to fund site acquisition or other fees associated with developing a new site so a commuted sum based on the full cost of providing affordable homes is considered unnecessary.

<sup>13</sup> Survey of other borough’s commuted sum payments.



## How the preferred option would work

**4.103** For developments with less than ten homes<sup>14</sup> a commuted sum is payable in lieu of providing affordable homes on site as on small schemes it would be difficult for a Registered Provider to manage on-site affordable housing. The commuted sum will be used to provide affordable homes through Croydon Council's New Build Affordable Homes programme or by a Registered Provider. Policy SP2.4 defers the calculation of the commuted sum to the Croydon Local Plan: Detailed Policies and Proposals.

**4.104** The fixed value per market unit on a development with less than ten homes is based on the average difference in value across the borough of an affordable unit compared to a market home<sup>15</sup> at a pro-rata rate<sup>16</sup> reflecting borough minimum requirement for affordable homes set in SP2.4<sup>17</sup>. This rate will be indexed using the national All-in Tender Price Index published by the Building Cost Information Service of the Royal Institution of Chartered Surveyors (as at 1st November of the preceding year). In the event that the All-in Tender Price Index ceases to be published, the retail prices index will be used; as at November of the preceding year. These indices are also used for calculating the changes in the Community Infrastructure Levy rates in Croydon.

**4.105** A table showing the contribution from a development of between one and nine non-affordable homes can be found in Appendix 1. This will be updated in April each year and published on the Council's website. Updates will reflect the change in the All-

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<sup>14</sup> This figure is net. If the gross gain is more than ten units but the overall development results a net gain of nine or fewer homes then this policy applies.

<sup>15</sup> £27,800 (see paragraph 4.99)

<sup>16</sup> £4,170 is 15% of £27,800

<sup>17</sup> 15% for the first year of the Croydon Local Plan - Strategic Policies

in Tender Price Index and any changes to borough minimum requirement for affordable homes.

**4.106** Croydon's Local Plan Strategic Policies seek to provide affordable housing on site in all developments of ten or more units. However, in certain circumstances the strategic policies allow for a commuted sum to be paid in lieu of a proportion of on-site provision on developments in the Croydon Opportunity Area to enable development to take place in this key area of growth. The value of the commuted sum will be negotiated in all instances based on the difference between the residual value of the development with the minimum requirement of affordable homes on site and the actual residual value of the development. The average sum per unit will not be less than that payable per unit on a small scheme<sup>18</sup>. The commuted sum will either be in the form of a guaranteed sum not less than the sum per unit payable on small schemes representing the difference between the on-site provision and the borough's minimum affordable housing requirement, or a commuted sum linked to a review mechanism based on gross development value at an agreed stage of development.

**4.107** Occasionally a developer of a small residential development sells the development site once planning permission has been granted to a Registered Provider of affordable housing. Registered Providers also apply for permission to build affordable housing as well. In both such instances the borough's minimum requirement for affordable housing would be provided on site and no commuted sum will be payable. However, to waive the commuted sum a successful application for Social Housing Relief from the Community Infrastructure Levy charge will need to be

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<sup>18</sup> Nine or fewer dwellings

made. In the event of Social Housing Relief being withdrawn the commuted sum will be payable.

# 5. Employment

Development in Croydon Metropolitan Centre, District and Local Centres

## Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP3.6
- Policy SP3.7
- Policy SP3.8
- Policy SP3.9
- Policy SP3.10

- Policy SP3.11
- Policy SP3.12
- Policy SP3.13

## Unitary Development Plan policies to be replaced by this policy

- SH3 Control of Retail Units outside Primary Shopping Areas
- SH4 Retail Vitality within Main Retail Frontages and Shopping Area Frontages

- SH5 Retail Vitality within Secondary Retail Frontages

## Why we are proposing this policy

**5.1** Retailing is at the heart of the borough's town centres. However, they are also places where a wide range of other uses help to ensure vitality and viability is maintained. This policy sets out the approach to uses by location within a centre. For this purpose it sets the following designations:

- Boundaries of the Croydon Metropolitan Centre, District and Local Centres (the borough's town centres);
- Primary Shopping Areas
- Main Retail Frontages; and
- Secondary Retail Frontages.

**5.2** London Plan policy 2.15 identifies a range of measures boroughs should undertake in relation to town centres, including setting out policies for each type of area within centres.

**5.3** Paragraph 23 of the NPPF states “Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period....”

**Key evidence**

- Croydon Annual Monitoring Report (2012)
- Assessments of boundaries and designations for Croydon Metropolitan Centre, District and Local Centres including analysis of mixed use developments (2012)
- Borough Wide Retail Needs Study Update (2008)
- Croydon Metropolitan Centre Retail Strategy (2009)
- Review of Town Centre Designations (2013)

- Office, Industrial & Warehousing Land/Premises Market Assessment (2010)
- Employment Land Review Update (2013)
- Review of Town Centre Designations (2013)

**What the evidence says**

**5.4** Assessments of boundaries and designations in 2012 have provided an understanding of the strengths and weaknesses of Croydon Metropolitan Centre and each of the District and Local Centres. When combined with assessments of the borough’s shopping parades these have led to the proposed boundary changes.

**5.5** The subsequent Review of Town Centre Designations (2013) considered the proposed changes and details of the findings and the rationale for the proposed changes are set out in Appendix 2.

**Policy DM6: Development in Croydon Metropolitan Centre, District and Local Centres**

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative option
<b>DM6.1</b> The Council will ensure that the vitality and viability of Croydon Metropolitan Centre and the borough’s District and Local Centres is maintained and increased by not permitting new developments or changes of use which would result in a net loss of ground floor <sup>19</sup> Class A uses within Main Retail Frontages (unless it relates to the expansion of an existing community use).	The Council will ensure that the vitality and viability of Croydon Metropolitan Centre and the borough’s District and Local Centres is maintained and where possible, enhanced, by not permitting new developments or changes of use which would result in a net loss of ground floor <sup>20</sup> Class A uses within Main Retail Frontages.

<sup>19</sup> For the purposes of this policy all floors within purpose built shopping centres are considered to be ground floors.

<p><b>DM6.2</b> Within Croydon Metropolitan Centre and the borough's District Centres development proposals and changes of use must:</p> <ul style="list-style-type: none"> <li>a) Accord with Table 5.1;</li> <li>b) Not result in a net loss of ground floor Class A uses within Secondary Retail Frontages unless it is for the provision of a community use (not exceeding 250m<sup>2</sup> (gross) on the ground floor).</li> </ul> <p><b>DM6.3</b> Within the borough's Local Centres development proposals and changes of use must:</p> <ul style="list-style-type: none"> <li>a) Accord with Table 5.2;</li> <li>b) Not result in a net loss of ground floor Class A uses within Secondary Retail Frontages unless it is for the provision of a community use (not exceeding 125m<sup>2</sup> (gross) on the ground floor).</li> </ul> <p><b>DM6.4</b> Outside of Main and Secondary Retail Frontages, but within centres, developments for mixed use developments will be required to either:</p> <ul style="list-style-type: none"> <li>a) Demonstrate that a specific end user will be occupying the ground floor unit upon completion; or</li> <li>b) Fit out all ground floor units ready for occupation and operation by an intended type of 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.</li> </ul>	<p>As Option 1 except that the maximum size of a community use that is acceptable is 500m<sup>2</sup> instead of 250m<sup>2</sup>.</p> <p>As Option 1 except that the maximum size of a community use that is acceptable is 250m<sup>2</sup> (gross) instead of 125m<sup>2</sup> (gross).</p>
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<sup>20</sup> For the purposes of this policy all floors within purpose built shopping centres are considered to be ground floors.

**Table 5.1 New development proposals and changes of use in Croydon Metropolitan Centre and District Centres**

<b>Part of the Town centre</b>	<b>Use</b>	<b>Expansion of existing uses or newly proposed uses</b>
Main Retail Frontage	A1	Acceptable in principle
	A2 – A4	Acceptable in principle as long as it does not result in more than 60% of the ground floor of units falling outside the A1 Use Class
	A5	Acceptable in principle as long as it does not result in more than 60% of the ground floor of units falling outside the A1 Use Class and does not result in two or more adjoining A5 units
	All Other Uses	All changes of use to a non Class A ground floor space within Main Retail Frontages will be refused and expansions of existing non Class A uses will be refused unless it relates to a Community Use.
Secondary Retail Frontage	A1 – A4 and Community Uses	Acceptable in principle with a ground floor limit on Community Uses in these locations of 250m <sup>2</sup> (gross)
	A5	Acceptable in principle as long as it does not result in two or more adjoining A5 units at ground floor
	All Other Uses	Unless it relates to a Community Use (up to 250m <sup>2</sup> (gross) on the ground floor) proposals involving an increase of existing non A Class ground floor space within Secondary Retail Frontage will be refused
Outside Frontage but within Primary Shopping Area	A1 – A5 and Community Uses	Acceptable in principle
	All Other Uses	Acceptable in principle
Rest of Centre	A1 – A5	See .Policy DM9: Development in edge of centre and out of centre locations
	All Other Uses	Acceptable in principle

**Table 5.2 New development proposals and changes of use in Local Centres**

<b>Part of the Town centre</b>	<b>Use</b>	<b>Expansion of existing uses or newly proposed uses</b>
Main Retail Frontage	A1	Acceptable in principle
	A2 – A4	Acceptable in principle as long as it does not result in more than 60% of the ground floor of units falling outside the A1 Use Class

Part of the Town centre	Use	Expansion of existing uses or newly proposed uses
	A5	Acceptable in principle as long as it does not result in more than 60% of the ground floor of units falling outside the A1 Use Class and does not result in two or more adjoining A5 units
	All Other Uses	All changes of use to a non Class A ground floor space within Main Retail Frontages will be refused and expansions of existing non Class A uses will be refused unless it relates to a Community Use.
Secondary Retail Frontage	A1 – A4 and Community Uses	Acceptable in principle with a ground floor limit on Community Uses in these locations of 125m <sup>2</sup> (gross)
	A5	Acceptable in principle as long as it does not result in two or more adjoining A5 units at ground floor
	All Other Uses	Unless it relates to a Community Use (up to 125m <sup>2</sup> (gross) on the ground floor) proposals involving an increase of existing non A Class ground floor space within Secondary Retail Frontage will be refused
Rest of Centre	All uses	Acceptable in principle

### Proposed amendments to the Policies Map

**5.6** Each of these designations set by this policy are shown on the Policies Map. These designations are generally the same as the designations of the same name in the Unitary Development Plan<sup>21</sup>. However there are a number of proposed amendments to the boundaries. These changes are summarised in Table 5.1 and full details including maps of each amendment can be found in Appendix 2.

<sup>21</sup> The Croydon Local Plan – Strategic Policies altered the designation of Coulsdon, Norbury, Purley and Thornton Heath Town Centres and Addiscombe Local Centre to District Centres with no boundary changes.

Table 5.3 Amendments to designations (see Appendix 2 for full details)

Centre	Boundary of Centre	Primary Shopping Area	Main Retail Frontage	Secondary Retail Frontage
Croydon Metropolitan Centre		✓	✓	✓
<b>District Centres</b>				
Addiscombe	✓	✓		
Crystal Palace (formerly Upper Norwood)			✓	✓
Norbury (preferred option)	✓		✓	✓
Norbury (alternative option)	✓		✓	✓
Purley	✓			
Selsdon			✓	✓
South Norwood	✓	✓		✓
Thornton Heath	✓	✓	✓	✓
<b>Local Centres</b>				
Beulah Road <sup>22</sup>	✓	✓	✓	

<sup>22</sup> Beulah Road is proposed as a new Local Centre

Centre	Boundary of Centre	Primary Shopping Area	Main Retail Frontage	Secondary Retail Frontage
Brighton Road (Sanderstead Road)	✓	✓	✓	
Brighton Road (Selsdon Road)	✓	✓		
Broad Green	✓	✓	✓	
Crown Point (preferred option)	No change from existing designation as a shopping parade			
Crown Point (alternative option) <sup>23</sup>	✓	✓	✓	✓
Pollards Hill	✓	✓	✓	
Shirley	✓	✓	✓	
Thornton Heath Pond	✓	✓		✓

### Why we are proposing this approach

5.7 In relation to drawing up Local Plans, paragraph 23 of the NPPF, states local planning authorities should:

- Recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;

<sup>23</sup> The alternative option for Crown Point is to designate it as a new Local Centre



- Define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations; and
- Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.

**5.8** The policy seeks to ensure that at least 60% of the Main Retail Frontage is in Class A1 use. This figure has been chosen as it is considered to be a good balance between the UDP policy thresholds of 65% (for Main Retail Frontages) and 50% (for Shopping Area Frontages). The Shopping Area Frontages policy has not been taken forward. This provides a clearer and simpler policy approach. The Main Retail Frontage alone is sufficient and therefore, a figure in between the two UDP thresholds has been chosen. Changes affecting traditional retailing such as the growth of online shopping also support a modest reduction from 65% to 60% as it will help town centres to adapt.

**5.9** This policy also limits the saturation of A5 uses as the associated waste and delivery issues can cause harm to residential amenity. Furthermore, limiting hot-food takeaways will help to ensure residents have a greater choice of retail services.

**5.10** The reason why 250m<sup>2</sup> is the preferred option threshold for community uses within Secondary Retail Frontages in Croydon Metropolitan Centre and District 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. A lower threshold of 125m<sup>2</sup> is proposed in Local Centres as the retail function

**5.11** Full justification for each proposed amendment to specific shopping parade designations can be found in Appendix 2.

#### Option 2

**5.12** The alternative option being put forward contains a different threshold for community uses (500m<sup>2</sup> in Croydon Metropolitan Centre and District Centres and 250m<sup>2</sup> in Local Centres). The higher thresholds might provide more flexibility without risking undue harm to the retail function of these locations. For this reason they are put forward as an alternative option.

**5.13** The neighbouring borough of Lambeth indicates they consider the area centred on Crown Point to perform a Local Centre function. Accordingly, the Council is seeking views on whether the existing Shopping Parade (on the Croydon side of the borough boundary) is reclassified to reflect this.

**5.14** Similarly, Lambeth considers the area of London Road, Norbury to be a District Centre and therefore the Council is seeking views on whether the proposed contraction to the north of the District Centre (on the Croydon side of the borough boundary) is supported.

#### **How the preferred option would work**

**5.15** In part, this policy sets thresholds for uses within the Main and Secondary Retail Frontages. For the purposes of calculating the percentage of units within a given frontage, the Council will apply the 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). Further guidance on this point is available in Appendix 3.

**5.16** Across the borough there are many examples of mixed use developments in town centres but outside of Main and Secondary

Retail Frontages where the ground floor units have been left as an empty shell. The costs of fitting out these units to a standard that allows them to be used for their intended purpose can be prohibitive and the resultant boarded up units harm the vitality of the centre. To avoid this all mixed use developments within a town centre but outside of a designated frontage will be required to have either an end user for the unit (evidenced by a pre-let agreement or by the applicant being the end user) at the time of granting permission or to provide a fitted out unit suitable for occupation by the intended type of end user.

**5.17** All speculative schemes in town centres but outside of Main and Secondary Retail Frontages will also be required to be designed in a way that would allow conversion of the ground floor unit to residential or the same use as the remainder of the building if not residential. In some cases the Council may enter a legal agreement with the applicant to ensure that the ground floor unit is let and if not then converted to the same use as the remainder of the building.

**5.18** These policies sit alongside the recent changes to Permitted Development Rights which allow the conversion of offices to residential use for a trial period up to 30<sup>th</sup> May 2016.

## 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

### Unitary Development Plan policies to be replaced by this policy

- SH6 Retail Vitality within Shopping Parades

### Why we are proposing this policy

**5.19** 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. The policy applies to the ground floor only in each parade.

**5.20** In relation to drawing up Local Plans, paragraph 23 of the NPPF 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”.

### Key evidence

- Croydon Annual Monitoring Report (2012)
- Assessments of boundaries and designations for Shopping Parades (2012)
- Borough Wide Retail Needs Study Update (2008)
- Review of Town Centre Designations (2013)

### What the evidence says

**5.21** Assessments of boundaries and designations in 2012 have provided an understanding of the strengths and weaknesses of each of the Shopping Parades. When combined with assessments of the Croydon Metropolitan Centre and the district and local centres these have led to some proposed boundary changes.

Policy DM7: Development in Shopping Parades

<b>Option 1</b>	Preferred option	<b>Option 2</b>	Alternative option
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 are in accordance with Table 5.4.		As option 1 but for Class A5 uses say "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"	

**Table 5.4 New development proposals and changes of use in shopping parades**

Use	Expansion of existing uses or newly proposed uses
A1	Acceptable in principle
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	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 and does not result in two or more adjoining A5 units
All Other Uses	Unless it relates to a Community Use proposals involving an increase of non Class A ground floor space within parades will be refused

**Proposed amendments to the Policies Map**

**5.22** In most instances the proposed Shopping Parade is unchanged from that included within the current Unitary Development Plan. Those that have changed are detailed in Table 5.5 below. The proposed extent and location of each of the amendments to Shopping Parade in the borough can be found in Appendix 4.

Table 5.5 Amendments to Shopping Parades designations (see Appendix 4 for full details)

Shopping Parade	New	Amended boundary	De-designated <sup>24</sup>
Beulah Road			✓
Brighton Road/ Kingsdown Avenue		✓	
Bywood Avenue		✓	
Crown Point (preferred option)	No change		
Crown Point (alternative option)			✓
Grovelands		✓	
Headley Drive		✓	
Monks Orchard/ Orchard Way			✓
Morland Road			✓
Northwood Road			✓
Old Lodge Lane			✓
Portland Road/ Albert Road	✓		
Royal Oak			✓

<sup>24</sup> These Shopping Parades are designated as such in the current Unitary Development Plan but it is proposed that they are not designated in the Croydon Local Plan – Detailed Policies and Proposals.

Shopping Parade	New	Amended boundary	De-designated <sup>24</sup>
The Parade, Coulson Road		✓	
Waddon Road		✓	

### Why we are proposing this approach

#### Option 1 (preferred option)

**5.23** The minimum requirement for 50% of ground floor units to be within Class A1 is a continuation of the Unitary Development Plan approach. 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.

**5.24** This policy also limits the saturation of A5 uses as the associated waste and delivery issues can cause harm to residential amenity. Furthermore, limiting hot-food takeaways will help to ensure residents have a greater choice of retail services.

**5.25** Full justification for each proposed amendment to specific Shopping Parade designations can be found in Appendix 4.

#### Option 2

**5.26** The alternative option does not differentiate between A2 to A4 uses and A5 uses. Rather than being a use that should be limited, it could be considered that hot-food takeaways (Class A5) are a local shopping function that ought to be afforded the same opportunities as A2 to A4 uses and, therefore, this alternative is put forward for consideration.

**5.27** The neighbouring borough of Lambeth indicates they consider the area centred on Crown Point to perform a Local

Centre function. Accordingly, the Council is seeking views on whether the existing Shopping Parade (on the Croydon side of the borough boundary) is reclassified to reflect this.

### **How the preferred option would work**

**5.28** This policy seeks to ensure that at least 50% of the units within the Shopping Parade are within Class A1 use. 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 community use, proposals involving the net loss of ground floor A Class floor space within Shopping Parades will be refused.

**5.29** Sui generis activities which serve the local area (such as a laundrette) and community facilities are also acceptable uses within Shopping Parades. However all other uses (including sui generis which serve a wider catchment) are not acceptable uses.

## Development in Restaurant Quarter Parades

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP3.6
- Policy SP3.7
- Policy SP3.8
- Policy SP3.9
- Policy SP3.10

- Policy SP3.11
- Policy SP3.12
- Policy SP3.13

### Unitary Development Plan policies to be replaced by this policy

- None

### Why we are proposing this policy

**5.30** 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.

**5.31** 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 within the frontage. It creates a new designation, a Restaurant Quarter Parade, to be shown on the Policies Map.

**5.32** In relation to drawing up Local Plans, paragraph 23 of the NPPF 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”.

### Key evidence

- ‘Consideration of a restaurant quarter policy’ topic paper (2013)
- London Plan

## What the evidence says

**5.33** 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.

Policy DM8: Development in Restaurant Quarter Parades

**5.34** Policy 4.6c of the London Plan encourages the designation and development of cultural quarters.

Option 1	Option 2
Preferred option	Alternative option
The Council will designate and ensure that the vitality and viability of the borough's Restaurant Quarters is maintained and increased and that they continue to serve local communities by ensuring new development proposals and changes of use are in accordance with Table 5.4.	As option 1 but rather than treat the Restaurant Quarter as a type of Parade, the area could be included within either the Croydon Metropolitan Centre or the South Croydon Local Centre and the same policy approach taken to this frontage.

**Table 5.6 New development proposals and changes of use in shopping parades**

Use	Expansion of existing uses or newly proposed uses
A3 - A4	Acceptable in principle
A5	Proposals for new activity or extensions to existing A5 uses will be refused
All Other Uses	Unless it relates to a Community Use (up to 250m <sup>2</sup> gross) proposals involving an increase of non A3 - A4 Class ground floor space within Restaurant Quarter Parades will be refused

## Proposed amendments to the Policies Map

**5.35** Appendix 5 shows the locations of the proposed Restaurant Quarter Parades designation.

## Why we are proposing this approach

### Option 1 (preferred option)

**5.36** This policy promotes greater representation of Class A3 and A4 activity whilst limiting Class A5 activity (which could

undermine the area's function if restaurants and bars are replaced with hot-food take-aways). This will help to safeguard and promote the Restaurant Quarter.

**5.37** Restaurant Quarter Parades will be designated in areas with high concentrations of Class A3 and A4 uses.

**5.38** Allowing community uses to locate here but limiting their size will enable complementary activities to move into the area but not dominate it.



## Option 2

**5.39** Alternatively, this same policy objective could be achieved by extending either of the neighbouring town centre boundaries and drafting a restaurant quarter specific approach within the policy relating to town centres.

**5.40** However, this is not the preferred option as inclusion of the area within a town centre could allow other town centre activities to locate on the upper floors of premises. Were it to happen, this activity may discourage investment in the town centres.

### **How the preferred option would work**

**5.41** 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 will be designated at 6 - 78 (even) and 1 - 77 (odd). Should other candidates for this status emerge, they too could be designated.

## Development in edge of centre and out of centre locations

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP3.6
- Policy SP3.7
- Policy SP3.8
- Policy SP3.9
- Policy SP3.10

- Policy SP3.11
- Policy SP3.12
- Policy SP3.13

### Unitary Development Plan policies to be replaced by this policy

- EM3 Industry and Warehousing outside Employment Areas
- EM4 Offices outside Croydon Metropolitan Centre and town centres
- EM6 Redevelopment or Extension for Industrial or Warehousing Uses Outside Employment Areas

- EM8 Redevelopment or Extension for Offices outside Croydon Metropolitan Centre and the Town, District and Local Centres
- HT1 Visitor Accommodation
- LR2 Development of Leisure and Indoor Sports, Arts, Culture and Entertainment Facilities outside of Croydon Metropolitan Centre and Town and District Centres

### Why we are proposing this policy

**5.42** 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.

**5.43** In relation to drawing up Local Plans, paragraph 23 of the NPPF 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”.

## Key evidence

- Croydon Annual Monitoring Report (2012)
- Assessments of boundaries and designations for Croydon Metropolitan Centre, district and local centres (2012)
- Borough Wide Retail Needs Study Update (2008)
- Croydon Metropolitan Centre Retail Strategy (2009)

### Policy DM9: Development in edge of centre and out of centre locations

<b>Option 1</b>	<b>Option 2</b>
Preferred option	Alternative option
<p>The Council will ensure the vitality and viability of the borough's town centres is maintained and increased by ensuring new development proposals for main town centre uses by:</p> <p>a) In edge of centre locations are in accord with Table 5.7; and</p> <p>b) In out of centre locations are in accord with Table 5.8.</p>	<p>As option 1 except with a maximum of a 20% increase in A1-A4 floor space and a maximum of a 40% increase in other commercial use floor space.</p> <p>As option 1 except with a maximum of a 10% increase in A1-A4 floor space and a maximum of a 20% increase in other commercial use floor space.</p>

**Table 5.7 Development of main town centre uses in edge of centre locations**

Use	Extension of existing building/use	Other development
A1 – A4	Maximum of 10% increase in floor space (gross)	Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within the town centre, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre.
A5	Not acceptable	Not acceptable
Community uses	Acceptable in principle	Acceptable in principle

Use	Extension of existing building/use	Other development
Offices and other Main Town Centre Uses	Maximum of 20% increase in floor space (gross)	Not acceptable

**Table 5.8 Development of main town centre uses in out of centre locations**

Use	Extension of existing buildings/use	Other development
A1 – A4	Maximum of 5% increase in floor space (gross)	Where a sequential test (and an impact assessment for schemes involving more than 2,500m <sup>2</sup> of floor space) satisfactorily demonstrates such uses cannot be accommodated within the town centre or within an edge of centre location, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre.
A5	Not acceptable	Not acceptable
Community Uses	Acceptable in principle	Acceptable in principle
Offices and other Main Town Centre Uses	Maximum of 10% increase in floor space (gross)	Not acceptable

## Why we are proposing this approach

### Option 1 (preferred option)

**5.44** This policy recognises the Government’s continued commitment to the ‘Town Centres First’ principle, yet recognises there will be circumstances where proposals to establish, extend or replace main town centre uses may need to be considered in edge of centre or out of centre locations. Such flexibility accords with bullet point 3 of paragraph 21 of the NPPF which states “...Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances.”

**5.45** The Council has not produced a policy before for either of these so there is no locally relevant precedent to inform what percentages the policy should allow in relation to the expansion of

existing uses. The responses to the consultation will inform the decision the Council takes in relation to these percentages.

**5.46** 10% (for A1 to A4 uses) and 20% (for other commercial use) are being consulted upon alongside an alternative policy option using 20% and 40% respectively.

**5.47** 5% (for A1 to A4 uses) and 10% (for other commercial use) are being consulted upon alongside an alternative policy option using 10% and 20% respectively. The responses to the consultation exercise, will inform the decision the Council takes in relation to these percentages

**5.48** In order to stop the ‘piecemeal’ expansion of commercial premises, once the maximum allowed floor space threshold has been reached for a given site further expansion will normally be

refused. Where planning permission is required, floor space gained through the introduction of mezzanine floors will be counted towards the maximum permissible threshold.

**5.49** As set out in the NPPF, 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, and 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.

**5.50** For major schemes where the full impact will not be realised in five years, the NPPF states impact should also be assessed up to ten years from the time the application is made.

#### Option 2

**5.51** This is an alternative policy which proposes higher thresholds and therefore increases the degree of flexibility for businesses and community organisations.

#### **How the preferred option would work**

**5.52** This policy applies to all commercial uses equating to the NPPF's main town centre uses. Together these are defined as the following:

- Retail development (including warehouse clubs and factory outlet centres);
- 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);
- Offices; and

- Arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

**5.53** For the purposes of this policy edge of centre and out of centre locations are defined as shown in Table 5.9. 'Well connected' is defined as a location benefiting from a Public Transport Accessibility Level of 4 and above.

**Table 5.9 Definition of edge of centre and out of centre location (informed by Annex 2 of the NPPF)**

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 station.	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 station.
Other commercial use	Within 300m of the boundary of the centre	More than 300m from the boundary of the centre

## Expansion of industrial and warehousing premises in Strategic and Separated Industrial Locations

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 1
- Policy SP3.1

- Policy SP3.2

### Unitary Development Plan policies to be replaced by this policy

- EM2 Industry and Warehousing in Employment Areas

### Why we are proposing this policy

**5.54** 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 NPPF.

**5.55** Alternatively, 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.

### Key evidence

- Office, Industrial & Warehousing Land/Premises Market Assessment (2010)
- Employment Land Review Update (2013)

- Land for Industry and Transport SPG (2012)

### What the evidence says

**5.56** 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.

**5.57** 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 SPG (2012).

**5.58** The Mayor of London's SPG 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 9ha. However, as Croydon lost 9ha

of industrial land in a single 5 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.

**Policy DM10: Expansion of industrial and warehousing premises in Strategic and Separated Industrial Locations**

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative option
Within the Strategic and Separated Industrial Locations identified in Table 4.3 of the Croydon Local Plan – Strategic Policies, the Council will encourage the redevelopment of low density industrial and warehousing premises with higher density industrial and warehousing premises.	As option 1 but also encourage the redevelopment of low density industrial and warehousing premises with higher density industrial and warehousing premises in Integrated Industrial Locations.

**Why we are proposing this approach**

**5.59** The preferred option seeks the expansion of industrial/warehousing premises in Strategic and Separated Industrial Locations. It does not apply to Integrated Industrial Locations as well as the Croydon Local Plan Strategic Policy SP3.2 identifies the Integrated Industrial Locations as areas where the existing capacity should be maintained and not increased.

**How the preferred option would work**

**5.60** The approach promoted by this policy is to encourage greater density of occupation within the current boundaries of the Strategic and Separated 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.



# 6. Urban Design and Local Character

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 SP1
- Policy SP2.2
- Policy SP4

## Unitary Development Plan policies to be replaced by this policy

- UD2 Layout and Sitting of New Development
- UD3 Scale and Design of New Buildings
- UD5 Advertisements
- UD6 Safety and Security
- UD7 Inclusive Design
- UD8 Protecting Residential Amenity

- UD9 Wooded Hillside and Ridges
- UD11 Views and Landmarks
- UD12 New Street Design and Layout
- UD13 Parking Design and Layout
- UD14 Landscape Design

## Why we are proposing this policy

**6.2** 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 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.

**6.3** A fundamental part of achieving high quality built environments is the need to develop a thorough understanding of the local character and the qualities which contribute to local distinctiveness.

### **Key evidence**

- CABE Design and Access Statements, How to write, read and use them (2008)
- National Planning Policy Framework (2012)
- The London Plan (2011)
- SPD2 Residential Alterations and Extensions
- SPG12 Landscape Design
- The Mayor Of London's Housing Supplementary Guidance (2012)
- By Design, Urban design in the planning system towards better practice (2001)
- Borough Character Appraisal (2011)
- Appendix 10 – Non-Residential Character Appraisal

### **What the evidence says**

**6.4** The NPPF 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.

**6.5** Paragraph 56 of the NPPF states that “Good design is indivisible from good planning”. It advocates good design to ensure attractive, usable, durable, adaptable and sustainable development.

**6.6** The Croydon Local Plan Strategic Policy SP4.1 and London Plan Policy 7.6 set out the need to ensure that developments are of a high quality.

**6.7** The Croydon Local Plan: Strategic Policies provides policy on urban design, local character and public realm. However, in line with the NPPF, 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.

**6.8** Paragraph 57 NPPF 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 available the opportunities for improving the character and quality of an area and the way it functions, should not be accepted.”

**6.9** 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

**6.10** 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 NPPF or the Croydon Local Plan: Strategic Policies.

Policy DM11: Design and character

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>No option</p>
<p><b>DM11.1</b> To ensure that development enhances and sensitively responds to the predominant built form, proposals should respect:</p> <ul style="list-style-type: none"> <li>a) The development pattern, layout and siting;</li> <li>b) The scale, height, massing, density and mix; and</li> <li>c) The appearance, existing materials and built and natural features of the surrounding area.</li> </ul> <p><b>DM11.2</b> To improve the quality of the borough’s public, private and semi-public spaces, proposals should create clear, well defined and designed public and private spaces.</p> <p><b>DM11.3</b> To ensure the amenity of the occupiers of adjoining residential and commercial buildings is protected or improved, proposals should:</p> <ul style="list-style-type: none"> <li>a) Ensure that it will not result in any undue visual intrusion or loss of privacy;</li> <li>b) Maintain sunlight and daylight levels for both existing and new occupiers;</li> <li>c) Ensure that the completed development will not result in an increase in noise and vibration levels; and</li> <li>d) Ensure that the completed development will not result in an increase in odours, smoke, fumes dust and litter accumulation.</li> </ul> <p><b>DM11.4</b> To ensure that the built environment is of the highest</p>	<p>Rely on existing Croydon Local Plan: Strategic Policies and national policy to achieve high quality architectural, landscape and urban design throughout the borough.</p>

quality, proposals should demonstrate that:

- a) The architectural detailing, specification of materials and their appearance is of the highest quality;
- b) High quality materials that are durable, and respond to the local character will be incorporated;
- c) Services, utilities and facilities will be unobtrusively incorporated within the building envelope<sup>25</sup>.

**DM11.5** To ensure the design of roof-form positively contributes to the character of the local and wider area, proposals should:

- a) Ensure the design is sympathetic and contextually appropriate;
- b) Where taller buildings are permitted; ensure the transitions between roofs of different heights are designed in a way that will not result in an overbearing roof-form;
- c) Enhance local views and panoramas; and
- d) Ensure they are not crowded, obstruct or appear too close to Landmarks.

**DM11.6** 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 in accordance with SPG12 (Landscape) and the Croydon's Public Realm Design Guide;

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<sup>25</sup> The building envelope (also known as the building shell) refers to the outer structure of a building.

b) Provide spaces 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 habitats; and

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.

**DM11.7** 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) Be designed in accordance with Croydon's Public Realm Design Guide;

c) Seek opportunities to enhance and emphasise the key features of heritage assets and landmark buildings; or seek to encourage the use of public spaces and make them feel safer by incorporating lighting within public spaces; and

d) Ensure lighting schemes do not cause glare and light pollution.

## Why we are proposing this approach

### Option 1 (preferred option)

**6.11** This approach is the Council's preferred approach because it aligns with the NPPF, the London Plan and the Council's strategic objectives, and adds value by assisting delivery of sustainable development.

### Option 2

**6.12** Option two is not preferred because the required high quality architectural, landscape and urban design cannot be achieved without robust policy that can be applied throughout the borough. A review of existing policies highlighted the need for additional policies that can be applied to both suburban and urban areas.

**6.13** Both the London Plan and the NPPF require council's to ensure that proposals reflect the local character. This cannot be achieved by sole reliance on national policy. In Croydon this is best achieved by adopting a place based approach that takes into consideration the character of each Place.

**6.14** Having regard for the reasons above, it is considered that the approach outlined in option two is not considered to be the most appropriate for Croydon.

## How the preferred option would work

### Character

**6.15** The Croydon Local Plan Strategic Policy SP4.1 supports developments that respect, enhance and strengthen the predominant positive character and appearance of the local area. All proposals will be expected to clearly demonstrate that they appropriately respond to the opportunities and constraints of the site and local area.

**6.16** When assessing the local character the Council will require proposals to show that they have paid special attention to and positively responded to the established:

- Form including layout (structure and urban grain<sup>26</sup>), scale (height and massing), appearance (materials and details), density, building lines and landscape; and
- Townscape rhythm, symmetries and uniformities; and
- Composition of elevations and roofscape.

**6.17** In areas where the predominant character is weakly defined or of poor quality, it is important that applicants take the opportunity to improve the overall quality of the area.

**6.18** To ensure developments positively contribute to or improve local character, the Council will consider the cumulative impact that proposals may have upon the local area.

**6.19** In line with the London Plan Policy 7.4, the local character of the borough's 16 Places has been mapped. The borough residential and non-residential character appraisals, 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.

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<sup>26</sup> Urban grain can be defined as the pattern of the arrangement and size of buildings and their plots and the degree to which an area's pattern of street – blocks and street junctions are small and frequent, or large and infrequent.

## Layout

**6.20** 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.

**6.21** 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 permeable and balance the needs of all users. Particular attention should be paid to ensuring safe and accessible pedestrian routes are accommodated within the development.

**6.22** The layout of new development should be arranged to provide clear distinctions between public, semi - public and private space. Clearly defined and enclosed private space provides better privacy and security and accords with secure by design principles. When considering the layout, proposals should demonstrate a clear and logical arrangement of buildings on site. Buildings 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.

**6.23** 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. The provision of sufficient lighting, in line with EU lighting uniformity requirements,

will encourage greater pedestrian access, movement and reduce opportunity for undesirable behaviour.

**6.24** 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. For this reason, the council will seek to support proposals to incorporate parking within the rear, to the side or underneath buildings.

**6.25** The Council will only consider parking within the forecourt of buildings, in locations where 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. In locations such as Croydon Metropolitan Centre or District Centres with a minimum PTAL<sup>27</sup> rating of 6, the Council will consider developments with a reduced amount of parking

**6.26** In order to encourage access to other modes of transport as an alternative to the car, adequate cycle parking provision should be incorporated into proposals. The Council will support proposals that take the opportunity to incorporate cycle parking within the building envelope, in a safe, secure, convenient and well lit location. Where it is not possible to incorporate cycle parking within the existing building envelope, the Council will require cycle parking to be located within the setting of the building, in a visually unobtrusive location. They should also be located within, safe, secure, well lit and conveniently located weather proof shelters.

**6.27** The Council considers the health and wellbeing of those living and working within the borough to be of the utmost

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<sup>27</sup> Public Transport Accessibility Level – a rating of accessibility provided by Transport for London

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. When assessing site layouts the Council will consider a development's impact on visual amenity, overlooking, outlook, and sunlight and daylight. Noise, vibration, odour, smoke fumes, dust, litter accumulation and the effect of traffic movement to, from and within the site will also be considered.

### Design

**6.28** The need for good design is supported in Paragraph 56 of the NPPF, in paragraph. Both the London Plan (policy 7.4b) and Croydon Local Plan Strategic Policy SP4.1 identify a 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 buildings and places that are well designed, safe, accessible, inclusive and enrich the quality of life for all those who live, work and visit them.

**6.29** 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. When assessing proposed materials the Council will consider the quality, durability, attractiveness, sustainability, texture, colour and compatibility with existing buildings. Additionally, when working with existing buildings, original architectural features; such as mouldings, architraves, chimneys or porches contribute to the architectural character of a building and should whenever possible be retained.

**6.30** 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 of windows (including setbacks and reveals) 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.

**6.31** 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 be incorporated within the building envelope without compromising the integrity of the original design concept.

**6.32** 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. The Council will consider the impact of a scheme in terms of its effect on Local Designated Views (as shown on the Policies Map). Developments should enhance panoramas as a whole and should seek to avoid buildings that tightly define the edges of viewing corridors and should not be too high, crowd around, appear too close, or obstruct Landmark(s).

**6.33** When considering the pitch, shape and materials of roofs, care should be taken to ensure that design is sympathetic and appropriate to neighbouring buildings. The Council would express a preference for maintaining the predominant roof or ridge heights present in an area. In locations identified as being suitable for taller buildings, the Council will seek to encourage transitions between different roof heights to be carried out in such a way as to ensure that it does not have an overbearing impact, cause undue harm upon existing adjacent buildings or compromise local character. Further guidance is available in the Residential Extensions and Alterations SPD.



## Public Realm

**6.34** A well designed, cared for and high quality public realm<sup>28</sup> 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 the Croydon Local Plan Strategic Policies SP4.6 to CS4.10.

**6.35** 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.

**6.36** 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

**6.37** 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.

## Landscape

**6.38** The character of a place can be significantly affected by the quality of the landscape and the way it is maintained. Sensitively designed landscape can enrich and reinforce existing wildlife habitats and improve the ecological value of sites and their surroundings. 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.

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<sup>28</sup> The public realm is defined as public spaces that are accessible to all without charge. These can include public, semi-public and privately owned spaces.

**6.39** SPG12 Landscape Design is referenced in the policy and provides detailed guidance and clarity on what the Council is seeking from development proposals on providing safe well designed landscaped schemes. The Croydon Public Realm Design Guide also sets out detailed guidance and clarity on what the Council is seeking from the public realm components of development proposals.

## Lighting

**6.40** 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.

**6.41** 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

**6.42** 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 thorough understanding and analysis of the physical, social and economic and policy context;
- A clear understanding of the development objectives and brief;
- Clear design principles and design concept and
- The evolution of the design and how the final design solution was arrived at.

**6.43** The Statement should refer to "By Design", SPD3 Designing for Community Safety, SPG12 Landscape Design and demonstrating how the NPPF, 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".

## 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

### Unitary Development Plan policies to be replaced by this policy

- UD4 Shopfront Design

### Why we are proposing this policy

**6.44** 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 town and district centre vitality.

### Key evidence

- National Planning Policy Framework (2012)
- Building Research Establishment (BRE) Security Protection Products (2012)
- Shop fronts and Signs Supplementary Planning Guidance No.1 (2012)

### What the evidence says

**6.45** The NPPF Section 7 paragraph 56 (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”. There is a need to ensure that opportunities are taken to promote a succinct and cohesive approach to shop front design and security. To facilitate processes that will help commercial premises provide appropriate shop front designs across the borough, which maintain local distinctiveness, whilst providing adequate levels of security and reduce enforcement action.

**6.46** The Council's Shop fronts and Signs SPG 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 guidance to deliver processes that will help provide adequate levels of shop front security through succinct and robust new planning guidance.

**6.47** The “Converting Shops into Homes Addendum” to Supplementary Planning Guidance No.1 Shop Fronts & Signs was

adopted October 2004. This addendum provides guidance to sympathetically convert shops to residential development through succinct and robust planning guidance.

**6.48** The Croydon Local Plan: Strategic Policies makes no reference to detailed policies on shop front design.

**6.49** 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.

**Policy DM12: Shop front design and security**

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative policy</p>
<p><b>DM12.1</b> 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:</p> <ul style="list-style-type: none"> <li>a) Respect the scale, character, materials and features of the buildings of which they form part; and</li> <li>b) Do not include solid, perforated/pinhole external shutters; or consists of a mix of solid and open grille which conforms to the SPD on Shopfront Design and Security.</li> </ul> <p><b>DM12.2</b> To ensure shop fronts are sympathetically incorporated and to provide future flexibility, developments that convert shops into residential accommodation should:</p> <ul style="list-style-type: none"> <li>a) Respect the scale, character, proportions, materials and features of the buildings of which they form part;</li> <li>b) Incorporate historic shop fronts, including signboards, roller blind boxes, corbels, stall risers, cornices, fanlights, console brackets, transoms, pilasters and lobbies into the design;</li> <li>c) For new elements, adopt and reinterpret the language of</li> </ul>	<p>No additional shop front policy would result in the Council failing to align guidance with The London Plan and Croydon Local Plan: Strategic Policies.</p>

shop front design; and

d) Optimise window and door openings whilst designing for privacy.

## Why we are proposing this approach

### Option 1 (preferred options)

**6.50** This policy is required to support the Council's Shop fronts and Signs SPG 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.

**6.51** 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. The alternative is the Council fails to ensure that its new policy aligns with existing and emerging policies.

### Option 2

**6.52** The outcome of such an approach would result in the Council failing to align guidance with The London Plan and Croydon Local Plan: Strategic Policies resulting in unwelcoming public realm, leaving businesses vulnerable to criminal activity.

## How the preferred option would work

**6.53** The Council expects all shop front design to be of a high design quality and craftsmanship and whenever possible, use sustainable or recycled materials.

**6.54** The Council encourages improved shop front security and public realm through the integration of innovative technologies.

**6.55** 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.

**6.56** Those seeking planning permission for shop front improvements and new shop fronts should seek additional guidance from the Council's Shop fronts and Signs SPG 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.

**6.57** 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.

**6.58** 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 unique, adaptable and attractive home that enhance and compliment the character of the local area.

**6.59** Those seeking planning permission to convert shops into homes should seek additional guidance from Addendum to Supplementary Planning Guidance No.1 Converting Shops into Homes Adopted October 2004.

## Refuse and recycling

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7

- Policy SP4.5
- Policy SP4.6

### Unitary Development Plan policies to be replaced by this policy

- UD15 Refuse and Recycling Storage

### Why we are proposing this policy

**6.60** 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.

#### Key evidence

- National Planning Policy Guidance (2012)
- The Mayor Of London's Housing Supplementary Guidance (2012)

#### What the evidence says

**6.61** The Croydon Local Plan: Strategic Policies does not provide specific design guidance and refers to the Detailed Policies and Proposals for specific design guidance.

**6.62** 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.

**6.63** The London Housing Design Guide provide some general guidance, however, it states that the Guide should be used in conjunction with local guidance. The Housing Design Guide does not address non - residential development. This policy will provide developers working on residential and non-residential scheme greater clarity about what the Council will expect them to provide.

Policy DM13: Refuse and recycling

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative policy
<p><b>DM13.1</b> 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:</p> <ul style="list-style-type: none"><li>a) Sensitively integrate refuse and recycling facilities preferably within the building envelope;</li><li>b) Ensure facilities are visually screened;</li><li>c) Provide adequate space for the temporary storage of waste materials generated by the development; and</li><li>d) Provide layouts that ensure facilities are easily accessible by residents.</li></ul> <p><b>DM13.2</b> To ensure refuse and recycling facilities are easily accessible by operators, the council will require developments to provide access roads that:</p> <ul style="list-style-type: none"><li>a) Are constructed to highway adopted standards;</li><li>b) Are capable of allowing access for refuse vehicles of at least 10.75 m long, 2.5 m wide and 3.5 m high; and</li><li>c) Facilitate the safe manoeuvring of refuse vehicles.</li></ul>	<p>No additional design policies. The NPPF is silent on this issue, without detailed policies, the Council would be reliant on general design policies.</p>

## Why we are proposing this approach

### Option 1 (preferred option)

**6.64** This option will enable the Council to update and clarify the existing UDP refuse and recycling policy to provide clear guidance about where these facilities should be located. Where the poor siting of these facilities could result in the loss of amenity space, this policy provide developers with clarity about the Council's requirements.

**6.65** This approach is in line with the NPPF and the Mayor Of London's Housing Supplementary Guidance and is therefore the Council's preferred option

### Option 2

**6.66** It is important that these facilities are considered as an integral part of the development process. This option would result in the reliance on design policies on layout.

**6.67** In some instances refuse and recycling facilities have been located within amenity areas or locations with poor accessibility. The absence of a specific policy would compound this issue. In such cases, the provision of a specific refuse and recycling policy would enable the Council to negotiate their siting and design.

**6.68** Since the NPPF clearly highlights the need for policies. Where they are absent, silent or out of date, regardless of the impact, the Council will have to grant consent.

## How the preferred option would work

**6.69** The Council considers the layout, siting, function and design of recycling and refuse storage facilities to be of equal importance. If considered at the initial stage of the design process, proposals for new developments will be able to successfully

integrate refuse and recycling into the building envelope without causing undue noise and odour nuisance.

**6.70** Conversions of existing buildings will also be expected to provide sufficient facilities. However, where integration within the building envelope is not possible, designs that locate refuse and recycling facilities behind the building line may be supported. The Council will expect facilities to be covered and located where they will not be visually intrusive and compromise the provision of shared amenity space.

**6.71** It is important that refuse facilities are located in an area where they can be 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. When designing these facilities it is important to ensure that the Council's requirements for collection of waste facilities have also been satisfied.

**6.72** Additional guidance should be sought from Croydon's Public Realm and Safety Department.

**6.73** This policy should be used in conjunction with the Mayor Of London's Housing Supplementary Guidance.



## Public art

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Strategic Objective 7

- Policy SP4.5
- Policy SP4.6

### Unitary Development Plan policies to be replaced by this policy

- UD16 Public Art

### Why we are proposing this policy

**6.74** 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.

**6.75** 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.

#### Key evidence

- Public Realm Design Guide (2012)
- SPG19 Public Art (2005)

#### What the evidence says

**6.76** 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.

**6.77** SPG19 provides a useful guidance for those wishing to incorporate public art within their development. However, this document provides references to “percent for art” a policy that is no longer live. This amended policy provides link to the Council’s Public Realm Design Guide which provides more detailed guidance.

Policy DM14: Public art

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative policy</p>
<p>To enhance and express local character, the Council will support the inclusion of public art and require all major<sup>29</sup> schemes to include public art that:</p> <ul style="list-style-type: none"> <li>a) Is integrated into proposals at an early stage of the design process;</li> <li>b) Enhances and creates local distinctiveness and reinforces a sense of place;</li> <li>c) Responds to local character;</li> <li>d) Makes a positive contribution to the public realm; and</li> <li>e) Engages the local community in its creation.</li> </ul>	<p>No alternative policy</p>

<sup>29</sup> Major schemes are defined as being over 0.5 hectares or residential schemes over 10 units or developments over 1000m<sup>2</sup>

## **Why we are proposing this approach**

**6.78** This policy is required to provide a link to SPG19 Public Art and Croydon's Public Realm Design Guide.

## **How the preferred option would work**

**6.79** By considering public art during the early stages of the design process and clarifying the scope at the beginning of the Design Team Service 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 ways such as bespoke paving, gates, lighting, signage, street furniture, playground equipment, railings and landscaping.

**6.80** 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.

**6.81** Those commissioning public art should seek additional guidance from Croydon's Public Realm Design Guide and SPG19.

## 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

### Unitary Development Plan policies to be replaced by this policy

- None

### Why we are proposing this policy

**6.82** The Council acknowledges the positive contribution that well designed tall buildings of high architectural quality can make. If sensitively and appropriately located, these buildings can facilitate regeneration through the provision of new jobs, homes and community facilities and an attractive built environment.

**6.83** 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.

#### Key evidence

- The London Plan (2011)
- National Planning Policy Framework (2012)
- Croydon Opportunity Area Planning Framework (2013)
- East Croydon Masterplan (2011)
- West Croydon Masterplan (2011)
- Mid Croydon Masterplan (2012)
- Infrastructure Delivery Plan (2012)

- Borough Character Appraisal incorporating Residential Character Appraisal (2011)
- Appendix 9 – Places of Croydon – Local Character
- Appendix 10 – Non-Residential Character Appraisal
- Open Space Needs Assessment (2009)
- CABE & English Heritage Guidance On Tall Buildings (2007)

#### What the evidence says

**6.84** 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.

**6.85** The need for this policy has been identified in the borough's Croydon Local Plan: 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 will also provide a link to the Croydon Opportunity

Area Planning Framework and the Policies Map which identify areas suitable for tall buildings.

**6.86** The Croydon Opportunity Area Planning Framework identifies locations within the OAPF that are suitable for tall buildings. It provides guidance on indicative tall building heights, form and typologies. This approach reflects the Mayor's aspirations for new residential development within the Croydon Opportunity Area.

**6.87** 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 developments are located in areas with sufficient green infrastructure or provide new green infrastructure to meet the increased demand.

**6.88** The base line information used to select locations outside of the Croydon Opportunity Area included mapping of the residential and non-residential character analysis and mapping, PTAL<sup>30</sup> ratings and open space deficiency mapping.

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<sup>30</sup> Public Transport Accessibility Level – a rating of accessibility provided by Transport for London

Policy DM15: Tall and large buildings

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative policy</p>
<p><b>DM15.1</b> To ensure tall or large buildings respect and enhance the local character, and do not harm the setting of heritage assets, proposals will be permitted where they:</p> <ul style="list-style-type: none"> <li>a) Are located in areas identified for such buildings in Policies DM28 to DM42, in masterplans and in the Croydon Opportunity Area Planning Framework;</li> <li>b) Are located within areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4 with direct public transport connections to the Croydon Opportunity Area; and</li> <li>c) Demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale.</li> </ul>	<p>No tall buildings policy</p>

**Why we are proposing this approach**

Option 1 (preferred option)

**6.89** This approach is the preferred approach because it meets Croydon’s needs for detailed criteria and is in line with CABE and English Heritage’s guidance and policies within the London Plan.

Option 2

**6.90** This policy would rely on the NPPF, London Plan and the Croydon Local Plan: Strategic Policies. Although this approach would not result in tall buildings being located in unsuitable areas, it would mean that to be able to assess the impact on local character more judgement on a site by site basis is required. This would provide less clarity for the developer.

**How the preferred option would work**

**6.91** When considering whether a development can be considered to be tall or large, the context within which the building is situated must be considered. This would mean that a proposal for six storeys; in an area where predominant building heights are two storeys, would be considered to be a tall building. In an area where an urban block<sup>31</sup> comprises of buildings with narrow frontages, a proposal for a building with a scale that differs from this would be considered to be large. .

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<sup>31</sup> An urban block is a rectangular area in a city surrounded by streets and usually containing several buildings.

**6.92** This definition closely aligns with the Croydon Local Plan Strategic Policy SP4.5, London Plan Policy 7.25 and CABI and English Heritage's guidance which refer to tall and large buildings.

**6.93** There is a need to expand the current definition of tall buildings to include large buildings. This policy will expand the definition of tall buildings to include large buildings and ensure development is sensitive to its local context.

**6.94** This policy in conjunction with the Place-specific development management policies (Policies DM28 to DM42) will establish clear principles and more certainty for developers about the locations for tall and large buildings.

**6.95** Proposals for tall or large buildings will need to include urban design analysis that demonstrates how they align with the Opportunity Area Planning Framework and the Fair Field, Mid Croydon, Old Town and East and West Croydon Masterplans. In locations outside of these areas, proposals for tall or large buildings will be expected to demonstrate that it will not cause unacceptable harm to the character of the surrounding area and meet all policy requirements, including those relating to tall buildings.

**6.96** Proposals for tall or large developments within sensitive locations<sup>32</sup> will be expected to demonstrate that it meets the requirements of the London Plan Policies 7.6 and 7.7.

**6.97** 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 areas where Policies DM28 to DM42 apply and would permit tall buildings.

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<sup>32</sup> Sensitive locations, include sites close to heritage assets, residential amenity spaces, schools, or where topography changes would result in the development crowding or blocking designated views or viewing corridors.

## Views and Landmarks

### Strategic Objectives and related Croydon Local Plan strategic policies

- Policy SP4.2
- Policy SPS4.6

- Policy SP4.9
- Policy SP4.13

### Unitary Development Plan policies to be replaced

- UD11 Views and Landmarks

### Why we are proposing this policy

**6.98** Croydon has compiled a list of Local Designated Views for the borough. These include panoramas that reinforce Croydon's sense of local place and identity and landmarks that assist with wayfinding and contribute to local character.

### Key evidence

- Borough Character Appraisal (2011)
- The London Plan (2011)
- Croydon Opportunity Area Planning Framework (2013)

### What the evidence says

**6.99** Unitary Development Plan Policy UD1 contained a list of Views and Landmarks. These have been assessed alongside others suggested in the Borough Character Appraisal and by Development Management Officers, in consideration of the London View Management Framework

**6.100** The following assessment criteria have been applied for both Croydon Panoramas and Local Designated Views:

- Viewpoint must be in publicly accessible location in a major public area or
- Located in an area or on routes identified in Figure 5.1 of the Croydon Local Plan: Strategic Policies for public realm improvements.

**6.101** The following additional assessment criteria for Croydon Panoramas have been applied:

- The viewpoint selected is where the widest panorama can be viewed, and
- The viewpoint selected is also the one that gives the clearest view, has least obstructions of the subject matter; and
- Is a view of substantial parts of the borough of Croydon<sup>33</sup>.

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<sup>33</sup> Views looking out of Croydon are not included as the subject matter is outside the remit of the Council



**6.102** The following additional assessment criteria for Local Designated Views have been applied:

- Subject matter must contribute positively to the local character;
- Views in which key landmarks are seen or it is a unique view; and
- Must be substantially of a part of the borough.

**6.103** The following assessment criteria for Landmarks have been applied:

- It is a prominent building/structure; and
- It is easily recognisable close up; and
- 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.

**Policy DM16: Views and Landmarks**

<b>Option 1</b>	<b>Option 2</b>
Preferred option	Alternative option
The Council will consider the proposed development in relation to its impact on protected Local Designated Views. Developments should enhance the panorama as a whole and should seek to avoid buildings that tightly define the edges of the viewing corridors. They should not create a crowding effect around, or obstruct, or appear too close or high in relation to the landmark(s).	No policy

**Proposed amendments to the Policies Map**

**6.104** Each of these designations set by this policy are shown on the Policies Map. These designations are largely the same as the designations of the same name in the Unitary Development Plan. However there are a number of amendments. These changes are summarised and full details including maps of each amendment can be found in Appendix 6.

**Table 6.1 Amendments to Local Designated Views, Croydon Panoramas and Landmarks (see Appendix 6 for full details)**

Name	New	Amended	De-designated
<b>Croydon Panoramas</b>			
From Addington Hills		✓	
From Croham Hurst looking south of Purley and Downs	✓		
From Farthing Downs of Coulsdon		✓	
From Norwood Grove		✓	

Name	New	Amended	De-designated
From Parkway of Addington Village and Shirley Hills	✓		
From Pollards Hill		✓	
From Riddlesdown of Kenley and hillsides	✓		
From Ross Road looking south west		✓	
From Limpsfield Road, near Wentworth Way looking west at All Saints Church	✓		
<b>Local Designated Views</b>			
From Farthing Downs of Cane Hill		✓	
From Heathfield of Selsdon and New Addington	✓		
From High Street of the Clock tower, Thornton Heath	✓		
From Kenley Common of Riddlesdown and housing in the valley and viaduct.	✓		
From Oliver Grove to the Clock tower and station, South Norwood	✓		
From Roman Way of Parish Church	✓		
From Rutherwick Rise of Cane Hill	✓		

Name	New	Amended	De-designated
From Sanderstead Hill westwards down the hill	✓		
From Selsdon Road to St. Peter's Church		✓	
From Woodcote Grove Road of Cane Hill and St. Andrews Church	✓		
Brighton Road to Cane Hill			✓
New Addington to Addington Palace			✓
Portnalls Road to St Andrew's Church			✓
<b>Landmarks</b>			
Cane Hill Water Tower	✓		
Clock tower, High Street, Thornton Heath	✓		
Clock tower, Station Road, South Norwood	✓		
Croydon Minster	✓		
St. Peter's Church, St. Peter's Road, South Croydon	✓		
All Saints Church Sanderstead	✓		

### Why we are proposing this approach

#### Option 1 (preferred option)

**6.105** The option provides detail on what the Council will consider in assessment of the impact of views. It also allows the Council to

designate new views and landmarks and refresh the assessment criteria in light of the London Plan.

#### Option 2

**6.106** The Croydon Local Plan Strategic Policies SP4.2 and SP4.13 provide adequate protection for views detailed in Appendix 6 of the same document. However, it would not cover any new views and landmarks.

#### **How the preferred option would work**

**6.107** 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 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 Landmarks, other important vistas and skylines.

**6.108** 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 landmarks`.

**6.109** 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 and 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.

**6.110** The full list of Local Designated Views, Croydon Panoramas, settings of Landmarks, other important vistas and skylines can be found in Appendix 6.

## 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

### Unitary Development Plan policies to be replaced

- UC2 Control of Demolition on Conservation Areas
- UC3 Development Proposals in Conservation Areas
- UC4 Changes of Use in Conservation Areas
- UC5 Local Areas of Special Character
- UC8 Use of Listed Buildings
- UC9 Buildings on the Local List

- UC10 Historic Parks and Gardens
- UC11 Development Proposals on Archaeological Sites
- UC13 Preserving Locally Important Remains
- UC14 Enabling Development

### Why we are proposing this policy

**6.111** Croydon has a rich and varied heritage that provides depth of character to the borough's environment. 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.

**6.112** 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 NPPF (chapter 12), the London Plan (Chapter 7) and strategic objectives and Croydon Local Plan: Strategic Policies. 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.

**6.113** 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 ancient monuments, and registered historic parks and gardens, or through designation by the Local Planning Authority, which includes locally listed buildings, local areas of special character (LASCs) and locally listed historic parks and gardens. Heritage assets can also be identified through area assessments, master planning or during the planning process itself.

**6.114** The special character of a heritage asset is the principle reason for why the asset is considered to have a degree of significance, and is usually defined by its architectural character or other distinguishing features, for example landscape features, historic importance, or, in the case of an historic area, the distinctive character of the area as a whole.

**6.115** The setting of a heritage asset is defined in the NPPF 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.’

**6.116** 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.

### Key Evidence

- National Planning Policy Framework (2012)
- The London Plan (2011)
- The Setting of Heritage Assets, English Heritage (2012)
- Understanding Place: Conservation Area Assessment, Designation and Management, English Heritage (2010)
- Understanding Place: Historic Area Assessments, English Heritage (2011)
- Enabling development and the conservation of significant places, English Heritage (2008)
- Appendix 5 of the Croydon Local Plan: Strategic Policies (2013)
- Croydon Borough Character Appraisal (2012)
- Croydon’s Local List of Buildings of Historic or Architectural Importance SPD (2007)
- Conservation Area Appraisal and Management Plans
- Conservation Area General Guidance SPD
- Draft Croydon Opportunity Area Planning Framework (2012)
- East Croydon Masterplan (2011)
- West Croydon Masterplan (2011)
- Mid Croydon Masterplan (2012)

**What the evidence says**

**6.117** This policy addresses detailed issues that relate to the detailed application of Croydon Local Plan 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.

**6.118** The NPPF states that “local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment”.

**6.119** The London Plan states that Boroughs should “include appropriate policies in their LDFs for identifying, 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”.

**6.120** The Croydon Local Plan: Strategic Policies provides general policy that relates 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.

**Policy DM17: Heritage assets and conservation**

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>
<p><b>DM17.1</b> 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:</p> <ul style="list-style-type: none"> <li>a) Development affecting heritage assets will only be permitted if their special character and appearance is preserved or enhanced;</li> <li>b) Proposals for development will only be permitted if they will enhance the setting of the heritage asset affected or have no adverse impact on the existing setting;</li> <li>c) Proposals for changes of use should retain the original character of a building and will be supported only if they are</li> </ul>	<p>No additional policies that related to heritage assets. Rely on national policy, London Plan and Croydon Local Plan: Strategic Policies to protect and enhance heritage assets.</p>

necessary to keep the building in active use;

d) Where there is evidence of intentional damage or deliberate neglect to a heritage asset its current condition may not be taken into account in the decision-making process; and

e) Proposals for enabling development must have benefits that outweigh the detriment of departing from other planning policies and the proposed development must be the minimum necessary to secure the heritage asset's long-term future.

**DM17.2** Applications for development proposals that affect heritage assets 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 of any retained historic fabric is preserved.

**DM17.3** To preserve and enhance listed buildings, scheduled ancient 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 park or garden should be exceptional;

b) Substantial harm to or loss of a Grade I or II\* listed building or a scheduled ancient 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.

**DM17.4** 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 SPD and Conservation Area Appraisal and Management Plan SPDs.

**DM17.5** To protect 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 protecting and enhancing locally listed buildings;
- b) All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building; and
- c) All proposals for development must have regard to Croydon's Local List of Buildings of Historic or Architectural Importance SPD.



**DM17.6** To preserve and enhance the character, appearance and setting of Local Areas of Special Character within the borough, the Council will determine all development proposals that affect Local Areas of Special Character in accordance with the following:

- a) Substantial weight will be given to protecting and enhancing buildings that make a positive contribution to the special character and appearance of a local area of special character; and
- b) All proposals for development must have regard to the development principles in the Conservation Area General Guidance SPD (or equivalent local guidance on Local Areas of Special Character).

**DM17.7** Substantial weight will be given to conserving and enhancing landscape features or planting that makes a positive contribution to the special historic character and original layout of statutorily registered and locally listed historic parks and gardens.

**DM17.8** All development proposals must preserve and enhance War Memorials and other monuments.

**DM17.9** 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.

## Why we are proposing this approach

### Option 1 (preferred option)

**6.121** The Croydon Local Plan: Strategic Policies states that ‘the Development Management DPD and Site Allocations DPD will address issues in relation to the detailed application of strategic policy on heritage assets on the borough.’

**6.122** This approach is the Council’s preferred approach because it is required through the NPPF, the London Plan, and the Croydon Local Plan: Strategic Policies and adds value by assisting delivery of sustainable development and heritage protection.

**6.123** This option will also provide a link to existing and future Council guidance documents including the Conservation Area General Guidance SPD, Conservation Area Appraisal and Management Plan SPDs, the Local List of Buildings of Historic or Architectural Importance SPD and the Residential Extensions and Alterations SPD.

### Option 2

**6.124** This option is not considered to be appropriate for Croydon as it does not comply with the requirements of the Croydon Local Plan: Strategic Policies and the additional requirements placed on local authorities through the NPPF and London Plan.

## How the preferred option would work

**6.125** 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 lost architectural or landscape features, for example traditional-style windows and doors and boundary treatments, or the removal or harmful alterations, such as the removal of paint or pebbledash render from brickwork, will be supported.

**6.126** In addition to the collective value of buildings and their relationship to each other, the character of conservation areas and Local Areas of Special Character (LASC) 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 LASC. In addition to protecting individual buildings the Council will ensure that the wider character of an area is protected and enhanced.

**6.127** LASCs are Croydon’s local heritage areas (which are of significance to the borough but not of national importance as Conservation Areas are). In order to qualify for designation as a LASC, an area needs to be of heritage significance and meet one or more of the following criteria:

- a) Architectural Significance – Be an area of distinctive architectural character as a result of the collective value of a group of historic buildings with consistent architectural form, style, features, detailing or materials. The group will often, but not always, have been built as a single development over a short period of time and will be well preserved.
- b) Townscape Quality – Be an attractive and historic composition of urban form, either planned or unplanned and distinctive from the surrounding area.

c) Landscape Quality – Be an area that is distinguished by the quality, extent or features of its historic landscape, which is well preserved.

**6.128** These criteria have been developed and updated in line with the new policy framework introduced by the Croydon Local Plan: Strategic Policies reflecting the status of the LASCs as local heritage areas. The criteria were based upon the original LASC designation criteria outlined in the Croydon Unitary Development Plan (1992 and 2006).

**6.129** As part of the consultation on the Detailed Policies (Preferred and Alternative Options), in addition to asking whether you think the preferred policy approach above is the most appropriate for Croydon to meet its strategic objectives, we are asking if you are aware of any areas of heritage significance within the borough that may be worthy of local designation (see the Key Questions in section 2). All areas submitted in response to this consultation will be reviewed against the new heritage-focussed criteria for LASCs to ensure that the designation is only applied to local heritage areas. Those areas that meet the criteria will be proposed as new local heritage areas (LASCs) in the Proposed Submission Croydon Local Plan: Detailed Policies and Proposals in winter 2015. This will be accompanied by an evidence base setting out each LASC and outlining why they are one of the borough's local heritage areas and how they meet the heritage based criteria.

**6.130** All planning applications submitted that relate to heritage assets should include a description of the significance of the heritage asset affected and analysis of the resultant impact of the development on the heritage asset and its setting. The level of detail of this statement should be proportionate to the significance of the asset affected and will, if necessary, be directed by the Council.

**6.131** All development that relates directly to heritage assets or affects their setting must be of a high quality design that enhances their special character and must pay special attention to the area's established height, scale, massing, building lines, detailing and materials. New development will not be encouraged to copy existing buildings but rather must be informed by and well integrated with the established character of the area.

**6.132** Development will be encouraged to enhance the setting of heritage assets, or at the very least not have any adverse impact on the current setting. In some cases there may be opportunities to better reveal the setting of heritage assets; however this must not have adverse impacts on local character or other heritage assets.

**6.133** Historic buildings should be maintained in their original use wherever possible unless fully justified. Where a proposed change of use is fully justified, it should be demonstrated how the building's original fabric and character is to be preserved.

**6.134** Historic landscapes, including registered and locally listed historic parks and gardens may have interest from: their age, connection with historic buildings, events or people, presence of ornamental features and artefacts, style of layout, or work of an important designer. The Council will ensure that historic parks and gardens are not adversely affected by new development.

**6.135** 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 zones, which are areas that have a high likelihood of archaeological significance. Due to its nature, much of the borough's archaeological heritage is likely to have been undiscovered and as a result is very sensitive. If a site is identified as having potential archaeological significance applicants will be

required to undertake an archaeological desk-based assessment and, if necessary, a field investigation. Any discovered archaeological remains will be required to either be preserved in situ or through a programme of excavation, recording, publication and archiving, undertaken by an archaeological organisation approved by the Council, prior to the commencement of any development. The Council will consult with and follow the guidance of the Greater London Archaeological Advisory Service, or equivalent authority, on the archaeological implications of development proposals.

**6.136** 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(s).

**6.137** The Council supports the principle of improving access to historic buildings but will ensure that works undertaken to achieve this are done so in the most sensitive and creative manner possible to reach a solution that causes the least harm to a building's significance.

**6.138** The Council will maintain the 'Heritage at Risk Register', which is managed by English Heritage, and monitors the condition of heritage assets where possible. If deemed appropriate, the Council will exercise its legal powers to ensure that essential maintenance of designated heritage assets is undertaken.

**6.139** 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.

**6.140** This policy should be read in conjunction with existing and future Council guidance documents including the Conservation Area General Guidance SPD, Conservation Area Appraisal and Management Plan SPDs, the Local List of Buildings of Historic or Architectural Importance SPD and the Residential Extensions and Alterations SPD.

## Wooded hillsides

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 5
- Policy SP1.2
- Policy SP4.2

- Policy SP4.6
- Policy SP4.13

### Unitary Development Plan policies to be replaced

- UD9 Wooded Hillsides and Ridges

### Why did we look at this subject?

**6.141** Croydon is a borough of hillsides, valleys and ridges with a mix of buildings and tree cover, with more vegetation to the hillsides to the south with Farthing Downs. Whilst there is statutory protection of much of the landscape, some of the wooded hillsides with a mix of residential dwellings and mature trees are not designated. However in the assessment of development proposals the Council will consider the cumulative impact on the local character, including the landscape and wooded hillsides, and as required in the Croydon Local Plan Strategic Policies SP1 and SP4.

### Key evidence

- Borough Character Appraisal (2011)

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative option
No policy and rely on other policies of the Croydon Local Plan.	Development will be permitted on wooded hillsides when <ul style="list-style-type: none"> <li>a) It considers the retention of semi mature and mature trees; and</li> <li>b) The individual and cumulative impact on the hillsides and local character has been assessed by the Council and is acceptable.</li> </ul>

### Why we are proposing this approach

#### Option 1 (preferred option)

**6.142** The Option relies on the NPPF and other Croydon Local Plan policies. The strategic policies require development to consider its impact on local character and this will include wooded hillsides.

**6.143** Some hillsides already have statutory protection such as Metropolitan Green Belt, Metropolitan Open Land or Conservation Areas and do not need a specific 'wooded hillside policy'. Development that could have an impact on those hillsides that do not have a statutory protection would be assessed for the potential impact on local character which includes existing vegetation. Further Tree Preservation Orders may be issued in such circumstances.

#### Option 2

**6.144** A policy could be justified as some hillsides in Croydon are not covered by Designated Local Views, but are still visible, form back drops to areas and are part of the local character of the Places. However, this may duplicate the other policies of the Plan as landscape design and the retention of mature trees and

vegetation will be considered as part of the assessment of individual developments proposals, along with their impact on the locality.

# 7. Community Facilities

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

## Unitary Development Plan policies to be replaced

- CS1 Development of New Community Facilities
- CS2 Retaining Existing Community Facilities

## Why we are proposing this policy

**7.2** The National Planning Policy Framework (NPPF) in paragraph 69 states that 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.

**7.3** 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.

## Key evidence

- The London Plan (2011)
- National Planning Policy Framework (2012)
- Infrastructure Delivery Plan (2012)

Policy DM18: Providing and protecting community facilities

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>
<p><b>DM18.1</b> The Council will ensure the provision of a network of community facilities, providing essential public services throughout the borough by protecting existing community sites that still serve, or have the ability to serve, the needs of the community.</p> <p><b>DM18.2</b> The Council will permit the loss of existing community facilities where:</p> <ul style="list-style-type: none"> <li>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;</li> <li>b) The existing use is located on the ground floor within a Main Retail Frontage, a Secondary Retail Frontage, a Shopping Parade or a Restaurant Quarter Parade; or</li> <li>c) Community facilities of equivalent floor space (either on site or off site as part of a comprehensive redevelopment) that meets the current or future needs are provided.</li> </ul> <p><b>DM18.3</b> The Council will support applications for community use where the proposals:</p> <ul style="list-style-type: none"> <li>a) Include buildings which are flexible, adaptable, capable of multi-use and enable future expansion;</li> <li>b) Is 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</li> </ul>	<p>Rely on Croydon Local Plan Strategic Policy SP5.</p>



c) Have regard to the cumulative effect of similar uses within the area, the impact on the street scene, traffic generation and parking provision; and the level of noise, disturbance and intrusion.

### Why we are proposing this approach

**7.4** The policy for the provision of new community facilities and protection of existing community facilities are provided under Strategic Policies SP1 and SP2 of the Croydon Local Plan respectively. This aligns with the NPPF, London Plan and Croydon Local Plan Policies Strategic Policy SP5.

### How the preferred option would work

#### Protection of existing community facilities

**7.5** Proposals involving the loss of a community facility will need to:

- Provide a replacement community facility of an equivalent floor space; or
- Show that the loss would not create, or add to, a shortfall in provision for the specific community use.

**7.6** If there were no recent users, the space should be offered at a reasonable charge for community groups/voluntary sector organisations. In cases where a community use ceases it has to be successfully demonstrated that there is no local need or demand for alternative community use.

**7.7** These should be demonstrated by submitting evidence regarding both need and development viability to support a proposal or a planning application. Need and development viability both need to be addressed and satisfied. The evidence should include consultation with relevant Council departments and third

parties to establish whether any community groups or service providers have expressed both a need for the site and are interested in buying or leasing and then using it. The Viability Assessment review would be at cost to the developers.

**7.8** The protection of community facilities will not apply to Main Retail Frontages, Secondary Retail Frontages, Shopping Parades and Restaurant Quarter Parades as these are locations where Class A uses are the preferred uses.

#### Proposals for new community facilities

**7.9** 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.

**7.10** 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 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.

# 8.Environment and Climate Change

## 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

### Unitary Development Plan policies to be replaced

- EP1 Control of Potentially Polluting Uses

### Why we are proposing this policy

**8.2**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.

### Key evidence

- Planning for Air Quality (2006)
- National Planning Policy Framework (2012)

### What the evidence says

**8.3**Environmental Protection UK’s guidance “Planning for Air Quality” initially published in 2004 provides a framework for air quality considerations that need to be taken into account in the development control process. The guidance provided a new approach to addressing air quality impacts and helped provide some consistency in decision making processes. In the light of experience using the guidance, an updated and extensively revised version was published in 2006.

**8.4**The National Planning Policy Framework (paragraph 93) states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon

energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

**Policy DM19: Sustainable Design and Construction**

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative option
<p>The Council will promote high standards of Development and Construction throughout the borough by:</p> <ul style="list-style-type: none"> <li>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; and</li> <li>b) 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.</li> </ul>	<p>No policy</p>

**Why we are proposing this approach**

**8.5** The policy would replace policy EP1 of the Croydon Plan covering development that may cause pollution.

**How the preferred option would work**

**8.6** In Croydon developments of 10 or more new homes or 500m<sup>2</sup> or more of non-residential floor space are expected to meet high sustainable construction standards in accordance with the Croydon Local Plan.

**8.7** Developers should seek to minimise the adverse environmental impacts of development during construction by considering the following best practice measures:

- Identifying potential sources of dust and other air pollution as early as possible from the earliest stages of project design and planning;
- Locating activities likely to generate air pollution or dust away from sensitive uses such as hospitals, schools, housing and wildlife sites where possible;
- Minimising dust generation by dampening stockpiles and covering skips;

- Dampening and sweeping construction sites, access roads and dust generating activities such as stone cutting as required;
- Accommodating wheel washer facilities as necessary; and
- Making use of techniques such as framed construction and prefabricated components in order to minimise construction noise and disruption on site

**8.8** Solid wall insulation will also be encouraged in existing developments where planning permission may be required.

#### Demonstrating Environmental Performance or BREEAM

**8.9A** preliminary Code for Sustainable Homes assessment should be provided as necessary.(thresholds set out in Croydon Local Plan: Strategic Policies)

**8.10** For developments that are assessed under the bespoke version of BREEAM, a detailed sustainability statement should be submitted instead, based on BREEAM credits. This is due to the high cost of the bespoke process.

**8.11** For major developments, an energy statement should be submitted, detailing how London Plan requirements for carbon reduction will be met.

#### Renewable energy

**8.12** The installation on site of low and zero carbon technologies, such as solar water heating, photovoltaic cells or combined heat and power will be encouraged for all major developments in Croydon in line with the London Plan. This reduction in CO<sub>2</sub> emissions is over and above that required by Part L of Building Regulations. It is advisable to address this issue early in the development of the design as this target may be difficult to address unless careful consideration has been given to the energy strategy.

#### Air quality

**8.13** The entire borough of Croydon is an Air Quality Management Area and therefore developers should give careful consideration to the air quality impacts of their proposed development. Since very few developments are ‘zero emission’ developments, most development will have a negative impact on air quality. Developers should consider measures to minimise emissions of air pollution at the design stage and should incorporate best practice in the design, construction and operation of the development. Where a development has a negative impact on air quality, developers should identify mitigation measures that will minimise or offset the emissions from the development. 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, or will give rise to other potentially significant sources of pollution.

**8.14** 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.

#### Noise during construction

**8.15** There is a need to ensure that residents and businesses are protected from environmental disturbance during the construction of major developments.

**8.16** The Council’s Code of Practice has been prepared to help developers and their contractors ensure that they undertake their works in the most considerate manner, in order to reduce the impact of the work on local communities. It also provides guidance

on a Construction Logistic Plan required for major developments and the assessment of traffic movements.

**8.17** 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 will always need a noise assessment.

## Land contamination

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9

- Policy SP6.3

### Unitary Development Plan policies to be replaced

- EP2 Land Contamination – Ensuring land is suitable for development
- EP3 Land Contamination – Development on land known to be contaminated

### Why we are proposing this policy

**8.18** Whilst a site may contain elevated levels of ‘contaminants’, it may or may not be defined in legislation as contaminated land.

**8.19** The legislation defines contaminated land as “any land which appears to the local authority in whose area it is situated, to be in such a condition, by reasons of substances in, on or under the land that:

- a) Significant harm is being, or there is a significant possibility of such harm being caused; or
- b) Pollution of controlled waters is being or is likely to be caused.”

**8.20** 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.

**8.21** Controls in the planning system aim to ensure that the effects of historical contamination do not cause any harm to the future users of a site. Provisions in the planning process ensure that, where contamination is an issue on a site, 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.

### Key evidence

- Environment Act 1995
- National Planning Policy Framework (2012)

### What the evidence says

**8.22** Before the introduction of the Environment Act 1995, there were instances where the previous controls dealing with

contamination were not so effective, and going back further in time, controls were, themselves, limited or non-existent. This may have resulted in contamination not being addressed or satisfactorily deal with prior to or during the site's development. It is these sites that the 1995 legislation aims to deal with by ensuring that, where potentially contaminated sites do exist, they

are found and, where appropriate, cleaned up. 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. The Environment Agency can then advise on remedial measures necessary for sites that are contaminated.

**Policy DM20: Land contamination**

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>
<p><b>DM20.1</b> 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:</p> <ul style="list-style-type: none"> <li>a) The nature and extent of contamination; and</li> <li>b) The production of landfill gases and the potential risks to human health, adjacent land uses and the local environment.</li> </ul> <p><b>DM20.2</b> 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.</p> <p><b>DM20.3</b> All development proposals on contaminated sites should be accompanied by a full risk assessment, which takes into account existing site conditions.</p>	<p>No policy</p>

## **Why we are proposing this approach**

**8.23** The Council seeks to ensure that any issues of contamination are addressed through the imposition of planning conditions prior to its development. By the use of planning conditions relating to contamination, the Council places a requirement on the developer to assess and deal with any contamination which may be present on these sites.

## **How the preferred option would work**

**8.24** 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 remediation of the land should reflect the nature and risk posed by any contaminants. The Council must consult with the Environment Agency in order to ensure that the measures are successfully implemented.



# 9. Green Grid

Metropolitan Green Belt, 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

## Unitary Development Plan policies to be replaced by this policy

- RO1 Maintaining open character of Metropolitan Green Belt and Metropolitan Open Land
- RO2 Control of Development Associated with Residential Properties in Metropolitan Green Belt and Metropolitan Open Land
- RO3 Changes of Use of Existing Buildings in Metropolitan Green Belt and Metropolitan Open Land
- RO4 Conversions of buildings to residential use in Metropolitan Green Belt and Metropolitan Open Land

- RO6 Protecting the Setting of the Metropolitan Green Belt and Metropolitan Open Land
- RO8 Protecting Local Open Land
- RO9 Education Open Space
- RO15 Outdoor Space and Recreation

## Why we are proposing this policy

**9.2** 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 Croydon Local Plan: Strategic Policies seeks to protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces.

## Key evidence

- Open Space Needs Assessment (2009)
- Local List of Historic Parks and Gardens (2008)
- Infrastructure Delivery Plan (2012)
- Assessment of proposed Local Green Spaces (2013)

## What the evidence says

**9.3** The Infrastructure Delivery Plan identifies that population increases, particularly in the CMC and north of the borough will heighten the need to protect existing local park facilities and to secure opportunities for new publicly accessible open space wherever practicable. Additional pressures placed upon the

borough from growing populations and a lack of spaces in neighbouring inner London Boroughs will further exacerbate the need for outdoor recreational space and educational open space facilities

## Policy DM21: Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces

<b>Option 1</b>	<b>Option 2</b>
Preferred option	Alternative option
<p><b>DM21.1</b> The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces 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 and Local Green Spaces in the borough.</p> <p><b>DM21.2</b> Extensions to existing buildings in Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces should not be more than 20% of their original floor space or 100m<sup>2</sup> (whichever is the smaller).</p>	<p>The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces 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 and Local Green Spaces in the borough.</p>

## Proposed amendments to the Policies Map

**9.4** Local Green Space is a new designation and all areas so designated will need to be shown on the Policies Map. A list of all proposed Local Green Spaces is shown in Table 9.1 and Appendix 7 has details of all proposed Local Green Spaces including maps.

**Table 9.1 Proposed Local Green Spaces (see Appendix 7 for full details)**

Local Green Space	New
Addiscombe Railway Park	✓
Addiscombe Recreation Ground	✓
All Saints Churchyard, Sanderstead	✓
All Saints Graveyard, Sanderstead	✓
All Saints with St Margaret's Churchyard, Upper Norwood	✓
Allder Way Playground	✓
Apsley Road Playground	✓

Local Green Space	New
Ashburton Park	✓
Ashen Grove	✓
Beaulieu Heights	✓
Beulah Hill Pond	✓
Biggin Wood	✓
Boulogne Road Playground	✓
Bourne Park	✓
Brickfields Meadow	✓
Canterbury Road Recreation Ground	✓
Castle Hill Avenue playground	✓
Chaldon Way Gardens	✓
College Green	✓
Convent Wood	✓
Copse Hill Spinney	✓
Coulsdon Coppice (Bleakfield Shaw)	✓
Coulsdon Coppice (North)	✓
Coulsdon Coppice (Stonyfield Shaw)	✓
Coulsdon Memorial Ground	✓
Duppas Hill	✓
Former Godstone Road allotments	✓
Foxley Wood and Sherwood Oaks	✓
Grangewood Park	✓
Green Lane Sports Ground	✓
Haling Grove	✓
Heavers Meadow & allotments	✓
Higher Drive Recreation Ground	✓
King Georges Field	✓
Land rear of Hilliards Heath Road	✓
Little Road Playground	✓
Millers Pond	✓
Norbury Hall	✓
Norbury Park	✓
Normanton Meadow	✓

Local Green Space	New
Northwood Road Recreation Ground	✓
Park Hill Recreation Ground	✓
Parkfields Recreation Ground	✓
Pollards Hill	✓
Promenade du Verdun	✓
Purley Beeches	✓
Queen's Road Cemetery	✓
Roke Play Space	✓
Rotary Field	✓
St John's Church	✓
St John's Church Memorial Garden	✓
St John's Memorial Garden (east)	✓
St John's Memorial Garden (north)	✓
St Peter's Churchyard	✓
Sanderstead Pond (and Green)	✓
Scrub Shaw	✓
Selsdon Recreation Ground	✓
Shirley Recreation Ground	✓
South Croydon Recreation Ground	✓
South Norwood Recreation ground	✓
Spring Park Wood	✓
Stambourne Woodland Walk	✓
Temple Avenue Copse	✓
The Lawns	✓
The Queen's Gardens	✓
The Ruffet	✓
Thornton Heath Recreation Ground	✓
Trumble Gardens	✓
Upper Norwood Recreation Ground	✓
Waddon Ponds	✓
Wandle Park	✓
Westow Park	✓
Wettern Tree Garden	✓

Local Green Space	New
Whitehorse Meadow	✓
Whitehorse Road Recreation Ground	✓
Wilford Road Playground	✓
Woodcote Village Green	✓
Woodside Green	✓

## Why we are proposing this approach

### Option 1 (Preferred Option)

**9.5** The National Planning Policy Framework sets out detailed criteria on acceptable and unacceptable development in the Metropolitan Green Belt. This policy approach extends these criteria to cover Metropolitan Open Land as well thus giving it the same level of protection. The policy also defines which areas of land in the borough will have Local Green Space designation. National planning policy affords the same protection to Local Green Space as to Metropolitan Green Belt.

**9.6** The proposed policy also defines a disproportionate extension to a building in the Metropolitan Green Belt, Metropolitan Open Land or Local Green Space. It also protects both the Metropolitan Green Belt and Metropolitan Open Land from development elsewhere that would have an impact on their openness. Neither of these are set out in the National Planning Policy Framework.

### Option 2

**9.7** The alternative policy approach does not contain either a definition of a disproportionate extension or consider development outside of the Metropolitan Green Belt or Metropolitan Open Land. Instead it relies upon the criteria set out in National Planning Policy Framework to consider development proposals. It is considered that protection of both Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces in Croydon requires the additional definition of a disproportionate extension and the ability to consider the impact on Metropolitan Green Belt

and Metropolitan Open Land of development outside these designations.

## How the preferred option would work

### Metropolitan Green Belt

**9.8** Metropolitan Green Belt is a national designation which aims to check the unrestricted sprawl of London, prevent Croydon from merging with towns in neighbouring local authorities, safeguard Croydon's countryside from encroachment, to preserve the setting and special character of Croydon, and to assist in the regeneration by encouraging the recycling of derelict and urban land.

### Metropolitan Open Land

**9.9** Metropolitan Open Land is a London designation which aims to protect land that either contributes to the physical structure of London, includes open air facilities which serve either the whole or significant parts of London, contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value, or forms part of a Green Chain or a link in the network of green infrastructure.

### Local Green Space

**9.10** Local Green Space is a new national designation that aims to protect green spaces which are demonstrably special to a local community and hold a particular local significance, for example because of their beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of their wildlife, and where the green space is in reasonably close proximity to the community it serves and local in character (rather than an extensive tract of land).

### National planning policy

**9.11** Between them the National Policy Framework and London Plan apply the same level of protection to the Metropolitan Open

Land and Local Green Spaces as is afforded to Metropolitan Green Belt.

**9.12** The National Planning Policy Framework says that new buildings in the Green Belt are inappropriate with the exception of:

- Buildings for agriculture and forestry;
- 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;
- 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;
- The replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

**9.13** The National Planning Policy Framework also says that the following uses are also not inappropriate in the Green Belt provided they preserve the openness and do not conflict with the purposes of including land within the Green Belt:

- Mineral extraction;
- Engineering operations;
- Local transport infrastructure which can demonstrate a requirement for a Green Belt location;

- The re-use of buildings provided that the buildings are of permanent and substantial construction; and
- Development brought forward under a Community Right to Build Order.

#### Local Green Space in Croydon

**9.14** Local Green Space is designated by the Croydon Local Plan. It is proposed to designate Local Green Spaces on all sites outside of Metropolitan Green Belt and Metropolitan Open Land that:

- Are in close proximity to the land that it serves;
- Are local in character and not part of an extensive tract of land; and
- Are at least three of the following or are publically accessible and at least one of the following:
  - a) Historic Park or Garden;
  - b) Community garden;
  - c) Children's play area;
  - d) Tranquil area;
  - e) Natural and semi-natural open space;
  - f) Cemetery, church yard or burial ground;
  - g) Site of Nature Conservation Importance; or
  - h) Playing field or recreation ground.

#### Extensions and replacement of existing buildings

**9.15** Any extension of more than 20% of the original floor space or greater than 100m<sup>2</sup> in extent (whichever is the smaller) of an existing building located in Metropolitan Green Belt, on Metropolitan Open Land or in Local Green Space will be considered disproportionate.

**9.16** In determining whether extensions smaller than 20% of the original floor space and less than 100m<sup>2</sup> in extent are disproportionate, a new replacement dwelling is materially larger

or, if the or if an ancillary structures harm openness, the Council will have regard to:

- Changes in the floor space and volume of buildings;
- The floor space and volume of all previous extensions (since 1948), alterations and developments within the curtilage of the dwelling;
- Use of basements and roof spaces as living areas;
- Whether there is an increase in the spread of buildings across the site, in particular where visible from public vantage points;
- The size of the curtilage and character of the surrounding area; and
- Whether ancillary structures have an urbanising effect.

**9.17** In considering applications for the replacement of existing buildings in Metropolitan Green Belt, on Metropolitan Open Land or in Local Green Space the Council may seek alterations in the position of the footprint on the site, or other changes that will reduce the impact on the open character of the area.

**9.18** Where a proposed change of use of an existing building in Metropolitan Green Belt, on Metropolitan Open Land or in Local Green Space 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.

#### Visual amenity of Metropolitan Green Belt and Metropolitan Open Land

**9.19** Openness is a primary consideration in designating Metropolitan Green Belt and Metropolitan Open Land. Its openness can be harmed by development not actually located within the designations. Therefore, development conspicuous from the Metropolitan Green Belt or Metropolitan Open Land will not be permitted if it would harm their visual amenity

## Biodiversity

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Strategic Objective 10

- Policy SP7.4

### Unitary Development Plan policies to be replaced by this policy

- NC1 Sites of Nature Conservation Importance
- NC2 Specially Protected and Priority Species and their Habitats
- NC3 Nature Conservation Opportunities throughout the borough

- NC4 Woodlands, Trees and Hedgerows

### Why we are proposing 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.

### Key evidence

- The Natural Choice: securing the value of nature (2011)
- Adapting to climate change: Creating natural resilience, London Climate Change Partnership (2009)
- Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)
- Green Infrastructure Study (2011)
- Infrastructure Delivery Plan (2012)

### What the evidence says

**9.21** The Infrastructure Delivery Plans states that Croydon's long term goal is to continue to identify opportunities to enhance biodiversity and implement them through measures such as urban agriculture, green roofs, and sustainable urban drainage.

**9.22** Some 84% of European crops and 80% of wildflowers rely on insect pollination. Over the last 20 years there has been a 54% decline in honey bee colony numbers in England. More than 50% of English landscapes now have fewer species of bees and hoverflies than in 1980. These changes have been driven by habitat loss (and also farming practices).

**9.23** The Council has commissioned further evidence to update the borough's local list of Sites of Nature Conservation Importance. This will be published later in 2013.

Policy DM22: Biodiversity

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>
<p>To enhance biodiversity across the borough and improve access to nature, development proposals should:</p> <ul style="list-style-type: none"> <li>a) Incorporate biodiversity on development sites to enhance local flora and fauna and aid pollination locally;</li> <li>b) Incorporate biodiversity within and on buildings in the form of green roofs, green walls or equivalent measures; and</li> <li>c) Have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map; and</li> <li>d) Have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a protected species would be affected.</li> </ul>	<p>No alternative option</p>

**Why we are proposing this approach**

**9.24** Only one option is proposed as there are no reasonable alternative options. The need to protect the remaining biodiversity in the borough, especially that of national and regional significance means that the preferred option, which is an approach aimed at protecting existing biodiversity and ensuring development aims to increase it further, is the only reasonable option.

**How the preferred option would work**

**9.25** 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. Backland and other 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.

**9.26** 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.

**9.27** 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.

**9.28** 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 a four Local Nature Reserves and one Regionally Important Geological site (the Croham Hurst Cemented Blackheath Pebble Beds).

**9.29** 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.

**9.30** 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.

**9.31** 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.

**9.32** Some species of flora and fauna are protected by national and international legislation. The habitats of certain wildlife species are also specifically protected, although the retention of the habitats and adequate foraging areas of all protected species are considered essential for their survival. Specially protected species can be found throughout the borough, they are not restricted to designated sites of nature conservation interest. It is therefore always necessary to consider the presence of specially protected species.

**9.33** Where an ecological assessment is needed to support a planning application the Council will require the applicant to pay for an additional independent assessment to be carried on out on behalf of the local authority.

**9.34** The Croydon Local Plan: Detailed Policies and Proposals will set out on the Policies Map where specific designations are.

Until the borough's local list of Sites of Nature Conservation Importance is updated the designations will remain as shown on the existing UDP Policies Map.

## 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

### Unitary Development Plan policies to be replaced by this policy

- NC4 Woodland, Trees and Hedgerows
- UD14 Landscape Design

### Why we are proposing 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.

### Key evidence

- The Natural Choice: securing the value of nature (2011)
- Adapting to climate change: Creating natural resilience, London Climate Change Partnership (2009)
- Guidance for Local Authorities on Implementing the Biodiversity Duty (2007)
- Green Infrastructure Study (2011)

Policy DM23: Trees

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>
<p>The council will seek to protect and enhance the borough's woodlands, trees and hedgerows by:</p> <ul style="list-style-type: none"> <li>a) Ensuring that all development proposals accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent;</li> <li>b) Not permitting development that results in the loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area;</li> <li>c) Not permitting development that could result in the future loss or excessive pruning of preserved trees or trees that make a contribution to the character of the area;</li> <li>d) Not permitting development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees; and</li> <li>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.</li> </ul>	<p>No alternative policy – rely on Tree Preservation Orders, the Hedgerow Act, other policies of the Plan and add the following clauses to the <i>Policy DM10 Design and Character</i>:</p> <ul style="list-style-type: none"> <li>a) Ensuring that all development proposals accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent; and</li> <li>b) Ensuring that landscape schemes emphasise the planting of impact trees.</li> </ul>

**Why we are proposing this approach**

**9.36** An alternative approach would rely on other policies on nature conservation in the Plan and Tree Preservation Orders and the Hedgerow Act to protect trees. This will only cover certain trees and hedgerows and given the importance of trees in Croydon a specific policy is considered to be the best approach.

**How the preferred option would work**

**9.37** The London Plan outlines 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.

**9.38** 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 where roads in or access to a development pass within close proximity to a tree. 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 the form of a tree survey or equivalent to determine the future impact upon the trees.

**9.39** Exceptionally the Council may permit development where the loss of the tree is unavoidable and there are clear benefits that outweigh the harm caused by the loss of the tree. In such cases the Council may impose a condition to require its replacement either, if practicable 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.

## Productive landscapes

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 4
- Strategic Objective 7
- Strategic Objective 9

- Policy SP7.5

### Unitary Development Plan policies to be replaced

- None

### Why did we look at this subject?

**9.40** The National Planning Policy Framework and the London Plan do not have sufficient policy support capable of yielding results on a site by site basis. Local development management policies are required that cover local agricultural land (including an allotments policy) and growing spaces within the site environs of new developments.

**9.41** Food security is a long-term challenge; farming needs to be supported in building capacity for sustainable production both in the UK and globally. However, the food chain has major impacts on climate change, biodiversity and the wider environment, which require management. Reducing food miles and maximising the use of agricultural land whilst maintaining soil quality and biodiversity are key challenges over the plan period.

**9.42** Demographic change will also have important environmental impacts. The recent report of the Royal Commission on Environmental Pollution, Demographic Change

and the Environment, argued that the main environmental challenge is not the total size of the population, but how and where people choose to live. Demographic change is also a factor in water stress and in competition for different types of land use (e.g. for energy, food or development). The Foresight Report, The Future of Food and Farming: Challenges and choices for global sustainability, concludes that substantial changes will be required throughout and beyond the food system to provide food security for a predicted 9 billion people.

**9.43** Policy SP7.5 provides a strategic framework for supporting food growing in Croydon but does not state specifically how it should be applied to developments in the borough. However a policy that states it should be provided in new developments would be difficult to enforce and there would be no guarantee that growing spaces would be used, or that incidental space would not be used for growing food.

**9.44** The Council will support the provision of new allotments and growing spaces within the borough.

## Key evidence

- Good planning for Good Food (2010)
- The Foresight Report, The Future of Food and Farming: Challenges and choices for global sustainability (2011)

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative option
Rely on Croydon Local Plan Strategic Policy SP7.5 and rely on NPPF as a material planning consideration.	<p>To increase create and safeguard opportunities for healthy, fulfilling and active lifestyles, and the creation of healthy and liveable neighbourhoods in Croydon and to reduce the environmental impact of importing food development proposals should:</p> <ul style="list-style-type: none"> <li>a) Incorporate food growing in the design and layout of buildings and landscaping of all major developments<sup>34</sup>;</li> <li>b) Not result in the loss of existing allotments; and</li> <li>c) Not result in the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a).</li> </ul>

<sup>34</sup> Developments of 10 or more residential units, 1,000m<sup>2</sup> or more of non-residential floor space or sites more than 0.5ha in extent.

## Other open land and open space in education use

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Strategic Objective 10

- Policy SP7.3

### Unitary Development Plan policies to be replaced

- RO8 Protecting Local Open Land
- RO9 Education Open Space

- RO10 Education Open Space

### Why did we look at this subject?

**9.45** Local Open Land and Education Open Space are both designated in the existing Croydon Replacement Unitary Development Plan. It contains a criteria based policy to protect sites.

**9.46** These policies are now covered through a combination of proposed policies on Local Green Space and Urban Design & Local Character and by the National Planning Policy Framework. The National Planning Policy Framework says that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

**9.47** Therefore, no specific policy on other open land and open space in education use is proposed in the Croydon Local Plan.



<b>Option 1</b>	<b>Option 2</b>
Preferred option	Alternative option
No policy on other open land and open space in education use.	Criteria based policy on acceptable development (design and used based) of other open land and open space in education use.

**Proposed amendments to the Policies Map**

**9.48** All sites designated as Local Open Land in the existing Croydon Replacement Unitary Development Plan have been assessed under the new criteria for designation as Local Green Space. There are a small number of sites designated as Local Open Land in the existing Croydon Replacement Unitary Development Plan that are not proposed as Local Green Space because they were contiguous with an adjacent area of Metropolitan Green Belt. Minor extensions to the Metropolitan Green Belt are proposed to ensure continued protection of these areas of land.

**9.49** There are proposed minor extensions to the Metropolitan Green Belt in the Places of Addington, Coulsdon, Kenley & Old Coulsdon, Sanderstead, Selsdon and Shirley. A list of all proposed minor extensions to the Metropolitan Green Belt is shown in Table 9.2 below and Appendix 8 has details of all proposed minor extensions including maps.

**Table 9.2 Proposed minor extensions to the Metropolitan Green Belt (see Appendix 8 for full details)**

Minor extension to Metropolitan Green Belt	New
The Bridle Road, Shirley	✓
Land between The Bridle Way and Selsdon	✓
Land between Vale Border and Selsdon	✓
Bradmore Green, Old Coulsdon	✓

Minor extension to Metropolitan Green Belt	New
Land SW of Cudham Drive, Flora Gardens and Corbett Close, New Addington	✓
Coulsdon Iron Railway Embankment	✓
Land on Riddlesdown Road	✓
Land at Rogers Close, Old Coulsdon	✓
Land in Tollers Lane	✓
Land to rear of Goodenough Close, Middle Close and Weston Close, Old Coulsdon	✓
Land to south of Croham Hurst	✓
Land off Lower Barn Road	✓
Sanderstead Recreation Ground	✓
Courtwood Playground	✓
Addington Vale	✓
Milne Park	✓
St John the Evangelist’s churchyard, Old Coulsdon	✓

## Open space in new development

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 9
- Strategic Objective 10

- Policy SP7.3

### Unitary Development Plan policies to be replaced

- RO12 Local Open Land in Residential Schemes

### Why did we look at this subject?

**9.50** The provision of open space within new residential development is considered by the Unitary Development Plan. It is not always possible to provide open space within new developments although it is desirable. Currently in situations where it is not possible to provide on-site open space a commuted sum to improve a local park or open space is taken instead. Following the introduction of Community Infrastructure Levy in Croydon in April 2013 it will not be possible to pool together commuted sums towards the improvement of parks and open space in Croydon. On-site provision of open space is included within proposed Policy DM1.

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative option
No policy as private open space is covered by Policy DM1 and public open space is considered infrastructure for the purposes of the Community Infrastructure Levy.	Residential developments should consider recreational open space arising from the needs generated by the proposal and provide open space commensurate with standards set out in the Infrastructure Delivery Plan.

# 10. Transport

Highway safety and reducing congestion

## Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 8

- Policy SP8.3

## Unitary Development Plan policies to be replaced by this policy

- T2 Traffic Generation from Development
- T4 Cycling

## Why we are proposing this policy

**10.2** Croydon has a strategic objective to improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

### Key evidence

- The Cost of Congestion to the Economy of the Portland Region (2005)
- Croydon Opportunity Area Planning Framework – Strategic Transport Study (2013)

## What the evidence says

**10.3** Croydon suffers from congestion in a number of locations identified in the Croydon Opportunity Area Planning Framework - Strategic Transport Study. Congestion hinders Croydon's economic regeneration and development. A study from Portland, USA has calculated that congestion costs it \$844m annually<sup>35</sup>. Congestion and use of private transport also leads to increased carbon emissions in the borough. Croydon produces 1,660kt of CO<sub>2</sub> a year which puts it at seventh highest out of 33 London boroughs. The London Plan includes a target to reduce CO<sub>2</sub> emissions by 60% by 2025, the Climate Change Act sets out that emissions will be reduced by 80% by 2050 (based on 1990 levels).

<sup>35</sup> [http://www.portofportland.com/PDFPOP/Trade\\_Trans\\_Studies\\_CoC\\_Report1128Final.pdf](http://www.portofportland.com/PDFPOP/Trade_Trans_Studies_CoC_Report1128Final.pdf)

Policy DM24: Highway safety and reducing congestion

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>
<p>To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:</p> <ul style="list-style-type: none"> <li>a) Promote measures to increase the use of public transport, cycling and walking;</li> <li>b) Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and</li> <li>c) Not result in a severe impact on the road network local to the site.</li> </ul>	<p>Rely on National Planning Policy Framework, the London Plan and Croydon Local Plan Strategic Policy SP8.</p>

**Why we are proposing this approach**

**10.4** 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.

**10.5** Strategic Policy SP8 provides a strategic overview for reducing congestion and improving highway safety. The preferred option extends this approach to ensure that individual developments consider these matters.

**How the preferred option would work**

**10.6** Some development would result in a severe impact on the local road network. An impact of this scale would detract from the economic and environmental regeneration of the borough by making Croydon less accessible and a less attractive location in which to develop. Such development will not be permitted.

**10.7** The extent of the local road network will vary depending on the location of the development but will always include the routes from the development site to the Transport for London Road Network. For developments located on a Transport for London road the local road network will include the Transport for London Road Network within and leading into the borough.

**10.8** All major development proposals<sup>36</sup> should demonstrate by means of a Transport Assessment or equivalent 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 road network.

**10.9** New development should also provide cycle parking in accord with the standards set out in the London Plan.

**10.10** The Croydon Local Plan: Strategic Policies requires new developments to increase the permeability and connectivity for pedestrians of their sites and to create new cycle routes in their developments.

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<sup>36</sup> Residential development of 10 or more units, 1,000m<sup>2</sup> of non-residential floor space or a development of 0.5ha or more in extent

## 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

### Unitary Development Plan policies to be replaced by this policy

- T8 Car Parking Standards in New Development

### Why we are proposing this policy

**10.11** 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.

**10.14** Occupiers of affordable housing also require car parking spaces although on average car ownership is 30-60% less than that of owner occupied homes.

### Key evidence

- Residential Car Parking Research (2007)
- The London Plan (2011)

### What the evidence says

**10.12** The London Plan requires new developments to provide electric car charging points in 20% of car parking spaces.

**10.13** The London Plan requires 10% of new residential dwellings to be wheelchair accessible or adaptable.

Policy DM25: Parking in new development

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option</p>
<p>To promote sustainable growth in Croydon and reduce the impact of car parking new residential development must:</p> <p>a) Reduce the impact of car parking in any development located in areas of good public transport accessibility<sup>37</sup> or areas of existing on-street parking stress;</p> <p>b) Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;</p> <p>c) Ensure that highway safety is not compromised by the provision of car parking;</p> <p>d) Provide car parking spaces as set out in Table 10.1; and</p> <p>e) Provide car parking for affordable homes at an average rate not less than <math>\frac{2}{3}</math> that of other tenures.</p>	<p>Rely on Croydon Local Plan Strategy Policy SP8.</p>

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
Minor Residential <sup>38</sup>	n/a	Enable the future provision of electric charging points and parking bays for electric vehicles	n/a	As per London Plan Table 6.2

<sup>37</sup> Public Transport Accessibility Level (PTAL) rating of 4 or more.

<sup>38</sup> Nine or fewer residential units on a site less than 0.5ha in extent.

<b>Development type</b>	<b>On-site car club/Pool car parking spaces</b>	<b>Electric charging points and parking bays</b>	<b>Disabled car parking</b>	<b>Overall number of car parking spaces</b>
Major Residential <sup>39</sup>	5% of spaces with a minimum of 1 parking space	Enable the future provision of electric charging points and parking bays for electric vehicles	10% of visitor parking with a minimum of 1 space plus 1 disabled car parking space for each new dwelling designed to meet London Plan requirement for 10% of homes to be wheelchair accessible or adaptable	
Minor Non-residential <sup>40</sup>	n/a	n/a	As per London Plan Table 6.2	
Major Non-residential <sup>41</sup>	5% of spaces with a minimum of 2 parking spaces	As per London Plan Table 6.2	As per London Plan Table 6.2	

<sup>39</sup> 10 or more residential units or a site of more than 0.5ha

<sup>40</sup> Less than 1,000m<sup>2</sup> of non-residential floor space on a site less than 0.5ha in extent

<sup>41</sup> A site of more than 0.5ha or more than 1,000m<sup>2</sup> of non-residential floor space



## Why we are proposing this approach

**10.15** Croydon Local Plan Strategic Policy SP8 sets basic car parking standards by referring to pan-London standards set by the London Plan. These are sufficient for managing the overall provision of car parking in new development. However as some potential users of car parking have particular requirements these need to be covered in a Croydon-specific policy.

## How the preferred option would work

**10.16** In locations in Croydon Opportunity Area<sup>42</sup> and other areas with very high levels of public transport accessibility new development may not need car parking but elsewhere in the borough car parking will probably be needed. 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 need to promote alternatives to private car use including car clubs, encouraging use of public transport by residents and enhanced provision of covered and secure cycle parking.

**10.17** 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.

**10.18** 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. 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.

**10.19** 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 and fully integrated in the design.

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<sup>42</sup> The Croydon Opportunity Area Planning Framework has more details on parking within the opportunity area.

## Temporary car parks

### Strategic Objectives and related Croydon Local Plan strategic policies

- Strategic Objective 1
- Strategic Objective 5
- Strategic Objective 9

- Policy SP1.1

### Unitary Development Plan policies to be replaced by this policy

- None

### Why we are proposing this policy

**10.20** 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.

### Key evidence

- Croydon Local Plan Strategic Policies SP3.5, SP5.7 and SP7.5 (2012)

### What the evidence says

**10.21** The Croydon Local Plan: Strategic Policies supports 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 DM26: Temporary car parks

<b>Option 1</b> Preferred option	<b>Option 2</b> Alternative option
To enhance a sense of place and improving the character of an area permission will only be granted for temporary uses other than temporary car parks.	To enhance a sense of place and improving the character of an area permission for temporary car parks for a period of not more than three years will be permitted if:  a) There is no demand for a scheme comprised of other temporary uses; and  b) Either there is a recent and extant <sup>43</sup> outline or full planning permission for a permanent use on the site or the applicant is engaging the Council's pre-application Development Team Service (or equivalent) to discuss the future redevelopment of the site.

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<sup>43</sup> Recent and extant is defined as a permission that is not more than three years old.

## Why we are proposing this approach

### Option 1 (preferred option)

**10.22** The Croydon Local Plan: Strategic Policies encourages 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. Temporary car parks can be easier to set up compared to other temporary uses. Therefore, the preferred approach would not permit temporary car parks to open.

**10.23** Temporary car parks could also undermine future car parking strategies for the borough.

### Option 2

**10.24** An alternative option would be to permit temporary car parks in some circumstances. To ensure that temporary car parks are intended to be temporary the site would already have a recent and extant outline or full planning permission for a permanent use. Alternatively a temporary car park might be granted permission if the applicant is engaging the Council's pre-application Development Team Service (or equivalent if it is replaced) to discuss the future redevelopment of the site. This could enable the Council to gauge the intent of applicants to secure the regeneration of a site. The simpler versions of the Council's pre-application advice service would not be sufficient to determine the intent of an applicant in this instance.

**10.25** A lack of demand for a scheme comprised of other temporary uses could be demonstrated through evidence of marketing the site for temporary use, both to specialist organisations such as ACAVA and Acme Studios and to community groups, along with evidence that the site is not suitable for a temporary urban greening or urban agriculture.

**10.26** The Sustainability Appraisal of the Detailed Policies (Preferred and Alternative Options) highlighted that Option 2 had negative sustainability impacts.

## How the preferred option would work

**10.27** 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.

**10.28** Temporary uses can include both specialist organisations such as ACAVA and Acme Studios and community groups, along with urban greening or urban agriculture.

# 11. The Places of Croydon

The Place-specific development management 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

## Unitary Development Plan policies to be replaced by these policies

- None

### Why we are proposing these policies

**11.2** 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.

**11.3** 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 Areas of Special Character (LASC) or the Croydon Opportunity Area.

**11.4** A Built Character Evaluation (see Appendix 9) was conducted to identify the locations in each of Croydon's 16 Places where Place-specific development management policies would be beneficial.

**11.5** 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 in the policy area maps (see Appendix 11).

**11.6** In Places where it is unclear which predominant residential character should be referenced, additional Place-specific

development management policies, including details on residential character have been included.

**11.7** The character within these areas can be managed through other policies within this Plan along with the masterplans, Conservation Area Appraisal and Management Plans, local areas of special character (LASC) and the Croydon Opportunity Area Planning Framework. These Places have been outlined in Table 11.1.

**Table 11.1 Policy and guidance matrix for the Places of Croydon**

Place	Opportunity Area Planning Framework	Conservation Area/LASC Management Plans (location specific)	Masterplan (location specific)	All other Croydon Local Plan policies
Addington		✓		✓
Addiscombe		✓		✓
Broad Green & Selhurst		✓	✓	✓
Coulsdon		✓	✓	✓
Croydon Opportunity Area	✓	✓	✓	✓
Crystal Palace & Upper Norwood		✓		✓
Kenley & Old Coulsdon		✓		✓
Norbury		✓		✓
Purley		✓		✓
Sanderstead		✓		✓
Selsdon				✓
Shirley		✓		✓
South Croydon		✓		✓
South Norwood & Woodside		✓		✓
Thornton Heath		✓		✓
Waddon		✓	✓	✓

**Key evidence for the Place-specific development management policies**

- Borough Character Appraisal (2011)
- Croydon Local Plan – Strategic Policies (2012)
- Non Residential Character Appraisal (2012)
- Built Character Evaluation Map (2012)
- Specific Character Management Policies Map (2012)
- Public Realm Design Guide (2012)
- SPG 19 Public Art (2005)
- Shop Front Security Addendum to Supplementary Planning Guidance No.1 Shop Fronts & Signs (2012)

**What the evidence says**

**11.8** The NPPF paragraph 58 states that “Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics”. The evaluation of the borough’s built character (see Appendix 9) fulfils this criterion.

**11.9** An evaluation was carried out to assess the character of the existing built environment across the borough to identify areas with a less consistent character pattern which may benefit from specific management policies. The work carried out through the evaluation of the existing character of the built environment within the borough has identified the need for Place-specific development management policies. This approach is in line with NPPF paragraph 59.

**Policy DM27: Positive character of the Places of Croydon**

<p><b>Option 1</b></p> <p>Preferred option</p>	<p><b>Option 2</b></p> <p>Alternative option <i>for all Place-specific policies</i></p>
<p><b>DM27.1</b> To ensure that Council’s aspirations and objectives for each of Croydon’s 16 Places is clearly reflected in the built environment proposals should respect and enhance the predominant positive character types identified for each Place. This policy should be read in conjunction with the following:</p> <ul style="list-style-type: none"> <li>a) Places of Croydon – Local Character (Appendix 9)</li> <li>b) The published Borough Character Appraisal including the Residential Character Typologies</li> </ul>	<p>Rely on general policies to provide guidance.</p>

c) Non Residential Character Typologies (Appendix 10)

**DM27.2** In the specific locations identified on the Policies Map development should also refer to and be informed by the Place-specific policy.

**Proposed amendments to the Policies Map**

**11.10** The Place-specific development management policies identify specific locations with less consistent character where the criteria of Policies DM28 to DM42 apply. As these are new designations they will need to be shown on the Policies Map. A list of all proposed Place-specific policies is shown in Table 11.2 and Appendix 11 has details of all proposed areas where a proposed Place-specific development management policy will apply including maps.

**Table 11.2 Proposed Place-specific development management policies (see Policies DM28 to DM42 and Appendix 11 for full details)**

Place-specific development management policy	Policy ref	New
New Addington District Centre	DM28	✓
Addiscombe District Centre	DM29.1	✓
Area between Addiscombe Railway Park & Lower Addiscombe Road (Section between Leslie Park Road & Grant Road)	DM29.2	✓
Broad Green Local Centre	DM30.1	✓
Potential new Local Centre at Valley Park	DM30.2	✓
Area of the Lombard Roundabout	DM30.3	✓
Area north of Broad Green Local Centre	DM30.4	✓
Area of the junction of Windmill Road and Whitehorse Road	DM30.5	✓
Coulsdon Masterplan area	DM31	✓
Croydon Opportunity Area (New Town and the Retail Core)	DM32.2	✓

Place-specific development management policy	Policy ref	New
Croydon Opportunity Area (London Road area)	DM32.3	✓
Croydon Opportunity Area (area along Sydenham and Lansdowne Road)	DM32.4	✓
Area between Kenley Station and Godstone Road	DM33	✓
Norbury District Centre	DM34.1	✓
Pollards Hill Local Centre	DM34.2	✓
Purley District Centre and its environs	DM35.1	✓
Environs of Reedham station	DM35.2	✓
Area of the junction of Brighton Road and Purley Downs Road	DM35.3	✓
Sanderstead Local Centre	DM36.1	✓
Hamsey Green Local Centre	DM36.2	✓
Selsdon District Centre	DM37.1	✓
Forestdale	DM37.2	✓
Shirley Local Centre	DM38.1	✓
Area between 518 and 568 Wickham Road	DM38.2	✓
Area of the Wickham Road Shopping Parade	DM38.3	✓
Area of the Shirley Road Shopping Parade	DM38.4	✓
Brighton Road (Selsdon Road) Local Centre	DM39.1	✓
Brighton Road (Sanderstead Road) Local Centre	DM39.2	✓



Place-specific development management policy	Policy ref	New
Brighton Road between the Brighton Road (Sanderstead Road) Local Centre and Grange Road	DM39.3	✓
Section of Portland Road between the South Norwood Conservation Area and Watcombe Road	DM40.1	✓
Section of Portland Road between Watcombe Road and Woodside Avenue	DM40.2	✓
Thornton Heath District Centre and environs	DM41.1	✓
Thornton Heath Pond Local Centre and environs	DM41.2	✓
Waddon's potential new Local Centre	DM42	✓

### Why we are proposing this approach

#### Option 1 (preferred option)

**11.11** The preferred option provides robust Place-specific development management policies for areas with less consistent character to facilitate growth and provide greater clarity regarding the key characteristics that should be respected, strengthened and enhanced.

#### Option 2

**11.12** This option relies on the existing design and character policies to conserve the established positive character of this area. Whilst this policy provides sufficient guidance in areas with a uniform character, it offers less guidance in areas where the character is mixed or less easily defined. This option provides less clarity with regard to which characteristics to respect, strengthen and enhance.

## Addington

### General character

**11.13** 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 a setting for the historic Addington Village (a designated Conservation Area), the 20th century housing estates in New Addington (comprising of "Local Authority Built Housing with Public Realm") and in Fieldway "Mixed Type Flats and Compact Houses".

**11.14** Apart from the historic Addington Village, the Place is served by two "Suburban Shopping Character Areas", Central Parade in New Addington (the District Centre) and Wayside in Fieldway.

**11.15** The spine of Central Parade separates the less green "Suburban Shopping Character 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.

### Policy DM28: Addington

#### ***Preferred option***

Within the New Addington District Centre, to ensure that the distinct 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.

### How the preferred option would work

#### New Addington District Centre

**11.16** A map showing the area in which Policy DM28 applies can be found in Appendix 11.

**11.17** 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 the policies in the Croydon Local Plan. However, additional policies are required to manage the area to the west of the parade (see Appendix 11) where there are precedents of large and tall buildings. This location presents opportunities for growth through the creation of large or tall buildings.

## Addiscombe

### General character

**11.18** Addiscombe is a suburban residential settlement, framed by green areas on the eastern side. 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 Chepstow/Addiscombe Road); and "Industrial Estates" within the interiors of blocks, interlaced with houses.

**11.19** The residential character consists of a varied yet balanced mix of "Terraced Houses and Cottages" (along Lower Addiscombe Road and in the East India Estate Conservation Area), "Mixed Flats and Compact Houses" in the south west (between East Croydon and the Addiscombe tram stop), "Detached Houses on Relatively Large Plots" in south east (between the Addiscombe tram stop and Lloyd Park) and "Local Authority Housing With Public Realm" in the north.

### Policy DM29: Addiscombe

#### **Preferred option**

**DM29.1** Within the Addiscombe District Centre, to ensure that the Distinct 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 Road Junction;

- b) Retain the rhythm, size and the continuity of ground floor active frontages<sup>44</sup>;
- c) Allow flexibility at first floor and above for mixed use;
- d) Retain, enhance and positively reference corner features such as the articulation of corner building 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 riser's fascias and pilasters; and
- f) Incorporate multi-stock brick as the predominant facing materials of the whole building.

**DM29.2** 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

<sup>44</sup> These buildings have few or no blank facades. At ground floor it contains 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.

open character of front gardens;

- b) Respond to the fine grain<sup>45</sup> of the existing residential developments;
- c) Complement the existing predominant building heights of 3 storeys up to 4 storeys;
- d) Enhance existing and provide new direct public walking and cycling routes to Addiscombe Railway Park.
- e) Incorporate multi-stock brick and white render as the predominant facing materials of the whole building.

### How the preferred option would work

**11.20** A map showing the areas in which Policies DM29.1 and DM29.2 apply can be found in Appendix 11.

#### Addiscombe District Centre

**11.21** 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.

**11.22** 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

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<sup>45</sup> Grain also called urban grain. It describes the pattern of the arrangement and size of buildings within a settlement and the degree by which an area's pattern of streets-blocks and junctions are respectively small and infrequent (fine grain) or large and infrequent (course grain).

Houses and Cottages" sited on the southern side of Lower Addiscombe Road.

**11.23** 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 within finials and the projecting double gable ends running at 90 degree angles interrupting the running cornices contribute to Addiscombe's distinctiveness. Additionally features such as the articulation of corner buildings including ground floor entrances that address corners is a characteristic feature throughout the District Centre and should be referenced.

**11.24** 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.

**11.25** The Lower Addiscombe Road/Blackhorse Road junction area is a formal, well defined urban public space framed on three sides by buildings with a predominant height of 2-5 storeys.

**11.26** 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 3.1 balances the need to facilitate growth and respect the existing character.

**11.27** This policy seeks to retain the continuity of plot widths, setbacks and traditional shop frontages (in line with the Shopfront Security Addendum to Supplementary Planning Guidance No.1 Shopfronts & Signs). This should not preclude growth, as growth may be still be achieved through creative design solutions such as (where appropriate) amalgamating shop units to create one larger unit.

Area between Addiscombe Railway Park & Lower Addiscombe Road (Section between Leslie Park Road & Grant Road)

**11.28** 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 Housing with Public Realm".

**11.29** 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 the Policies in DM29.2 will provide guidance to enable this to be carried out in a sensitive way.

## Broad Green and Selhurst

### General character

**11.30** 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 and 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" and "Mixed Type Flats and Compact Houses" including tall and large buildings along London Road.

### Policy DM30: Broad Green and Selhurst

#### *Preferred option*

**DM30.1** 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.

**DM30.2** Within the area of the potential new Local Centre at Valley Park, to ensure potential development opportunities including public realm improvements are undertaken in a cohesive and coordinated manner and that they result with creation of a Local Centre with a sense of place and distinct character, a masterplan will be considered.

**DM30.3** In the area of the Lombard Roundabout, to facilitate growth and to enhance the distinctive character of the Lombard Roundabout Area proposals should:

- a) Complement the existing predominant building heights of 3 storeys up to a maximum of 5 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.

**DM30.4** In the area north of Broad Green Local Centre, to ensure that proposals enhance and strengthen the character of the area north of the Broad Green Local Centre, and facilitate

growth, developments should:

- a) Retain and create glimpses and separation distances between buildings in order to improve the openness of London Road;
- b) Incorporate main pedestrian entrances onto London Road;
- c) Complement the existing predominant building heights of 3 storeys up to a maximum of 8 storeys; and
- d) Retain the extent and enhance the quality of the existing public realm within the development, including introducing large trees and other vegetation to balance the impact of large and tall buildings.

**DM30.5** 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;
- 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.

## How the preferred option would work

**11.31** A map showing the areas in which Policies DM30.1 to DM30.5 apply can be found in Appendix 11.

### Broad Green Local Centre

**11.32** Broad Green Local Centre is dominated by the London Road traffic. It is an area with potential for growth.

**11.33** 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.

**11.34** The detailed policies in DM30.1 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

**11.35** The area is currently dominated by large scale "Retail Estates, Business and Leisure Parks" and associated parking, separated from the adjoining area by embankments, Purley Way and the tram infrastructure.

**11.36** 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.

**11.37** 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.

#### Lombard Roundabout area

**11.38** This is an area at the edge of two character types that contrast in scale. These are "Terraced Houses and Cottages" and "Large Buildings in an Urban Setting". 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.

**11.39** 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.

#### Area north of Broad Green Local Centre

**11.40** The edge of the Broad Green Local Centre is eroding and is beginning to lose its separate identity and sense of place. This could result in its being absorbed into the homogenous urban form of London Road.

**11.41** The area north of Broad Breen 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

**11.42** 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 and Business and Leisure Parks".

**11.43** 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



## Coulsdon

### General character

**11.44** Coulsdon is a small suburban settlement surrounded by areas of Green Belt. This area is characterised by "Institutions with Associated Grounds" (Cane Hill). The District Centre has a well-defined and consistent "Urban Shopping Area" character and two parallel strips containing "Retail Estates and Business and Leisure Parks" and "Industrial Estates separated by the bypass and railway lines".

**11.45** 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, "Planned Estates of Semi Detached Houses" with garages and low density, "Scattered Houses on Large Plots" in the south.

### Policy DM31: Coulsdon

#### ***Preferred option***

To enable development opportunities; including public realm improvements, to be undertaken in a cohesive and coordinated manner, proposals should follow the Coulsdon Masterplan.

### How the preferred option would work

**11.46** Coulsdon has the potential for growth. Much of this is concentrated within the Cane Hill area.

**11.47** The proposed new Local 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.

**11.48** Coulsdon Local 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.

**11.49** The additional Place-specific development management policy will ensure that proposals within the Local Centre are undertaken in a cohesive way and that developments within this area are aligned with the Coulsdon Masterplan.

## Croydon Opportunity Area

### General character

**11.50** 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 and Precincts" 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 in an Urban Setting" 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 in an Urban Setting" located to the south. Radiating southwards from the "Shopping Centres and Precincts" are the "Urban Shopping Area" character. The urban grain of these areas reflects the surrounding residential character with a smaller finer grain.

**11.51** 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 "Mixed Type Flats". Interspersed amongst the residential areas are small pockets of "Industrial Estates" and "Retail Estates and, Business and Leisure Parks" and "Institutions with Associated Grounds".

### Policy DM32: Croydon Opportunity Area

#### *Preferred option*

**DM32.1** To enable development opportunities; including public realm improvements, to be undertaken in a cohesive and coordinated manner a Croydon Opportunity Area Planning Framework and masterplans for Fair Field, Mid Croydon and, West Croydon and East Croydon have been adopted. Additionally a masterplan will be created for Old Town.

**DM32.2** 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 will be considered for the area within New Town and the Retail Core<sup>46</sup>.

**DM32.3** Within the London Road Area to ensure that proposals positively enhance and strengthen the local character and setting of locally listed buildings, the development should:

- a) Complement the existing maximum height of 4 storeys;
- b) Incorporate multi-stock brick as the predominant facing material;
- c) Retain, enhance and positively reference existing set backs of the major massing above ground floors; and
- d) Retain, enhance and positively reference architectural

<sup>46</sup> As defined in the Croydon Opportunity Area Planning Framework, pg 167

detailing on locally listed buildings.

**DM32.4** 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.

### How the preferred option would work

**11.52** A map showing the areas in which Policies DM32.2 to DM32.4 apply can be found in Appendix 11.

**11.53** The extent of Croydon is mostly covered by the Croydon Opportunity Area Framework and the Masterplans for Fair Field, Mid Croydon, Old Town, West Croydon and East Croydon which address the complex issues within this area. Character in areas outside of the OAPF can be successfully managed by the general policies.

#### London Road Area

**11.54** 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.

**11.55** 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.

**11.56** 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

**11.57** 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.

**11.58** 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.

## Crystal Palace & Upper Norwood

### General character

**11.59** Crystal Palace and Upper Norwood are historic Victorian settlements, picturesquely located on green hills. It has a number of significant landmarks such as the Crystal Palace television mast visible from long distances and various locations across London.

**11.60** 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 "Mixed Type Flats and Compact Houses". There are areas where high quality examples of the original character have survived. These have been designated as Conservations Areas.

**11.61** Almost half of Crystal Palace and Upper Norwood lies within the following Conservation Areas:

- Upper Norwood Triangle
- Church Street
- Harold Road
- Beulah Hill

### ***Preferred option***

No Policy as there are no areas in Crystal Palace and Upper Norwood with less consistent character.

### How the preferred option would work

**11.62** Crystal Palace and Upper Norwood has a predominately consistent character which, can be managed by general DPD and Core Strategy 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.

## Kenley and Old Coulsdon

### General character

**11.63** 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.

**11.64** 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.

**11.65** 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 Riddlesdown to the north and railway to the south.

**11.66** 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.

**11.67** 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.

### Policy DM33: Kenley and Old Coulsdon

#### *Preferred option*

In the area between Kenley Station and Godstone Road, to strengthen the character of the existing suburban shopping area and to ensure the predominant suburban character is respected and enhanced proposals should:

- a) Ensure the mixed character (including suburban shopping area, "Institutions with Associated Grounds" and "Local Authority Built Housing with Public Realm") is maintained;
- b) Maintain existing building lines, active ground floor frontages and associated public realm along Godstone Road; and
- c) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys.

#### **How the preferred option would work**

**11.68** A map showing the area in which this policy applies can be found in Appendix 11.

**11.69** Although not a formally designated Local Centre, it is considered that its distinctive mix of characters makes a significant contribution to Kenley and Old Coulsdon. The character mix includes an "Urban Shopping Area", "Transport Node", "Institutions with Associated Grounds", "Terraced Houses and Cottages" and "Mixed Flats and Compact Houses".

**11.70** The mix of architectural styles ranging from Victorian, Edwardian to modern buildings, along with the mix of materials, reinforces the sense of place. The consistency in building heights (of 2 & 3 storeys), building line and ground floor retail frontages with mixed use above creates a sense of cohesion.

**11.71** In some parts of Kenley and Old Coulsdon the public realm is less accessible than other suburban areas of Croydon. To address this and to improve public realm connections to green spaces throughout Kenley new walking and cycling routes should be created.

**11.72** The proximity of the area to the rear of Godstone Road with the railway station has resulted in an intensification of this area. In this location, where the PTAL<sup>47</sup> level is high and there is good access to nature, proposals for large and tall buildings of up to 4 storeys may be considered.

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<sup>47</sup>Public Transport Accessibility Level – a rating of accessibility provided by Transport for London

## Norbury

### General character

**11.73** Norbury is a suburban town with its District and Local Centres located along long linear route of London Road. The built form emphasises this linear route and its dominance on the area.

**11.74** Norbury has a residential character that predominantly consists of "Terraced Houses and Cottages", "Large Houses on Relatively Small Plots" and "Local Authority Housing with Public Realm". Scattered amongst these residential areas are a number of green spaces and parks such as Norbury Park, Norwood Grove, Biggin Woods, and Pollards Hill. These green spaces positively contribute to the character of the Place.

### Policy DM34: Norbury

#### *Preferred option*

**DM34.1** 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 the Norbury railway station.

**DM34.2** 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, and

d) Retain the extent and enhance the quality of the existing public realm within the development, including reinforcing a consistent building line.

### How the preferred option would work

**11.75** A map showing the areas in which Policies DM34.1 and DM34.2 apply can be found in Appendix 11.

**11.76** 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.

**11.77** 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 DM34.1 and DM34.2 identify the maximum buildings heights along with key architectural features to enable growth and retain local distinctiveness.

## Purley

### General character

**11.78** 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 and Leisure Parks" and moderate density residential areas such as "Terraced Houses and Cottages", "Mixed Type Flats and Compact Houses" and "Planned Estates of Semi-Detached Houses".

**11.79** The residential character outside of Brighton Road is fairly uniform and consists of large detached houses on relatively large plots with minimal public realm and low density scattered houses on relatively small plots.

**11.80** The areas containing the most consistent built environment are located within the Webb Estate and Upper Woodcote Village. Both of these areas have been designated as Conservation Areas.

### Policy DM35: Purley

#### ***Preferred option***

**DM35.1** 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 14 storeys; and

- c) Demonstrate innovative and sustainable design, with special attention given to the detailing of frontages.

**DM35.2** 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.

**DM35.3** 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 3 storeys.

### **How the preferred option would work**

**11.81** A map showing the areas in which Policies DM35.1 to DM35.3 apply can be found in Appendix 11.

#### Purley District Centre and its environs

**11.82** 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.

**11.83** This area has a varied topography which presents opportunities for tall buildings and the availability of vacant land creates the potential for growth. Policy DM35.1 facilitates this and identifies architectural features that should be referenced in the design of the development to enhance the distinctive character of Purley District Centre.

#### The environs of Reedham Station

**11.84** The area has good public transport accessibility and a varied character including "Urban Shopping Area", "Large Buildings in an Urban Setting", "Mixed Type Flats and Compact Houses" and "Planned Estates of Semi-Detached Houses".

**11.85** 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

**11.86** 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.

**11.87** Detailed policies are required to strengthen the character of the Brighton Road and Purley Downs Road junction area.

## Sanderstead

### General character

**11.88** Sanderstead is a suburban Place located on a hilltop, with residential areas surrounded by large scale green open spaces such as Mitchley Wood and Kings Wood.

**11.89** 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 "Planned Estates with Public Realm" towards the Local Centre of Hamsey Green.

### Policy DM36: Sanderstead

#### *Preferred option*

**DM36.1** 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
- e) Improve walking and cycling connectivity and access to open space.

**DM36.2** 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.

### How the preferred option would work

**11.90** A map showing the areas in which Policies DM36.1 and DM36.2 apply can be found in Appendix 11.

#### Sanderstead Local Centre

**11.91** 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".

**11.92** 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

**11.93** 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 rhythm and articulation of window and doors. In areas where the character is inconsistent the Place-specific development management policy in DM36.2 will help enhance Hamsey Green's local the identity and encourage growth.

## Selsdon

### General character

**11.94** 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 "Planned Estates with Public Realm" and "Mixed Type Compact Houses and Flats on Relatively Small Plots".

Policy DM37: Selsdon

#### ***Preferred option***

**DM37.1** 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.

**DM37.2** In Forestdale, to create a sense of place and to facilitate growth, proposals should:

- a) Maintain a building line that respects the curve of the

street and maintains a consistent setback;

- b) Retain and create glimpses and separation distances between buildings in order to improve the openness of Selsdon Park Road;
- c) Ensure massing is sympathetic to the predominant massing within the Forestdale Estate; and
- d) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys in the Forestdale Centre.

#### **How the preferred option would work**

**11.95** A map showing the areas in which Policies DM37.1 and DM37.2 apply can be found in Appendix 11.

#### Selsdon District Centre

**11.96** 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.

**11.97** 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.

**11.98** In the western part of the centre the public realm is discontinued 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.

#### Forestdale

**11.99** The area around the over-scaled and poorly defined junction of Selsdon Park Road and Huntingfield comprises of a mosaic of character types consisting of "Suburban Shopping Area", "Mixed Type Flats and Compact Houses", "Planned Estates of Semi-Detached Houses". Additionally, the tree lined streets with generous grass verges also make an important contribution to the character of this location.

**11.100** Forestdale's good access to open space provides potential for development and densification up to 3 storeys, possibly 4 at the corner of the junction. This would facilitate growth while respecting the character of the area.

## Shirley

### General character

**11.101** Shirley is predominantly a suburban residential settlement surrounded by natural areas of Green Belt. This place is defined by 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.

**11.102** Shirley's residential character predominantly consists of "Planned Estates of Semi-Detached Houses" with garages and "Mixed Type Flats and Compact Houses" set in large green spaces. The southern part is dominated by "Scattered Houses on Large Plots" surrounded by expansive areas of greenery, including woodland of Addington Hills.

**11.103** 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.

### Policy DM38: Shirley

#### ***Preferred option***

**DM38.1** 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; within the Local Centre; and

d) Incorporate or retain traditional shop front elements such as stall riser's fascias pilasters and stall risers; and

**DM38.2** In the area between 518 and 568 Wickham Road, to improve the character proposals should reference the "Suburban Shopping Area" character type.

**DM38.3** 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.

**DM38.4** In the area of the Shirley Road Shopping Parade, to retain the distinctive character of this part of Shirley Road, proposals should:

a) Complement the existing predominant building heights of 2 storeys up to a maximum of 3 storeys along Shirley Road and 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

## **How the preferred option would work**

**11.104** A map showing the areas in which Policies DM38.1 to DM38.4 apply can be found in Appendix 11.

### Shirley Local Centre

**11.105** Shirley Local Centre consists of the combination of three different character types a "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.

### Shirley Road and Wickham Road

**11.106** 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 rises. 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.

## South Croydon

### General character

**11.107** 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.

**11.108** The predominant residential character consists of "Terraced Houses and Cottages", located within the central strip, with "Mixed Type Flats and Compact Houses" to the north and west. 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.

### Policy DM39: South Croydon

#### *Preferred option*

**DM39.1** 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.

**DM39.2** Within the Brighton Road (Sanderstead Road) Local Centre, to ensure a balance is struck between strengthening and enhancing the character and facilitating growth, 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.

**DM39.3** Along Brighton Road between the Brighton Road (Sanderstead Road) Local Centre and Grange Road, to reduce the impact of Brighton Road as a linear corridor, clearly differentiate the area from the Local Centre and strengthen the sense of place, proposals should:

- a) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and
- b) Retain vistas and strengthen visual and physical connections to green open spaces; between buildings in order to enhance the openness of Brighton Road.

### How the preferred option would work

**11.109** A map showing the areas in which Policies DM39.1 to DM39.3 apply can be found in Appendix 11.



Brighton Road (Sanderstead Road) and Brighton Road (Selsdon Road) Local Centres

**11.110** The two Local Centres along the 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.

**11.111** 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 with narrow footways that do not encourage walking.

**11.112** 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.

Brighton Road between the Brighton Road (Sanderstead Road) Local Centre and Grange Road

**11.113** This area has evolved as an extension of the Brighton Road (Sanderstead Road) Local Centre. This location contains a mix of Urban Shopping Area, Retail Estate/Business/Leisure Parks interlaced with Terraced Houses and Cottages.

**11.114** Brighton Road's built form is less dense on the east side with more opportunities to open vistas to nearby green spaces.

**11.115** Due to growth, the edge of the Brighton Road (Sanderstead Road) Local Centre is beginning to lose its separate identity and sense of place. A cohesive approach needs to be taken to reduce the impact of Brighton Road as a linear corridor.

Detailed policies are required to ensure that the Local Centre's edge is well defined.

## South Norwood and Woodside

### General character

**11.116** 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 "Mixed Type Flats and Compact Houses". Larger "Industrial Estates" are located along the railways and scattered within smaller residential blocks. The Place's only "Retail Estate, Business and Leisure Park" lies on the western edge next to Selhurst Park football stadium.

**11.117** The 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. Smaller green open spaces are scattered throughout south Norwood and Woodside.

### Policy DM40: South Norwood and Woodside

#### ***Preferred option***

**DM40.1** 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.

**DM40.2** 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.

### How the preferred option would work

**11.118** A map showing the areas in which Policies DM40.1 and DM40.2 apply can be found in Appendix 11.

#### Section of Portland Road between the South Norwood Conservation Area and Watcombe Road

**11.119** Portland Road is a street linking South Norwood District Centre with Woodside Green and Norwood Hill. The edge of the District Centre is becoming less well defined due to unsympathetic conversions from shops to residential use. This has resulted in an "Urban Shopping Area" character that is spilling into Portland Road.

**11.120** 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

**11.121** The character of the area consists of small "Urban Shopping Areas" and "Institutions with Associated Grounds"

interlaced with "Mixed Type Flats and Compact Houses". These character areas are surrounded by "Terraced Houses and Cottages".

**11.122** A Place-specific development management policy is required to create a cohesive sense of place.

## Thornton Heath

### General character

**11.123** Thornton Heath is a densely built up settlement, with District and Local Centres that are spatially clearly defined.

**11.124** 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.

### Policy DM41: Thornton Heath

#### ***Preferred option***

**DM41.1** Within the Thornton Heath District Centre and its environs, to ensure a balance is struck between strengthening and enhancing the character and enable growth, proposals should:

- a) Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;
- b) Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;
- c) Ensure tall or large buildings, located in the local vicinity of Thornton Heath Railway Station do not exceed 9 storeys;
- d) Promote the expansion and enhancement of the shared public realm within the curtilage of the development;
- e) Ensure that the setting of Thornton Heath's local landmark: Clock Tower is respected; and
- f) Incorporate red multi-stock brick as the predominant facing material.

**DM41.2** 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.

#### **How the preferred option would work**

**11.125** A map showing the areas in which these Policies DM41.1 and DM41.2 apply can be found in Appendix 11.

#### Thornton Heath District Centre and environs

**11.126** 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 3 storey buildings with active frontages and strong tree lines and the local landmark clock tower.

**11.127** The character around the railway station is less consistent changing from smaller scale buildings (up to 3 storeys)

with narrow footways to tall and large buildings (up to 9 storeys) with wider footways. The building lines within this area step back and forward resulting in inconsistent street frontages.

**11.128** 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

**11.129** 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.

**11.130** 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.

## Waddon

### General character

**11.131** Waddon has a fragmented character which consists of “Retail Estates and Business and Leisure Parks” and “Industrial Estates” along Purley Way and “Local Authority Housing with Public Realm” on the Waddon Estate and large green open spaces of Duppas Hill, Wandle Park, Purley Way Playing Field and Roundshaw. The local character is most consistent within the centre and becomes more inconsistent towards the northern and eastern edges of Waddon.

### Policy DM42: Waddon

#### ***Preferred option***

To enable development opportunities including public realm improvements to be undertaken in a cohesive and coordinated manner, a masterplan will be considered for the area within Waddon's potential new Local Centre.

### How the preferred option would work

#### Waddon's potential new Local Centre

**11.132** A map showing the areas in which this policy applies can be found in Appendix 11.

**11.133** 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 additional a Place-specific development management policy is required.

**11.134** Waddon's potential to accommodate significant growth has it to be considered for designation as 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.

**11.135** Due to the complexity of these issues and the number of development opportunities in Waddon's proposed 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.

