

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

## **Technical Paper – Transport and Communication**

**February 2017**

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# 1. Introduction

1.1 This technical note aims to set out and discuss the evidence on transport and communication supporting the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission). The evidence has informed the preparation of the policies for Transport and Communication (Policies DM30 to DM34).

1.2 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 policy and the allocated sites for development. For further information on individual pieces of evidence it is recommended that you look at the Executive Summaries of the evidence documents themselves which can be found at <https://www.croydon.gov.uk/planningandregeneration/framework/lpevidence/>

## 2. Policy Context

### National Planning Policy

2.1 The National Planning Policy Framework (NPPF) states transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives and that the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Paragraph 32, in relation to considering the impact of development on movement, reads:

*All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:*

- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure*
- *safe and suitable access to the site can be achieved for all people*
- *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*

2.2 Paragraph 35, in relation to sustainable transport, reads:

*Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to*

- *accommodate the efficient delivery of goods and supplies*
- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones*
- *incorporate facilities for charging plug-in and other ultra-low emission vehicles*
- *consider the needs of people with disabilities by all modes of transport.*

2.3 Paragraph 43, in relation to telecommunication equipment, reads:

*In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.*

### The London Plan

2.4 The London Plan sets out in Policy 6.7B that boroughs should in their Local Plans promote bus, bus transit and tram networks, through:

- allocating road space and providing high level of priority on existing or proposed routes
- ensuring good access to and within areas served by networks, now and in future
- ensuring direct, secure, accessible and pleasant walking routes to stops
- implementing TfL's Accessible Bus Stop Design Guidance
- ensuring standing, garaging and drivers' facilities are provided where needed

- making provision for retaining or creating new interchanges where appropriate.

2.5 In Policy 6.11B the London Plan says that borough's should in their Local Plans develop an integrated package of measures drawn from the following

- promoting local services and e-services to reduce the need to travel
- improving the extent and quality of pedestrian and cycling routes
- making greater use of the Blue Ribbon Network
- improving the extent and quality of public transport
- developing intelligent transport systems to convey information to transport users
- developing integrated and comprehensive travel planning advice
- promoting and encouraging car sharing and car clubs
- smoothing traffic flow to improve journey time reliability
- applying the London street-types framework to ensure that the needs of street users and improvements to the public realm are dealt with in a co-ordinated way
- promoting efficient and sustainable arrangements for the transportation and delivery of freight.

2.6 In Policy 6.13E the London Plan says the following about car parking policies in Local Plans:

- the maximum standards set out in Table 6.2 in the Parking Addendum should be used to set standards in DPDs.
- in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people)
- in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole
- Outer London boroughs should demonstrate that they have actively considered more generous standards for housing development in areas with low public transport accessibility (generally PTALs 0 -1) and take into account current and projected pressures for on street parking and their bearing on all road users, as well as the criteria set out in NPPF (Para 39).

## **Local Planning Policy**

2.7 The Croydon Local Plan: Strategic Policies sets out in Policy SP8 the strategic approach to transport in Croydon. It does not go into detail about specific standards to be met, nor does it cover telecommunications. The policy is largely unchanged in the Partial Review The only changes being changes to reflect Transport for London's (TfL) plans for tram extensions, especially the Dingwall Loop project and potential improvements to the national rail network in the borough, particularly the Brighton Mainline Upgrade. It is important to note these changes are a consequence of collaboration with TfL and Network Rail on these projects.

## **3. Policy DM30: Promoting sustainable travel and reducing congestion**

3.1 This section of the technical paper looks at Policy DM30 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:

Promote measures to increase the use of public transport, cycling and walking;

Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and

Not result in a severe impact on the transport networks local to the site.

## **How the policy works/key evidence**

3.2 The key evidence that supports this policy includes:

- The Croydon Opportunity Area Planning Framework Strategic Transport Study
- The Cost of Congestion to the Economy of the Portland Region

3.3 The Croydon Opportunity Area Planning Framework Strategic Transport Study identifies that in central Croydon the PM peak is more congested than the AM Peak with the following junctions of concern:

- Fiveways Junction;
- The approaches to the Lombard Roundabout;
- The road network in the south of the Opportunity Area including Park Lane and Lower Coombe Street; and
- The road network around West Croydon Station.

3.4 The same areas are also shown by the same study to be congested in the Saturday and Sunday Interpeak periods.

3.5 As a first step to, public and private sector partners commissioned a study to provide

3.6 In the Portland study; carried out as a first step to addressing the Portland region's rising congestion problem by providing base-line information about the relationship between investments in transport and the economy; they identified that congestion harms Portland's competitiveness. The city is largely dependent on efficient transportation, and congestion threatens the region's economic vitality. Businesses there reported that traffic congestion was costing them money. The study found that failure to invest adequately in transportation improvements would result in a potential loss valued at of \$844 million annually by 2025 and 6,500 jobs.

3.7 Policy DM30 seeks to address these issues through encouraging the use of means of transport other than the private car through designing developments in such a way as to encourage walking, cycling and public transport over use of the private car. This policy combined with Policy DM11 together should ensure that new developments provide a safe and direct pedestrian access from street to front door, meaning one that does not cross areas of open car parking. Likewise the positioning of cycle parking should be such that it easier to get a bicycle from the cycle store than it is to get to a car. Designing development around the needs of pedestrians and cyclists over the private car should also have a positive impact on highway safety (or at least have a neutral impact).

3.8 Altogether this policy aims that new development will have a positive impact on the character of local areas by reducing the amount of visible car parking in urban areas and improving highway safety for all users. This will link in with Croydon Council led investment in public realm that is taking place to encourage walking and cycling.

3.9 Policy DM30 recognises that the use of the private car will continue and almost all new development will need to accommodate some car parking (even if it is only for car club and disabled residents spaces). Together with increased use of public transport and cycling it is inevitable that development will have an impact on transport networks in the borough. In order to manage that impact only those developments that don't have a severe impact on local transport networks will be permitted by the policy.

3.10 It is unlikely that many developments would have a severe impact as such an effect is defined as one which would detract from the economic and environmental regeneration of the borough by making Croydon less accessible and a less attractive place in which to develop. Developments that could have this effect include:

- A large out of centre retail store that is a significant trip generator adding significantly to congestion (through both volume of traffic or the need for additional junction control);
- A large trip generator such as a secondary school or residential development of over 500 homes located in close proximity to a tram or bus stop that increased peak passenger flows without increasing capacity of the tram or bus route to the effect that passengers seeking to board at subsequent stops would be unable to do so<sup>1</sup>; or
- Any major development that does not seek to mitigate the traffic impacts through measures to encourage the use of walking and cycling as well as public transport.

3.11 The local transport network is defined to be, as a minimum, all routes from the development site to the Strategic Road Network (which is shown on the Policies Map), bus routes that are within a ten minute walk of the development, tram and rail routes that are within a fifteen minute walk of the development, and cycle and walking routes within 15 minutes of the development. For larger developments which generate more traffic the local transport network will be significantly larger than this. The exact extent of the Local Transport Network should be established in any accompanying Transport Assessment (or equivalent) used to support an application for planning permission.

## Consultation

3.12 The draft policy was consulted upon twice, in October 2013 and November 2015.

3.13 As a result of the consultation the policy was widened to encompass public transport as well as the private car and greater priority was given to designing developments with cyclists in mind.

## Sustainability Appraisal

3.14 The Sustainability Appraisal of Policy DM30 states that it should have a positive effect on a range of sustainability objectives. To give greater clarity to developers the Council should consider defining "severe impact" and the measures sought to increase the use of public transport, cycling and walking. "Severe impact" is defined in the supporting text for the policy.

## Health Impact Assessment

3.15 The Health Impact Assessment recognised the positive impacts of this policy through:

- Improved air quality as a result of less congestion; and
- The encouragement for walking and cycling which increases physical activity and reduces obesity.

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<sup>1</sup> Transport for London have carried out modelling of the Tramlink and bus networks for Croydon Council to understand the impact of the two proposed secondary schools located along the route of Tram line 3 to New Addington. The study found that the network had spare capacity as the majority of journeys would be counter-peak flows.

3.16 The assessment recommended that the supporting text should make reference to the fact that encouraging cycling, walking and increasing use of public transport promotes physical activity, improves mental health and reduces physical obesity. A corresponding additional paragraph was added to the supporting text as a result of this recommendation.

## **4. Policy DM31: Car and cycle parking in new development**

4.1 This section of the technical paper looks at Policy DM31 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

To promote sustainable growth in Croydon and reduce the impact of car parking new development must:

- a) Reduce the impact of car parking in any development located in areas of good public transport accessibility or areas of existing on-street parking stress;
- b) Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;
- c) Ensure that highway safety is not compromised by the provision of car parking including off street parking where it requires a new dropped kerb on the strategic road network and other key roads identified on the Policies Map;
- d) If the development would result in the loss of existing car parking spaces, demonstrate that there is no need for these car parking spaces;
- e) Provide car and cycle parking spaces as set out in Table 10.1;
- f) Ensure that cycle parking is designed so that it is secure and can also be used for parking for mobility scooters and motor cycles; and
- g) Provide car parking for affordable homes at an average rate not less than  $\frac{2}{3}$  that of other tenures.



**Table 10.1 Car parking in new development**

<b>Development type</b>	<b>On-site car club/Pool car parking spaces</b>	<b>Electric charging points and parking bays</b>	<b>Disabled car parking</b>	<b>Overall number of car parking spaces</b>	<b>Overall number of cycle parking spaces including motor cycles and mobility scooters</b>
Minor Residential <sup>2</sup>	1 space unless otherwise agreed by the Council and car club providers that the site is not suitable for a car club/pool car space	Enable the future provision of electric charging points and parking bays for electric vehicles with 20% of spaces to have an actual charging point	n/a	As per London Plan Table 6.2 with no provision for higher levels of car parking in areas with low Public Transport Accessibility Levels	As per London Plan Table 6.3 with cycle parking in major development to include charging for electric bicycles and mobility scooters

<sup>2</sup> Nine or fewer residential units on a site less than 0.5ha in extent

Development type	On-site car club/Pool car parking spaces	Electric charging points and parking bays	Disabled car parking	Overall number of car parking spaces	Overall number of cycle parking spaces including motor cycles and mobility scooters
Major Residential <sup>3</sup>	At least 5% of the total number of spaces with a minimum of 1 parking space plus additional spaces at a rate of 1 space for every 20 spaces below the maximum overall number of car parking spaces set out in Table 6.2 of the London Plan	Enable the future provision of electric charging points and parking bays for electric vehicles with half of car club bays to have an actual charging point and the free installation of a charging point to be provided for other spaces should a future occupier require a charging point	10% of visitor parking with a minimum of 1 space plus 1 disabled car parking space for each new dwelling designed to be wheelchair accessible or adaptable with half of bays to have electric vehicle charging		

<sup>3</sup> 10 or more residential units or a site of more than 0.5ha

Development type	On-site car club/Pool car parking spaces	Electric charging points and parking bays	Disabled car parking	Overall number of car parking spaces	Overall number of cycle parking spaces including motor cycles and mobility scooters
Minor Non-residential <sup>4</sup>	1 space unless otherwise agreed by the Council and car club providers that the site is not suitable for a car club/pool car space or where the development does not provide any car parking	n/a	As per London Plan Table 6.2	As per London Plan Table 6.2	
Major Non-residential <sup>5</sup>	5% of spaces with a minimum of 2 parking spaces	As per London Plan Table 6.2	As per London Plan Table 6.2		

## How the policy works/key evidence

4.2 The policy addresses both the impact of, and the need for car parking in new development as well as considering provision of cycle and motorcycle parking.

4.3 In areas with greater levels of public transport accessibility (a PTAL level of 4 or above) the Council will consider developments with no private car parking (other than disabled persons spaces). Car parking can be intrusive in new developments, reduce the developable area and the policy encourages reduced parking in the most accessible locations which will help to improve the design of public facing elements of new developments. It also encourages the promotion of car clubs and walking, cycling and public transport. These latter measures will be of particular importance in those areas of the borough which have existing problems with demand for on-street parking spaces.

4.4 The policy also seeks to ensure that existing car parking that is used is maintained. A clause that requires evidence to be provided demonstrating the lack of need for existing spaces to be lost was incorporated as a direct response to public consultation on the draft policy.

4.5 The provision of car parking in new development is set out by the policy and in the majority of cases of is the same as that in the London Plan. Key differences and the reason for them are set out in the table below:

<sup>4</sup> Less than 1,000m<sup>2</sup> of non-residential floor space on a site less than 0.5ha in extent

<sup>5</sup> A site of more than 0.5ha or more than 1,000m<sup>2</sup> of non-residential floor space

London Plan requirement	Proposed standard in Croydon Local Plan: Detailed Policies and Proposals	Reason for difference
<p>20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.</p>	<p>In minor residential developments there should be passive provision (meaning incorporating the electric wiring for future electric charging points) for 80% of spaces and actual provision (the wiring and the plug) for 20% of spaces</p>	<p>It is more costly to retrofit electric wiring to enable electric car charging after development has been completed. If the wiring has been incorporated in the development from the outset it is more cost effective and it is not difficult to add additional charging points.</p>
	<p>In major residential developments there should be 100% passive provision with half of all car club and disabled spaces to have actual provision, and free fitting of an electric charging point for all other spaces</p>	<p>In many developments car parking spaces are assigned to particular units. At the point of design it is not possible to know which occupiers will have an electric vehicle. It is also more costly to retrofit electric wiring to enable electric car charging after development has been completed. If the wiring has been incorporated in the development from the outset it is more cost effective. In flatted developments the charging point will also need a meter which is more costly to fit. For this reason developers will need to provide 100% passive provision and a free fitting of an electric car charging point to residents who require one. This enable greater take up of electric vehicles in Croydon</p>
<p>In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.</p>	<p>No provision for higher levels of provision in low PATAL areas</p>	<p>The Croydon Local Plan: Detailed Policies and Proposals is promoting sustainable growth of the suburbs. Part of this approach is that new development will enable the provision of more public transport leading to increased accessibility to public transport (and higher PTAL levels). This approach would be undermined by allowing higher levels of parking in areas which currently have a low PTAL rating.</p>

London Plan requirement	Proposed standard in Croydon Local Plan: Detailed Policies and Proposals	Reason for difference
Cycle parking is for cycles only	Cycle parking can also be used for motorcycles and mobility scooters	As an outer London borough (the centre of which is over 16km from central London) commuting by bicycle, whilst important, is not as great as in inner London boroughs. The space could also usefully be used for motorcycle and mobility scooter parking.

4.6 Research on car parking in residential developments by the Department of Communities and Local Government published in 2007 ([http://www.leics.gov.uk/residential\\_car\\_parking\\_research.pdf](http://www.leics.gov.uk/residential_car_parking_research.pdf)) highlighted the average car ownership levels between owner occupied and non-owner occupied homes. This is set out in the table below:

Number of rooms	Average number of cars (owner occupied houses)	Average number of cars (non owner occupied houses)	% of cars in non occupied houses compared to owner occupied
3	1.0	0.4	40%
4	1.0	0.6	60%
5	1.2	0.7	58%
6	1.3	0.8	62%
7	1.6	1.0	63%
8 or more	1.9	1.3	68%
All	1.4	0.7	50%

Number of rooms	Average number of cars (owner occupied flats)	Average number of cars (non owner occupied flats)	% of cars in non occupied flats compared to owner occupied
1	0.6	0.3	50%
2	0.7	0.3	43%
3	0.7	0.4	57%
4	0.8	0.5	63%
5	1.0	0.6	60%
All	0.8	0.4	50%

4.7 In order to ensure that car parking is provided for affordable homes as well as private market units the provision should not be less than two-thirds of that for the market homes. This figure reflects the upper end of the range for the average percentage of cars in non-owner occupied homes compared to owner occupied homes.

## Consultation

4.8 The draft policy was consulted upon twice, in October 2013 and November 2015.

4.9 As a result of the consultation additional wording was added to the supporting text to set out how the Council would ensure that car club provision was still made if no car club operator was interested in locating at the actual site of the proposed development.

4.10 In response to comments on the loss of existing car parking the policy was amended to include a clause requiring applicants to demonstrate that there is no need for the existing spaces before their loss would be permitted.

4.11 In response to comments about reduced parking in new residential development the policy was amended to ensure that if levels of car parking are below the maximum allowed by the London Plan then there should be increased provision of car club spaces to reduce the chance of increased on-street parking occurring.

4.12 In response to comments about the provision of secure parking for motor cycles the policy was amended to include motor cycle parking within the requirement for cycle parking.

## **Sustainability Appraisal**

4.13 The Sustainability Appraisal was positive about Policy DM31 so no changes have been made to it as a direct result of the findings of the Sustainability Appraisal.

## **5. Policy DM32: Restricting temporary car parks**

5.1 This section of the technical paper looks at Policy DM32 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

To enhance a sense of place and improving the character of an area, permission will only be granted on empty spaces for temporary uses that are not temporary car parks.

5.2 Temporary car parks are unlikely to improve the character of an area and the Croydon Local Plan: Strategic Policy supports the use of vacant buildings and sites for creative and cultural industries, community uses and food growing. Therefore, a policy restricting the opening of temporary car parks is included within the Croydon Local Plan: Detailed Policies and Proposals.

## **Consultation**

5.3 Comments were made on this policy that said it was wrong to not permit temporary car parks. These comments came from residents from one part of the borough which did require a temporary car park due to the temporary closure of an existing car park to allow redevelopment. To enable temporary car parks to be opened in such circumstances the supporting text of the policy was amended to enable the provision of a temporary car park when an existing permanent car park is undergoing redevelopment (to reopen at a later date).

## **Sustainability Appraisal**

5.4 The Sustainability Appraisal made to specific comments on this policy.

## **6. Policy DM33: Facilitating rail and tram improvements**

6.1 This section of the technical paper looks at Policy DM33 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

Development will not be supported where it might prejudice the implementation of:

- a) Station improvement schemes or other proposals to upgrade train services along the Brighton Main Line corridor; or

- b) Infrastructure extensions or other operational improvements to increase capacity of the Tramlink network.

## How the policy works/key evidence

6.2 Croydon Council has worked with Network Rail and Transport for London to prepare this policy. Both organisations are supportive of the wording of the policy.

6.3 Network Rail are proposing improvements to the Brighton Mainline through Croydon to increase capacity. At the time of writing of the Croydon Local Plan: Detailed Policies and Proposals these improvements were not funded so it is not possible to safeguard specific land in the Local Plan as it cannot be demonstrated to be deliverable.

6.4 Similarly Transport for London (through the Tramlink company) are proposing a number of network improvements to increase capacity of the tram network.

6.5 In order to facilitate these improvements at a later date when they are funded a criteria based policy is included within the Plan to enable applications for development that would prejudice these capacity improvements (and therefore, in themselves could not be implemented) to be refused.

6.6 The policy is accompanied by some changes to Policy SP8 in the Croydon Local Plan: Strategic Policies – Partial Review which also reflect the above and the support for associated projects.

## Consultation

6.7 This policy was first included in the Croydon Local Plan: Detailed Policies and Proposals in the Proposed Submission draft

## Sustainability Appraisal

6.8 The Sustainability Appraisal made to specific comments on this policy.

## 7. Policy DM34: Telecommunications

7.1 This section of the technical paper looks at Policy DM34 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

**DM34.1** When planning permission is required proposals for telecommunications development will be permitted provided that:

- a) If proposing a new mast, it has been demonstrated that there are no existing buildings, masts or other structures on which the proposed apparatus can be sited;
- b) If proposing telecommunications development in Metropolitan Green Belt it has been demonstrated that there are no suitable sites that are not in Metropolitan Green Belt and there is no impact on openness;
- c) If proposing telecommunications development on Metropolitan Open Land it has been demonstrated that there are no suitable sites that are not on Metropolitan Open Land and there is no impact on the existing purpose of the site and its reason for it being designated as Metropolitan Open Land; and
- d) The siting of the proposed apparatus and associated structures minimises the impact on the operation of other electronic devices within the surrounding area.

**DM34.2** Telecommunication development on a building or other existing structure should be sited and designed to minimise impact to the external appearance of the host building or structure.

## **How the policy works/key evidence**

7.2 Most telecommunications development is covered by the General Permitted Development Order. This policy addresses those cases where planning permission is required.

7.3 There are two aspects to the policy.

7.4 The first is to permit telecommunications equipment in Metropolitan Green Belt and on Metropolitan Open Land where there are no other suitable sites not in these designations, and where there is no impact on openness of Green Belt or the reason why the site is designated as Metropolitan Open Land.

7.5 These clauses are included because telecommunications development is not classed as appropriate development in the Green Belt by the National Planning Policy Framework. However, as a considerable part of the borough is Metropolitan Green Belt or Metropolitan Open Land this policy is included. Telecommunications development can be sensitively incorporated into those locations if it justified.

7.6 The second aspect of the policy is to ensure that new telecommunications equipment is designed in such a way to minimise the operation of existing telecommunications equipment or on the appearance of existing buildings.

## **Consultation**

7.7 This policy was introduced as a direct response to a comment that a policy on telecommunications should be included within the Croydon Local Plan: Detailed Policies and Proposals.

## **Sustainability Appraisal**

7.8 The Sustainability Appraisal made to specific comments on this policy.