

# CROYDON LOCAL PLAN: STRATEGIC POLICIES.

## Partial Review of Policy SP3.2 on Employment

***October 2015***

# **CROYDON LOCAL PLAN: STRATEGIC POLICIES – PARTIAL REVIEW POLICY SP3.2 ON EMPLOYMENT**

**2015**

## **TIER 2 POLICY REVIEW**

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.

Policy SP3.2 of the Croydon Local Plan Strategic Policies states that 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 4.3. For a Tier 2 integrated industrial location its approach is to provide strong protection for industrial and warehousing activities. Limited residential development is acceptable providing it meets the following 3 criteria;

- 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.

## **POLICY SP3.2: Employment**

### **4-Tier approach**

Tier 1

Strategic and Separated Industrial Locations:

#### Locations

Marlpit Lane

Purley Way

Selsdon Road

Vulcan Way

#### Approach

Strong protection of industrial and warehousing activities with no loss of Class B floorspace permitted, and no other uses permitted.

#### Permitted Uses

Class B1b, B1c, B2 and B8 uses

Employment generating sui-generis uses

## Tier 2

### Integrated Industrial Location:

**Strong protection of industrial and warehousing activities, with no loss of Class B floorspace permitted. Planning permission for other limited uses will be granted if it can be demonstrated that there is not net loss of industrial and warehousing space, that this space is designed to meet the needs of occupiers, and that residential and office uses do not harm the site and wider location's industrial function;**

### Locations

**Gloucester Road**

**Thornton Road**

**Union Road**

### Approach

**Strong protection for industrial and warehousing activities with no net loss of Class B floor space<sup>32</sup> permitted**

### Permitted Uses

**Class B1b, B1c, B2 and B8 uses Employment generating sui-generis uses**

## Tier 3

### Town Centre Industrial Location:

Protection for industrial and warehousing activities encouraging opportunities to provide additional workshop/studios on town centre sites. Planning permission for other uses will be granted if it can be demonstrated that there is no demand for the existing premises or for a scheme comprised solely of the permitted uses and there is no net loss of industrial and warehousing floor space unless the other uses are required to enable development of the site to be viable; that residential use does not harm the wider location's business function; and that the development will increase the vitality and viability of the town centre;

### Locations

Industrial sites in Croydon Metropolitan Centre, a District Centre or a Local Centre.

### Approach

Protection for industrial and warehousing activities encouraging opportunities to provide additional workshop/studios on town centre sites

### Permitted Uses

Class B1b, B1c, B2 and B8 uses

Employment generating sui-generis uses

## Tier 4

### Scattered Employment Sites:

Protection for offices, industrial and warehousing activities. Allowance for community uses to locate in the (Higher PTAL) more accessible locations. Planning permission for limited residential development will be granted if it can be demonstrated that there is no demand for the existing premises or for a scheme comprised solely of the permitted uses and residential use does not harm the wider location's business function.

### Locations

Other employment locations/sites falling outside of Tier 1, Tier 2 and Tier 3. Approach

Protection for offices, industrial and warehousing activities. Allowance for community uses to locate in the (Higher PTAL) more accessible locations Permitted Uses

Class B1, B2 and B8 uses

Employment generating sui-generis uses

Class D1 (Education and Community Facilities) in industrial locations in PTALs 3 or above

### **Tier 2 Clusters**

In total the three Tier 2 clusters provide 16.5 hectares of employment land and include a range of different uses:-

Thornton Road (4.7ha)

Union Road (3.3.ha)

Gloucester Road (8.5ha)

## **NATIONAL AND REGIONAL CONTEXT**

The NPPF Chapter 1 *Building a Strong Competitive Economy* states that 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.

Account has also been taken of the National Planning Guidance on *Housing and Economic Land Availability Assessment* which guides councils in identifying appropriate land to meet development needs together with the guidance on *Local Plans* which provides clarity in production and deliverability of local plans

The London Plan 2011 Policy 2.7 *Outer London : Economy* seeks to address constraints and opportunities in the economic growth of outer London by, amongst other things : managing and improving the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs), start-ups and businesses requiring more affordable workspace.

The London Plan 2011 Policy 4.4 *Managing Industrial Land and Premises* expects boroughs to adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space. It also requires boroughs to plan, monitor and manage release of surplus industrial land so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal. The London Plan Map 4.1 *Borough Level Groupings for Transfer of Industrial Land to Other Uses* places Croydon in the 'restricted' category for

industrial land. This means Croydon has a relatively low level of industrial land relative to demand and/or low proportions of industrial land within the Strategic Industrial Location framework. Boroughs in this category are encouraged to adopt a more restrictive approach to the transfer of industrial land to other uses.

With regard to London Plan Policy 4.4, the Council's approach to employment land has been endorsed by the GLA and Planning Inspectorate. The Council has a mechanism to release surplus industrial land where a lack of demand from the business community is demonstrated, and this relates to Tier 3 Town Centre Industrial Locations and Tier 4 Scattered Employment Sites. Tier 1 and Tier 2 Industrial Locations are not subject to demand-based release.

## **LOCAL CONTEXT**

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 4.3 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.

## **COMMUNITY USES AND EMPLOYMENT AREAS**

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.

## **METHODOLOGY**

The scope of this update involved a Land Use Site Analysis of Tier 2 clusters with the following site criteria and factors to be considered. This mirrors the criteria used in the ELR update

- Predominant Use of Site or Main Mix of Uses (e.g. B1, B2, B8 or others)
- Neighbouring uses / Adjoining residential or other sensitive uses with larger employment area/ no incompatible adjoining land uses
- Access:  
Good: within 1 mile of major road junction/ via good unconstrained roads .Parking  
Poor: over 3 miles from junction/access, and through constrained/local roads and poor parking
- quality of appearance, environment and quality of occupiers
- level of vacancy

### Evidence Base

- 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
- Planning History of Sites
- Meeting with agents-October 2014

## **RECOMMENDATION**

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. 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

### **Boundary Changes to Clusters**

#### **Duke of Gloucester PH**

This site sits at the junction of Sydenham Road and Gladstone Road in the Gloucester Road (west) cluster. In 2010 planning permission was given for demolition of the Duke of Gloucester and the redevelopment for twelve flats. Although in an employment area as the application site use fell under Use Class A4 'Drinking Establishments' this policy did not apply.

#### **Albany Lodge Nursing Home,**

This site is at the junction Milton Road and St James's Road in the Gloucester Road (west) cluster. It has been in use as a nursing home since the application for this use was allowed on appeal approximately ten years ago

#### **Tait Road/Roman Road Industrial Estate**

This is a coherent purpose built estate that functions well providing a good range of industrial and warehousing uses. It is a well-established location for general industrial SMEs. It has better separation from nearby residential properties than the rest of the Gloucester Road cluster. Therefore the area lends itself better to the highest level of protection for industrial and warehousing activity. It also lacks the fragmentation of uses of the other clusters. It is therefore proposed to be designated as Tier 1. Meetings with agents have confirmed that Tait Road has worked well as an Employment site. Given its location with good access and servicing arrangements it can be distinguished from the other Tier 2 sites and also does not integrate the industrial and warehousing uses with residential uses

### **Tier 1**

#### **Strategic and Separated Industrial Locations:**

Strong protection of industrial and warehousing activities with no loss of Class B floorspace permitted, and no other uses permitted

The purpose built industrial estate at Tait Road has been removed from Tier 2 and added to Tier 1

### **Tier 2**

#### **Integrated Industrial Location:**

Protection of industrial and warehousing activities, (excluding Class B1a (Offices)). Planning permission for other limited uses will be granted if it can be demonstrated that there is no demand for the existing premises or for a scheme comprised solely of the permitted uses and that residential uses do not harm the site and wider location's industrial function.

### **Tier 3**

#### Town Centre Industrial Location:

Protection for industrial and warehousing activities encouraging opportunities to provide additional workshop/studios on town centre sites. Planning permission for other uses will be granted if it can be demonstrated that there is no demand for the existing premises or for a scheme comprised solely of the permitted uses and there is no net loss of industrial and warehousing floor space unless the other uses are required to enable development of the site to be viable; that residential use does not harm the wider location's business function; and that the development will increase the vitality and viability of the town centre.

### **Tier 4**

#### Scattered Employment Sites:

Protection for industrial and warehousing activities.

Allowance for community uses to locate in the more accessible locations (inc.PTAL 3 and above ). Planning permission for limited residential development will be granted if it can be demonstrated that there is no demand for the existing premises or for a scheme comprised solely of the permitted uses and residential use does not harm the wider location's business function. Preference given for mixed-use and live-work units in these locations.



	Designation	Locations	Approach	Permitted Uses	Other Uses
1	Strategic and Separated Industrial Locations	Marlpit Lane Purley Way <sup>2919</sup> Selsdon Road Tait Road / Roman Road Industrial Estate Vulcan Way	Strong protection for industrial and warehousing activities with no loss of Class B <del>floor space</del> floorspace <sup>3020</sup> permitted	Class B1b, B1c, B2 and B8 uses Employment generating sui-generis uses <sup>3421</sup>	Not permitted
2	Integrated Industrial Locations	Gloucester Road (West) Thornton Road Union Road	Strong protection for industrial and warehousing activities with no <del>net loss of Class B floor space</del> <sup>32</sup> permitted	Class B1b, B1c, B2 and B8 uses Employment generating sui-generis uses <sup>3322</sup>	<p>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:</p> <ul style="list-style-type: none"> <li>• There is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and there is no net loss of Class B1b, B1c, B2 and B8 floor space; and</li> <li>• new Class B1b, B1c, B2 and B8 <del>floorspace</del> floorspace is designed to meet the needs of future occupiers; and</li> <li>• Residential and office use does not harm the site and wider location's industrial function.</li> </ul>
3	Town Centre Industrial Locations	Industrial sites in Croydon Metropolitan Centre, a District Centre or a Local Centre	Protection for industrial and warehousing activities encouraging opportunities to provide additional workshop/studios on town centre sites	Class B1b, B1c, B2 and B8 uses Employment generating sui-generis uses <sup>3423</sup>	<p>Planning permission for offices (Class B1a), residential (Class C3), leisure (Class D2), visitor accommodation (Class C1) and community facilities (Class D1) development will be granted if it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>• there is no demand for the existing premises or for a scheme comprised solely of the permitted uses; and</li> <li>• there is no net loss of Class B1b, B1c, B2, B8 <del>floorspace</del> floorspace unless the other uses are required to enable development of the site to be viable; and</li> <li>• residential use does not harm the wider location's business function; and</li> <li>• the development will increase the vitality <del>and</del> viability and diversity of employment uses of the town centre</li> </ul>

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 <del>offices</del> , industrial and warehousing activities. Allowance for community uses to locate in the (Higher PTAL) more accessible locations	<p>Class B1, (excluding B1a office), B2 and B8 uses</p> <p>Employment generating sui-generis uses<sup>3524</sup></p> <p>Class D1 (Education and Community Facilities) in industrial locations in PTALs 3 or above.</p>	<p>Planning permission for limited residential development will be granted if it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>• there is no demand for the existing premises or for a scheme comprised solely of the permitted uses and</li> <li>• residential use does not harm the wider location's business function.</li> </ul>

## REASONED JUSTIFICATION

~~4.21~~ **4.19** 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. ———

~~4.23~~ **4.20** In the face of strong competition from other uses, planning policies giving strong protection for industrial sites have served the borough well in terms of retaining the stock of industrial and warehousing premises and land.<sup>3625</sup>

~~4.24~~ **4.21** 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. ~~Whilst the 2008/9 Annual The Croydon Monitoring Report (January, 2014) found that more non-office, class B floor space had been delivered than in the previous year, it also found that, a large amount of employment land (11,684m<sup>2</sup>) had been lost to other uses overall there was a net loss of almost 2,500m<sup>2</sup> of Class B floorspace in Croydon between 2011 and 2013.~~

~~4.25~~ **4.22** The '4-tier' approach ~~is proposed as it remains a relatively~~ is a strong approach to the protection of industrial capacity (in line with Croydon's 'restrictive transfer' status<sup>3726</sup>) which supports the South London Waste Plan DPD, yet also offers greater prospects of bringing about investment and renewal of industrial/employment locations, bringing forward new workshops/studios in town centre locations and meeting other policy objectives.

~~4.26~~ **4.23** '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.

~~4.27~~ **4.24** '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.

**4.25** 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 both intensification of development or the introduction of a new mix of land uses.

~~4.28~~ **4.26** Extending protection of industrial/warehousing activities to sites falling within town centres ('Tier 3') will help the ~~council~~ 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~~ Council will adopt a flexible approach to B1 uses (~~excluding B1a office~~), leisure, visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre.

~~4.29~~ **4.27** The ~~council~~ 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~~ utilise public transport.

~~4.30~~ **4.28** 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~~ 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.

**4.29** Where an applicant is proposing a mixed use scheme which involves a reduced amount of industrial and warehousing space, account would 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 in the borough.

~~4.31~~ **4.30** To support Croydon's Sustainable Community Strategy ~~vision 2013-2018~~, one of the six headline priorities is 'A Creative City - a place noted for its culture and creativity - one of the best incubators of new artistic and sporting talent in the country'. ~~The 'We are Croydon - This is our Vision' document states, "The creative sector in Croydon will be a key component of the local economy, fuelling the growing number of arts and cultural enterprises that will help to lead the borough's regeneration and reinforce its reputation as London's most dynamic and enterprising place".~~

~~4.32~~ **4.31** Croydon is good at producing creative talent (BRIT School, College of Art, Dance, Dubstep etc), but less successful at providing them with a base in the borough<sup>3827</sup>. Other London boroughs have been able to address this – e.g. the 'Chocolate Factory' in Hackney and Westbourne

Studios in Kensington and Chelsea. Evidence supports promotion and supporting cultural and creative industries to assist in changing Croydon's image<sup>3928</sup>.

**4.33 4.32** 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 Croydon Metropolitan Centre act as a flagship for the sector. Developing a central location as a 'hub' will provide a clear signal that Croydon is 'open for creative businesses'.

**4.34 4.33** 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.

**4.36 4.34** 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~~ Council considers such sites laying 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.

**4.36 4.35** As well as encouraging new activity in this sector, it is essential that the ~~council~~ 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.

**4.37 4.36** 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**

**4.38 4.37** 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.

**4.39 4.38** 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.

**4.39** Croydon Metropolitan Centre has the highest level of regional and sub-regional accessibility in the borough. The case for it to be the principal location for the town centre uses is supported by the importance attached to Croydon Metropolitan Centre

in the London Plan. The ~~council~~Council is committed to facilitating development within Croydon Metropolitan Centre. Therefore, the ~~council~~Council will seek to strengthen Croydon's role as a Metropolitan Centre and adopt a flexible approach to B1 uses (office, light industry and research & development) retail, leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre. This flexible approach will be supplemented by the Croydon Opportunity Area Planning Framework and the ~~council's~~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.

~~4.43~~ **4.40** 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'.

~~4.42~~ **4.41** Regular town centre 'health checks' form part of the ~~council's~~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.

~~4.42~~ In addition to the London Plan town centre hierarchy Neighbourhood Centres have been identified. These offer the opportunity for clusters of uses, in particular community uses, to emerge with support through 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.

~~4.43~~ 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) ~~of this document~~ will also help Croydon to retain/attract new job opportunities.

~~4.44~~ 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 centres-sites. Within Croydon Metropolitan Centre, the Opportunity Area Planning Framework will address this point and the uptake of approximately 15,500m<sup>2</sup> ~~floor space~~ floorspace alone could equate to the provision of approximately 800 additional jobs. For the District and Local Centres the proposed reduction in vacancy would equate to an uptake of approximately 16,000m<sup>2</sup> ~~floor space~~ floorspace 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'.~~

~~4.45~~ The demand for office space in the borough over the period 2013 to 2031 is for between 29,440m<sup>2</sup> and 91,840m<sup>2</sup>. It is estimated that there is potential for 60,010m<sup>2</sup> of space. This space requirement is of a similar scale to that estimated for the 2010

Employment Land Review. The majority of this office space demand (90%) is projected to be for prime locations within Croydon Metropolitan Centre. This demand will need to be met by refurbishment or new build projects. 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 proposal. ~~Potential growth in Croydon Metropolitan Centre (CMC) of 95,000m<sup>2</sup> of new or refurbished office floor space would equate to up to 8,000 additional jobs (full-time 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 Croydon Metropolitan Centre~~, support its urban renewal and contribute to the Croydon Local Plan: Strategic Policies' spatial vision of being London's most enterprising borough.

## REFERENCES

32. *Excluding Class B1a (Offices)*

## APPENDICES

Appendix 1

Amended Maps showing ~~changes to:~~

~~Gloucester Road boundaries~~

Tait road redesignated as Tier 1.

Appendix 2

Site Analysis

Appendix 3

Town and Country Planning Use Classes Order 1987 (as amended)

# Site 3: Gloucester Road Tier 2 (Integrated) Employment Area (CLP1)

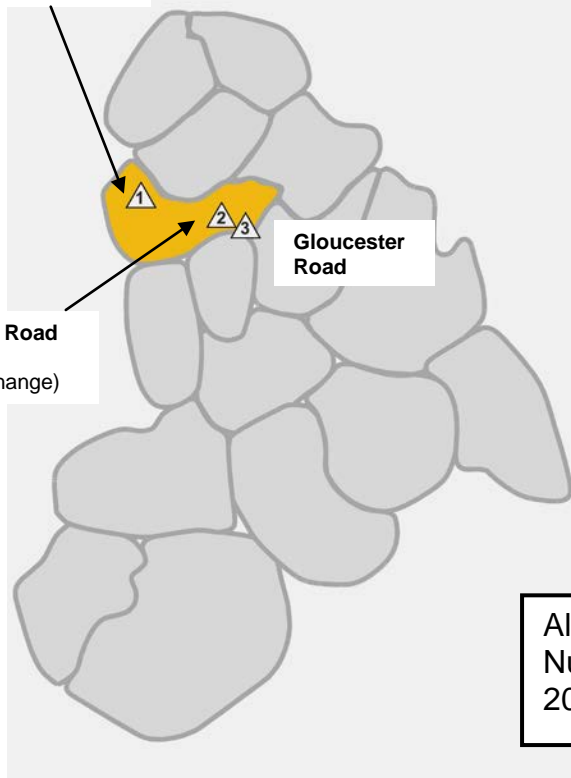
## Proposed Changes

- Deletions to Tier 2 (Integrated) Employment Area
- Re-designate Tier 2 (Integrated) Employment Area to Tier 1 (Separated) Employment Area

## Designations Retained

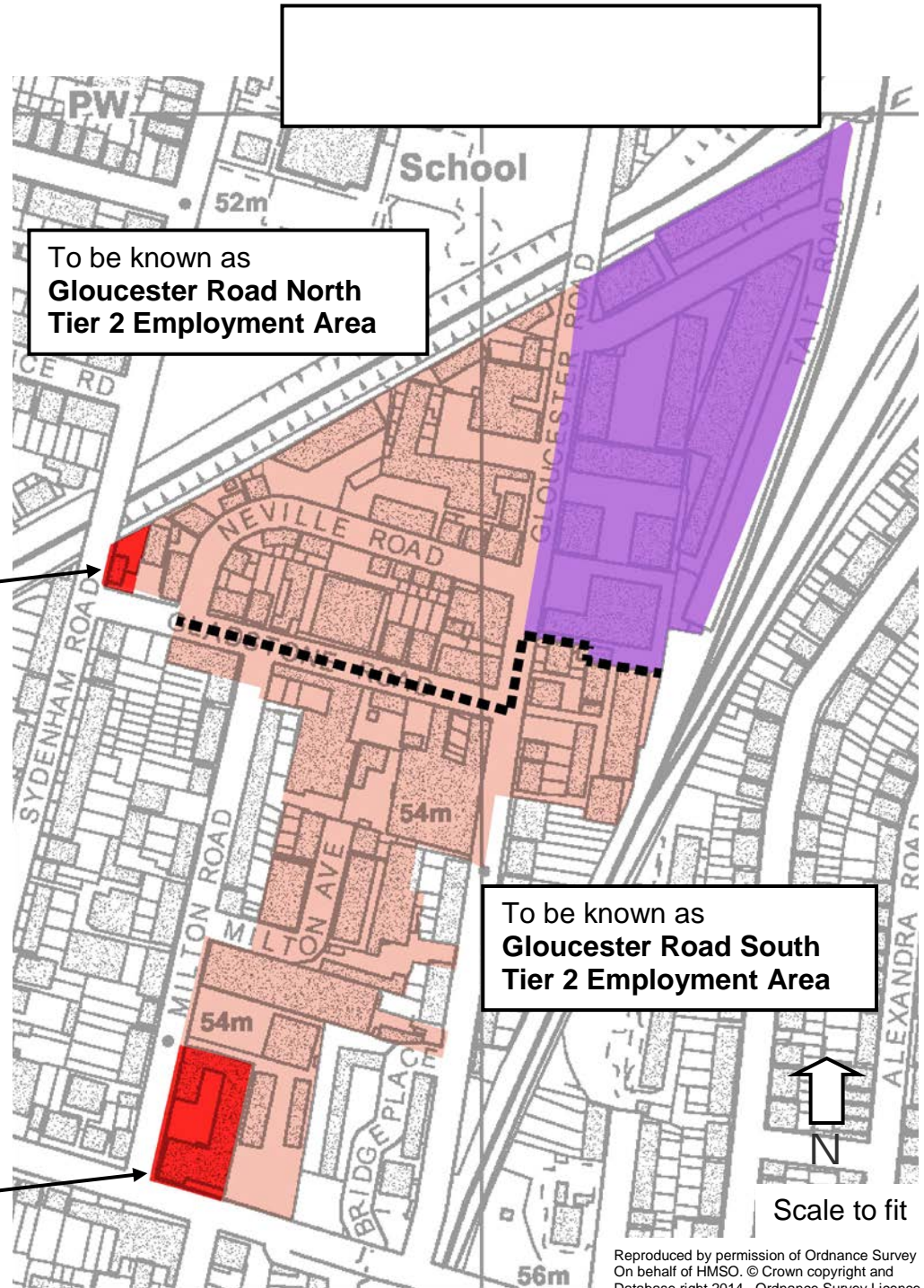
- Tier 2 (Integrated) Employment Area (CLP1)

Thornton Heath  
Tier 2  
(No Change)



Gladstone Road

Albany Lodge  
Nursing Home  
201 St.James's Road





**TIER 2 EMPLOYMENT LAND REVIEW SITE ANALYSIS**

Area	Description/sites of interest	Access	PTAL	Parking	Adjoining Uses	Appearance and Quality/Vacancy
<b>Gloucester Road (west)</b>		Poor strategic access to roads but just north of Croydon Town Centre good Public transport links	3	Servicing facilities are adequate but little parking facilities	Primarily residential	Buildings are dated and of older stock Some are in poor condition
	Sterling House, Place of worship( temporary pp)	Poor transport links	2	Limited parking	Employment uses	Buildings are dated and of older stock
	Former Duke of Gloucester PH - now residential flats	Poor transport links	2	Limited parking	On fringes of employment area and close to shopping	Recent development
	Albany Lodge nursing home , Milton Road	Good access to CMC	2	Limited parking	On fringes of employment area and close to shopping	Recent development
	Motorcycle repair & MOT Centre, FaradayHouse	Good access to CMC	2	Limited parking and servicing	Employment uses	Older stock
	Milton House-Vacant warehouse	Good access to CMC	3	Limited parking and servicing	Employment uses	Large vacant buildings with extensive site coverage
	8- 28 Avenue House, various workshops			Limited parking and servicing	Employment uses	Mainly occupied
<b>Gloucester Road (east)</b>	Well used and coherent industrial area of mainly good quality; Small to medium sized employment uses and residential properties; Premises appear fit for purpose. Occupiers are typically small and medium sized; Purpose-built industrial units predominant	Poor strategic access to roads	2	Servicing facilities and parking are good	Employment uses	Mainly occupied
<b>Union Road</b>	Fragmented with large no. of retail and community uses.	Poor strategic road access but good accessibility to public transport	4/ 5	Subject to parking controls		Little B1 or B2/B8 activity remaining except car repairs and storage
	Windmill Road frontage severely lacking in B2/B8; Residential firmly integrated in all parts;	Within 500m of CMC/within easy reach of tram	3	limited parking and servicing	Primarily residential; close to Shopping Parade	MP site now redeveloped to provide custody facility covers large part of area: community uses beginning to dominate
	ACTS Training Centre,30 Union road	Within 500m of CMC/within easy reach of tram	3	Limited parking and servicing	Located in employment area but close to Shopping Parade	Older stock
	45-49 Union Road recently implemented Place of Worship	Within 500m of CMC/within easy reach of tram	3	Limited parking and servicing	Located in employment area but close to Shopping Parade	Older stock
	2-10 Union Road recent consent for HMO on upper floors	Within 500m of CMC/within easy reach of tram	3	No parking and servicing	In employment area but close to Shopping Parade and some residential	
<b>Thornton Road</b>	Mix of B1 and B2/B8 uses inc. the Peall Road Industrial estate	Good strategic road access, on the A23.	low	Dedicated parking and unloading in the estate	Primarily residential	About 20-30 years old
	Several retail units, trade counter and a large self-storage unit( Big Yellow)and a large vacant retail unit ( 22,000 sq ft) with Non-B uses approx. half of the area	Good internal road access but concern at congestion on Peall Road adjacent to Croydon House		PTAL is low (1a) with poor access to facilities	Surrounding area is residential	Appearances of the buildings are fairly good
		Thornton Road is designated as a red route				
	Mulberry House, Aurelia Road	Vacant Food storage & distribution	2			In need of renovation
	Croydon House: recent PD for C3 on top floors		Low			Office use

# The Town and Country Planning (Use Classes) Order 1987 (as amended)

## Change of Use

## Planning Permission

### Use Classes

The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.

The following list gives an indication of the types of use which may fall within each use class. Please note that this is a guide only and it's for local planning authorities to determine, in the first instance, depending on the individual circumstances of each case, which use class a particular use falls into.

- **A1 Shops** - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices (but not sorting offices), pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.
- **A2 Financial and professional services** - Financial services such as banks and building societies, professional services (other than health and medical services) including estate and employment agencies and betting offices.
- **A3 Restaurants and cafés** - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.
- **A4 Drinking establishments** - Public houses, wine bars or other drinking establishments (but not night clubs).
- **A5 Hot food takeaways** - For the sale of hot food for consumption off the premises.
- 
- **B1 Business** - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.
- **B2 General industrial** - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).
- **B8 Storage or distribution** - This class includes open air storage.
- 
- **C1 Hotels** - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).
- **C2 Residential institutions** - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.
- **C2A Secure Residential Institution** - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.
- **C3 Dwellinghouses** - this class is formed of 3 parts:
  - C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.
  - C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
  - C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.

- **C4 Houses in multiple occupation** - small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.
- 
- **D1 Non-residential institutions** - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non residential education and training centres.
- **D2 Assembly and leisure** - Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used).
- 
- **Sui Generis** - Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: theatres, houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses, amusement centres and casinos.

Before you negotiate a lease or buy a property for your business, check whether you need to obtain planning permission for your intended use, and, if so, your chances of getting it.

## Changes of use not requiring planning permission

In many cases involving similar types of use, a change of use of a building or land does not need planning permission. Planning permission is not needed when both the present and proposed uses fall within the same 'class', or if the Town and Country Planning (Use Classes) Order says that a change of class is permitted to another specified class (see table below and associated text under 'Additional change of use permitted development rights applying from 30 May 2013').

For example, a greengrocer's shop could be changed to a shoe shop without permission as these uses fall within the same 'class', and a restaurant could be changed to a shop or a estate agency as the Use Class Order allows this type of change to occur without requiring planning permission.

Most external building work associated with a change of use is likely to require planning permission.

From	To
<b>A2</b> (professional and financial services) when premises have a display window at ground level	<b>A1</b> (shop)
<b>A3</b> (restaurants and cafes)	<b>A1</b> or <b>A2</b>
<b>A4</b> (drinking establishments)	<b>A1</b> or <b>A2</b> or <b>A3</b>
<b>A5</b> (hot food takeaways)	<b>A1</b> or <b>A2</b> or <b>A3</b>
<b>B1</b> (business) (permission limited to change of use relating to not more than 500 square metres of floor space)	<b>B8</b> (storage and distribution)
<b>B2</b> (general industrial)	<b>B1</b> (business)
<b>B2</b> (general industrial) (permission limited to change of use relating to not more than 500 square metres of floor space)	<b>B8</b> (storage and distribution)
<b>B8</b> (storage and distribution) (permission limited to change of use relating to not more than 500 square metres of floor space)	<b>B1</b> (business)
<b>C3</b> (dwellinghouses)	<b>C4</b> (houses in multiple occupation)
<b>C4</b> (houses in multiple occupation)	<b>C3</b> (dwellinghouses)
Casinos (sui generis)	<b>D2</b> (assembly and leisure)

Additionally, a planning application is not required for change of use in the following circumstances:

- from A1 or A2 to A1 plus up to two flats above;
- from A2 to A2 plus up to two flats above.

These changes are reversible without an application only if the part that is now a flat was, respectively, in either A1 or A2 use immediately before it became a flat.

## **Additional change of use permitted development rights applying from 30 May 2013**

Agricultural buildings under 500 square metres can change to a number of other uses (A1, A2, A3, B1, B8, C1 and D2). For buildings between 150 square metres and 500 square metres, prior approval (covering flooding, highways and transport impacts, and noise) is required.

Premises in B1, C1, C2, C2A and D2 use classes can change use permanently to a state-funded school, subject to prior approval covering highways and transport impacts and noise.

Premises in B1(a) office use can change to C3 residential use, subject to prior approval covering flooding, highways and transport issues and contamination.

Prior approval fees for change of use is set at £80. The draft regulations have been laid in Parliament and are due to come into force on 1 October 2013. This fee will be applicable from 1 October 2013.

Buildings with A1, A2, A3, A4, A5, B1, D1 and D2 uses will be permitted to change use for a single period of up to two years to A1, A2, A3 and B1 uses.

Thresholds for business change of use. Thresholds increased on May 2013 from 235 square metres to 500 square metres for permitted development for change of use from B1 or B2 to B8 and from B2 or B8 to B1.

## **Additional change of use permitted development rights applying in England from 6 April 2014**

These new permitted development rights will not apply in sites of special scientific interest, safety hazard areas or military explosives storage areas; nor do they apply to scheduled monuments. With the exception of new Class CA the rights will also not apply to listed buildings.

- **retail to residential** - new class IA allows change of use and some associated physical works from a small shop or provider of professional/financial services (A1 and A2 uses) to residential use (C3). This involves a 'prior approval' process and the local planning authority can consider impacts of the proposed change. Up to 150 square metres of retail space will be able to change to residential use. This new right does not apply to land protected by article 1(5) of the General Permitted Development Order.\*
- **retail to banks and building societies** - new class CA allows change of use from a shop (A1) to a bank or a building society.
- **agricultural to residential** - new class MB allows change of use and some associated physical works from buildings used for agricultural purposes to residential use (C3). This involves a 'prior approval' process and the local planning authority can consider impacts of the proposed change. Up to 450 square metres of retail space will be able to change to up to three dwellings. This new right does not apply to land protected by article 1(5) of the General Permitted Development Order.\*
- **commercial to childcare nurseries** - change of use from offices (B1), hotels (C1), residential (C2 and C2A), non-residential institutions (D1), and leisure and assembly (D2) to nurseries providing childcare. This involves a 'prior approval' process and the local planning authority can consider impacts of the proposed change.
- **agricultural to new schools and nurseries** - new class MA allows change of use from buildings used for agricultural purposes to a state funded school or nursery providing childcare. This involves a 'prior approval' process and the local planning authority can consider impacts of the proposed change.

\* Article 1(5) land includes National Parks, the Broads, areas of outstanding natural beauty, conservation areas, World Heritage Sites and certain areas specified under the Wildlife and Countryside Act 1981.