

**Croydon Local Plan: Strategic
Policies – Partial Review and Croydon
Local Plan: Detailed Policies and
Proposals evidence base**

Technical Paper – Employment

January 2017

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1. Introduction

1.1 This technical note aims to set out and discuss the evidence supporting the policies on Employment, both the amendments to the Strategic Policies in the Proposed Submission of The Croydon Local Plan: Strategic Policies (Partial Review) and the detailed policies in the Proposed Submission Croydon Local Plan: Detailed Policies and Proposals on Employment DM5 to DM10 inclusive.

1.2 This technical note only discusses the evidence supporting those parts of the **policy text marked in red** that are the subject of the partial review. The remainder of the policy is either the same as in the adopted Croydon Local Plan: Strategic Policies (2013) or the requirements of the policy are unchanged and it is only the way that it is expressed that has changed.

1.3 The note sets out the policy context and outlines how the evidence has been used to inform the policies.

1.4 This note is not designed to explain each specific piece of evidence in detail. It is only designed to explain how the evidence has been used to inform the policies on Employment. For further information on individual pieces of evidence it is recommended that you look at the evidence documents themselves which can be found at <https://www.croydon.gov.uk/planningandregeneration/framework/pevidence/>.

Where we are now

The key issues that the borough faces in terms of planning for employment up to **2031-2036** are:

- Land for industry and warehousing will need to have continued protection to support these sectors in the future.
- There is approximately **20%–30%** vacant office floor space in Croydon Metropolitan Centre and current low rents do not support the development of new office floor space **although some speculative office is being built out**.
- Supporting the area around East Croydon Station and New Town as Croydon Metropolitan Centre’s office centre.
- The public realm of Croydon Metropolitan Centre **has seen considerable investment and improvement, but ~~needs renewing~~; renewal remains necessary as poor public realm** ~~it~~ discourages businesses from locating in Croydon and people shopping in the town.
- Encouraging development in Croydon Metropolitan Centre through flexible and pragmatic planning, that contributes to the centre’s economic prosperity and vitality.
- Croydon faces competition from other areas of London and the South East for inward investment both in office and retail markets.
- The increase in the population of Croydon and planned house building will result in an increase in the need for jobs.

- **Establishing a policy response** to the contracting of retail uses within District and Local Centres, increased vacant premises on the edges of the District and Local Centres along with poorly designed conversions to other uses, has further impacted on the public realm and ability of the Centres to attract new business and create attractive residential areas.

Policy Context

National and London Planning Policy

The below policy context relates to policies on Employment. The National Planning Policy Framework (NPPF) states the following with regard to Employment.

1.2 Paragraph 158 reads

Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals

1.3 Paragraph 22 reads

Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

1.4 Paragraph 23 on ensuring the vitality of town centres 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. In drawing up Local Plans, local planning authorities should:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- 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;

- promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;
- retain and enhance existing markets and, where appropriate, re introduce or create new ones, ensuring that markets remain attractive and competitive;
- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and
- where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.1.6 Paragraph 24 reads

Local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale

London Plan

Policy 4.1 on Developing London's economy Policy states the following with regard to Employment

The Mayor will work with partners to:

- a1 promote and enable the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors
- a2 maximise the benefits from new infrastructure to secure sustainable growth and development

- b drive London's transition to a low carbon economy and to secure the range of benefits this will bring
- c support and promote outer London as an attractive location for national government as well as businesses, giving access to the highly-skilled London workforce, relatively affordable work space and the competitive advantages of the wider London economy
- d support and promote the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity
- e sustain the continuing regeneration of inner London and redress its persistent concentrations of deprivation
- f emphasise the need for greater recognition of the importance of enterprise and innovation
- g promote London as a suitable location for European and other international agencies and businesses

Policy SP3: Employment (Croydon Local Plan: Strategic Policies -Partial Review)

SP3.1 The Council will encourage innovation and investment into the borough to support enterprise and increased employment for the benefit of all Croydon residents. The Council will apply a presumption in favour of employment-related development provided it meets the standards of Policy SP3 and other applicable policies of the development plan.

Innovation, Investment & Enterprise

SP3.2 The Council will adopt a '4-Tier' approach to the retention and redevelopment of land and premises relating to industrial/employment activity as set out in Table 4.1.

SP3.3 The Council will promote the growth and expansion of Cultural and Creative Industries to make Croydon a better place to live and to act as a driver of growth and enterprise in the local economy. The focus for accommodating Cultural and Creative Industries will be the network of Enterprise Centres set out below.

- a. Croydon Metropolitan Centre;
- b. Purley District Centre;
- c. Crystal Palace District Centre; and
- d. South Norwood District Centre/Portland Road

SP3.4 The Council will promote the remodelling of the Fairfield Halls ~~for its retention and ongoing development~~ as a performance facility.

SP3.5 The Council will support the temporary occupation of empty buildings and cleared sites by creative industries and cultural organisations ~~and other meanwhile uses~~ where they contribute to regeneration, ~~vitality~~ and enhance the character and vitality of the area.

Town Centres

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

- a. Croydon Metropolitan Centre
- b. District Centres: Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, Purley, Selsdon, South Norwood and Thornton Heath
- c. Local Centres: Broad Green, Brighton Road (Selsdon Road), Brighton Road (Sanderstead Road), Hamsey Green, Pollards Hill, Sanderstead, Shirley and Thornton Heath Pond

SP3.7 The Council will work with the GLA and neighbouring boroughs to ensure Croydon's network of town centres is sufficiently flexible to accommodate change up to ~~2031-2036~~ by:

- a. Working with its partners through the process of regular town centre 'health checks' to highlight reclassifications of the borough's existing Local and District Centres.
- b. Designating the boundaries of the network of town centres and their Primary Shopping Areas in the Croydon Local Plan: Detailed Policies and Proposals DPD and undertaking regular review to ensure the vitality of the centres is maintained.
- c. Considering the designation of new Local Centres at Fiveways and Valley Park when they can be supported by population growth in these areas.

SP3.8 The Council will promote and support the development of all B1 uses (including office, light industry and research & development) retail, leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre, District Centres and Local Centres

SP3.9 Croydon Metropolitan Centre will remain the principal location in the borough for office, retail, cultural (including a diverse evening/night-time economy) and hotel activity, and also be the largest retail and commercial centre in South London.

SP3.10 The Council will adopt a flexible approach to B1 uses (office, light industry and research & development), retail, leisure (including evening/ night economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre. This flexible approach will be supplemented by the Croydon Opportunity Area Planning Framework and the Council's masterplans that apply to the Croydon Metropolitan Centre.

SP3.11 The Council will promote and support measures to improve the quality of the borough's stock of retail²⁷ and office²⁸ premises, particularly in the Croydon Metropolitan Centre.

SP3.12 The Council will favourably consider net increases to the stock of retail premises commensurate with Croydon's retail function as a Metropolitan Centre and ensuring the viability and vitality of Croydon Metropolitan Centre, District Centres and Local Centres. The Council will seek to maintain as a minimum, the current amount of retail floorspace in Croydon, enhance the quality of retail floor space in Croydon and seek to reduce A Use Class vacancy.

SP3.13 The Council will promote and support the development of new and refurbished office floor space in Croydon Metropolitan Centre, **particularly around East Croydon Station and New Town**, and the District Centres as follows²⁹:

- a. Up to ~~95,000~~**92,000**m² to be located in Croydon Metropolitan Centre;
- b. **Within the Office Retention Area in the Croydon Metropolitan Centre the loss of office floor space will be permitted only if it is demonstrated that there is no demand for the offices or refurbished floorspace and that there is no demand for a mixed use development that includes a proportionate level of office floor space;**
- c. Up to 7,000m² to be spread across the borough's District Centres

Table 0.1: Four-tier approach to land and premises in industrial locations

Tier	Designation	Locations	Approach	Permitted Uses	Other Uses
1	Strategic and Separated Industrial Locations	Marlpit Lane Purley Way ¹ Selsdon Road Gloucester Road (East) Vulcan Way	Strong protection for industrial and warehousing activities with no loss of Class B floor space ² permitted	Class B1b, B1c, B2 and B8 uses Employment generating sui-generis uses ³ Gypsy and Traveller pitches (for Gypsies and Travellers with a qualified connection to Croydon)	Not permitted
2	Integrated Industrial Locations	Gloucester Road (West) Thornton Road Union Road	Strong protection for industrial and warehousing activities	Class B1b, B1c, B2 and B8 uses Employment generating sui-generis uses ⁴	<ul style="list-style-type: none"> • Planning permission for limited residential (Class C3) office (Class B1a) or Education and Community Facilities (Class D1) will be granted if it can be demonstrated that: <ul style="list-style-type: none"> • There is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and there is no net loss of Class B1b, B1c, B2 and B8 floor space and new Class B1b, B1c, B2 and B8 floor space is designed to meet the needs of future occupiers; and • Residential and Office use does not harm the site and wider location's industrial function. • Opportunities for employment and skills training will be considered via Section 106 where possible

¹ Including both Purley Way North and Purley Way South

² Excluding Class B1a (Offices)

³ To be acceptable in these locations, employment generating sui-generis uses must provide employment which is comparable in terms of activities and job numbers to industrial/warehousing uses.

⁴ To be acceptable in these locations, employment generating sui-generis uses must provide employment which is comparable in terms of activities and job numbers to industrial/warehousing uses.

Tier	Designation	Locations	Approach	Permitted Uses	Other Uses
3	Town Centre Industrial Locations	Industrial sites in Croydon Metropolitan Centre, a District Centre or a Local Centre	Protection for industrial and warehousing activities encouraging opportunities to provide additional workshop/studios on town centre sites	Class B1b, B1c, B2 and B8 uses Employment generating sui-generis uses ⁵	<p>Planning permission for offices (Class B1a), residential (Class C3), leisure (Class D2), visitor accommodation (Class C1) and community facilities (Class D1) development will be granted if it can be demonstrated that:</p> <ul style="list-style-type: none"> • there is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and • there is no net loss of Class B1b, B1c, B2, B8 floor space unless the other uses are required to enable development of the site to be viable; and • residential use does not harm the wider location's business function; and • the development will increase the vitality, viability and diversity of employment uses of the town centre • Opportunities for employment and skills training will be considered via Section 106 where possible

⁵ To be acceptable in these locations, employment generating sui-generis uses must provide employment which is comparable in terms of activities and job numbers to industrial/warehousing uses.

Tier	Designation	Locations	Approach	Permitted Uses	Other Uses
4	Scattered Employment Sites	Other employment locations/sites falling outside of Tier 1, Tier 2 and Tier 3.	Protection for offices industrial and warehousing activities. Allowance for community uses to locate in the (Higher PTAL) more accessible locations	Class B1 (excluding B1a office), B2 and B8 uses Employment generating sui-generis uses ⁶ Class D1 (Education and Community Facilities) in industrial locations in PTALs 3 or above	Planning permission for limited residential development will be granted if it can be demonstrated that: <ul style="list-style-type: none"> • there is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and • residential use does not harm the wider location's business function. • Opportunities for employment and skills training will be considered via Section 106 where possible

⁶ To be acceptable in these locations, employment generating sui-generis uses must provide employment which is comparable in terms of activities and job numbers to industrial/warehousing uses.

Proposed amendments to the Policies Map

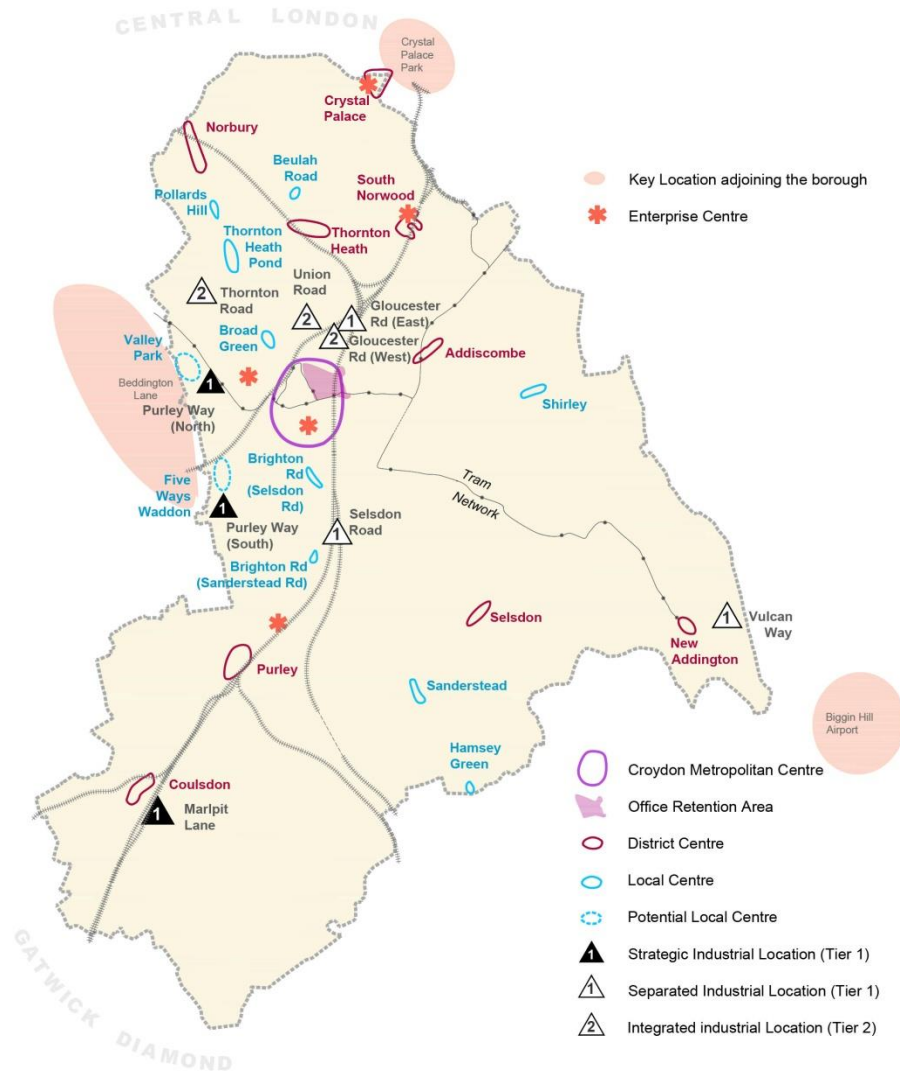
Each of the designations set by this policy are shown on the *draft Policies Map*. These designations are generally the same as the designations of the same name on the current adopted Policies Map accompanying the Croydon Local Plan: Strategic Policies. However there are a number of proposed amendments to the boundaries. These changes are summarised in Table 0.2 below:

Table 0.2 Amendments to Employment designations (see the Proposed Submission Policies Map for full details)

Designation	New	De-designated
Gloucester Road Integrated Industrial Location (Policy Error! Reference source not found.)		✓
Gloucester Road (East) Separated Industrial Location (Policy Error! Reference source not found.)	✓	
Gloucester Road (West) Integrated Industrial Location (Policy Error! Reference source not found.)	✓	
Office Retention Area (Policy Error! Reference source not found.)	✓	

What will it look like

Figures 0.1 Employment in Croydon (2011-2036)



Why we have taken this approach

Innovation, Investment & Enterprise

4.24 The vision from Croydon's Sustainable Community Strategy states 'We will be London's most enterprising borough – a city that fosters ideas, innovation and learning and provides skills, opportunity and a sense of belonging for all'. A network of Enterprise Centres focusing on cultural and creative industries and innovation will be pursued across the borough as part of realising this vision.

4.22 The previous Unitary Development Plan, adopted in 2006, promoted development of a Science and Business Innovation Park at Cane Hill in Coulsdon. To date the market has not delivered this ambition, but the council is continuing to explore with key partners, through a masterplan process the option of developing land in Coulsdon for an innovation complex (with associated Enterprise Centre). Following discussion around concepts, layout, design etc, the masterplan process has now reached the stage where market feasibility will be tested.

4.25 Opportunities for employment and skills training will be considered by means of Section 106 agreements for major developments (residential developments of 10 units or more or non-residential developments exceeding 1,000m²)

4.26 The Council will seek to secure a minimum of 20% of the total jobs created by the construction of new development above the set threshold to be advertised exclusively to local residents through the Council's Job Brokerage Service for a specified minimum period. It is expected that best endeavours be used to ensure that the target of 20% employment of local residents is achieved in both construction and end user phase of new qualifying development. It is expected that the developer will work with the Council to achieve this target

4.27 The Council is committed to training, work placements and apprenticeships and views them as being a sustainable way to improve employment prospects for local people. The Council is determined to ensure that S106 obligations secure placements for local people during the construction phase of building projects and the provision of skills training.

4.28 In the face of strong competition from other uses, planning policies giving strong protection for industrial sites have served the borough well in terms of retaining the stock of industrial and warehousing premises and land.

4.29 To achieve our vision to '...be London's most enterprising borough ...' it is essential that Croydon has the capacity to meet expected demand for industrial and warehousing activities. The evidence base indicates that the current supply is tight and predicted to become more so. The Croydon Monitoring Report (April,2015) found that overall there was a net loss of almost 42,000m² of Class B floor space in Croydon between 2011 and 2015.

4.30 The '4 tier' approach is proposed as it remains a relatively strong approach to the protection of industrial capacity (in line with Croydon's 'restrictive transfer' status) which supports the South London Waste Plan DPD, yet also offers greater prospects of bringing about investment and renewal of industrial/employment locations, bringing forward new workshops/studios in town centre locations and meeting other policy objectives.

4.31 'Tier 1' locations benefit from better separation from nearby residential properties and therefore lend themselves to the highest level of protection for industrial and warehousing activity. Two of the areas, Purley Way (comprising Purley Way North and South) and Marlpit Lane, are also identified as Preferred Industrial Locations in the London Plan – see figure 4.4). 'Tier 1' locations due to their strategic function and economic importance will be subject to the highest policy protection to ensure their economic importance is assured.

4.32 'Tier 2' Locations are industrial estates where residential development grew up alongside the commercial buildings. This proximity between uses has not resulted in undue harm to residential amenity and therefore, new mixed-use schemes, that are well designed and give priority to the area's commercial functionality, are acceptable. New Class B1b, B1c, B2 and B8 premises in mixed use developments should be designed to meet the needs of future occupiers and to preclude future conversion to residential use. Mixed use developments in these locations must not result in an increase in operational difficulties for businesses, and not result in a net loss of Class B1b, B1c, B2, B8 floor space. 'Tier 2' locations also perform an important economic function so will be subject to strong policy protection to ensure their role is assured.

4.33 The fringes of some Tier 1 and Tier 2 locations within the context of Policy SP3.2 have the potential for transition through development that enables the locations to relate better to their surrounding uses and character. This transition could come in the form of intensification of development, high density development and the introduction of new land uses or mix of land uses.

4.34 Extending protection of industrial/warehousing activities to sites falling within town centres ('Tier 3') will help the Council limit the losses in the borough wide stock of such premises. The promotion of new workshops in these locations will also add a greater degree of diversity (and theoretically a greater resilience), to the employment offer of the borough's

town centres. However, the Council will adopt a flexible approach to B1 uses (excluding B1a office), leisure, visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre.

4.35 The Council is aware that D1 uses can struggle to find suitable premises. This has led, in the past, to situations where 'Tier 1' type premises have been lost to community uses to the detriment of the area's business function. Allowing the change of use or redevelopment of 'Tier 2 and 4' premises ~~that benefit from~~ in the more accessible locations ~~higher public transport accessibility levels (PTAL~~, to D1 use class activities (non-residential institutions), not only helps safeguard 'Tier 1' ~~and Tier 2~~ for continued industrial uses, it also opens up a significant supply of premises for community uses/groups to consider. Restricting this flexibility to higher PTAL locations means that uses which attract large numbers of visitors will be able to make more use of public transport.

4.36 Likewise Gypsies and Travellers also struggle to find suitable sites for new pitches. To enable provision of sites throughout the Plan period, particularly the last ten years of the Plan period, the development of Tier1 sites to use as Gypsy and Traveller pitches (for those families with a qualified connection to Croydon) will be permitted. In the case of Gypsies and Travellers a qualified connection is defined as being resident on an existing authorised site in Croydon (but with no space to expand), being the parent, grandparent, child, grandchild, brother or sister of a Gypsy or Traveller currently resident in Croydon on an authorised site; or having resided in Croydon on unauthorised sites for a period of not less than five years ending on the date of adoption of the Local Plan. If there is no qualified connection then the use of Tier 1 sites would not be permitted.

4.37 In order to demonstrate that there is no demand for a scheme comprised solely of Class ~~B1b and B1c~~, B2 and B8 uses in Tiers 2, 3 and Tier 4 locations, evidence will need to be submitted that a marketing exercise has been undertaken for a minimum of 18 months. The Council will need to be satisfied that the site has been offered at a price commensurate with the value of the site for the permitted uses and that active promotion has been undertaken by agents marketing the site.

4.38 Where an applicant is proposing a mixed use scheme which involves a reduced amount of Industry and Warehousing space, account will be taken of the proposed end user of the Industry and Warehousing and the nature and type of the proposal in terms of meeting the Plan's vision and the Council's Economic Development Strategy. This will apply to speculative units, of a size and format that analysis shows there to be a shortage of in the borough. Mixed use developments should take account of the health and well-being impact on future residents and the surrounding area and should consider opportunities for the provision of open space and improved access to community facilities and local services in these locations.

4.39 Croydon is good at producing creative talent (BRIT School, College of Art, Dance, Dubstep etc.), but less successful at providing them with a base in the borough . Other London boroughs have been able to address this – e.g. the 'Chocolate Factory' in Hackney and Westbourne Studios in Kensington and Chelsea. Evidence supports promotion and supporting cultural and creative industries to assist in changing Croydon's image.

4.40 The study, 'Understanding and Shaping the Cultural Sector in the London Borough of Croydon, Sept 2010', highlights clusters of creative industries talent in four locations with a recommendation that the Enterprise Centre in CMC act as a flagship for the sector. Developing a central location as a 'hub' will provide a clear signal that Croydon is 'open for creative businesses'.

4.41 The Fairfield Halls is a cultural asset synonymous with Croydon and is also of regional importance therefore its retention and remodelling merits inclusion within the Croydon Local Plan: Strategic Policies.

4.42 Across Croydon, but particularly within Croydon Metropolitan Centre, there are substantial amounts of underused sites/buildings. This usually corresponds with sites that are

pending development. The Council considers such sites lying dormant a potential opportunity. Organisations within this sector such as ACAVA (Association for Cultural Advancement through Visual Art) and ACME (providing artists with affordable studio and living space) are experts at making temporary use of such space. Elsewhere in the Strategic Policies other temporary uses are promoted such as urban greening, urban agriculture and providing space for community groups.

4.43 As well as encouraging new activity in this sector, it is essential that the Council continues to protect existing capacity for activities such as theatres, cinemas, art galleries etc. This is supported by Policy Action 2.1 of the London Mayor's Cultural Metropolis Strategy.

4.44 Derelict sites and buildings can impact on the perception of the borough and the visual quality of the public realm. They can have an adverse impact on community safety owing to lack of active frontages. A policy to encourage creative and cultural uses can enhance the public realm to help build social cohesion, support cultural diversity and engender a sense of safety and belonging as well as helping this sector to grow in the borough.

Town Centres

4.45 The process of conducting town centre health checks should ensure that the role of the borough's town centres and their relationships to one another is fit for purpose and adequately supports the London network of town centres and the borough's convenience and comparison retail needs. Centres can be reclassified in the light of subsequent reviews or alterations to future LDF DPDs. Changes to the upper tiers in the network (Major and above) should be coordinated first through the London Plan.

4.46 The objective to direct town centre uses to existing centres (because of their higher levels of accessibility and ability to support multiple purpose trips) remains central to government policy in the National Planning Policy Framework and provides justification for this policy. The mix of uses in each centre will be determined by factors such as existing clusters of activity (e.g. vibrant evening economy, grouping of large offices, presence of higher education providers, etc.) as well as other designations. For example, both Crystal Palace and Croydon Metropolitan Centre are identified in the Sub-Regional Development Framework, South London, 2006 (Table 1D.3), as Primary Locations for future visitor accommodation.

4.47 Croydon Metropolitan Centre (CMC) has the highest level of regional and sub-regional accessibility in the borough. The case for it to be the principal location for the town centre uses is supported by the importance attached to CMC in the London Plan. The Council is committed to facilitating development within Croydon Metropolitan Centre. Therefore, the Council will seek to strengthen Croydon's role as a Metropolitan Centre and adopt a flexible approach to B1 uses (office, light industry and research & development) retail, leisure (including evening/night economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre. This flexible approach will be supplemented by the Croydon Opportunity Area Planning Framework (OAPF) and the Council's masterplans that apply to the Croydon Metropolitan Centre. Policies in the Transport and Communications section to improve Wi-Fi connectivity and mobile phone bandwidth will support this policy.

4.48 Furthermore, changing the town centre hierarchy as set out in Croydon's Unitary Development Plan to the hierarchy set out in the London Plan brings the Strategic Policies into general conformity with the regional plan. Development in Croydon Metropolitan Centre will be promoted in accordance with the London Plan designation as an 'Opportunity Area, 'a Metropolitan Centre', a 'Potential Outer London Development Centre' for 'Strategic Office' and 'Higher Education' uses and in accordance with its status as a 'Strategic Cluster of Night-Time Activity with Regional/Sub-Regional Importance'.

4.49 Regular town centre 'health checks' form part of the Council's promotional role and help to ensure boundaries, policies and classifications remain relevant. The nature of planned growth in the borough over the plan period could necessitate the need to provide additional

town centres. Conversely, other centres which face challenges resulting from changes in retailing (growth in online shopping, competition from out-of-town retail, etc.) may require consolidation.

4.50 In addition to London Plan town centre hierarchy Neighbourhood Centres have been identified. These offer the opportunity for clusters of uses, in particular community uses, to emerge or be supported by planning policy. The identification of Neighbourhood Centres goes beyond recognising centres solely for their retail function, but for the wider role they play in supporting the local community.

4.51 Croydon is in competition for inward investment with other parts of London, notably the Thames Gateway and the M4 corridor (the Western Wedge). It also competes with centres in Surrey and West Sussex and to do so successfully, the stock of commercial premises needs to be improved. Policy SP4 (Urban Design & Local Character) will also help Croydon to retain/attract new job opportunities.

4.52 It is anticipated that the level of reduction in retail vacancies will be achieved through the regeneration of Croydon as a Metropolitan Centre and through a mixture of new lettings and redevelopments of town centre sites. Within Croydon Metropolitan Centre, the Opportunity Area Planning Framework will address this point and the uptake of approximately 15,500m² floor space alone could equate to the provision of approximately 800 additional jobs. For the District and Local Centres the proposed reduction in vacancy would equate to an uptake of approximately 16,000m² floor space and provision of approximately 850 additional jobs. ~~The forthcoming Croydon Local Plan: Detailed Policies and Proposals DPD will consider the case for a 'small shops/affordable retail' policy to help Croydon retain and develop an independent retail sector. It will also consider detailed policy matters such as designating 'Main' and 'Secondary Retail Frontages~~

4.53 The demand for office space in the borough over the period 2013 to 2031 is for between 29,440 sq. m and 91,840 sq. m. It is estimated that there is potential for 60,010 sq. m of space. This space requirement is of a similar scale to that estimated for the 2010 Employment Land Review. The majority of this office space demand, (90%), is projected to be for prime locations within the Croydon Metropolitan Centre. In the vicinity of East Croydon station, within the New Town area (as defined in the OAPF) and Croydon being identified as a strategic outer London office location in the London Plan means this area is the borough's most attractive to commercial developers. Therefore, development in this area is encouraged to be office based (in full or part) and it is required that office development is explored fully as part of any development proposal. ~~Potential growth in Croydon Metropolitan Centre (CMC) of 95,000m² of new or refurbished office floor space would equate to up to 8,000 additional jobs (fulltime equivalents) and within the District Centres would equate to up to 400 additional jobs (full-time equivalents)~~ This growth and protection will increase the opportunities for employment in CMC, support its urban renewal and contribute to the Croydon Local Plan: Strategic Policies' spatial vision of being London's most enterprising borough.

Why we are proposing this Policy

Employment Policy Justification

The Council's Employment Land Review (ELR) which was updated in 2013, recommended a review of the borough's Tier 2 locations to ensure they fulfil the role of a Tier 2 location and can be considered against the content of Croydon Local Plan: Strategic Policy SP.3.2: Employment.

Employment sites in Croydon cover office (B1a) (although this use is not protected at the moment other than in Tier 4 locations), industrial (B1b/c and B2) and warehousing (B8) use classes and employment-generating sui-generis uses. In Croydon employment sites could be best described by two distinct geographical and use classes areas in the borough i.e.:

The Croydon Metropolitan Centre (CMC), a Strategic Office Location as identified in the in the London Plan, containing the majority of office floorspace with a presence of large employers from the public sector, as well as financial and business services and engineering/construction occupiers. Outside the CMC, employment land is dispersed throughout the borough. There are industrial areas that contain general industrial, light industrial and warehousing uses, including both Purley Way and Marlpit Lane, which are allocated in the London Plan as Strategic Industrial Locations (SILs), as well as local employment areas and small pockets of unallocated industrial land. The Tier 2 sites are all located outside of CMC.

For Tier 2 Integrated Industrial Location (Croydon Local Plan :Strategic Policies SP3.2)table 4.1 identifies the permitted uses as Class B1b, B1c, B2, B8 and employment generating sui-generis uses. The adopted policy approach safeguards these sites for industry and warehousing use and evidence relating to demand from the business community is only given weight in relation to Tier 3 and Tier 4 Locations. There is still a reasonable level of flexibility relating to Tier 2 Locations and justification for a limited residential development is acceptable providing it meets the 3 criteria identified above in the policy.

Tier 2 Locations are industrial estates where residential development grew up alongside the commercial buildings. This proximity between uses has not resulted in undue harm to residential amenity and therefore, new mixed-use schemes, which are well designed and give priority to the area's commercial functionality, have been acceptable. New Class B1b, B1c, B2 and B8 premises in mixed use developments should be designed to meet the needs of future occupiers and to preclude future conversion to residential use. Mixed use developments in these locations must not result in an increase in operational difficulties for businesses and not result in a net loss of Class B1b, B1c, B2, B8 floor space.

The Council is aware that D1 Uses can struggle to find suitable premises. This has led, in the past, to situations where 'Tier 1' employment premises have been lost to community uses to the detriment of the area's business function. Allowing the change of use or redevelopment of 'Tier 2' employment premises to D1 Use Class activities (non-residential institutions), not only helps safeguard 'Tier 1' for industrial uses, it also opens up a significant supply of premises for community uses/groups to consider. Restricting this flexibility to higher PTAL locations means that uses which attract large numbers of visitors will be able to make more use of utilise public transport

In order to demonstrate that there is no demand for a scheme comprised solely of Class B1b and B1c, B2 and B8 uses in Tier 3 and Tier 4 locations evidence will need to be submitted that a marketing exercise has been undertaken for a minimum of 18 months. The Council requires that they need to be satisfied that the site has been offered at a price commensurate with the value of the site for the permitted uses and that active promotion has been undertaken by agents marketing the site. Evidence provided such as from the Land Use Site Analysis suggests that industry and warehouse uses continue to be eroded from Tier 2 sites. These have been further compromised by the increase in community uses and residential use in these locations. Recent changes in planning legislation allowing change of use from

office to residential have also had an impact. It is also clear that community uses in Tier 2 sites appear to have thrived despite some Tier 2 sites having a PTAL rating of only 2. As a result the demand for the retention of Industrial and Warehousing uses in Tier 2 sites have been compromised.

The Employment Land Review (2013) was of the view that there was potential to consider re-designation or release of the clusters of Thornton Road and Union Road. The study envisaged scope to allow a restricted loss of industrial and warehousing land to non-B use classes. Potentially this land could be released from industrial and warehousing use at Thornton Road and Union Road clusters as parts of the Thornton Road and Union Road clusters are considered less suitable for industrial and warehousing uses, as evidenced by increasing proportion of non-B use classes located in these clusters.

It is proposed to amend the Tier 4 approach to employment sites. There would still be protection for industry and warehousing but where there is justification for the loss of employment; preference would be given in the first instance for mixed use. The current protection for offices in Tier 4 is also proposed to be removed to support the intention for the Office Retention Area to be the focus of new office development and retention.

The Council's Employment Land Review (ELR) which was updated in 2013 recommended a review of the borough's Tier 2 locations. Tier 2 Locations are industrial estates where residential development grew up alongside the commercial buildings. This proximity between uses has not resulted in undue harm to residential amenity and therefore, new mixed-use schemes, which are well designed and give priority to the area's commercial functionality, have been acceptable. New Class B1b, B1c, B2 and B8 premises in mixed use developments should be designed to meet the needs of future occupiers and to preclude future conversion to residential use. Mixed use developments in these locations must not result in an increase in operational difficulties for businesses and not result in a net loss of Class B1b, B1c, B2, B8 floor space.

The Council is aware that D1 Uses can struggle to find suitable premises. This has led, in the past, to situations where 'Tier 1' employment premises have been lost to community uses to the detriment of the area's business function. Allowing the change of use or redevelopment of 'Tier 2' employment premises to D1 Use Class activities (non-residential institutions), not only helps safeguard 'Tier 1' for industrial uses, it also opens up a significant supply of premises for community uses/groups to consider. In order to demonstrate that there is no demand for a scheme comprised solely of Class B1b and B1c, B2 and B8 uses in Tier 3 and Tier 4 locations evidence will need to be submitted that a marketing exercise has been undertaken for a minimum of 18 months. The Council requires that they need to be satisfied that the site has been offered at a price commensurate with the value of the site for the permitted uses and that active promotion has been undertaken by agents marketing the site.

At present, the 4 tier approach set out in Policy SP3.2 allows D1 uses on Tier 4 Scattered Employment Sites with a PTAL of 3 and above. It is recommended that the PTAL bar remains at PTAL 3 and above and the principle of D1 use be accepted as one of the Permitted Uses on all Tier 4 sites. However this would still be subject to any amenity issues identified by other policies and any transport concerns regarding a high-trip generating use, such as a church, to operate in an unsustainable location.

Conclusion

Evidence provided such as from the Land Use Site Analysis suggests that industry and warehouse uses continue to be eroded from Tier 2 sites. These have been further compromised by the increase in community uses and residential use in these locations. Recent changes in planning legislation allowing change of use from office to residential have also had an impact. It is also clear that community uses in Tier 2 sites appear to have thrived despite some Tier 2 sites having a PTAL rating of only 2. As a result the demand for the retention of Industrial and Warehousing uses in Tier 2 sites have been compromised. The Employment Land Review (2013) was of the view that there was potential to consider redesignation or release of the clusters of Thornton Road and Union Road. The study envisaged scope

to allow a restricted loss of industrial and warehousing land to non-B use classes. Potentially this land could be released from industrial and warehousing use at Thornton Road and Union Road clusters as parts of the Thornton Road and Union Road clusters are considered less suitable for industrial and warehousing uses, as evidenced by increasing proportion of non-B use classes located in these clusters.

It is proposed to amend the Tier 4 approach to employment sites. There would still be protection for industry and warehousing but where there is justification for the loss of employment; preference would be given in the first instance for mixed use. Consideration would also be given to community uses irrespective of PTAL rating. The current protection for offices in Tier 4 is also proposed to be removed

OFFICE RETENTION

Policy SP3.13 states

The Council will promote and support the development of new and refurbished office floor space in Croydon Metropolitan Centre, particularly around East Croydon Station and within New Town, and the District Centres as follows:

- a) Up to 92,000m² to be located in Croydon Metropolitan Centre;**
- b) Within the Office Retention Area in the Croydon Metropolitan Centre the loss of office floor space will be permitted only if it is demonstrated that there is no demand for the offices or refurbished floorspace and that there is no demand for a mixed use development that includes a proportionate level of office floor space;**
- c) Up to 7,000m² to be spread across the borough's District Centres.**

Croydon has introduced measures to prevent offices from being converted into new homes in its central area. The Council has been concerned that strategically important office floorspace was being lost, and that the quality of the majority of residential accommodation being delivered was sub-standard and not meeting requirements, such as minimum floorspace standards. The current position is that overall 34% of office floor space in Croydon Metropolitan Centre is vacant, down from 51% in 2013/14 and 48 office premises are completely vacant (13 less than in 2013/14) and 27% of all office premises (down from 32% in 2013/14).

If all approved developments were completed it would result in a net loss of 26,600m² of office floor space in the Metropolitan Centre since 2011. Most of the loss arises from schemes with prior approval (permitted development) to change the use of a building from office to residential. 2014-15 is the first year since 2011 when all permissions together would result in a net loss of floor space. Although the loss of floor space will help reduce the surplus of Grade B office space in Croydon many of the conversions are of Grade A offices in locations where the loss of office is not desirable

This growth and protection will increase the opportunities for employment in CMC, support its urban renewal and contribute to the Croydon Local Plan: Strategic Policies' spatial vision of being London's most enterprising borough

The Office Retention Area Paper (July, 2015) seeks to justify the case for office retention around East Croydon and New Town. The purpose of this policy is to provide evidence to support decision-making on planning applications, justifying the emergent policy (Policy SP3.13) which protects office floorspace in the East Croydon and New Town Croydon Opportunity Area character areas as an Office Retention Area.

Why we have taken this approach

The London Plan identifies central Croydon as an Opportunity Area (COA), Metropolitan Centre, Strategic Outer London Development Centre and one of the capital's two outer London Strategic Office locations. This demonstrates that the London Plan and the Mayor continues to see Croydon having a strong role to play in London's office supply and office development being concentrated in strategic locations for growth. The COA contains the majority of the borough's B1(a) office floorspace and has a presence of large public sector employers as well as financial and business services, engineering and construction occupiers. The Croydon Opportunity Area Planning Framework (COAPF) (2013) identifies New Town and East Croydon as areas within which development of new commercial space will be focussed. The Croydon Local Plan: Strategic Policies (2013) and OAPF has earmarked this area for 95,000sqm of new office floorspace and the refurbishment of 150,000sqm of existing outdated office space. This approach, together with consolidation through the conversion and redevelopment of surplus office space will support the development of residential development, new hotel space and encourage new cultural and creative industries within the COA.

Furthermore, the Council has adopted The Croydon Promise: Growth for All (2014) which supports the creation of 16,000 jobs, increased employment, improved development opportunities and investment and to reinstate Croydon's position as a premier office location. The retention of office floorspace in New Town and East Croydon is based on a solid economic and business case; to retain employment and to realise aspirations of growth in the context of a Strategic Office Location.

The East Croydon Masterplan outlines the aspirations for the Ruskin Square site adjacent to East Croydon Station which will realise approximately 100,000sqm of office floorspace in accordance with the OAPF and the Croydon Local Plan: Strategic Policies. Besides the development at Ruskin Square, there has been very little recent development of office floorspace and the current stock of office space is outdated.

An Office, Industrial and Warehousing Land/Premises Market Assessment carried out in 2010 (<https://www.croydon.gov.uk/sites/default/files/articles/downloads/industrial-warehouse.pdf>) found, that in order to attract occupiers from competing centres, the quality of office floorspace in the Croydon Metropolitan Centre will need to be improved requiring significant speculative development to achieve higher rents. Furthermore, it states that the success of the Croydon Metropolitan Centre is dependent on the ability of the borough to attract future employment growth through the development of new build office floorspace, and the refurbishment of existing office floorspace which is considered highly site-specific.

An office retention policy, specific to an area within the Croydon Metropolitan Centre would help to consolidate office floorspace and to attract inward investment into the centre by offering prospective developers some certainty with regards to office development and/or redevelopment within the area.

Demand for Grade A office space is high, however availability of office space around East Croydon Station is a barrier to retaining existing businesses and attracting inward investment to create new jobs in the area. This type of office space is essential to accommodate growing sectors such as Tech Industries and SME's. Presence of Grade A office space in the East Croydon area is important for its designation as a strategic office location adjacent to the Station, its location on the Brighton to London Mainline and its proximity to Gatwick Airport.

The area around East Croydon is the most attractive for potential employers due to its proximity to the station and the clustering effects that can be achieved. Retention and refurbishment of office floorspace in the Croydon Metropolitan Centre and in particular in East Croydon and New Town will have other benefits beyond creating jobs, which include an increase in daytime footfall and spend in the COA, increased business retention and in attracting other businesses to the area.

CONCLUSION

The Council has formulated office retention policy in order to protect and enhance office floorspace in the retention area, and to enable the conversion or redevelopment of dis-used or unsuitable office space in areas that are less well connected and unattractive for office development. A robust approach to the loss of office space will be

taken and a detailed assessment of proposals for the loss of office floorspace will need to be justified fully against the whole planning policy landscape. It will need to be demonstrated that there is no reasonable prospect of office retention, upgrade of office led redevelopment of the site, or mixed use development including office floorspace.

Strategically important office floorspace has been lost to residential use which in turn undermines the overall office floorspace availability and market activity. Furthermore, the permitted development right has undermined the objectives of the OAPF to consolidate office floorspace in the East Croydon and New Town areas. Many of the schemes that have come forward as a result of the permitted development right have yet to be implemented, which in itself causes stagnation and further uncertainty in the market. This policy aims to provide clarity to communities, businesses, investors and developers regarding the Council's position on proposals for office space, and its position regarding the permitted development right which allows the conversion of office floorspace to residential use

Background Documents

- National Planning Policy Framework (2012)
- National Planning Practice Guidance (2014)
- Permitted Development Rights (2013)
- London Plan 2011 (GLA, 2011)
- Further Alterations to the London Plan (2014)
- Supplementary Planning Guidance (SPG) for Land, Industry and Transport (GLA, 2012)
- Mayor's Economic Development Strategy (GLA, 2010)
- Outer London Commission (2010)
- Croydon Local Plan Strategic Policies (LB Croydon, 2013)
- URS Employment Land Review including Update 2013
- Office Retention Area Paper(July,2015)

- October Office Retention Cabinet Report
- Article 4 data

Proposed Submission of the Croydon Local Plan: Detailed Policies and Proposals on Employment

Policy DM5: Development in Croydon Metropolitan Centre, District and Local Centres

DM5.1 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 Class A uses within Main Retail Frontages (unless it relates to the expansion of an existing community use).

DM5.2 Within Croydon Metropolitan Centre and the borough's District and Local Centres development proposals and changes of use on the ground floor must accord with Table 5.1

DM5.3 Outside of Main and Secondary Retail Frontages, but within centres, proposals for mixed use developments will be required to either:

- a. Demonstrate that a specific end user will be occupying the ground floor unit upon completion; or
- b. Provide a free fitting out of all ground floor units for the eventual end occupier to ensure that the unit is capable of occupation and operation by the end user and ensure that the ground floor units are capable of conversion to the same use as the remainder of the building if after two years, subsequent to completion, no end user has been found for the ground floor unit.

Table 0.1 New development proposals and changes of use in Croydon Metropolitan Centre and District and Local Centres

Part of the town centre	Use	Expansion of existing uses or newly proposed uses
Main Retail Frontage	A1	Acceptable in principle
	A2 – A4	Acceptable in principle as long as it does not result in more than 60% of the ground floor of units falling outside the A1 Use Class
	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. 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 ² (gross)
	A5	Acceptable in principle as long as it does not result in two or more adjoining A5 units at ground floor
	B1	Acceptable in principle as long as it results in an active frontage and does not undermine the retail function of the frontage
	All Other Uses	Unless it relates to a Community Use proposals involving an increase of existing non A Class ground floor space within Secondary Retail Frontage will be refused
Outside a Frontage but within Primary Shopping Area	All Uses	Acceptable in principle subject to the requirements of Policy Error! Reference source not found.

Part of the town centre	Use	Expansion of existing uses or newly proposed uses
Rest of Centre	A1	See Error! Reference source not found. Error! Reference source not found.
	All Other Uses	Acceptable in principle subject to the requirements of Policy Error! Reference source not found.

Proposed amendments to the Policies Map

Each of the 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 Plan⁷. However there are a number of proposed amendments to the boundaries.

Table 0.2 Amendments to designations (see *The draft Policies Map* for full details)

Centre	Boundary of Centre	Primary Shopping Area	Main Retail Frontage	Secondary Retail Frontage
Croydon Metropolitan Centre		✓	✓	✓
<i>District Centres</i>				
Addiscombe	✓	✓		✓
Crystal Palace (formerly Upper Norwood)		✓		✓
Norbury	✓		✓	✓
Purley	✓		✓	
Selsdon	✓	✓	✓	✓
South Norwood	✓	✓		✓
Thornton Heath	✓	✓	✓	✓
<i>Local Centres</i>				
Beulah Road ⁸	✓	✓	✓	✓
Brighton Road (Sanderstead Road)	✓	✓	✓	✓
Brighton Road (Selsdon Road)	✓	✓		
Broad Green	✓	✓	✓	✓
Pollards Hill	✓	✓	✓	
Shirley	✓	✓	✓	

⁷ 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.

⁸ Beulah Road is proposed as a new Local Centre

Centre	Boundary of Centre	Primary Shopping Area	Main Retail Frontage	Secondary Retail Frontage
Thornton Heath Pond	✓	✓		✓

Why we need 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:

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

5.2 These boundaries have been reviewed during the preparation of this Plan to ensure they meet the needs of the borough. The review has been supported by an Assessment of boundaries and designations for Croydon Metropolitan Centre, District and Local Centres including analysis of mixed use developments (2012 and 2015) and a Review of Town Centre Designations (2013).

5.3 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.

5.4 Paragraph 23 of the National Planning Policy Framework 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

How the policy works

5.5 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 2. This policy limits the saturation of A5 uses as the associated waste and delivery issues can cause harm to residential amenity. The clustering of hot-food takeaways can have an adverse impact on the vitality and viability of town centres, therefore limiting hot-food takeaways will help to ensure residents have a greater choice of retail services.

5.6 Studies have identified that one in three children is overweight or obese by the time they leave primary school and in 2014, an estimated 62% of the adult population were overweight or obese ¹⁰. Croydon was selected as a pilot for the Mayor of London's Food Flagship program and one of the aims of the program is to improve the quality of food available to schools and communities. Limiting the number of hot food takeaways in the borough's town centres will support the public health agenda of tackling obesity and associated health problems and will promote access to healthier food options.

5.7 Proposals for B1 uses will be supported in Secondary Retail Frontages to create opportunities for office, research & redevelopment and light industrial workshops within town centres. However, these uses should not undermine the retail function of the frontages and will be only permitted if they provide an active frontage.

5.8 The reason why 250m² is the threshold for community uses within Secondary Retail Frontages in Croydon Metropolitan Centre and District and Local Centres is that it would allow uses such as dentist surgeries and a High Street police office to operate but would deter larger scale activities from potentially undermining the A Use Class focus of these locations.

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

5.10 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.

5.11 For the purposes of Part 3 Class M of the General Permitted Development Order (2015), which sets out the circumstances where planning permission is not required for changes of use from retail to residential use, Main Retail Frontages and Secondary Retail Frontages are considered to be key shopping areas. In these locations any change of use from a retail use to residential will require an application to be made for planning permission which will be considered against the requirements of this policy.

Policy Justification

The Council reconsidered its retail and planning strategy for Croydon Metropolitan Centre (CMC) in 2009. A Review of Town Centre Designations was also carried out in 2013. CMC serves a catchment including the whole of the Borough, plus some areas beyond the Borough boundary, for example Waringham and Caterham in the south and Streatham in the north. However, the Borough Council administrative area constitutes the majority of the catchment area.

CMC is the dominant shopping centre within a substantial area of South London. It contains a total of 195,000 sq m town centre retail floorspace (Promis) and its catchment area extends beyond the administrative boundary into neighbouring Boroughs and Districts. The primary shopping area of CMC is focussed on the Whitgift Centre developed in the 1970s, North End, and Centrale which opened in 2004. The centre contains a large number of national multiple retailers, although its

comparison retail offer is mostly mainstream. It generally lacks the quality retailers within the upper end of the fashion spectrum that can typically be found in regional centres. At present, the upmarket fashion provision is largely confined to department store concessions.

Bromley to the east and Sutton to the west are the nearest 'metropolitan' town centres, which compete with Croydon. Kingston, which lies to the west is less accessible, but also attracts shoppers from the Croydon area. The other major competing comparison goods shopping facilities are the nearby Purley Way Retail Parks comprising some 135,000 sq. m, of which approximately 2/3rd is comparison traders.

Furthermore, the Croydon Opportunity Area Planning Framework (2013) supplements the London Plan and Local Plan policy context by setting the framework for the renewal of the retail core and to address the acknowledged deficiencies of the retail core in its current form. This has resulted in the grant of planning permission for the comprehensive redevelopment of the Whitgift, the approval of Compulsory Purchase Order to enable this to occur and receipt of a further planning application for an amended scheme for the comprehensive redevelopment of the Whitgift.

KEY ISSUES IDENTIFIED

Croydon's Vision says that by 2040 Croydon town centre will be regarded as an iconic, safe and modern mixed-use European city. It will enjoy a reputation comparable with other major commercial centres thanks to a raft of new, modern office developments. It will provide the principal retail and leisure offer in outer South London and its tree-lined street environment will also compete well against more sterile retail and leisure malls in other parts of London and the immediate South East.

The following issues were identified.

Main Shopping Frontage

The main shopping frontage should be focused essentially on the Core Retail Area. The extent to which the primary shopping frontage should extend south of George Street will depend on the case that is made for any 'main stream' retailing to the south of George Street. There is no justification for a main shopping frontage in Church Street, nor north of Poplar Walk in North End. But there may be justification for main shopping frontage to the western end of George Street linked with any major redevelopment that may occur in this location.

Secondary Shopping Frontage

The major shopping frontages beyond the Core Retail Area should remain largely as existing in the Church Street, Surrey Street and Middle Street area, High Street and in George Street. Any new retail development in the West Croydon Station Area is likely to be of a scale and type that would warrant secondary shopping frontage status only. There is no justification therefore for seeking to extend the primary shopping frontages north of Poplar Walk.

Primary Shopping Area

The defined primary shopping area should encompass the primary and secondary shopping frontages identified above, with the exception of the area south of Mint Walk. Although these frontages perform an important function, they are remote from the Core Retail Area.

Conclusion

There are problems and issues within the existing Core Retail Area that require addressing if the Centre is to achieve its full potential. One of the principal issues is that Croydon has somewhat of a negative image, which affects its standing and perception as a shopping centre.

The policy sets out the approach to ensuring a mix of uses within designated centres and Primary and Secondary Retail Frontages.

In 2012 the Council undertook a review of its town centres which included an assessment of the boundaries of the town centres, the primary shopping areas and primary and secondary retail frontages. This was independently reviewed as part of the Review of Town Centre Designations. These proposed changes were consulted on as part of the Detailed Policies (Preferred and Alternative Options).

Table 0.3 Croydon Metropolitan Centre

Designation Change	What does the evidence say?
<p>Extension of the Primary Shopping Area to include the Whitgift Centre and George Street to East Croydon station</p>	<p>The PSA is to be extended to support the planned, retail-led regeneration set out in the Croydon Local Plan and Croydon Opportunity Area Planning Framework.</p> <p>The 2013 review identified that if the planned developments came forward within this area, the extension will not endanger future investment into the existing retail core.</p> <p>As George Street functions as a route from the existing retail core to East Croydon station, retail uses would be supported in this area and would support the Fairfield Masterplan. The 2013 review identified recent lettings on George Street for retail.</p>
<p>Designate Church Street as a Secondary Retail Frontage and 1-37 High Street and 4-56 High Street as Secondary Retail Frontage</p>	<p>These designations would support a greater flexibility of uses in these areas. For Church Street, the 2013 review identifies this as a secondary location in the town centre, with demand from retailers who cannot afford prime rents. The re-designation will support flexibility and will ensure vacancy rates remain low. The High Street has greater vacancy rates and the designation will support a flexibility of uses as the 2013 review identified it is difficult to see a strong A1 demand in the future.</p>

Table 0.4 Addiscombe District Centre

Designation Change	What does the evidence say?
Reduce the District Centre boundary and primary shopping area	The 2012 assessment identified that the proposed areas to be deleted were predominantly in residential use and these locations do not support future town centre activities.
Secondary Retail Frontages	The 2015 assessment identified these units requiring protection for their retail units but could also support a greater flexibility of uses.

Table 0.5 Crystal Palace District Centre

Designation Change	What does the evidence say?
Extend the Primary Shopping Area to include Church Road and parts of Westow Hill and Westow Street.	The 2012 assessment identified that Church Road has become an integral part of the shopping offer in Crystal Palace. All three sides of the triangle now have ground floor commercial activity and associated footfall to support the PSA designation. The 2013 review confirms that Crystal Palace has seen significant improvement in the last few years and the proposed change can support this growth in the District Centre.
Extension of the Secondary Retail Frontage on Church Road	As the PSA is to be extended this designation will protect the A class Uses in this area.
Re-designate Westow Hill as Secondary Retail Frontage	It was proposed in the Detailed Policies (Preferred and Alternative Options) to re-designate this as a Secondary Retail Frontage due to vacancy rates. However, the 2015 assessment identified that these units are now in use so the Main Retail Frontage designation will remain.
Remove Secondary Retail Frontage from part of Church Road	It was proposed in the Detailed Policies (Preferred and Alternative Options) to remove this as a Secondary Retail Frontage. However, the 2015 assessment identified that these units are now in use so the Secondary Retail Frontage will remain.

Designation Change	What does the evidence say?
Remove the Phoenix Centre from the Secondary Retail Frontage	Following the consultation on the Detailed Policies (Preferred and Alternative Options), the Phoenix Centre was removed to ensure it still continues to be protected as a community facility.

Table 0.6 Norbury District Centre

Designation Change	What does the evidence say?
Reduce the District Centre boundary	The 2012 assessment identified that the south of the District Centre was predominately offices. The point where London Road becomes Streatham High Road acts as natural break and is separated from the retail in the primary shopping area. The 2013 review agreed that an increase in retail in the area would detract from the primary shopping area and as demand in Norbury is quite limited, the contraction of the centre is unlikely to lead to stagnation through no churn.
Re-designate part of London Road as Secondary Retail Frontage	The 2012 assessment identified that this area already has a high number of non-A1 uses and the Main Retail Frontage could potentially stop the development of a restaurant quarter in this area.

Table 0.7 Purley District Centre

Designation Change	What does the evidence say?
Reduce District Centre boundary	The area to be deleted contains residential flatted developments and houses that do not need to be part of the District Centre. The 2015 assessment identified that the library and church do not need to form part of the District Centre as they will continued to be protected as community facility. The proposed boundary better reflects the commercial core of Purley. The 2013 review confirmed that the proposed area acts as the commercial core and that it would be difficult to imagine retail development in this location. It concludes that the change will not have a detrimental effect on the vibrancy of Purley.
Remove Purley Leisure Centre from the Secondary Retail Frontage	Following the consultation on the Detailed Policies (Preferred and Alternative Options), the leisure centre was removed to ensure it still continues to be protected as a community facility.

Table 0.8 Selsdon District Centre

Designation Change	What does the evidence say?
Remove SRF designation from 236-238 (even) Addington Road	The 2012 assessment identified that removing this frontage would allow for greater flexibility of uses in the District Centre.
Replace MRF designation with SRF designation at 230-234 (even) Addington Road	This section of Addington Road represents a natural break in the Main Retail Frontage at the former Selsdon Garage. This re-designation would allow for a greater flexibility of uses.
Reduce District Centre boundary	The 2015 assessment identified that the church would be protected as a community facility and does not need to form part of the District Centre.

Table 0.9 South Norwood District Centre

Designation Change	What does the evidence say?
Reduce District Centre boundary	The boundary of the District Centre includes numerous houses and flatted developments which do not perform a town centre function so it is proposed to be removed. In the Detailed Policies (Preferred and Alternative Options) it was proposed to delete the northern end of Portland Road as it is separated from the rest of the District Centre by the low rail bridge. However, the 2015 assessment identified that this area should remain in the District Centre and the retail units should be protected as Secondary Retail Frontages.
Revised Primary Shopping Area to match revised District Centre boundary	
Remove SRF designation from 1-5 (cons) Commercial Buildings & 26-34 High Street	

Key supporting documents

- Croydon's Monitoring Report (annual)
- Borough Wide Retail Needs Study Update (2008)
- Croydon Metropolitan Centre Retail Strategy (2009)
- Office, Industrial & Warehousing Land/Premises Market Assessment (2010)
- Employment Land Review Update (2013)
- Review of Town Centre Designations (2013)
- Assessment of boundaries and designations for Croydon Metropolitan Centre, District and Local Centres including analysis of mixed use developments (2012 and 2015)
- Appendix 3 – Designated shopping frontages

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

Policy DM6: Development in Neighbourhood Centres

DM6.1 The Council will ensure that the vitality and viability of Neighbourhood Centres are maintained and enhanced and that they continue to provide a level of service of neighbourhood significance.

DM6.2 In the vicinity of Neighbourhood Centres, development proposals must:

- a. Accord with Table 5.3; and
- b. Demonstrably relate to the Neighbourhood Centre, be in scale and be within reasonable walking distance to other retail and community uses within the centre.

Table 0.1 New development proposals and changes of use in the vicinity of Neighbourhood Centres

Part of Neighbourhood Centre	Use	Expansion of existing units or newly proposed units
Within a Shopping Parade	All	See Error! Reference source not found. Error! Reference source not found.
Outside of a Shopping Parade	A1 – A4, B1 and town centre community uses	Acceptable in principle with a limit of floor space of 280m ² (net)
	All other community uses	Acceptable in principle
	C3	Acceptable in principle
	All other uses (including A1 – A4, B1 and town centre uses with more than 280m ² (net) floor space)	Not acceptable

Proposed amendments to the Policies Map

In all instances the Neighbourhood Centres that have been identified do not appear in the Unitary Development Plan. The proposed Neighbourhood Centres are listed in Table 0.2 below. The proposed location of each Neighbourhood Centre can be found on the draft Policies Map.

Table 0.2 Proposed Neighbourhood Centres (see *The draft Policies Map* for full details)

Neighbourhood Centre	New
Ashburton Park	✓
Brighton Road/Downlands Road	✓
Brigstock Road	✓
Coulsdon Road/Court Avenue	✓
Fieldway	✓
Green Lane/Northwood Road	✓
Kenley (Godstone Road)	✓
London Road/Kidderminster Road	✓
Lower Addiscombe Road/Cherry Orchard Road	✓
Portland Road/Watcombe Road/Woodside Avenue	✓
Selhurst Road	✓
Selsdon Park Road/Featherbed Lane	✓
Shirley Road	✓
South End/Parker Road/St Peter's Church	✓
South Norwood Hill	✓
Spring Park/Bridle Road	✓
Waddon Road/Abbey Road	✓
Woodside Green	✓

Why we need this policy

5.12 The Council seeks to provide a range of services and community facilities to contribute to its aim of creating healthy and liveable neighbourhoods as set out in the Croydon Local Plan Strategic Policy SP5.3 and Strategic Objectives 5, 6 and 7. This will help in promoting healthy communities in line with paragraphs 69 and 70 of the National Planning Policy Framework.

5.13 In appropriate areas, the Council will seek to promote development of community facilities that will serve a neighbourhood demand for these uses.

5.14 Community facilities are defined in the Croydon Local Plan: Strategic Policies as facilities providing for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

5.15 Neighbourhood Centres are not intended to compete with designated District or Local Centres, and should serve a local need smaller in scale to that of a Local Centre. They should be able to meet the day-to-day needs of the local community and allow for modest growth in order to accommodate local needs.

5.16 Typically more limited in retail offer to Local or District Centres, Neighbourhood Centres may contain a place of worship, playground, school, public house, GP and pharmacy.

5.17 Neighbourhood Centres serve the whole community, but are particularly important to those who do not have access to a car, are unable to travel far or those with a disability.

5.18 The London Plan states that boroughs should identify and promote the complementary offers of the other smaller centres in the network including neighbourhood centres and local shopping parades. These play a key role in meeting 'walk to', everyday needs and are often the core of local 'Lifetime' neighbourhoods.

5.19 Neighbourhood Centres typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, mostly for convenience goods and other services. They may include a small supermarket, sub-post office, pharmacy, launderette and other useful local services. They can play a key role in addressing areas deficient in local retail and other services.

5.20 The London Plan sets out its ambitions to plan for a range of social infrastructure required for London's communities and neighbourhoods to support a high and improving quality of life. It supports a city of diverse, strong, secure and accessible neighbourhoods and seeks to ensure that neighbourhoods provide convenient access, especially by foot, to local goods and services needed on a day to day basis. Local neighbourhoods should act as a focal point for local communities and enhance their overall attractiveness.

5.21 Surplus commercial capacity should be identified and brought forward to meet housing and local community needs, recognising that this process should contribute to strengthening the 'offer' of the Centre as a whole.

5.22 The London Plan advocates a light touch approach regarding neighbourhood centres in order to sustain and improve their convenience offer while supporting redevelopment of surplus units for housing.

5.23 The Urban Design Compendium notes that 'local facilities bring residents together, reinforce community and discourage car use'. Furthermore, it states that newsagents should be within a five minute walk, and local shops, health centres and other services which serve a local need, should be a ten minute walk. This approach is also considered appropriate in Shaping Neighbourhoods: A Guide for Health, Sustainability and Vitality.

How the policy works

5.24 This approach is the preferred approach as it assists in promoting the development of community facilities to serve neighbourhood areas and complies with the National Planning Policy Framework and the London Plan.

5.25 Neighbourhood Centres are not town centres (unlike District and Local Centres). Thresholds are applied to specific uses within Neighbourhood Centres to ensure that proposed developments only serve a neighbourhood need and should not be to the detriment of designated Local or District Centres whilst enabling development of town centre uses that serve the local community.

5.26 This policy seeks to ensure that flexibility is granted to community facilities that wish to locate in Neighbourhood Centres in order to serve a local identified need.

5.27 Within Neighbourhood Centres, development proposals for A1 – A5 uses, B1 uses and community facilities should be of a reasonable scale proportionate to serve a neighbourhood need and have a clear relationship to other facilities within the centre.

5.28 Development of A1 - A5 uses, B1 uses and community facilities should not have a detrimental impact on neighbouring amenity or traffic safety.

5.29 Proposals for A1 - A5 uses, B1 uses and community facilities should be within a five or ten minute walk from the centre, have a clear visual relationship to the centre and should not be disconnected from the centre by physical barriers.

Further guidance is available in Appendix 4.

5.30 Neighbourhood Centres typically serve their immediate residential properties, and as such a five to ten minute walk is considered an appropriate distance.

5.31 The Council will not permit the development or expansion of retail or commercial premises that would significantly increase the 'offer' of the Neighbourhood Centre to the detriment of a Local or District Centre. For this reason, development of retail and town centre community uses with a floor space above 280m² will still be subject to a sequential test in accordance with Policy DM9: Development in edge of centre and out of centre locations.

5.32 For the purposes of Part 3 Class M of the General Permitted Development Order (2015), which sets out the circumstances where planning permission is not required for changes of use from retail to residential use, designated Shopping Parades within Neighbourhood Centres are considered to be key shopping areas.

In these locations any change of use from a retail use to residential will require an application to be made for planning permission which will be considered against the requirements of this policy which would not allow for the conversion.

Policy Justification

The Unitary Development Plan (2006) set out the hierarchy of centres in Table 12.1 and are updated in SP3.6 of the Croydon Local Plan: Strategic Policies (2013) to conform with the London Plan Town Centre Hierarchy. District Centres are: Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, Purley, Selsdon, South Norwood and Thornton Heath. These are distributed more widely than the metropolitan centres, providing convenience goods and services for more local communities and accessible by public transport, walking and cycling. Typically they contain 10,000 – 50,000m² of retail floorspace. Some District Centres have developed specialist shopping function

Local Centres are; Broad Green, Brighton Road (Selsdon Road), Brighton Road (Sanderstead Road), Hamsey Green, Pollard's Hill, Sanderstead, Shirley and Thornton Heath Pond. These centres typically serve a localised catchment often mostly accessible by walking and cycling and may comprise a local parade and small clusters of shops, mostly for convenience goods and other services. This may include a small supermarket (less than 2,000m²), sub-post office, pharmacy, launderette and other useful local services.

Together with District Centres they play a key role in addressing areas deficient in local retail and other services. There are no further tiers which sit below Local Centres and concern has been raised about whether the Local Plan Town Centre hierarchy is offering the opportunity for clusters of uses, in particular community uses to emerge or be supported by current planning policy. Current planning policy protects community facilities but does not go so far as to actively promote community facilities in appropriate locations. Policy SP5 of the Croydon Local Plan: Strategic Policies sets out the current position regarding the provision of community facilities and the approach taken to assess applications for this type of development.

Methodology for Neighbourhood Centres

The assessment focused around the Local centre / parade level of the hierarchy and goes beyond recognising them solely for their retail function but for the wider role they play in supporting the local community. A planning policy review of CLP1 Partial Review and identification of Neighbourhood Centres on the Places Plans has been undertaken. Care has been taken to promote particular use classes so as to ensure that unintended consequences of inappropriate major Town Centre uses/operators locating in these locations do not arise. A maximum floorspace is also included to ensure development in these locations is appropriate.

A desktop search has been carried out which identified areas or clusters of ten units or more. This was so that areas of critical mass, or that comprised of different uses in one area could be defined. 42 clusters were identified.

A comprehensive survey has been carried out which involved assessing the clusters and the surrounding areas with regards to the level of community facility provision that these areas currently provide, or could potentially provide in future. A total of 17 areas have been identified that meet the criteria in order for them to be designated Neighbourhood Areas. A selection of criteria were used in order to ascertain the suitability of designating these areas which included

- the level of vacancies in the cluster and surrounding areas to accommodate potential growth;
- whether or not there was a landmark/war memorial in the area
- whether or not there was a church, school, community centre or pub in the area;
- the number of community facilities in the area (as defined in CLP 1); and
- accessibility to open space

Where four or more of the criteria have been met, these areas are designated a Neighbourhood Area. Consideration has been taken with regards to the designation of areas which have extant centres nearby, and the threats Neighbourhood Centres could evoke should they be situated close by.

A Neighbourhood Centre/ Urban Village will be designated where appropriate;

- where there are four or more different community facilities present, and
- where its designation would not threaten the vitality or vibrancy of Local/District Centres in the surrounding area

The development of community facilities will be supported in Neighbourhood Centres where;

- They would enhance the centre's ability to serve a local need;
- They would improve the vitality and vibrancy of the centre;
- Where a unit has been vacant for a significant period of time and there is no reasonable prospect for it to be brought back into its previous use; and
- They would not exceed 500sqm so as to protect the amenity of the surrounding area and to ensure that the development would serve a local need.

In considering proposals within Neighbourhood Centres, the Council will seek to safeguard existing A1 retail uses and the provision of a minimum range of essential local facilities including a post office, chemist, doctor and dentist. Change of use in any such facility will be opposed if it would result in the loss without replacement of a valued local service, or its loss would place the surrounding area more than 400 metres from the nearest alternative.

Within defined district/ local centres as set out in the policies map, community facilities will be supported where:

- They would improve the centre's ability to serve a local need
- They would demonstrably improve the vitality and vibrancy of the centre; or
- Where a unit has been vacant for a significant period of time and there is no reasonable prospect for it to be brought back into its previous use as well as lack of demand for service or community use before other uses are proposed
- They would not exceed 500sqm so as to protect the amenity of the surrounding area and to ensure that the development would serve a local need

Key supporting documents

- Croydon's Monitoring Report (annual)
- Assessments of boundaries and designations for Croydon Metropolitan Centre, District and Local Centres (2012 and 2015)
- Assessments of potential Neighbourhood Centres (2015)
- Borough Wide Retail Needs Study Update (2008)

- The Urban Design Compendium (2000)
- Barton, H., et al. (2003) Shaping Neighbourhoods: A Guide for Health, Sustainability and Vitality

Policy DM7: Development in Shopping Parades

The Council will ensure that the vitality and viability of the borough's Shopping Parades is maintained and increased and that they continue to serve local communities by ensuring new development proposals and changes of use on the ground floor are in accordance with Table 5.5.

Why we need this policy

5.33 The primary function of Shopping Parades is to provide local convenience shopping facilities. This policy sets out the policy approach to different uses within Shopping Parades and also designates each Shopping Parade in the borough.

5.34 In relation to drawing up Local Plans, paragraph 23 of the National Planning Policy Framework states that local planning authorities should 'set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres'.

5.35 A review of all retail units outside any town centre or Shopping Parade based on the Croydon Monitoring Report 2014/15 has identified that there are a number of locations in the borough that could benefit from designation as a Shopping Parade

Table 0.3 New development proposals and changes of use in Shopping Parades

Use	Expansion of existing uses or newly proposed uses
A1	Changes of use or proposals which do not result in an increase in floor space of the overall Parade are acceptable in principle. Other development will be subject to the provisions of Error! Reference source not found. Error! Reference source not found..
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	Not acceptable
B1 (Change of use only)	Changes of use to office, research & development and light industrial workshops are acceptable in principle as long as it does not result in more than 50% of the ground floor of units (within the entirety of the Parade) falling outside the A1 Use Class and provides an active frontage.
All Other Uses (including new development of B1)	Unless it relates to a Community Use or change of use to B1 use, proposals involving an increase of non Class A ground floor space within parades will be refused

Proposed amendments to the Policies Map

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 0.4 below.

Table 0.4 Amendments to Shopping Parades designations (see *The draft Policies Map* for full details)

Shopping Parade	New	Amended boundary	De-designated ⁹
Beulah Road			✓
Brighton Road/ Kingsdown Avenue		✓	
Brighton Road/ Biddulph Road	✓		
Bywood Avenue		✓	
Grovelands		✓	
Headley Drive		✓	
London Road/Mead Place	✓		
London Road/Nova Road	✓		
London Road/Fairholme Road	✓		
Lower Addiscombe Road/Davidson Road	✓		
Morland Road			✓
Northwood Road			✓
Old Lodge Lane			✓
Portland Road/Sandown Road	✓		
Royal Oak			✓
Shirley Road/Bingham Road	✓		
Southbridge Road	✓		

⁹ 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 ⁹
The Parade, Coulsdon Road		✓	
Thornton Road	✓		
Waddon Road		✓	
Whitehorse Lane	✓		
Whitehorse Road		✓	

How the policy works

5.36 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. 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.

5.37 The policy limits the opening of new A5 units or changes of use to A5 in shopping parades. This will help to ensure residents have a greater choice of local retail services and will limit associated waste and delivery issues that can cause harm to residential amenity. Controls on the opening of new hot food takeaways support access to healthier food options outside town centres as shopping parades are often located in residential areas in close proximity to open spaces and schools.

5.38 Sui generis activities which serve the local area (such as a laundrette) and community facilities are also acceptable uses within Shopping Parades. Shopping Parades can also provide space for small start-up companies who need office or workshop space so changes of use to Class B1 uses are also acceptable to facilitate this. However all other uses (including sui generis which serve a wider catchment) are not acceptable uses. New development of Class B1 uses are also unacceptable as new development of this type could threaten the retail character of a Shopping Parade in a way that change of use would not.

5.39 For the purposes of Part 3 Class M of the General Permitted Development Order (2015), which sets out the circumstances where planning permission is not required for changes of use from retail to residential use, Shopping Parades are considered to be key shopping areas. In these locations any change of use from a retail use to residential will require an application to be made for planning permission which will be considered against the requirements of this policy.

Policy Justification

A Review and Assessments of boundaries and designations for Shopping Parades was carried out in 2015 on potential changes to the boundaries and designations. The criteria included the number of units involved, the level of vacancy and the amount of active retail frontages. This resulted in minor changes to the Shopping Parades as informed by Table 5.6 above

Key supporting documents

- Croydon’s Monitoring Report (annual)
- Assessments of boundaries and designations for Shopping Parades (2012 and 2015)
- Appendix 3 – Designated shopping frontages

Policy DM8: Development in Restaurant Quarter Parades

The Council will designate Restaurant Quarter Parades and ensure that their 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 5.7.

Table 0.5 New development proposals and changes of use in Restaurant Quarter Parades

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

Proposed amendments to the Policies Map

Restaurant Quarter Parades are a new designation that will be on the Policies Map. A list of proposed Restaurant Quarter Parades can be found in Table 0.6 below.

Table 0.6 Proposed Restaurant Quarter Parade designations (see *The draft Policies Map* for full details)

Restaurant Quarter Parade	New
South End	✓

Why we need this policy

5.40 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

5.41 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.

5.42 In relation to drawing up Local Plans, paragraph 23 of the National Planning Policy Framework states that local planning authorities should ‘set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres’.

5.43 A survey of South End indicated that the cluster of bars and restaurants is significant not only in terms of the cultural and leisure offer, but also as a generator of direct and indirect employment.

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

How the policy works

5.45 This policy seeks to promote bar and restaurant activity by limiting the amount of other uses that can occupy (or extend) the ground floor of premises. A new Restaurant Quarter Parade has, therefore, been designated at 6 – 78 (even) and 1 - 77 (odd).

5.46 The policy limits Class A5 activity (which could undermine the area’s function if restaurants and bars are replaced with hot food takeaways). This will help to safeguard and promote the Restaurant Quarter.

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

Policy Justification

The London Plan Policy 4.6 states Local Plans should designate and develop cultural quarters. They should promote and develop existing and new cultural and visitor attractions, especially in outer London and where they can contribute to regeneration and town centre renewal.

The Annual Monitoring Report and the Restaurant Quarter topic paper identified South End as having a clustering of A4 and A5 uses. There is already a strong business forum within the area and is a generator of direct and indirect employment. It also supports a night time economy

The NPPF and London Plan promote the town centre first approach and the proposed restaurant quarter is in an edge of centre location to the Metropolitan Centre. However, the NPPF states that Local Plans can allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. The policy will allow for a clustering of A3 and A4 uses, which are main town centre uses in an edge of centre location, as policies within the Metropolitan Centre aim to promote and protect retail uses.

Whilst all other uses are restricted, permitting community uses (up to 250m²) allows for complementary activities, including leisure and cultural, which can support the Restaurant Quarter. Restricting A5 uses will prevent the purpose of the Restaurant Parades being undermined if the restaurant and bars are replaced with hot food takeaways

Key supporting documents

- Appendix 3 – Designated shopping frontages

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

The Council will ensure the vitality and viability of the borough's town centres is maintained and increased by:

- a. Ensuring new development proposals for main town centre uses in edge of centre and out of centre locations are in accordance with Table 5.9; and**
- b. Applying planning conditions to control the subdivision of units, extensions (including mezzanines), and the range and mix of convenience and comparison goods sold.**

Use	Development in edge of centre locations	Development in out of centre locations
A1 – A4	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre</p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m²</p>	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within a town centre or edge of centre location or existing vacant units in any location, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre</p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m²</p>
A5	Not acceptable	Not acceptable
Offices and other main town centre uses	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre</p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m²</p>	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within a town centre or edge of centre location or existing vacant units in any location, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre</p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m²</p>
Non town centre community uses	Acceptable in principle	Acceptable in principle

Why we need this policy

5.48 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.

5.49 In relation to drawing up Local Plans, paragraph 23 of the National Planning Policy Framework states that local planning authorities should ‘set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres’

How the policy works

5.50 This policy applies to all commercial uses equating to the National Planning Policy Framework’s main town centre uses. Together these are defined as the following:

- a. Retail development (including warehouse clubs and factory outlet centres);
- b. Leisure, entertainment facilities and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls);
- c. Offices; and
- d. Arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

5.51 For the purposes of this policy edge of centre and out of centre locations are defined as shown in Table 5.10. ‘Well connected’ is defined as a location benefiting from a Public Transport Accessibility Level of 4 and above.

Table 5.10 Definition of edge of centre and out of centre location (informed by Annex 2 of the National Planning Policy Framework)

Use	Edge of centre when...	Out of centre when...
Retail development	Within 300m of the boundary of the centre’s Primary Shopping Area and well connected	More than 300m from the boundary of the centre’s Primary Shopping Area
Offices	Within 300m of the boundary of the centre or within 500m of East Croydon, West Croydon, Norbury, Thornton Heath, Norwood Junction, Purley or Coulsdon Town stations.	More than 300m from the boundary of the centre and more than 500m from East Croydon, West Croydon, Norbury, Thornton Heath, Norwood Junction, Purley or Coulsdon Town stations.
Other commercial use	Within 300m of the boundary of the centre	More than 300m from the boundary of the centre

When undertaking a sequential test, applicants will be required to demonstrate there is no town centre or edge of centres sites or units that accommodate their proposal. For out of centre locations they will be required to assess whether there are any existing vacant out of centre units which can accommodate the proposal as it is sequentially preferable to occupy an existing unit in an out of centre location than develop a new unit.

Extensions to existing, changes of use to or new A5 uses will not be permitted in edge of centre or out of centre locations which will prevent the opening of hot food takeaways in close proximity to schools and open spaces. This will support the public health agenda of tackling obesity, particularly for children and young people, and promotes access to healthier food options.

As set out in the National Planning Policy Framework, the purpose of an impact assessment is to understand the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal. It also assesses the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made.

Where a proposed extension results in a unit greater than 2,500m² of floor space, an impact assessment will be required. Impact assessment will be required to assess the impact of the whole unit and not just the proposed extension.

For major schemes where the full impact will not be realised in five years, the National Planning Policy Framework states impact should also be assessed up to ten years from the time the application is made. Impact assessments will be required to assess the impact of the whole unit if it results in a floor space greater than 2,500m².

The use of planning conditions on the subdivision, extensions and the range of goods and mix of convenience and comparison goods sold ensures that developments in edge of centre and out of centre locations do not have any significant adverse impact of the vitality and viability of the Metropolitan, District and Local Centres.

New community facilities in edge of centre or out of centre locations are acceptable in principle. This does not apply to facilities considered to be a D2 use. These main town centre uses will require a sequential test and an impact assessment.

Use	Development in edge of centre locations	Development in out of centre locations	How has the policy changed?	What does the evidence say?
A1-A4	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle</p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m²</p>	<p>Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within a town centre or edge of centre location of existing vacant units in any location, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre</p> <p>An impact assessment will be required for proposals which result in a unit greater than 2,500m²</p>	<p>In the Detailed Policies (Preferred and Alternative Options) different approaches for edge of centre locations and out of centre locations were proposed. It was proposed that in edge of centre locations developments would be allowed a maximum increase in floorspace and in out of centre locations a maximum increase of 5%</p>	<p>The NPPF and London Plan promote the town centre first approach for main town centre uses to ensure they are accommodated in town centre locations, then in edge of centre locations and then out of centre locations.</p> <p>No locally set threshold has been set for Croydon and so the requirement for impact assessments on proposals greater than 2,500m² is in accordance with the NPPF.</p>
A5	Not acceptable	Not acceptable	<p>For the Detailed Policies and Proposals (Preferred and Alternative Options) the policies for edge of centre and out of centre locations were merged for ease of use.</p>	<p>The Local Plan Health Impact Assessment identified this approach as having a positive impact on health and wellbeing. This restriction on A5 uses will prevent new hot food takeaways opening in residential areas and in close proximity to open spaces and schools.</p>

Use	Development in edge of centre locations	Development in out of centre locations	How has the policy changed?	What does the evidence say?
Offices and other main town centre uses	Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within a town centre or existing vacant units in edge of centre locations, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre An impact assessment will be required for proposals which result in a unit greater than 2,500m ²	Where a sequential test satisfactorily demonstrates such uses cannot be accommodated within a town centre or edge of centre location of existing vacant units in any location, proposals will be acceptable in principle, provided the site is accessible and well connected to the town centre An impact assessment will be required for proposals which result in a unit greater than 2,500m ²		The NPPF and London Plan promote the town centre first approach for main town centre uses to ensure they are accommodated in town centre locations, then in edge of centre locations and then out of centre locations. No locally set threshold has been set for Croydon and so the requirement for impact assessments on proposals greater than 2,500m ² is in accordance
Non town centre community uses	Acceptable in principle	Acceptable in principle		

Key supporting documents

- Croydon's Monitoring Report (annual)
- Borough Wide Retail Needs Study Update (2008)
- Croydon Metropolitan Centre Retail Strategy (2009)

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

Within the Strategic, Separated and Integrated Industrial Locations identified in Table 4. 1 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

Why we need this policy

5.59 Croydon continues to lose industrial/warehouse capacity at a rate which exceeds the forecast decline in demand. A natural response to this situation could be to adopt a more restrictive approach to the loss of such premises than was previously

the case. However, such an approach would not be consistent with the London Plan or the National Planning Policy Framework

5.60 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.

5.61 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.

5.62 The Employment Land Review Update (2013) found that forecasts for demand and supply of industrial/warehousing land in Croydon was broadly consistent with the Office, Industrial & Warehousing Land/Premises (2010) and the Land for Industry and Transport Supplementary Planning Guidance (2012).

5.63 The Mayor of London's Supplementary Planning Guidance on Land for Industry and Transport sets out an annual indicative industrial land release benchmark for Croydon of 0.5 hectare with a total release benchmark for 2011-2031 of 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

How the policy works

5.64 The approach promoted by this policy is to encourage greater density of occupation within the current boundaries of the Strategic, Separated and Integrated Industrial Locations. There are isolated examples where higher densities have been achieved without compromising the operational ability of the premises and the Council is keen to see more of this type of development.

Policy Justification

The London Plan Policy 2.17 supports the promotion and growth of industrial locations for industry and warehousing.

The Office, Industrial & Warehousing Land/Premises Market Assessment (2010) identified that there was scope to encourage the expansion within employment areas through redevelopment and/or intensification and better management of the industrial locations.

Key supporting documents

- Office, Industrial & Warehousing Land/Premises Market Assessment (2010)
- Employment Land Review Update (2013)
- Land for Industry and Transport Supplementary Planning Guidance (2012)