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**Regulation 22(1)(c) Statement for the Partial Review of the Croydon Local Plan 2019-2040**

November 2024

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**1.0 Introduction**

Purpose

This Consultation Statement sets out how the Council has involved residents and key stakeholders in revising the Local Plan to produce an updated Local Plan for (2019 to 2040) in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the updated Local Plan for (2019 to 2040) has been undertaken in accordance with the relevant Regulations and the adopted [Statement of Community Involvement](https://www.croydon.gov.uk/planning-and-regeneration/planning-policy/local-plan-review/statement-community-involvement) (SCI).

The SCI document sets out how the Council consults and involves public and statutory consultees in the preparation of the new Local Plan.

The [Local Development Scheme](https://www.croydon.gov.uk/planning-and-regeneration/planning-policy/local-plan-review/local-plan-programme) identifies and sets out the timetable for the planning documents that will be prepared to plan for development in the borough.

Background

This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the new Local Plan, setting out how such efforts have shaped the revised Local Plan and the main issues raised by consultation / representations.

The Council began revising the Local Plan for the borough of Croydon in 2019. The revised Local Plan will set out the strategic vision, objectives and spatial strategy for the borough as well as, the planning policies which will guide future development. The revised Local Plan will look ahead to 2040 and identify the main areas for sustainable development and growth. It establishes policies and guidance to ensure local development is undertaken in accordance with the principles set out in the National Planning Policy Framework (NPPF).

The revised Local Plan will replace the Local Plan adopted in 2018 which is a Development Plan Document forming the development framework for the borough.

The Council’s Proposed Submission Local Plan and supporting documents, including the sustainability appraisal, were published in accordance with Regulation 19 for a six-week consultation period lasting from Monday 1st July until Monday 12th August 2024. The Council consulted specific consultation and statutory bodies, local amenity and residents’ groups, businesses and individual residents. A variety of consultation techniques were used in accordance with the Statement of Community Involvement.

Structure of Statement

This statement of consultation comprises four sections:

**Section 1** is an introduction to explain how the consultation statement meets the regulatory requirement. It also sets out how the revised Local Plan has been shaped by effective engagement with public and statutory consultees.

**Section 2** sets out the timeline of production in preparing the revised Local Plan which is accordance with the adopted [Local Development Scheme](https://www.croydon.gov.uk/planning-and-regeneration/planning-policy/local-plan-review/local-plan-programme) (November 2024).

**Section 3** summarises the main issues raised during the course of the consultation carried out under Regulations 18/19 and how the comments received have been considered by the Council.

**Section 4** is supported by the two Appendices found at Section 4 detailing how consultation was undertaken, the responses received at Regulation 18 and 20 stages and includes how the comments have been taken into account by the Council.

* Appendix 1 explains:
  + who was invited to make representations and how (Regulation 22 (1)(c)(i) and (ii))
  + a summary of the main issues raised by those persons (Regulation 22 (1)(c)(iii)) in Plan order and
  + how those issues have been addressed in the preparation of the Local Plan (Regulation 22 (1)(c)(iv)).
* Appendix 2 explains: how the Regulation 19 Local Plan consultation was undertaken and the number of representations made including a summary of the main issues (Regulation 22 (1)(c)(v) with a council response to the issues raised.

# 2.0 Plan Production Timeline

To ensure that the production of the Local Plan is robust, the draft must go through several stages of consultation. Ongoing engagement with the public, developers and organizations contributes to the creation of a document with sound policies.

Noted below are key local plan stages and timelines for the production of the emerging Local Plan up until the submission date of the 29th of November 2024.

**1: Review of 2018 Croydon Plan: 2018-2019**

Croydon adopted the current local plan on 27 February 2018. However, a new London Plan had been published in draft which the Croydon Local Plan needs to be in conformity with. Most importantly the housing target was going to be higher than that in the adopted Local Plan as it was recognised that there was a housing crisis which the council sought to address. It was also known that changes were planned to the National Planning Policy Framework. To respond to these changes and the climate emergency declared by Croydon Council in June 2019, the Council decided to carry out a partial review of the adopted local plan. In this light, further research to inform the draft was undertaken.

**2: Regulation 18 (Issues and Options) consultation: November 2019**

An Issues and Options consultation was prepared. The consultation through various means proposed various spatial strategies and options for policies required to deliver higher levels of housing growth in the borough, address the climate emergency and changes to the NPPF and the London Plan. The consultation took place from 8 November 2019 to 13 January 2020. During this period, consultees had the opportunity to comment on the issues to be addressed, thereby an opportunity to shape the revised Local Plan.

**3: Local Plan amendments: 2020-2021**

The Council reviewed the comments received during the Regulation 18 draft Local Plan consultation. A spatial strategy was formulated to deliver good growth that responded to the national housing crisis and the global climate emergency taking on board the comments received from the stakeholders. The evidence base documents to support the spatial strategy were also updated and policies were drafted to support the identified spatial strategy.

**4: Pre-Submission Consultation Regulation 19 of the revised Local plan: January-February 2022**

The Regulation 19 consultation follows on from the Regulation 18 consultation and as required, comments received during Regulation 18 consultation have been used to feed into the review of the Local Plan. The draft covering the whole of the borough of Croydon was made available for representations from 6th January to 17th February 2022. The aim of the consultation was to seek comments related to the soundness of the plan as required by the regulation.

**5. Further amendments to the Local Plan and approvals- 2022-2024**

In the interim, the Council’s new elected mayor published the Mayor’s Business Plan 2022-2026 which impacted the spatial strategy put forward by the draft revised Local Plan. In this light, the spatial strategy had to be reviewed and some changes were made to the draft. Ongoing changes to regulations and government guidance were addressed. Due to the passage of time since the start of the partial review and other issues such as the impact of Covid on retailing, new evidence base documents were also produced during this time. The resultant revised draft Local Plan and supporting documents were approved by Cabinet in March 2024 and the Council in April 2024.

**6. Pre-Submission Consultation Regulation 19 of the revised draft plan – July- August 2024**

A revised submission ready version of the revised Local Plan along with the Sustainability Appraisal and other mandatory documents were published on 1 July 2024 for consultation. The formal statutory public consultation was open for a 6-week period until 12th August 2024. Representations related to the soundness of the draft local plan for Examination in Public were invited.

**7: Submission to the Sectary of State: November 2024**

The comments received during the regulation 19 consultation were assessed and no issues related to the soundness of the plan were found. Therefore, it was decided that the plan will be submitted to the secretary of State on the 29th of November 2024.

3.0 Summary of Process and Main Issues

**Main Issues raised pursuant to Regulation 19:**

By section of the Plan, the main issues raised pursuant to Regulation 19 were have been detailed below.

***Chapter 1 – Introduction***

There were no comments on this section of the revised Local Plan which is about the process.

***Chapter 2 – Setting the Scene***

There were no comments on this section of the revised Local Plan which is about the scene setting.

***Chapter 3 – We are Croydon***

Spatial Strategy

*Greater London Authority (GLA)*

Overall regarded that the revised Local Plan was sound and in general conformity with the London Plan 2021. They said that LBC should note that the London Mayor is in the process of preparing a new Strategic Housing and Land Availability Assessment (SHLAA) and London Plan which will result in a new housing target for the borough. It is also noted that proposed changes to national policy are likely to mean a significant increase to London’s overall housing need figure and this will impact on LBC’s housing requirement beyond March 2026. Recognition of this would be a useful consideration when planning for housing beyond 2029.

*Network Rail Network Rail*

Supports the objectives, specifically objectives 1 (seeking to establish Croydon as a premier business location) and 8 (improving accessibility) for which the railway will play a key role in supporting and delivering these. As a whole, the plan has a supportive rail approach to rail which is carried through. Network Rail notes the housing requirement set out within the Policy. Part b refers to the identification of the Croydon Opportunity Area (COA) and the opportunities from rail upgrades associated with this. Croydon presents a significant opportunity to address rail capacity issues with the Brighton Main Line alongside supporting development within the COA. Network Rail also welcomes the identification of the BML and East Croydon transformation corridor as within SP1.0 B as a Transformation Area.

*Historic England*

discussion of Croydon’s historic environment in the supporting text . However, a positive strategy for the historic environment requires an explicit outcome if it is to be effective. For example: ‘By the end of the plan period the significance of the areas historic environment will have been preserved or enhanced and its wider environmental, social and economic benefits maximised.’ Such an addition would signal a clear alignment with NPPF para 196 and the London Plan HC1b.

*LB Bromley*

consider that the revised Local Plan is a comprehensive policy document which has been underpinned by careful consideration and evidence, and they support the broad objectives of the draft plan. They would support cross boundary consideration to transport impacts (e.g. impact on transport infrastructure arising from development of industrial uses or significant residential development), catchments of community facilities and provision of sustainable infrastructure.

*Reigate & Banstead Borough Council*

commented on the strategic policy for the Purley Way and note that the masterplan approach will help reduce car dominance and improve public realm but notes that such large scale development is likely to have an impact on the existing transport networks.

Non- Statutory Consultees

*Monks Road Residents Association (MORA)*

Policy SP1.0C is the introduction to the Strategic Policy for “Growth” within and across the Borough including all “16 Places” of Croydon. These are all Strategic Objectives without any definition of how, or by how much, a development could achieve the requirement. There is also appropriate National Guidance 1 available (since 2021) which provides the appropriate guidance on design codes but these National Guidance Policies are NOT quoted or referenced anywhere in this version of the revised Croydon Local Plan (2024). Table 1.1 setting out Croydon’s Planning Policy Framework needs other policy documents added such as the NPPF (2023) etc.

***Chapter 4 – Housing***

Statutory Consultees

*Greater London Authroirty (GLA)*

Affordable housing

The London Borough of Croydon should make clear its intention to follow all affordable housing thresholds or alternatively refer to them as set out in Policy H5 of the London Plan (2021) to avoid confusion.

Student housing

Paragraph 4.5C (in relation to the Whole Plan Viability Assessment) of the draft Local Plan, identifies a ‘current and future demand’ for student housing in the borough. There should be clarification regarding the nature of this demand and plans should be outlined as to how to meet that need will be met to be consistent with Policy H15A of the LP2021.

Gypsies and travellers

To be consistent with London Plan (2021) Policy H14A, the London Borough of Croydon should set out their ten-year pitch requirements and should plan to meet that need. It may be the case that 20 new pitches are enough to meet the borough’s ten year need but as currently written, this isn’t clear. The London Borough of Croydon should also note that the Mayor is currently preparing a London-wide Gypsy and Traveller Accommodation Needs Assessment.

*Historic England*

To ensure a positive strategy for the historic environment, it is advised that the criteria for Policy DM1A (Estate Renewal) includes a reference to conserving and enhancing the significance of heritage assets

*London Borough of Bromley –*

Welcomes Croydon’s commitment to meet identified housing targets; and Gypsy and Traveller need in the Borough through intensification of existing Council sites.

*Reigate & Banstead Borough Council*

It is noted that Croydon has recorded completions of 8,505 units over the 4-year period 2019/20-2022/23 and therefore, we do not dispute that Croydon will meet its housing need. This is understood to be aided through the Local Plan’s identified ‘transformation areas’, including Purley Way.

*London Borough of Southwark*

Supports Croydon’s commitment to delivering new housing to meet the targets set by the Mayor of London. The Croydon Local Plan (Revised 2024) (Policy DM1: Housing) outlines a clear strategy to maintain a robust pipeline of housing projects over the plan period 2019 - 2040. This aligns with Southwark’s housing strategy and housing delivery objectives in the Southwark Plan 2022. (London Borough of Southwark).

Other Consultees

*Housing Supply*

The comments on housing supply ranged from comments that the proposed supply was too low (developers and the House Building Federation) to comments that it was too high or wrong (residents associations). Montagu Evans, Savills and several resident associations queried the accuracy of the housing need figure as shown in paragraph 4.2. It is believed that the housing target for the borough is primarily based on available supply of land rather than evidenced need. It is therefore believed that the need for new homes over the plan period is higher than what is being planned for (Stantec UK Ltd on behalf of Crown Golf Ltd).Build to Rent schemes can make a contribution towards meeting housing need in Croydon (DP9 on behalf of Croydon Gateway Limited Partnership). Housing delivery within the borough is being restricted (CBRE on behalf of Peabody Group and the Home Builders Federation).Policy SP2, part 2f should specifically reference residential conversions of existing buildings and the important contribution these units can make towards housing stock (HGH consulting on behalf of The John Whitgift Foundation ). In relation to policy SP2.8(c), local residents are not convinced that the requirement to be designed to contribute positively to resident’s health and wellbeing can be assessed. (MORA).

*Affordable Housing*

The viability study supporting the local plan makes clear that delivery of 50% affordable homes is challenging in all circumstances.(Quod on behalf of Unibail Rodamco Westfield). Policy SP2.3 should be classified as an ambition and an aim rather than actual policy and be dependent on the viability testing carried out in the process of determining the application (Iceni Projects on behalf of Greystar Europe Holdings Ltd). Draft Policy SP2.3 (Affordable Homes) is unclear on how the affordable housing policy is applied to specialist housing for older people (Planning Issues on behalf of Churchill Living and McCarthy Stone). It is not clear how offsite affordable housing and commuted sum payments towards affordable housing will be calculated. (MORA). The minimum requirement of what outlined within part (b) of Policy SP2.5 (which refers to the minimum levels of affordable housing on the same site as the proposed development and also the equivalent level of affordable housing on a donor site), does not take into account deliverability and viability of redevelopment schemes (Q Square Group on behalf of London Square Developments Ltd and Spurgeon's College). It is suggested that the wording of policy SP2.5 should include “subject to viability” to enable developers to viability test a scheme to provide the maximum reasonable amount of affordable housing (Dara Capital on behalf of Croydonbridge Limited). With additional requests that the level of affordable housing for individual schemes should be based on the financial viability of the development to enable the scheme to be delivered with the agreed level of affordable housing (DP9 on behalf of Ho-Bee Land). Registered Providers are less able to contract with housebuilders to acquire affordable homes provided via S106 agreements. Recommend an amendment to part A (SP2.6) to allow applicants to provide other types of affordable housing if they are unable to attract a Registered Provider after a period of time (Home Builders Federation).

*Housing standards*

Policy DM1 (Housing choice for sustainable communities) unnecessarily restricts development in certain locations by imposing requirements which could affect development’s ability to meet other policy requirements (e.g. viability, design etc) (Montagu Evans on behalf of Primevest Capital Partners). Policy DM1.1 should refer to the London Plan Policy appropriate to minimum internal space standards, and Housing Design Standards LPG which provides “Best Practice” guidance on Space Standards and Storage Space (MORA). Further clarity is sought for policy DM1B.2(Amenity standards) with regards to how to measure high quality design, what is the definition of “functional space” and how outdoor space is assessed.(MORA) It is recommended that paragraph 4.25 should be amended to include 2b4p in its definition of family housing, as these units play a fundamental role in accommodating small families (Savills on behalf of Bellway Homes (Thames Gateway) Limited). Suggestion that a reference to the transformation areas should be made at paragraph 4.26 (Savills). With regards to paragraph 4.32P, there is no mention of the 45°degree rule to ensure a neighbour’s amenity is not compromised, both horizontally and vertically. There is no flexibility between the various area type settings as the relationships vary with the different area type settings. (MORA). Local residents have expressed the view that provision should be made to ensure that there is adequate infrastructure to support new developments.

Local Plan to ensure that character is a secondary planning consideration and re-instate a commitment to promoting densification of existing housing sites or small site developments (Councillor Sean Fitzsimons, Addiscombe West Ward) It is important to ensure that adequate ecological surveys are undertaken prior to giving planning permission. (East Coulsdon (ECRA), Old Coulsdon (OCRA), Hartley and District (HADRA) and Coulsdon West (CWRA)). The needs of wild animals and their ability to roam freely in around the development should be considered (ECRA) (OCRA) (HADRA) (CWRA).

*Older people’s housing*

Comments sought SP2 to accommodate more flexibility in new developments which provide specialist older persons housing (Avison Young on behalf of Polaska Assets Limited). Draft policy H13(housing for older people) is not in conformity with the London Plan and national policy. The Council should introduce via policy DM2 a “Presumption in favour” of older persons housing (Home Builders Federation).

*Gypsies and travellers*

Amend the wording in Chapter 4 paragraph 4.17as it is out of date and does not reflect changes in the Planning policy for Traveller sites policy paper (<https://www.gov.uk/government/publications/planning-policy-for-traveller-sites#full-publication-update-history>) (London Gypsies and Travellers).

*Purpose-built shared living*

The current wording of Draft Policy DM2A.1 is considered to be excessively restrictive and could prevent the delivery of much needed homes for smaller households (Quod on behalf of Unibail Rodamco Westfield). Clarification should be made in relation to supporting paragraph 4.46D to confirm that an applicant’s proposal would not compromise self-contained housing delivery (Montagu Evans on behalf of John Whitgift Foundation).

*Housing Mix*

In relation to DM1, it is believed that there should be a more flexible approach for the housing mix to deliver affordable housing.(Q Square Group on behalf of London Square Developments Ltd and Spurgeon’s College). It should be reinstated into the policy text of DM1.2 that the 3+ bed requirement only applies on sites proposing ten or more dwellings (HGH consulting on behalf of The John Whitgift Foundation). Request that additional wording be added to Policy DM1.2 to accommodate viability and site/technical constraints to be taken into consideration when assessing an appropriate housing mix (Savills on behalf of Bellway Homes (Thames Gateway) Limited). There is a notion that the requirement of Table 4.1 (from policy DM1.2), to provide a minimum number of 3 bed or larger, may not be feasible in every circumstance and could become an obstacle to the supply of homes (Home Builders Federation). Local residents have queried with reference to clause 20 of table 4.1, why a site with a lower PTAL than the surrounding sites and adjoining streets shall be considered at the higher PTAL.(MORA) It is recommended that Table 4.1 should be removed (Savills on behalf of Hyde Development Housing Ltd). Concern that the Council’s 30% strategic target for three bed homes (SP2.7) is onerous compared to both current and future demographics of Croydon and should be reduced (Savills on behalf of Hyde Development Housing Ltd).

*Houses in Multiple Occupation*

Concern over the number of licenced (and unlicensed (HMOs) and how they adversely cumulatively impact the area. (On behalf of residents - Councillors L Ben-Hassel and M Griffiths). Residents welcome the new policy. There is no objection to well designed, well-built and well managed HMOs as there is a realisation that they can serve specific needs and budgets. However, there are concerns with regards to the wording of the policy in particular paragraphs b and d (On behalf of residents - Councillors L Ben-Hassel and M Griffiths).

***Chapter 5 – Employment***

Statutory Consultees

*Greater London Authority (GLA)*

Consider that Policy SP3 should be clearer about what LBC’s industrial needs are over the Plan period. It raises concerns that the proposed 4-Tier system approach to managing employment land doesn’t align directly with the London Plan industrial designations for Strategic Industrial Land (SIL), Locally Significant Industrial Locations (LSIS) and non-designated industrial sites which enable London Plan policies to be applied directly as part of the development plan and as a consequence effectively monitored. The GLA also encourages the Council to do more to promote the intensification of the industrial land in the most suitable locations.

*Transport for London (TfL)*

Maintains there may be sites in PTAL 2 which are relatively well served or close to existing amenities that should be considered on a case by case basis rather than generally being considered an unacceptable proposal for accessibility reasons. *.*

*Network Rail*

Supports the inclusion of Approach Road, Purley; Land between railway tracks (Norwood Junction/Penge) and land between railway tracks (Purley/Fairbairn Close) as Integrated Industrial Locations and noted the opportunity for co-location of uses but with railway uses as the primary use. It also contends that development should consider railway uses and any impacts.

*Sports England*

Raised concerns about the unintended impacts of the proposed use class order changes in Table 5.11 and the broader range of leisure uses it covers. It also concerned about the assessment guidelines for leisure proposals in neighbourhood centres being too inflexible.

*Historic England*

Suggests that references to ‘built heritage’ should be replaced with the more encompassing ‘historic environment’ or ‘heritage’.

Other Consultees

*Residential Use and the Employment Hierarchy*

Generally supportive of SP3 but suggested Policy DM4 should be amended to reflect the NPPF which states residential development in town centres are an important supporting use (The Whitgift Foundation - two separate representations).

Suggestion to make it clear that the residential redevelopment of Tier 4 (Scattered Employment) sites will be supported where it is demonstrated that there is no demand for the existing premises. Also, SP3 needs to revert to the current adopted policy approach set out which is seen to be more permissive of residential uses (AXA Investment Managers UK Ltd).

The Plan is overly prescriptive in addressing the redevelopment of Tier 4 sites for housing and felt that the plan should prioritise safeguarding employment sites in existing employment areas and in town centres (Tier 1, 2 and 3 sites) rather than unallocated in scattered sites (Tier 4 sites) (WSP).

*Retail Impact Test and Retail Frontages*

Quod on behalf of IKEA is generally supportive of the Plan’s promotion and protection, but objects to the scope of the retail impact test in Table 5.11 which applies to the whole of the retail unit rather than just than the extension only.

Quod on behalf of Westfield raised the following: they do not consider that “Retail” frontages is the appropriate policy definition given the existence and purpose of Class E within the Use Classes Order; Table 5.3 needs to be updated to reflect the flexibility of use and remove reference to the types of uses (i.e. “shops”) on frontages and a percentage to remain in “shops”; and delete Paragraph 5.39 as it is not consistent with the GPDO.

*Green Jobs and Climate Change*

Creating and maintaining green jobs needs to be an integral theme of the Croydon Local Plan ensuring that in addressing the Climate Emergency (the Croydon Climate Action Group) and the plans should include references to green jobs/employment, sustainable jobs/employment (the Croydon Climate Action Group and Plan Croydon Green Network).

*Other Comments*

The ‘Town Centre and Retail Study 2023’ does not adequately reflect the opportunities, constraints and needs of Crystal Palace & Upper Norwood district town centre; PTAL levels were not seen to be an adequate measure of accessibility (The London Hotel Group); concerned raised about current and future pipeline supply of office floorspace and there needs to be reduction in the extent of the Office Retention Zone with reference to 2 Lansdowne Road (Croydon Bridge Ltd); an objection was made to the omission of a specific requirement to safeguard rail aggregates sites (Day Group Ltd and Aggregates Industries); the changes to DM6 – Development of Shopping Parades are welcomed but suggest that without an Article 4 direction applied to the policy would not be effective (Norbury and Pollards Hill residents represented by Leila Ben Hassel Local Ward Councillor).

***Chapter 6 – Urban Design, Heritage and Local Character***

Statutory Consultees

*Greater London Authority (GLA)*

Tall buildings

Reference to the word ‘maximum’ should be removed from paragraph 6.152; 6.157 should be amended to remove the exception which would allow tall buildings to take place outside of the identified areas; a single map to accompany Policy DM15 illustrating all the tall building locations in one image would be helpful.

Views and Landmarks

There are three strategic views that run through the borough, and these should be considered as part of Policy DM17, which, as currently written, only appears to focus on Local Designated Views.

*Historic England*

Tall buildings

A list of the tall building zones (TBZs) and the indicative maximum heights in metres m AOD should be included. Tall buildings policy DM15d should be modified to include reference to a design led approach; a Heritage Impact Assessment should be required if the proposal affects a heritage asset; DM15i reads as though only the cumulative effects of tall buildings need assessing, which does not conform with the London Plan Policy D9; An explicit policy should be required that all tall building applications are accompanied by evidence showing that alternative building typologies and configurations had been tested; Expand the factors listed in para.6.152, on which appropriate heights will depend.

Views and Landmarks

Policy DM17.4 is unclear and ambiguous, especially in terms of the designations it refers to**.**

Heritage assets and Conservation

The list of locally designated heritage assets in paragraph 6.180 should be amended to include Archaeological Priority Areas for clarity and completeness. Amend the wording of paragraph 6.183 to quote the NPPF definition of setting in full. As currently described setting is separate to the significance of heritage assets and may be misunderstood to mean visual amenity, allowing for townscape/visual enhancements to be misrepresented as beneficial heritage effects.

Policies DM18.1a & b DM18.1b are not in conformity with the NPPF as the policies suggest that setting is separate to significance. To be in conformity with the NPPF, Policy DM18.3, should be expanded to state that consent for applications causing substantial harm to (or total loss of significance of) a designated heritage asset will be refused unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss, or meet the other criteria at NPPF para. 207a-d.

The policy approach of policy DM18.4 which states that demolition of a building positively contributing to a conservation area will equate to substantial harm is supported. It should be noted that predetermining the weight of an effect does not conform with the NPPF. It is recommended that policy DM18.4a be deleted and, as DM14.b&c are criteria, it is advised to add a sentence to conclude DM18.4 that captures the intention of the deleted policy more positively. Policy -

DM18.9 is not in conformity with para. 200 of the NPPF and requires the submission of an archaeological desk-based assessment (not just field evaluation). In relation to policy DM18.9 Paragraph 6.196, it is advised that Archaeological Priority Areas (APAs) and their function are explained, especially their tiering.

Welcome the approach highlighted in para. 6.190 which requires a Heritage Statement for applications affecting the significance of heritage assets. However, to be in conformity with The London Plan HC1c, it further requires the assessment of cumulative effects. Several of the documents in the key supporting documents section are out of date and should be updated.

*Transport for London (TfL)*

Tall buildings

Welcome the addition to the policy which takes into consideration comfort while walking and cycling around tall buildings in line with the Healthy Streets Approach and Policy T2 Healthy Streets of the London Plan. We recommend replacing ‘pedestrians and cyclists’ with walking and cycling in order to avoid creating identity and division based around modes (TfL). Welcome the addition to policy DM15 which takes into consideration comfort while walking and cycling around tall buildings in line with the Healthy Streets Approach and Policy T2 Healthy Streets of the London Plan (TfL).

*Environment Agency*

Design and Character

Recommendation that mention should be made of the exploration for opportunities to achieve water efficiency in new developments and retrofit measures in existing developments. Refuse and recycling - There are no references to recycling collection in the document from the public realm. An update to the relevant design guide or in other guidance on recycling collection/design could be carried out add the need for enhanced opportunities for moving waste up the hierarchy from the public realm by provision of separate recycling/refuse bins etc.

*NHS (Healthy Urban Development Unit)*

Promoting healthy communities

The wording of policy DM16 should be clearer regarding the requirement for developments to support good physical and mental health and wider wellbeing (NHS – Healthy Urban Development Unit). With regards to policy DM16, include reference to the ‘relevant HUDU guidance’ in the supporting text in paragraph 6.168. (Healthy Urban Development Unit). A clause should be added to ensure that developers mitigate their impact on local health infrastructure (Healthy Urban Development Unit). There is no measure (Policy DM16), for the scale of food growing space which should be provided therefore making it difficult for applicants and the Council to assess what is adequate.

Other Consultees

*Urban design*

The principle of Norbury high street being suitable to build at heights considering existing pattern of development and the current national housing crisis is accepted. However, in the case of Norbury, the policy should specify the need to accompany such intensification with greater infrastructure incl. transport (On behalf of residents - Councillor Leila.ben-hassel).

*Design and character*

SP4.13 (Public Realm) goes beyond the NPPF assessment criteria and seeks enhancements and improvements (Q Square Group on behalf of London Square Developments Ltd and Spurgeon's College).

SP4.2 sets development requirements relating to urban design, heritage and local character. Criteria (b) correctly seeks for development to preserve and enhance heritage assets, there is no recognition of the need for a balanced view given the scale of growth envisaged as per the draft policies in Chapter 13 (Quod on behalf of Unibail Rodamco Westfield).

Policy DM10 (Design and Character) should provide sufficient guidance to ensure that appropriate supporting infrastructure would be available or planned within the plan period to meet the requirement of a proposed development (MORA) Policy DM10.7 (Design and character) is considered too vague to be implemented (MORA).

SP4.2 (Urban Design, Heritage and Local Character) and DM18 (Heritage and Conservation) make multiple references to ‘preserving’ heritage assets and their settings. It is felt that the word ‘conserving’ is more appropriate as it allows for a degree of evolution and change in the built environment. It is recommended that a further amendment to DM18.1.c) is introduced to the policy to promote flexibility (HGH consulting on behalf of The John Whitgift Foundation).

The Area of focussed intensification designations have been deleted from policy DM10 For the Plan to be found sound this needs to be reinstated to ensure soundness (Montagu Evans on behalf of AXA Investment Managers UK Limited).

Request to provide maps to show areas of intensification across London Borough of Croydon. Clarification is required to establish whether the transformation areas are included in the areas of “focused intensification” should be provided (Savills on behalf of Hyde Development Housing Ltd).

Various comments were made with regards to Policy DM10 7(f) retrofitting should be required to whole-house methodology including a Heritage Impact Assessment (Croydon resident). This policy (10.7(J)) does effectively promote uptake. Demolition of an existing building to facilitate increased density should be a last resort and subject to significant feasibility criteria to justify. Solely 'exploring' opportunities for integration of renewables is not an effective policy. The Croydon Local Plan should be modified to state how the adoption of renewables should be encouraged and mandated generally in new developments or retrofitted into existing or refurbished buildings (Croydon Climate Action).

There is no mention of supporting local community renewable energy initiatives. There is only an intention to promote communal heating systems (Croydon Green Network).

Appeal for the Council to protect historic land from future development and to ensure the future of community asset for generations to come (Norbury Park Lawn Tennis Club). The Rotary Field Park in Purley should be included in Table 6.1.(Croydon resident).

The Croydon Local Plan Review (June 2024) is unsound as the heritage of the Borough has not been considered through up-to-date evidence. This is particularly the case with regards to the Hooley House Estate in south Coulsdon (Hooley House Residents Group).

*Heritage assets and conservation –*

Heritage and conservation of traditional buildings including all buildings of architectural quality and character must be emphatically protected. The current local plan and its proposed review 2019-2040 do not meet the NPPF soundness criteria.Support for Dunstan Cottages in Chipstead Valley Road, The Dutch Village, the cottages on Station Approach and Stoats Nest Village being designated as Heritage areas..Suggestions were made that the frontage of the Coulsdon Manor Hotel (Court) should be protected due to its historic importance. Marlpit Farm (which is locally listed), should be protected and brought back into use as a family home. (ECRA)(OCRA)(HADRA)(CWRA)

Croydon Downlands has the ancient monument New Ditch across it at the northernmost end of the City of Londons Riddlesdown Common. The archaeological importance of the rest of to the heritage Riddlesdown must not be lost to more inappropriate development.

It is noted that there has been no update to the Local list. (Savills on behalf of Hyde Development Housing Ltd)

It is recommended that a further amendment to DM18.1c) is introduced to the policy to promote flexibility (HGH consulting).

*Refuse & Recycling*

The Refuse & Recycling Bin capacities appropriate for a development proposal and the number of occupants should be either specified in the policy or referenced to a document (MORA).

*Views and Landmarks*

It is recommended that Coulsdon Methodist Church should be added to the recognised landmarks (East Coulsdon. Hartley and District, Old Coulsdon and Coulsdon West RAS). The view from Farthing Downs to Central London should be added to views to be preserved (East Coulsdon. Hartley and District, Old Coulsdon and Coulsdon West RAS). Amend the methodology for Croydon Panoramas as listed in Appendix 5 (Wandle Valley Forum).

*Tall buildings*

There should be a commitment protect the amenities of sites which are close to tall building proposals otherwise Policies SP4.6 (Urban Design, Heritage and Local Character) and DM15 (Tall Buildings) are supported. (The John Whitgift Foundation)

It is recommended that text be added to Policy DM15 to recognise that applications for tall buildings should not preclude nearby development sites from coming forward and should be required to minimise construction impacts on the surrounding area (HGH consulting).

Object to the removal of DM15(e) in relation to amenity space within tall buildings. It is not justified given the evidence set out in the Croydon Tall Buildings Study aims for publicly accessible landscaped open spaces, including viewing platforms. (Southern Housing).

Tall Buildings outside Tall Building Zones should be considered on a site-by-site basis and the proposed boundary should be modified (Primevest Capital Partners). Buildings taller than the specified height threshold should be considered on a site-by-site basis (SKM Croydon Limited and KS Croydon Limited)

Supports the inclusion of part Policy DM15 parts (g)(h)(i) and removal of policy DM15 parts (b) and (e). Site Allocation 142 (1 Lansdowne Road), is an important strategic site for a tall building where a maximum height of 68 storeys was agreed in principle. (Greystar Europe Holdings Ltd).

*Promoting healthy communities*

Coulsdon Health services should be further prioritised due to the increase in population and development constrained until adequate facilities are provided (ECRA)(OCRA)(HADRA)(WRA).

*Public Art*

Each district centre should contain some form of public art that is linked to the area. It is perceived that this will add interest to the town and attract visitors (ECRA)(OCRA)(HADRA)(WRA).

It is recommended that the Council should support projects such as the Coulsdon Art Trail and the Bourne Society Blue Plaque walk (ECRA)(OCRA)(HADRA)(WRA).

***Chapter 7 – Community Facilities***

Statutory Consultees

*National Health Service (NHS)*

The plan should say that the Council will work with the NHS and developers to ensure that proposals positively contribute to health and wellbeing and mitigate any adverse impacts including increased demand for health facilities. It should also be clearer that the loss of a medical facility may be acceptable if it is part of a wider public service transformation plan and enables investment in modern fit for purpose infrastructure and facilities.

*Sports England*

A separate policy for sports facilities should be provided or the policy adjusted to bring it into line with the wording of paragraph 103 of the NPPF and London Plan Policy S5 C.

Other Consultees

*SP5.9- SP5.15 (Education)*

Policy SP5.12 which supports the growth and improvement of higher education in the borough (including defining a campus location at a suitable site with high public transport accessibility within or near Croydon Metropolitan Centre), should be clear that it sits alongside Policy SP5.3(b) for existing successful educational facilities outside of the locations highlighted. (London Square Developments Ltd and Spurgeon's College); Policy SP5.1 should provide clarity to explain what constitutes an ‘appropriate’ location with regards to provision of infrastructure and community facilities (The John Whitgift Foundation/ Old Palace Senior School); There are no policies addressing the importance of retaining and enhancing associated sporting facilities and pitches; A key priority for schools is ensuring the safety of their pupils and staff is not currently addressed in Policy SP5; SP5 should encourage local authorities to take a collaborative approach to working with school promoters; The inclusion of the Trinity School site within the Green Belt seems to be an irregularity (The John Whitgift Foundation for Whitgift School and Trinity School); Highfield Road playing fields should be removed from MOL and allocated for educational use (Roman Catholic Archdiocese of Southwark); Consideration should be given to relocating New Valley School in Old Lodge Lane on vacant land at the junction of Brighton Road and Old Lodge Lane Purley; Croydon should not be approving development without first ensuring there is educational capacity locally; (East Coulsdon. Hartley and District, Old Coulsdon and Coulsdon West RAS) Welcome the removal of the Heath Clark secondary school provision from the allocation. (Hyde Development Housing Ltd).

*SP5.8 and DM22 (Burial Spaces)*

There are not enough burial spaces allocated in the plan and there are two sites proposed for this, Land at Waterhouse Lane, Kenley andd Site at Old Lodge Lane (AA Homes and Housing).

*SP5 and DM 19 (Other Community Facilities)*

Remove Policy 19.1b as it is in conflict with the NPPF and London Plan and fails to protect existing facilities from unnecessary loss (Theatres Trust), The provision of leisure facilities for young people should be prioritised in Coulsdon; The council should support cultural activities in Coulsdon Town Centre and Coulsdon Community Centre; Welcome the proposal for the remodelling and updating Coulsdon library, Bradmore Green Library should not be closed as it serves the local community well (East Coulsdon. Hartley and District, Old Coulsdon and Coulsdon West RAS)

***Chapter 8 – Environment and Climate Change***

Statutory Consultees

*Environment Agency*

Part SP6.4 should also require to seek betterment in accordance with the requirements of the Exception Test of the NPPF; A new policy should require developments to be set back 8m from the riverbanks; Welcome the inclusion of applying the sequential approach to site layout within DM25.1d; Policies needed to enhance water quality resilience in the face of climate change-induced challenges; Consideration should be given to the development of road drainage infrastructure and associated mitigation measures to address issues related to road drainage; Opportunities to enhance the rivers are also encouraged along with de-culverting; Clearly state how the SUDS will improve water quality in response to Policy DM25.3.e; Work closely with neighbouring boroughs and the wastewater company to ensure sufficient wastewater treatment capacity for future growth; More explicit reference to the circular economy statements in the London Plan; Welcome the references to the agent of change principle; Changes recommended to SFRA based on the recent changes in legislation and draft River Wandle report 2024; DM23, DM24.2 and DM24.3 do not consider the risk of pollution of controlled waters.

*Historic England*

HE guidance cited in paragraph 8.4, has been superseded by Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency (2024) and should therefore be updated.

*London Borough of Southwark*

Supports Croydon’s goals for environmental sustainability, including the transition to a net zero carbon borough by 2040; Welcomes further discussion if any waste policies affect waste apportionment or wider waste infrastructure.

*Network Rail*

Supports the wording in para 8.11 of the supporting text regarding ensuring that the use on Purley Rail head site is not prejudiced by other developments

*Sports England*

Sport England objects to policy SP6.5 B on de-culverting Norbury Brook in Thornton Heath Recreation Ground, as it affects the need to provide space for sport and recreation.

*Surrey County Council*

Notes that when considering planning applications for new waste management facilities Croydon will have due regard to the policies in the waste plan; Supports paragraph 8.11 which states that the applications should be assessed in accordance with the agent of change principle.

Other Consultees

The policy responses are inadequate in the face of the climate and ecological crisis, Policy SP6 should include the recommended actions from the London wide Low Carbon Development Action Plan (Croydon Green Network)

*SP6.4, SP6.5 and DM25 (Flooding and Water Management)*

Amend SP6.5 to read “Green and Blue Spaces and Corridors” (Southern Housing); Strong policies are needed to promote the management of rainwater on sites for new development (CPRE) It is not the responsibility of the housebuilder to ascertain whether the water company can service a development by providing the connections required. (House Builders Federation) Developers should pay towards the cost of improving the sewage infrastructure before planning permission is granted. (East Coulsdon. Hartley and District, Old Coulsdon and Coulsdon West RAS).

General Comments - The policies do not reflect Flood and Water Management Act 2010; SuDS should be required in all development including minor and surface water connections should no longer be permitted to a Public Sewer or Watercourse; The negative impact of cumulative development should be addressed in flood zone 1; Supporting maps showing the ground/surface water risk areas and the catchments and links to section 19 flood investigation reports should be included; Paragraph 8.38 should be amended to say that flood risk assessments should have input from utility providers regarding any necessary upgrade to sewage and drainage treatment; The lack of clear flood risk mitigation measures shown in the Local Plan is a significant concern for two areas in Crystal Palace; the needs to upgrade drainage is included in any planning decision.

SP6.2 and SP6.3 (Sustainable Design and Energy Efficiency in Buildings)

Policy SP6 should be updated to include the recommended actions from the London wide Low Carbon Development Action Plan and include measurement of absolute energy use. (Croydon Climate Action) Update the evidence base and bring forward a completely new plan which address the Climate and Ecological Emergencies (Croydon Green Network). None of the policies make any reference to overheating; Greater clarity regarding the timescales for intended heating networks would be beneficial; Greater evidence is required to confirm whether the requirements for energy efficiency in new homes in SP6.3a are appropriate for Croydon; SP6.3h requiring development to mitigate any effects of pollution is unclear and contradicts paragraph 8.17 requiring new developments to be at least ‘air quality neutral’.; Greater evidence is required to justify the intended approach to submit whole life cycle assessments. (Southern Housing); SP6.2, parts A and B concerning district energy network are unsound because they are ineffective and could be counter-productive in terms of high rise development (Home Builders Federation)

General Comments -Para 8.4A proposes that there are opportunities to modernise and improve Croydon's existing buildings yet there is no mention of retrofitting and reusing; Mention of Retrofitting is limited to listed and historic buildings; A Whole Life Carbon assessment in line with the RICS WLCA standard should be required for the assessment of proposed demolition of all existing buildings; Adaptive reuse through retrofitting, renovation and extension should be prioritised and encourage; No emphasis placed on Adaptive reuse, Renovation or Retrofit of existing buildings; No requirement for Whole Life Carbon assessments for any development/redevelopment; Policy SP6 should include the recommended actions from the London wide Low Carbon Development Action Plan.

SP6.2 (Minerals)

Objection to omission of cross reference to ‘Safeguarded Rail Aggregates Site’ Policy in paragraph 8.11 (Day Aggregates Group)

***Chapter 9 – Green Grid***

Statutory Consultees

*Transport for London (TfL)*

Suggests that there should be provision of cycle parking and adherence to London Cycling Design Standards when improving active travel routes to or through the green grid.

*Environment Agency*

Welcome the inclusion of enabling the Green Grid to be established in areas at risk from flooding; Opportunities to enhance the rivers are also encouraged along with de-culverting; Recommend that riverbank restoration techniques such as softening, regrading etc. is included as a way of achieving urban greening within Table 8.2.

*Reigate & Banstead*

The boundary variation of Surrey Hills Area of Outstanding Natural Beauty includes proposals to extend the boundary into Croydon which will lead to cross borough collaboration.

*London Borough of Southwark*

Policy DM27 of the local plan aligns with Southwark Plan Policies Policy P57 and Policy P59; Cross-borough collaboration will be important to link green spaces and promote biodiversity connectivity across borough boundaries.

*Historic England*

SP7.3h should be amended to say that any setting enhancements must specifically relate to an asset’s significance.

*Sports England*

Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision.

Other Consultees

*SP7.2 and DM26 (Metropolitan Green Belt and Metropolitan Open Land)*

The Green Belt designation removed from the Trinity school’s site seems to be an irregularity. (The John Whitgift Foundation/ Trinity School) There are very limited options to deliver homes without further release of the Green Belt (Carter Jonas). Authorities should review Green Belt boundaries and propose alterations to meet the housing and commercial needs in full (Vistry Group). Release of the MOL is required and that sites (such as World of Golf) should be allocated for development. (Arringford Ltd / Maizelands Ltd) Explore new areas of green space that could be designated as MOL (CPRE).

General Comments - SP7 should be amended to explicitly make provision for the release of Green Belt in exceptional circumstances to meet housing needs; DM26.1- The policy should be amended to remove the need of protection and safeguarding of the Green Belt; Review of Metropolitan Green Belt July 2016 contains inaccuracies as the site description is not right for Site 774 name and 775; Site 772: land south of Wilhelmina Avenue and west of Woodplace Lane in Coulsdon should be reclassified as SINC site in the study; Part of land at Shirley Oaks’ should be labelled as Addiscombe, Woodside and Shirley Leisure Gardens in Table 9.2; Allotments are a crucial asset for the community and wildlife and should be protected and enhanced; It would be useful to understand what further measures the Council may put in place to further safeguard Green Belt, Metropolitan Open Land, SINCs, LNRs, NNRs, SSSis, RIGS, allotment spaces and Important Green spaces. Paragraph 9.7 does not make reference to allotments. Allowances within DM26 for the extension of buildings within Green Belt will not be supported.

*SP7.2, DM26 (Local Green Space) and (Important Green Space)*

Evidence has been submitted about designating St Helen’s Triangle as local green space by SERA in the past. (Norbury Village Green Residents' Association, constituents of Norbury and Pollards Hill Ward and Scots Estate Norbury Residents' Association (SERA) and Friends of Norbury Hall Park) St Helen’s Triangle should be protected under DM26A as Important Green Space. There should be a policy that restricts the large scale felling of legacy trees (even if not TPOed) in areas with known ground movement (constituents of Norbury and Pollards Hill Ward) Norbury Park Lawn Tennis Club designated as a “playing field” or “sporting facility within the Local Plan and extended to include the area of the tennis club within the policies SP4, DM18, SP7, DM26A, DM27. (Norbury Park Lawn Tennis Club, constituents of Norbury and Pollards Hill Ward)

General Comments - The green space around Sanderstead library should be designated a 'local green space.

*SP7.3 (Green Grid) and SP7.4 Biodiversity*

Local Plan should specifically explain how additional Green Space and enhanced green space will be created in the Croydon Metropolitan Centre and in more nature deprived parts of the Borough; explain how the Croydon Green Grid proposed linking routes work. The Biodiversity Action Plans (Habitat Plans from 2013) need to be reviewed and updated. (Croydon Climate Action, Croydon Green Network); Be more ambitious about creating clear identities for green spaces across the borough; The Plan should also introduce a policy to create new green open spaces especially in areas of deficiency; Re-allocate land-use for at least 25% of Croydon’s kerbside space; identify any derelict green sites or disused playing fields and allocate these for a clear green infrastructure purpose; Railway sidings should be allocated for nature recovery; Front and back garden vegetation / natural surfaces should be protected; encourage a range of treescape (CPRE)

Farthing Downs, Happy Valley and Coulsdon Common are valuable and important Green Belt in Coulsdon and Old Coulsdon and should be included in the Surrey Hills of Natural Beauty. Marlpit Lane Memorial Park and Grange Park should remain as Registered Open Space Protected Historic Park. Rickman Hill Park and Mother Kitty’s Shaw has no existing protection under the Local Plan. There is lack of infrastructure facilities for children in the 11- 18 age range in any of the parks. The Hive Coulsdon Library Garden should be added to the listed of recognised community spaces. (East Coulsdon. Hartley and District, Old Coulsdon and Coulsdon West RAS)

General Comments - The Town Centre and Retail Study states there are no public green spaces in Crystal Palace which is incorrect.

*SP7.3 (Wandle River)*

Policies like SP6.5, SP7.4f, SP7.2, SP7.3 and PW SP1.6 are supported; Include deculverting Norbury Brook in SP7.4f and PW SP1.6; Provide clear and consistent policies for development immediately adjacent to the River Wandle; Policies should aid cross borough collaboration on development along Wandle river including CIL; Delivery of a major new green space and nature reserve on both side of the railway between Beddington Park and Mitcham Common connected to the Tier 1 industrial estate west of Purley Way should be encouraged; Wandle Valley Regional Park, the Wandle and Norbury Brook should feature in the Key Diagram, the Green Grid Figure 9.3 and the relevant Place maps. This list of delivery partners should be reviewed to ensure it is up to date. (Wandle Valley Forum)

*DM27 (Sites of Nature Conservation Importance)*

Policy DM27.1 is not explicit enough in seeking to protect SNCIs, in line with Policy G6 of The London Plan; In the review of Sites of Nature Conservation Importance undertaken, sites of Metropolitan importance were not included for reasons that are not clear; Para 9.28 does not reference SNCIs of regional importance. The three tiers are referenced in Table 9.2, but many designations are missing and the designations are not distinguished in their respective tiers in the Sites of Nature Conservation Importance layer in the Proposed Submission Policies Map; The Local Plan should explicitly reference the hierarchy of SNCIs as set out in Policy G6, and paras 8.6.1-5, of The London Plan; Policy DM 27.1(d) is amended to explicitly reference SNCIs, as set on out in London Plan Policy G6 (London Wildlife Trust)

*DM27 (Biodiversity Net Gain)*

The text “proportionate to scale” should be deleted from policy DM27.1, Add ‘where feasible’ to DM27.1 (f). (Unibail Rodamco Westfield) DM27.1, Part A about Biodiversity net gain on site is unsound because it is ineffective as the statutory percentage is unclear in the policy. (Home Builders Federation) Modify DM27.1 to say swift bricks to be installed in all new developments including extensions (Swifts Local Network, Croydon Swifts Group) DM27 does not clearly consider building-dependent biodiversity (Croydon Swifts Group); Suggestion for drafting a "Species Protection Plan" that relates to ensuring that protected species are not harmed; Materials used in building should be sustainable for 100 years and be able to cope with Climate Change and extreme weather events; Avoiding flooding should be the no 1 priority (OCRA) The draft Local Plan Review has not taken the opportunity to assess up to date evidence and produce a plan focused on addressing the adaptation and mitigation challenges. There is no single Biodiversity Action Plan for Croydon and local habitat plans dating back to 2013 is out of date. Improvement of biodiversity in the north needs to be achieved through various ways. (Croydon Green Network)

*DM28 (Trees)*

Contribution to the character and local environment of the area should be clearly defined within either Policy DM28, or paragraphs 9.38 - 9.41 (Bellway Homes).

***Chapter 10 – Transport and Communication***

Statutory Consultees

*Transport for London (TfL)*

Welcomed the commitment to the tram network with text amendments suggested and exploring modes which improve public transport services on key corridors; addressing the climate emergency, health and environmental challenges and recognition of the importance of transport in achieving this. However, they noted that an updated Infrastructure Delivery Plan is needed including a funding and delivery strategy. For London Plan soundness and consistency there should be a clearer commitment to use of planning obligations, CIL and other funding for transport infrastructure and service improvements. Recommended that for soundness Policy SP8.3 addressing active travel and modal shift should be amended and to include both reference to the London Cycling Design Standards in Policy SP8.7 and TfL’s Freight and Servicing Action Plan in paragraph 10.23.

Welcomed recognition of reduced car parking going forward and changes in car ownership. For London Plan soundness and conformity, changes are required to car parking policies (SP8, DM30 and Table 10.1). A number of changes were proposed for London Plan soundness and consistency including to Policy SP8.15 addressing car free development and the policy related to parking stress (DM30.2); the inclusion of sustainable mode share targets and reinstating from the Regulation 19 submission draft Local Plan (December 2021) the reduced car parking, car free and car lite policy (DM30.8) and Policy SP8.16 addressing Controlled Parking Zones.

*National Highways*

Welcomed Policies SP8.9 (encouraging development around railway stations), SP8.15 (car-free in town centres and controlled parking zones) and Policy SP8.16 (limiting parking borough wide). Agreed with alternatives to single occupancy vehicle travel and reducing the need to travel. Supported promoting net carbon zero developments and tougher car parking standards in Policy DM30, compared to the adopted Local Plan.

It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the necessary infrastructure in place and it should be clear that Strategic Road Network (SRN) highway improvements are a last resort. Transport evidence supporting the new housing target and extended Local Plan end date has not been provided. To ensure the Local Plan is deliverable, a transport evidence base should be developed and demonstrate the Local Plan impact on the SRN and suitable mitigation where necessary. This will form a key piece of evidence to demonstrate the Local Plan is sound. Mitigation should have a reasonable prospect of delivery linked with the timescale of when identified growth is planned. Once the transport impacts of the Local Plan sites are understood, an Infrastructure Delivery Plan (IDP) may be required for the SRN.

*Network Rail*

Supported Policy SP8.2 (East Croydon station as the main transport hub) but revised text was suggested stating that upgrading is required, to support the transport network and proposed Croydon Opportunity Area growth. Supported the inclusion of "Metroisation" in Policy SP8.4 and supported Policies SP8.9 (addressing rail infrastructure provision and network improvements) and DM32 (Facilitating rail and tram improvements).

*London Borough of Southwark*

Supported the transport policy approach in the Local Plan.

Other Consultees

*Strategic Policy SP8 Transport and Communication*

Policy SP8.4 should include transport improvement funding and timescale details (Savills on behalf of Hyde Development Housing). The Council and its partners should encourage as per Policy SP8.10 bus network improvements including across county boundaries from Coulsdon to Netherne in Surrey (East Coulsdon, Hartley and District, Old Coulsdon and Coulsdon West Residents’ Associations).

*Safe and Effective Highway During Construction*

There is insufficient guidance in Policy DM28A on highways, fire safety requirements and Building Regulations for backland development.

*Promoting Sustainable Travel*

To meet demand in London, Policy DM29 should include electric vehicle charging hub provision adjacent to arterial routes, including the Purley Way (Places for London).

*Car Parking Standards (Table 10.1)*

There is no evidence justifying in Croydon a higher car parking level in PTALs 0, 1A or 1B of 1.5 per unit, as opposed to “up to” 1.5 in the London Plan (Southern Housing). Table 10.1 is a useful guide but it was suggested that the supporting text allows flexibility on car parking provision by site (Savills on behalf of Hyde Development Housing). Explanation is needed on how less than one space per unit in table 10.1 works in practice (HBF). Clarification was requested on an inconsistency, between Table 10.1 (Parking Standards) referencing PTAL 5, 6a or 6b as car free and Policy DM30.2 stating development in PTAL2+ locations should provide parking on-site (HGH on behalf of The John Whitgift Foundation).

*Trains, Buses and Trams*

Many borough metro and suburban services at local stations are not restored to pre-Covid levels and step free access at Norwood Junction and Waddon should be a priority. In addition, that trams have proved successful in regeneration and should be promoted with TfL and surrounding boroughs, including an extension to Crystal Palace. Also, an additional super loop bus stop is needed to serve the Purley Way Transformation Area with extensions, reinstatements and addressing gaps in bus services to be taken forward borough wide (East Surrey Transport Committee). Public transport needs to be reliable, regular and cheap (East Coulsdon, Hartley and District, Old Coulsdon and Coulsdon West Residents’ Associations).

*General Comments*

General comments about transport and related issues were raised. This included that development in Purley (e.g. Purley Pools) will reduce parking provision and amended bus services are needed to access Purley. Also, that vehicular traffic should use Park Lane and A232 instead of Coombe Road/Lower Coombe Road thereby improving the local environment including around Ruskin House and with the potential to create a South Croydon Open Space. The issues and options 2019 and the Retail Study (2023) do not accurately reflect for Crystal Palace and Upper Norwood the borough’s topography and therefore ease of walking and cycling, access to rail stations and retail uses; traffic/highway issues and retail parking. It was also recommended that the provision of e-bike hire at stations serving Crystal Palace and Norwood Junction, cross border working and highway issues are addressed. It was stated that the Borough Wide Transport Strategy (Cycling) on the Council website is instead the Walking element.

In Coulsdon Town Centre short term free parking is welcomed, but a mix with longer term provision is needed and the recent evening/night time charge is wrong. In addition, it was recommended that at least one parking space per new housing unit is needed in Coulsdon and Old Coulsdon with new residents allowed on street parking permits (East Coulsdon, Hartley and District, Old Coulsdon and Coulsdon West Residents’ Associations).

***Chapter 11 – Place of Croydon***

Statutory Consultees

*Greater London Authority (GLA)*

There are inconsistencies between the place policies and the Interactive Policies Map; The site allocations are not accompanied by location and/or site plans so it isn’t clear where the sites are situated and lack necessary detail such as planning designations/constraints.

*Transport for London (TfL)*

A potential north-south tram line is not a TfL priority and there is a need to secure funding for any transport proposals including planning obligations and CIL. The policy should demonstrate how the transport measures proposed for Croydon Opportunity Area will be delivered. DM42 should demonstrate how changes to Purley Cross gyratory and associated public transport will be delivered. This will require development contributions in the form of planning obligations or CIL which should be mentioned in the policy. TfL is not currently in a position to fund or operate any enhancements to the tram network.

*Reigate & Banstead Borough Council*

The possible expansion of the tram network either along Purley Way or from Croydon Metropolitan Centre to Coulsdon along Brighton Road is welcomed. We wish to be involved in any future highways and transport consultations on the Brighton Road (A23) as one of the key stakeholders. Change in wording of DM42.1 A can help create gentle density and we acknowledge that an overall approach to design over density is sought after.

*LB Southwark*

Supports Croydon’s identification of Opportunity Areas for significant development and growth, such as the Brighton Main Line and East Croydon (Policy SP9). These areas are crucial for regional economic growth and infrastructure improvement. While these Opportunity Areas present significant development potential, it is important that they are developed in a way that supports regional growth without adverse cross-boundary impacts. Southwark’s Plan (Policy AV.06) outlines a vision for areas like Crystal Palace and Gipsy Hill, preserving local character and improving connectivity. Joint planning and regular consultation will be necessary to align strategies and avoid conflicts in these areas.

*Network Rail*

Supports the additional wording in para 11.275 related to improvements at Waddon station, in para 11.161 related to improvements at Purley Station and in para 11.239 related to improvements linked to rail upgrades.

*Historic England*

The tall building heights policies state definitively that the heights ‘are considered appropriate’. We advise amending all references to ‘are considered appropriate’ to ‘may be appropriate’. The places of Croydon policy updates are checked against the Town Centre Masterplans to ensure consistency.; Each ‘Character Heritage and Design’ should clarify that the design of new development should not only respect the historic environment of the area but should be informed by it; Addiscombe is identified as an area potentially suitable for tall buildings but is not supported by the Tall Building Study; It is unclear how the different height ranges in DM36.5 have been derived at as the Tall Building Study only gives one height across the zone; DM47.2 states that South Norwood is identified as an area potentially suitable for tall buildings but is not supported by the Tall Building Study.

Other Consultees

*General Comments*

These Places provide an ideal opportunity to embrace the National Model Design Code and Guidance to describe the various community groups, residential areas, District and Local Centres. Switching to private electric vehicles will not be enough to combat climate change and in the hilly areas in the south of the borough, with the types of residents reliant on cars and its scattered amenities. Improved public transport is required e.g. extension of the tram network to the south of the borough.

*DM36 (Broad Green and Selhurst)*

DM36.4 c) – the reference to a maximum of 8 storeys has been replaced with 5 storeys except in Tall Building Zones. The reduction to 5 storeys doesn’t appear to be justified/evidenced within the Croydon Tall Buildings Study (2024). (Southern Housing) The Policies Map and Table 11.1 should be modified to remove reference to Policy DM36.3. (Hold my Bricks)

*DM 37 (Coulsdon)*

Tall Buildings should be limited to 7 stories in line with existing buildings and above that height would be both out of place and dominate the town. Coulsdon’s district centre would be best protected by the implementation of an Article 4 Direction preventing any further loss of retail space. Greater flexibility in the forms of employment use on Ullswater Industrial Estate. (East Coulsdon Hartley and District, Old Coulsdon and Coulsdon West RAS)

*General Comments*

The policy DM37 should be deleted and a new strategy should be established which provides more housing and in particular family housing; Include more ambitious sustainable transport options that will promote healthy living and respond to the Climate Emergency declared by the borough in 2019. Include potential / new designated sites for infrastructure in Coulsdon e.g. land west of 41 Malcolm Road for new community health centre.

*DM38 (Croydon Opportunity Area)*

The policy DM38 should make it clear that this approach should / will not, preclude development sites from coming forward on their own accord. (John Whitgift Foundation). Policy DM38 is generally supported in terms of supporting positive growth. (Primevest Capital Partners) The inner core tall building zone is extended to cover the west Croydon bus station site as high-density development is likely to be required to achieve viable development above a bus station (Places for London, TFL Property Development) It is unclear from the policy wording and supporting text as to whether the suggested height range is a fixed position and anything above or below the range would be considered unacceptable, or if schemes that fall within the range are automatically considered appropriate from a townscape perspective; We strongly object to the suggested ranges as there appears little evidence to support how or why the policy wording has been developed based on the findings of the Tall Building Study evidence base (Croydon Bridge Limited) It is recommended that the boundary of the ‘Core Area within the Inner Zone’ tall building zone is amended to capture Site 34 (Croydon Developments Ltd) The site description in Table 11.6 and the description of the option for the site in Appendix 7 need to be consistent in the Local Plan (Croydon Gateway Limited Partnership) The building height range in the COA outer tall building zone allows a maximum height of 15 storeys which is lower than the proposed new Citiscape buildings on Keeley Road and Drummond Road granted in March 2024 which is inconsistent. (Unibail Rodamco Westfield)

*DM40 (Kenley and Old Coulsdon)*

General Comments - Kenley is not suitable for infill sites for housebuilding in much of the area. There is a conflict between the sentiments expressed in para 11.120A and para 11.122. Para 11.120D contains a token statement about increasing the parking availability near Kenley shops and railway station. There is no indication in the Plan as to where such land can be found. Para 11.120A refers to the wooded hillsides but does not recognise the detailed character of that wooded hillside. The Croydon Plan as it affects Kenley and Coulsdon should include a policy to cause the replacement of the trees systematically to maintain the present semi-rural characteristic of the area. The supporting text does not express the existing character and distinctiveness clearly, demonstrating what is necessary to be retained. It should cite the existing feeling of spaciousness, the wealth of mature trees, and the presence of old-style housing.

*DM42 (Purley)*

Figure 11.9 to additionally identify ‘Safeguarded Aggregates Site’ and ‘Safeguarded site for transfer of freight to/from rail’– with associated amendments made to the Key; Modification suggested for addition of wording to Policy DM42 given that development coming forward in the vicinity of the Purley Rail Site is considered on balance; Para 11.157 should be modified to reference ‘Rail Aggregates Site’ and as a ‘Safeguarded site for transfer of freight to/from rail’. (Day Group Ltd and Aggregate Industries UK Ltd)

General Comment -Keep buildings to a max 8 story height in Purley as this is the prevailing height.

*DM41 (Norbury)*

Remove paragraph about Norbury being potentially suitable for Tall Buildings. (Scots Estate Norbury Residents' Association (SERA) and Friends of Norbury Hall Park)

*DM46 (South Croydon)*

Policy DM46 does not allow for site specific considerations and sets an arbitrary maximum height which may not lead to making the most efficient use of land. (AXA Investment Managers UK Limited)

*DM47 (South Norwood and Woodside)*

DM47.2A references a Tall Buildings Zone where heights of 21-39 metres are considered appropriate. However, this is not in accordance with the evidence presented in the Croydon Tall Buildings Study (2024), which concludes that tall buildings are not appropriate in the area (section 23.1, page 222). (Southern Housing)

*DM 49 (Waddon)*

Waddon Station should be refurbished with a new entrance on the Purley Way together with step free compliant access to the platforms. The proposed development in Purley Way will require the improvement of passenger journeys for residents and school children of Waddon. Morrisons serves our residents and has come to play an important part of the Waddon economy both in retail and employment and needs to be protected. We ask that the Council undertake work to build in services in the ward to serve the additional homes proposed in the plan which are accessible by public transport. (Ward Councillors for Waddon representing residents)

***Chapter 12 – Transformation Area: Brighton Mainline and East Croydon***

Statutory Consultees.

*Network Rail Network Rail*

Supports the policies in this chapter and notes that East Croydon station plays a vital role in transport connectivity from the south coast, into London and beyond. As details of a future CARS scheme have not been agreed it is important that flexibility remains to consider the type of scheme that may come forward and within a realistic timeframe. Additionally, there is no certainty over what would be included within any future Transport and Works Act Order (TWAO). It is essential that the Policy remains open to consider all options and does not bind the TWAO to a specific option at this stage. It is essential that the Council and Network Rail remain engaged on how the Brighton Mainline and East Croydon rail upgrades progresses and how the options are considered. As part of this, it is imperative that improvements to East Croydon can also be secured from developments that may come forward in advance of the BML project to ensure facilities at the station and its capacity remain capable of supporting this growth

*Transport for London (TfL)*

The policies should demonstrate how associated transport improvements in the Brighton Main Line and East Croydon Transformation Corridor will be delivered. This will require development contributions in the form of planning obligations or CIL which should be explicitly mentioned in the policies and in relevant site allocations to ensure soundness.

*London Borough of Southwark*

Projects, such as the Brighton Main Line and East Croydon Transformation Corridor will provide important sub-regional benefits which will enhance connectivity. While the proposed railway improvements are supported, further clarification is needed on the details and impact on Southwark, i.e. from the increased number of passengers coming through London Bridge.

Non- Statutory Consultees

There is significant uncertainty of delivering Croydon Area Remodelling Scheme (CARS) over the plan period.Uncertainty about the delivery is not addressed or the possibility of any alternative or intermediate measures that could achieve or partially achieve the needs identified in the policy. Ineffective and inflexible because delivery of all the identified needs are wholly contingent upon the CARS scheme proceeding. The policy approach would be flexible if meanwhile alternatives were proposed. The transformation would be deliverable or at least partially deliverable if it were not wholly contingent on a unfunded project over the plan period East Croydon Community Organisation (ECCO).

It will be critical through the application of the strategic and development management policies that the future development of Ruskin Square is not prejudiced by the aspirations of the East Croydon Station improvements (Croydon Gateway Limited Partnership).

Although they support the proposed CARS renovation scheme, moving the station a few meters north to improve the station layout and increase its capacity. They note that this was paused by the previous government and the present government is unlikely to have funds to allow Network Rail to undertake the scheme in the near future. The remodelling and step free access to which is an important interchange station with the Overground, Southern Metro and Thameslink trains was an integral part of the CARS scheme and should now be separated out and Croydon should work with Network Rail and TfL to bring this forward (East Surrey Transport Committee).

Several references are made to the CARS acronym, but the full term is not provided until the next section. Suggest including the full description (Southern Housing)

***Chapter 13 – Transformation Area: The North End Quarter***

Statutory Consultees.

*National Health Service (NHS) Healthy Urban Development Unit*

Welcome the vision for the North End Quarter. However, they have concerns that the site allocations within the area as they stand are unlikely, as stated within the Vision, to build on the area’s history as a residential, commercial and social hub without the inclusion of community space including health infrastructure. There is an identified need for additional health and wellbeing capacity within the south-west /central section of the town centre.

Other Consultees

*Unibail Rodamco Westfield (URW)*

The majority of the comments on this chapter were from the developer Unibail Rodamco Westfield (URW**)** who are key landowner within the heart of Croydon Town Centre. They state overall, URW are supportive of the vision and policy thrust for the Quarter, which recognises that resilience and a flexible approach to the delivery of a mix of uses are key to the success of the Opportunity Area. However, URW are of the view that specific amendments to policy wording and supporting paragraphs are necessary having regard to the requirements of the National Planning Policy Framework (2023) (‘NPPF’) and sound plan making.

On Policy NEQ SP1 (b) they consider that the inclusion of triggers to retain a minimum quantum of town centre floorspace during redevelopment is not justified as development will be appropriately sequenced allowing for activation but it is it not necessary or appropriate for a floorspace level to be identified and it is unclear how such a figure would be arrived at.

In relation to Draft Policy NEQ SP1 (c), this text sets unrealistic expectations for the masterplan process. The masterplan will not identify ‘requirements’ due to the level of assessment work required, which will only be undertaken as part of the planning application process and should also reflect the transformational change that will occur.

With regards to streets and routes; “permeable open active town centre streets” is too specific for this stage and is not justified given masterplanning has not yet been undertaken to determine the type of streets to be provided. On a similar matter they consider it is not clear what “spine route” or “Secondary Frontage Uses” relate to and consider that any potential “North-south” route needs to be subject to the proposals for the former Allders Department Store; and the “East-West” route policy wording is not clear.

Figure 13.3 identifies the Indicative Spatial Vision. Although this figure is termed indicative, the figure includes a level of design and delivery expectation that is not realistic, justified or appropriate.

Paragraph 13.28 should be amended to remove “recreation” as this is inconsistent with the role of the space as identified in Policy NEQ DM2(h) requiring the new anchor public space.

Policy NEQ DM3 – Northern Boundary - Poplar Walk identifies the criteria for development along Poplar Walk but given the nature of Poplar Walk the redevelopment will not provide active frontages. The same applies to Wellesley Road so that active frontages are provided “where appropriate” given the nature of the road.

Clarifications to wording and suggested amendments are sought for; Paragraph 13.15 to improve clarity to indicate where the removal of buildings in the Conservation Area will be appropriate; paragraph 13.19 referring to the range and size of public spaces it is not clear what is sought or should be achieved; paragraph 13.22 makes reference to servicing and delivery plans and having the “centralised distribution centres in locations away from the town centre will be encouraged for appropriate uses”. This statement relates to matters which occur outside of land within the Quarter and that applicants within the NEQ may no control over. Policy

NEQ DM1 – North End – town centre retail focal point should be updated to remove “civic” given that this is commercial focused public area. “Main Retail Frontage” should be amended to read “Main Frontage” as well as in Policy DM4 for consistency. Policy

NEQ DM2 North End Central Neighbourhood should confirm that the neighbourhood will be supported by a mix of other uses consistent with national policy and guidance. It is unclear what “green framework” is in part e.

Wording should be added requiring well designed car parking.

The word “reducing” in Paragraph 13.29 should be deleted as a servicing strategy has not been prepared. This proposed removal does not change the effect regarding the consideration of impacts at planning application stage.

In Para 13.30 the wording relating to “innovative new uses” is unclear and should be updated to refer to a range of town centre uses. The paragraph should also be updated to reflect the policy wording relating to transformational change.

As the Policy NEQ DM3 Northern Boundary relates to Poplar Walk only, the text in Paragraph 13.31 should be removed. The first sentence is also amended for clarity.

Suggest that “gradually” in policy NEQ DM6 is deleted as this is unnecessary and criteria a should be amended to reflect the nature of mixed use development and the principles of agent of change. The word “rich” should be deleted from Policy NEQ DM5 as it is not necessary. The word “creating” should be replaced with “explore the potential to create” in Criteria (a) as this should be an aspiration rather than a requirement and any new entrance will not be “historical”. The first line of Paragraph 13.41 – “This part of the transformation area could go through the most significant change and improvement” - should be deleted. It is not justified and does not assist policy interpretation.

The last line of Paragraph 13.42 should be deleted as the servicing strategy needs to be resolved as part of a planning application and this text is not justified.

Minor changes observed; table 13.4 needs a numbering correction, NEQ SP1 c there is a typo at “streets, the”; Paragraph 13.11 contains repeated reference to “phasing”, Policy NEQ DM1 deals with development on North End, however the supporting text within Paragraph 13.24 strays into matters relating to land behind North End which is covered by Policy NEQ DM2. There is a typo in Paragraph 13.32 and proposals within the Quarter cannot deliver improvements to permeability between Station Road and Poplar Walk as this is outside the Quarter area.

*Iceni Projects OBO Greystar*

Support the wider strategy that Croydon are proposing along Wellesley Road to make it a transformative area of positive change. Greystar are keen to work with Croydon to ensure the best possible of high-quality public realm is provided for its future residents at their Lansdowne site re-development (which lies in Croydon Place but outside NEQ). The Croydon proposed policy NEQ DM4 Wellesley Road part G seeking to enhance connectivity and public realm to which Greystar have looked to work cooperatively with Croydon to ensure that Wellesley Road is transformed into a high quality public realm and create a main highly trafficked route into Croydon town centre through all modes of travel.

***Chapter 14 – Transformation Area: The Purley Way***

Statutory Consultees

*Greater London Authority (GLA)*

Consider that the chapter needs to be clearer in terms of the reconfiguration of Strategic Industrial Land (SIL) and would welcome the inclusion of the Amazon Distribution centre as SIL. If SIL land is to be lost as part of the Purley Way Transformation Area the plan should be clear as to where this will be reprovided.

*Transport for London (TFL)*

TFL consider the wording in PWSP1.7 e which includes the design principle **‘***Create an overall reduction in parking across the Transformation Area, including through the consolidation of surface parking into multistorey facilities where appropriate***.**’ is insufficient to address acknowledged issues of congestion and to accommodate planned growth. They consider that without restraint-based parking standards, the proposed level of growth for the Purley Way area will not be deliverable.

TfL is also potentially concerned about the wording in para 14.40 which lists a series of focused highways improvements. If these improvements were designed primarily to accommodate additional highways trips this approach would be inconsistent with the London Plan and Mayor’s Transport Strategy.

*Historic England (HE)*

Policies PWDM1c, PW DM2d, PW DM3d, PW DM4c, and PW DM5f all state that building heights for the areas should be 3-8 storeys, but it is not clear if these potential new local centres are in tall building zones and are therefore suitable for buildings over 6 storeys (21m) however this is not considered to be a matter of conformity and request that this is clarified in amended text. HE also request that references to the “Ikea chimneys” in the plan should be amended to Croydon Power Station Chimneys throughout as it is more historically accurate.

*Reigate & Banstead Borough Council (RBBC)*

Generally welcome policies DM28A and Policy DM29 as they address the highway and transport impacts on the Purley Way Transformation Area but consider that all key transport (not specified in the rep) holders should be involved to ensure a joint strategic approach.

Other Consultees

Views were expressed that proposals for the Purley Way should not result in the loss of any common land and that enhancements should be made to the Purley Way playing fields. A representor of the East Surrey Transport Committee states that significant improvements are required to Waddon station to accommodate the Purley Way Transformation Area. One representor has commented that the Purley Way Strategy is wrong, relying on high-density mixed-use schemes as it will not deliver family housing and that Green Belt releases are required to deliver the housing that the Borough needs.

*Site Allocations*

Representations have been made on behalf of interested parties regarding the proposed site allocations summarised as follows:

* Site allocation 153 (Five Ways Triangle) should be reallocated as a “Short Term Site” from Long Term;
* Site allocation 11 (Croydon Garden Centre) is currently not deliverable and amendments need to be made to the specific site allocation and in particular a reduction in the commercial floorspace requirement;
* Site allocation 348 (Home base and Matalan 60-66, Purely Way) is unlikely to come forward unless the existing retail and warehousing is properly planned for in the future; and
* Site 8 (Motor Village Croydon 121, Canterbury Road)– evidence has been submitted as part of a representation to demonstrate that this site is not viable for residential development and should be removed from the plan.

*Quod on behalf of IKEA*

Generally supportive of the Plan’s promotion and protection but considers that the strategic policy PWSP1.5 lacks clarity. Two areas of concern have been expressed as follows:

* Policy PWDM1 criterion (b) would act as a constraint to IKEA’s future plans for warehousing/distribution on the site as it focuses warehousing/distribution uses outside of the intended area for the new Local Centre (i.e. away from Ampere Way and the tram stop) and;
* Paragraph 14.45 talks about opportunities to decrease visits to the area by car, but this undermines IKEA’s business model whereby they sell bulky goods which customers wish to take home by car.

*Savills on behalf of Hyde Development Housing Ltd*

States that the timings for the new Neighbourhood Centre and the reconfiguration of the junction at Fiveways need to be clearly set out

*Pegasus on behalf of Hold my Bricks*

States that site 8 (Canterbury Road) which has an extant planning permission for 95 units should be removed as an allocation because it will not come forward as a residential site as it is unviable and is to be redeveloped as a self-storage unit which is viable.

***Sustainability Appraisal***

*Environment and Climate Change*

General Comments - The recognition that heat network opportunities are more unlikely to be realised is now included but no alternatives for decarbonising energy supply have been added. There is growing evidence for the successful use of community energy schemes to decarbonise local energy supply and at the same time help the organisations with reduced energy costs. It is clear from the SA that the council should have considered green belt release and this should have been properly tested in detail as a reasonable alternative. As set out within these representations, the consideration of green belt is highly ambiguous in the SA, and this has not been tested to the required level of detail expected within a local plan.

Urban Design

Historic England have highlighted that there are heritage sensitivities regarding the proposed tall building zones and the site allocations. Consequently Historic England do not agree with the conclusion that the plan will have a positive effect in terms of the historic environment objective. Instead they consider the historic environment objective to negatively compound an inherent uncertainty in the effect.

Historic England advise that the SA historic environment objective is amended to fully align with the NPPF paragraph 196 (Conserving and enhancing the historic environment). Historic England also advise in adding an objective which seeks to maximise opportunities for delivering wider heritage related social, cultural, economic and environmental benefits.

The key performance indicators (KPIs) included in Appendix 9 of the Local Plan for heritage are changes to designation of assets and changes in the number of heritage assets at risk. These are considered appropriate. Historic England further states that:

* With regards to the point in SA2, that it could suggest some monitoring indicators.
* A recommendation to consider the review/updating of Conservation Area Appraisals, Archaeological Priority Areas and the Local List 3.
* The Council should refer to the London Plan’s heritage KPI which seeks to monitor the impact of development on London’s heritage by measuring whether there is a positive trend in the reduction of harm and/ or an increase in benefits to designated heritage assets in approved referable development applications (based on a rolling average).

***Evidence Base***

Tall Buildings Study

*Statutory Consultees*

The tall buildings analysis does not consider whether existing tall buildings resulted in harm to the historic environment. The heritage sensitivity methodology is also flawed for several reasons, the most fundamental being that it does not consider heritage significance. As a result, the study does not indicate whether tall buildings are appropriate in relation to historic environment especially in Central Croydon. The Purley, Purley Way, Regina Road, and Norbury TBZs also lie adjacent to and/or in the setting of heritage assets and may also result in harm to the historic environment. The simplest way to ensure that the TBZs are justified, effective, and sustainable, would be to undertake a supplementary assessment of heritage sensitivity. However, the design-led approach is supported but it should cover all site allocations. In the absence of any Heritage Impact Assessment (HIA), it is questioned how the identification of heritage assets in and around the site has informed the allocations building height/quantum of development. There are concerns regarding the cumulative effect on allocations that are clustered together. Recommend cross referencing back to relevant place policies for the development management policies to bring site allocations specific policy context and requirements to the forefront.

*Whole Plan Viability*

The point was raised that the Plan Viability Assessment does not take into account the borough’s net zero target, as the Viability Report suggests there is no target within the current plan period (Croydon Climate Action, Croydon Green Network). In addition, it was stated that the local plan evidence base doesn’t explore the current climate crisis or reference relevant reports, which underplays the crisis and for the Viability Assessment to be revisited as there are flawed assumptions (Croydon Green Network). Reference was made to the Plan Viability 50% Affordable Housing testing, stating that the strategic target change means a greater number of schemes will need to be viability tested, when there is little evidence to support the uplift from 35% (ICENI).

*Local Plan Policies Map*

The reference on Policies Map key in terms of rail freight should allow for movement of freight to and from rail and modifications have been suggested as Safeguarded site for transfer of freight to/from rail. (Day Group Ltd and Aggregate Industries UK Ltd)

Other comments

No page numbers have been provided (the on line word document as it is in two sections to reduce its size) for readability.

***Appendices***

***Appendix 1 – Glossary***

***Appendix 2 – Calculating the percentage of units within a Main or Secondary Retail Frontage***

No comments.

***Appendix 3 – Designated Shopping Frontages***

No comments.

***Appendix 4 – How to assess whether proposals demonstrably relate to a Neighbourhood Centre***

No comments.

***Appendix 5 – Heritage assets in Croydon***

Historic England query the value of Appendix 5, which comprises a list of heritage assets in Croydon. If, updated the policy map will depict this information and is more useful as it shows their location. The hyperlinks are useful, especially as they link to the live datasets.

***Appendix 6 – About the proposal sites***

No comments.

***Appendix 7 – Schedule of proposal sites***

Statutory Consultees

*Transport for London (TFL)*

Site 40 – West Croydon Bus Station. The justification of option needs to confirm a need to consult TfL Buses; Site 347 - The justification should state a requirement for contributions towards changes to Purley Cross gyratory and associated transport improvements in the form of planning obligations or CIL.

*Environment Agency*

Comments highlighting changes in flood risk for the allocated sites within the Level 2 SFRA dated 2021 and Level 2 SFRA 2024.

*Network Rail*

Network Rail should be consulted on all planning applications where there is an interface with the railway and/or land that is safeguarded for railway upgrades. The safeguarding of the BML should be retained as shown on the Policies Map to ensure development does not conflict with land required for railway upgrades.

*Historic England*

Appendix 7 should follow the same structure and to have the proposal sites in each area listed under an area sub-heading; In Appendix 7, the ‘Justification for Option’ column of the site allocation tables includes requirements for the historic environment which should be signposted to Character, Heritage and Design sections for each area; The heritage information provided in Appendix 7 should be reviewed to ensure that heritage considerations have been consistently identified and explained. Site allocations within Tier II APAs and Tier III APAs will require an archaeological desk-based assessment and archaeological evaluation. To ensure that the significance of the heritage assets within conservation areas is conserved or enhanced, design proposals should be informed by understanding of it from the outset. Site allocations containing listed buildings should require that the listed/ locally listed buildings are retained in line with legislation/policy. Planning applications should then be accompanied by Heritage Impact Assessments assessing the effect of the final proposal on the assets in site and around the site.

* Site 153 – Five Ways Triangle (516-540 Purley Way & 107-113 Stafford Road) -Justification of Option should be modified to provide reference to Old Tithe Barn.
* Site New 2: Regina Road Estate- This allocation proposes a tall building within the setting of the South Norwood CA
* Site New 4: Centrale - This site is partly within/adjacent to the Central Croydon and Church Street Conservation Area and has the potential to affect both adversely unless appropriately scaled and designed. It is also located within the setting of the Grade I Almshouses and within a Tier II APA.
* Site 28: Bowyers Yard- This allocation gives no quantum of development but indicates that up to six storeys could be built in a sensitive area in the Upper Norwood Triangle Conservation Area, where the prevailing building height is two storeys.
* Site 133: Woburn and Bedford Court- This site lies opposite the Wellesley Rd North Conservation Area which consists of 2-3 storey Victorian villas, and forms part of the setting of the impact on the Grade II\* Church of St James. Tall development on this site has potential to cause harm to significance of both these heritage assets by virtue of its proximity, scale, and massing.
* Site 194: St George’s Walk, Katharine House and Park House, Park Street- Concerned about the indicative number of units for this site, which includes the Grade II listed Segas House (which is at risk) and is partly located within the Central Croydon Conservation Area, near to the Grade I listed Almshouses. It should require the retention of the Segas House and that the redevelopment meets its long-term conservation needs.
* Site 683: Purley Back Lanes- This site is archaeologically sensitive as it is in a Tier I APA and will require early archaeological engagement and an archaeological desk-based assessment.
* Site 242: Davis House, Robert Street requires particular attention to the views looking south along High Street in the context of the Old Bank Chambers

*Sports England*

* Site 16 – Health Clark, Stafford Road- Sport England continues object to this allocation as this is a former playing field/open space.
* Site 30 - Purley Leisure Centre, car park and former Sainsbury's Supermarket- It is not clear what is meant by ‘creative and cultural enterprise centre’ but the Council’s priority should be getting the public swimming pool and leisure centre rebuilt and operational for the local community. The scheme’s phasing slippage to 2029-2034 means that residents continue to be without their local pool.
* Site 405- Capella Court & Royal Oak Centre and Site 137 –Colonnades- This site is not consistent with national policy (paragraph 103) that seeks to protect community facilities. There are a number of site allocations in the plan that suggest community uses should be demolished and then re-provided within the site. The construction period which could be lengthy for a complicated mixed-use site which will mean that the community will be without that facility for more than a year.

*Thames Water*

Water Response and Waste response has been provided for all sites within Appendix 7.

Other Consultees

*Site Suggestions*

* Reallocate Telephone Exchange site, 88-90 Brighton Road, Purley, CR8 4DA (Telereal Securitised Properties GP Limited)
* The submission confirms the deliverability of site on Drive Road, Coulsdon, CR3 1BN for redevelopment and that amendment to the Green Belt boundary should be carried out and the site should be allocated for residential development. (Carter Jones)
* Land at Addington Court is available for residential development of 550 homes alongside publicly accessible open space (Crown Golf Ltd).
* The site at 128-30 Frant Road, should be identified in Appendix 7 as a housing site to come forward early in the Plan period. (WSP)
* Land at the bottom of the Cane Hill site at the junction of Brighton Road and Lion Green Road- it may be appropriate for the site to be re-designated for community use or housing. (East Coulsdon. Hartley and District, Old Coulsdon and Coulsdon West RAS)
* 29-31 Park Street should be allocated for residential development of up to 6 units with potential Class E ground floor use. (The John Whitgift Foundation)
* Seeks the allocation of a site in this Place adjacent to Blackhouse Lane Tram Station and Coulsdon Train Station (Places for London, TFL Property Development)

*Site Specific Comments*

* Site 103- 585-603 London Road- More flexibility in the quantum of hotel floorspace and/or residential floorspace; Ensure the non-residential floor space is consistent with the extant permission. (London Hotel Group)
* Site 220- 9-11 Wellesley Road- The current description of the site allocation suggests “conversion”. The provision of redeveloping the site should be included in the proposed use; Housing number should be increased to 600 PBSA units or circa 250 homes (WRC Ltd)
* Site 16- The indicative number of units should be increased to 341 comprising of the 126 units on the southern part of the site and the revised figure of 215 for the northern part of the site; The omission of the secondary school is supported by the Site Promoter. (Hyde Development) The large area of green space on the site provides important benefits for local wildlife and should be maintained as part of the adjacent recreation ground and designated as a Local Green Space. (CPRE)
* Site 133 Woburn and Bedford Court- The proposed housing number should be increased to 445 homes; Changes should be made in Site Area and Site Description. (Ivel Limited) Site 126 Proposed housing number should be increased to 42 units and the redeveloped site should be able delivered within the next three years earlier than the phasing indicated in the Site Allocation. (Spurgeons College/London Square Developments Ltd)
* Site 128 – fully support the principle of the Site Allocation (Regent Land and Development Ltd) This site is part of a green chain, is clearly distinguishable from the built-up area surrounding it and contains features of nature conservation and habitat interest and meets the criteria for designation as Metropolitan Open Land. (CPRE London)
* Site 153- Five Ways Triangle (516-540 Purley Way & 107-113 Stafford Road) Remove the SIL designation from site; Increase the proposed housing number and change the phasing. (Greencroft Investments Limited)
* Site 199 – 20-22 Lansdowne Road- The policies map refers to Site 199 as 20-22 Lansdowne Road. However, the two sites totalling 1.56 ha with previously identified capacity for 109-313 and 111-319 homes respectively reduced to 107 homes combined and the site area does not align with the boundary shown; Changes required to evidence of deliverability. (CBRE Ltd. on behalf of Peabody Group)
* Site 61 - Purley Station Car Park - Objection to deletion of reference to the Safeguarded Rail Aggregates Site. Modification required under the heading ‘Justification for option’.
* Site 30- Purley Leisure Centre- Objection to the omission of text confirming that the site is located in close proximity to a safeguarded site and requirement that any proposals must be designed to ensure they do not prejudice its current and future operation. (Day Group Ltd and Aggregate Industries UK Ltd)
* Site 218, Lunar House and Site 236, Apollo House Wellesley Road- Add redevelopment along with retention and conversion in the proposed use; The proposed housing number should be at least 500 homes for Lunar and Apollo house. (Ho Bee Land)
* Site 348- Homebase and Matalan Store- The proposed housing number should be reduced from 685 homes to 175 homes; The phasing should reflect the length of leases until 2031 and 2033; Minor changes to site area and uses - inclusion of retail warehousing use suggested. (The Freddie Green and Family Charitable Foundation and Henry Streeter (Automotive) Ltd)
* Site 405- Supports the deletion of Capella Court including reference to the medical facility which relocated to more suitable premises in 2020; The reference of community use within justification should be removed; Phasing should be changed as the development will get delivered by 2029; The proposed number of homes should be changed from 50 to 150 homes. (Peer Group)
* Site 952- 103-111A High Street- The proposed housing number has significantly reduced from the previous iteration of the emerging local plan from 121 no. to 37 no. It does so without any form of stated reasoned justification. (Leos North London Ltd)
* Site 950 - Norfolk House, 1-28 Wellesley Road- No up-to-date evidence underpinning the retention of the listed building; Indicative capacity of 700-900 proposed homes for the site within the Site Allocation. (SKM Croydon Limited and KS Croydon Limited)
* Site 201 Lidl, Easy Gym and Car Park - The proposed educational use is undeliverable as well as unjustified based on the latest evidence; A mix of residential and the existing retail uses on site is considered a more appropriate and deliverable mix. (Folgate Estates)
* Site 30, Purley Leisure Centre- The proposed development at Purley Leisure Centre includes an Integrated Retirement Community comprising 180 Specialist Older Persons Housing (SOPH) units, 40 Care Accommodation units for Older Persons and associated communal facilities. There is a significant potential for additional homes to be supported on the site, to support the Council’s emerging vision for the Borough and meet the Council’s housing targets. (Polaska Assets Limited)
* Site 34- Land Bounded By George St, Park Lane, Barclay Road and Main London To Brighton Railway Line- The site allocation is modified to increase the residential capacity and allow for the delivery of retail uses. (Croydon Developments Ltd.)
* Site 172- North Site, Ruskin Square -The reference to an indicative number of 158 homes on the site, may be the least the site could deliver. The site is located within the tall building zone and suitable for a tall building, delivering a significant quantum of residential unit. (Croydon Gateway Limited Partnership)
* Site 945 - This site should be categorised as retail in order to serve the increased local population and provide them with the option of shopping locally.
* 163 Brighton Road - should not be considered for conversion to residential purposes. (East Coulsdon. Hartley and District, Old Coulsdon and Coulsdon West RAS)
* Site 306- The Good Companions Public House Site -Objection to the revised allocation to deliver a wholly residential scheme on the site at any point in the future(Lidl GB Ltd).
* Site 504 - Stroud Green Pumping Station, 140 Primrose Lane - This site is part of a green chain, is clearly distinguishable from the built-up area surrounding it and contains features of nature conservation and habitat interest and meets the criteria for designation as Metropolitan Open Land. (CPRE London).
* Site 8- Motor Village Croydon, 121 Canterbury Road -The evidence shows that no mixed-use development at the site involving residential-led development with ground floor employment use is viable(Hold My Bricks).
* Site 522 - It is noted that the Wandle Car Park Site is not allocated for development in the Local Plan, despite being included at the Regulation 18 stage. It is understood that the allocation has been removed as no developer interest was received by the Council in the previous consultation. (Primevest Capital Partners)
* Site 374- Reeves Corner former buildings- Flexibility should be incorporated into the wording of proposed use by expanding it to include alternative residential products; Old Palace Senior School site’s prominent, highly sustainable location within the Metropolitan Town Centre makes it suitable for appropriate alternative uses in the future, which could be through redevelopment or sensitive conversion. (John Whitgift Foundation)

General Comment - Designated sites 60 and 372 have been removed, even though the “leisure, community, health and educational” facilities included in these sites have not yet been delivered. Site 357 Norwood Heights Shopping Centre -Any redevelopment should be in keeping with the community use and the green space; Changes to be made to description of option and justification of option.

***Appendix 8 – Delivery Matrix***

No comments.

***Appendix 9 – Monitoring Framework***

GLA -suggest monitoring of SIL alongside the four tier approach.

Other - Monitoring housing delivery and consented applications against housing target is currently inadequate

# 4 Appendices

Appendix 1-Regulation 18

*Introduction*

This appendix sets out how Regulation 18 was undertaken in November 2019;

1. which bodies and persons the local planning authority invited to make representations and how,
2. a summary of the main issues raised by the representations made pursuant to regulation 18 and how any representations made pursuant to regulation 18 have been taken into account;

*The Council published the Local Plan Issues and Options Consultation Document (IOCD)for consultation on 8th November 2019, under Regulation 18 of the of the Town and Country Planning (Local Planning) (England). The Issues and Options Consultation was held from 8th November 2019 to 13th January 2020.*

*A* [*scoping report*](https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20Local%20Plan%20Sustainablility%20Appraisal%20Scoping%20Report%20November%202019.pdf) *was prepared that presents a suggested scope for the SA which statutory consultees were asked to provide comment on. This report is also published for consultation more widely.*

*1)* *Who was consulted under Regulation 18 and how that was undertaken?*

*Upon publication, a formal notification letter or email was sent to statutory consultees(list provided in schedule 1), those identified or registered as interested parties, members of the public or organisations on the LDF database to invite them to make representations on the consultation. Consultation documents, in accordance with the SCI, were made available on the Council's website and available at public libraries and the Council offices. In addition, Council’s Social Media pages, Press Releases, Newspaper adverts, magazine, posters, shopfront displays and school bulletins were used to inform the community about Reg 18. Consultation. Pop up events on High streets, Urban Room consultation, schools visits, Residents Association meetings and stakeholder workshops were also organized to contribute to the consultation.*

*See Schedule 1 and 2 at the end of this section for a full list of those contacted and consultation undertaken including full details of the consultation methods undertaken.*

*.*

*2)* *Summary of main Issues raised through the Regulation 18 consultation in Plan order including the Council response/action*

*Strategic Options*

*The three Strategic spatial options attracted responses with strong opposition against option 3 (Urban area, Purley Way and Green Belt release). The comments made on options 1 (Urban area plus smaller Purley Way) and option 2 (urban area and large Purley Way) were generally observations about the advantages and disadvantages of the approach and reflected upon the consultation material. Option 2, Purley Way attracted support. There were 13 themes in addition to spatial options and all generated answers with the homes and environment and climate change attracting the most comments.*

*Environment and climate change*

*Support for the Council’s Climate Change emergency declaration and Citizen’s Assembly, but want to see action. Comment that it is vitally important to maintain the quantity and improve the quality of all the borough’s green spaces, including gardens, parks, allotments and woodlands. Remove cars and much of the private parking in central Croydon. There was widespread support for a stricter SUDS policy to help minimise flood risk. There was a lot of comments indicating conflict between building more homes / intensifying land in town centres and the fight against climate change.*

*Green grid and local green space*

*Concern with the need to protect local character whilst supporting intensification. Highlighting the need to identify where tall buildings would be suitable. Whilst encouraging the regeneration of the Purley Way, there is a need to conserve historic elements sympathetically, including industrial relics. Clearer definitions of the types of change or protection that are set out were considered to be required.*

*Transport*

*Transport improvements should be in tandem with development proposals. Less car use in the south of the borough would be difficult due to limited public transport provision and the topography does not easily lend itself to cycling - bus/tram improvements welcomed. Concentrate development including higher density type development around transport nodes. To achieve less car usage it means improving the “bus experience” as bus services are not adequate. In wanting less car use, have the logistics been thought through.*

*Parking*

*There needs to be at least 1 parking space per dwelling as the borough, the south in particular has poor public transport. Car free and reduced parking provision in the centre of Croydon where there is good public transport. Should be alternatives to the private car including suggestions of; car clubs, bike share schemes, on demand buses/transit. Support for disabled parking. Call for innovative bike parking and bike rental schemes to increase provision, especially in the town centres.*

*Brighton main line upgrade and East Croydon station*

*General support for the project to address congestion and Croydon bottleneck. Good accessibility and connection across all transport modes at the node is essential. Concern the current proposals focus on the station only. A new station should operate as a destination with attractive and viable ancillary spaces and uses. The project should be the catalyst for inward investment – both commercial and residential. There needs to be more clarity regarding the funding, delivery and mitigation*

*Homes*

*The Council should be providing all types of housing including single-level homes (for down-sizing) and family homes (semi-detached with amenity space) for a long-term and attractive housing market. The Council should re-consider their housing target numbers given the changes made in the London Plan by the Planning Inspectors. Larger / high density buildings should be confined to district centres or within short walking distances of public transport nodes and services / facilities. Previously developed and brownfield land should be the priority for flatted developments (the policy of replacing a detached property in a residential location with small flatted developments is not supported. Community-led, self-build, HMOs and build-to-rent need to be highlighted in policy.*

*Affordable housing*

*Viability assessments are still needed for individual sites. Policy on tenure mix should allow flexibility in the mix and types on individual sites. Local Plan should adopt the London Plan threshold approach. Contributions on small sites may be contrary to national policy and render them unviable. A changed approach to AH is needed as reliance on private developers and windfall sites will not meet targets.*

*Employment*

*Use of brownfield land for business development and support for retaining Croydon’s industrial land. Co-locating - if housing and employment are located in close proximity, need to establish what is acceptable for new development in terms of noise, insulation measures, etc. and impact of disturbance during construction. Encourage small/medium sized start-ups/incubator units – providing modular businesses. (Suggestions also of non-planning matters such as reduced business rates to attract/facilitate new businesses into the borough). Co-locating uses - mixed use development offers opportunities for business/housing development, and the combination of uses proposed at Purley Way could be a model elsewhere, with the option of a true mix of uses in the Croydon Opportunity Area. With loss of employment buildings, how do you increase employment opportunities – suggestion of environmentally/ economically positive policies which encourage high quality employment floorspace/business into Croydon, in the best locations.*

*Retail*

*Retail chapter should recognise the proposals for the Whitgift centre. Whitgift proposals have stalled – what are the alternative proposals for this area. Importance of maintaining district centres (range of uses, reason to go there, etc.) as these centres are often in competition with other centres, out of town, and centres outside the borough. Changing face of the high street – flexibility to address vacancy rates, such as permitting community facilities, health, mixed use, forms of employment, etc. Need more housing in town centres for vibrancy.*

*Housing design*

*A need for greater consideration of fire and safety standards within planning applications. Consider an added commitment to addressing the climate crisis through housing design policies with an emphasis on passive design principle, fabric first approach, biodiversity and sustainable technologies. Can this be both incentivised as well as regulated? Policy should look to improve the communal experience and amenity of multi unit developments; include inclusive design principles, design for multigenerational buildings (HAPPI Principles), minimum standards for semi private external spaces and quality of environments. Improve the quality and standards for family units within flatted developments especially on small sites where existing family homes are being removed. Greater importance should be given policy supporting high quality design of landscape and public realm surrounding new developments.*

*Urban design and local character*

*Concern with the need to protect local character whilst supporting intensification. Highlighting the need to identify where tall buildings would be suitable. Whilst encouraging the regeneration of the Purley Way, there is a need to conserve historic elements sympathetically, including industrial relics. Clearer definitions of the types of change or protection that are set out are required.*

*Community facilities -general*

*Additional health and education facilities are required in the borough. Easily accessible health provisions (GPs, A&Es) within a specified walking distance. There is a lack of community facilities to accommodate the increasing population and housing in the borough. Decent facilities for the youths of the borough - more youth clubs, increase the facilities like sports centres, swimming baths, cinemas. Better choice and availability of these facilities.*

*Statutory Consultees -All providers sought further work to identify capacity and future needs as a result of new development. Specific additional comments are:*

*Department for Education - new schools should have provision for expansion, as provision for schools in the future may change DfT recommends that specific developer contributions to increase capacity should be identified.*

*Environment Agency – consider the capacity and quality of systems, considering major developments identify the capacity requirements and that supply infrastructure can support the planned growth.*

*London Borough of Sutton – consider sites in Croydon to meet burial space needs and for Purley Way development, ensure sufficient infrastructure capacity is identified.*

*Police – infrastructure required through Section 106 is not limited to buildings.*

*NHS Croydon – assess and provide for the health impacts of development to maximise benefits as per the approach in the London Plan to create a healthy city.*

*Sport England – the approach should support improvements to low-quality facilities, no facilities should be lost, further clarification about the strategic need for a new leisure centre.*

*4) Conclusion*

*3050 comments were received from 773 respondents. Prior to the Regulation 18 Consultation, between May and November 2019, the Council sought information from the community to support the Local Plan Partial Review, namely to receive nominations for site allocations and information for Local Green Space designation.The Council/Authority has met the requirements of the required regulation 18 requirements with reference to the relevant Statement of Community Involvement.*

*Schedule 1: Details of the consultation contacts*

*Statutory bodies consulted for as part of the Reg.18 consultation*

* *Natural England*
* *Highways England*
* *Thames Water*
* *National Grid*
* *Environment Agency*
* *Historic England*
* *Sutton and East Surrey Water plc*
* *Network Rail*
* *Transport for London*
* *NHS Croydon CCG*
* *Network Rail Infrastructure Limited*
* *Department for Education*
* *Sport England*
* *Met Police*
* *Greater London Authority*
* *London Borough of Merton*
* *Reigate & Banstead Borough Council*
* *London Borough of Sutton*
* *Tandridge District Council*
* *London Borough of Lambeth*
* *London Borough of Bromley*
* *London Borough of Southwark*
* *Surrey County Council*

*Other consultees*

* *those identified or registered as Residents Associations, interest groups, members of the public or organisations on the LDF database*

*Schedule 2: Details of the consultation methods undertaken.*

|  |  |
| --- | --- |
| ***Method*** | ***Detail*** |
| *Croydon Website* | *The Local Plan Partial Review webpage was updated to contain the consultation documents and details of how to make a representation as well as all events and workshops and provide a link to the online survey platform* |
| *Email* | *Sent to:*   * *Statutory consultees* * *Local Development Database registered people* * *Residents Associations*   *Small/Medium Developers* |
| *Letter* | *Sent to Local Development Database without registered email address.* |
| *Council’s Social Media* | *Various posts across all Council channels: Twitter, Facebook and Instagram* |
| *Press Release* | [*8 November 2019*](http://news.croydon.gov.uk/consultation-on-croydons-local-plan-review-begins/)*,* [*10 December 2019*](http://news.croydon.gov.uk/still-time-to-have-your-say-on-local-plan-review/) *and* [*8 January 2020*](http://news.croydon.gov.uk/feedback-deadline-extended-on-local-plan-review/) |
| *Other means of marketing* | *Newspaper Advertisement , Your Croydon Magazine , Schools Bulletin, Shopfront display at the Croydon Art Store and floor tiles within the Whitgift Centre* |
| *Pop-up stalls in markets and on the high street* | *Council staff hosted stalls at various markets and on high streets in order to be publicly available for information, discussion and to receive feedback on the Local Plan Partial Review.  The markets were chosen to publicise the Local Plan Partial Review to those in the community who may not otherwise engage with the Council or hear of consultations by online methods. Pop-ups were held at the following locations*   * *Surrey Street, 8 November 2019* * *Crystal Palace Farmers Market, 9 November 2019* * *South Norwood Community Clocktower Market, 7 December 2019* * *Brighton Road, Coulsdon, 13 November 2019* * *London Road, Norbury, 20 November 2019* * *High Street, Purley 26, November 2019* * *Addington Road, Selsdon, 4 December 2019* * *Lower Addiscombe Road, Addiscombe, 11 December 2019* |
| *Posters* | *Posters, including translated posters in Hindi, Urdu, French and Polish displayed at:*   * *Libraries within the Borough and Retail outlets, such as cafes, barbers, supermarkets, gyms etc. on main streets in; Addiscombe; Coulsdon; Thornton Heath; South Norwood; Norbury; Purley; New Addington; Selsdon.* |
| *Leaflets* | * *Leaflets were handed out at pop-up events and left in retail locations and libraries* |
| *External media* | * *Newspaper article* * [*Croydon Guardian article*](https://www.yourlocalguardian.co.uk/news/18033021.consultation-launches-croydons-local-plan/)*, 13 November 2019* * *Migrants Bureau social media* * *VU.CITY social media post* * *Develop Croydon’s Newsletter* |

Appendix 2- Regulation 19 undertaken in January 2022

*Introduction*

*The Council published the Local Plan Submission document for consultation from 6th January 2022 to 17th February 2022 pursuant to Regulation 19 of the of the Town and Country Planning (Local Planning) (England).*

*1)* *Who was consulted under Regulation 19 and how that was undertaken?*

*Upon publication, a formal notification letter or email was sent to, statutory consultees, members or public or organisations to invite them to make representations on the consultation document. Consultation documents were made available on the Council's website and available at public libraries and the Council offices in accordance with the SCI. In addition, Council’s Social Media pages, posters and press releases were used to advertise the publication.*

*2)* *Main Issues raised in Plan order including the Council response/action*

*The following is a summary of changes as a result of the first Regulation 19 consultation. This is organised by Local Plan Chapter*

*General Changes*

*• Reference to the Detailed Policies and Proposals of the Croydon Local Plan will be removed.*

*• Population data from 2021 Census to be incorporated*

*• Removed Reference to Strategic Objectives and Strategic Policies before Development Management Policies.*

*Chapter 3 – We are Croydon (The Spatial Strategy)*

*• Update the housing numbers to align with the London Plan’s housing target*

*• Ensure that the numbers in Table 3.1 align with the numbers in Policy SP1*

*Chapter 4 – Homes*

*• Amend the strategic affordable housing target to 50% in order to align with the London Plan*

*• Include reference to the GLA’s definition of “Genuinely affordable” in SP2.5*

*• SP2.5: Remove “exceptional circumstances” and replace with wording concerning “where viability testing shows that the full policy compliant affordable housing amount cannot be achieved on-site…”*

*• SP2.5 – Make clear the policy choices when target affordable housing on-site cannot be achieved.*

*• Align SP2.5(c) to accept in perpetuity as well as cash payments*

*• Para 4.33 – expand to include reference to people with dementia.*

*• Review the 250m minimum distance between LSPBSL developments (saturation/ overload point)*

*• SHMA Update is required. SHMA Update needs to:*

*o Provide evidence on the relative importance of delivery of PBSA & LSPBSL in the borough.*

*o Address differences in need for affordable housing targets between traditional and older peoples housing typologies.*

*o Update housing mix recommendations*

*• DM2A.1 (a) – Revise wording to acknowledge the primacy of self-contained residential products, and introduce a test that acknowledges the quantum of self-contained residential units as a consideration when determining applications for LSPBSL.*

*• The size range for LSPBSL units should be expanded to 18-33m2 to accord with the London Plan guidance.*

*• Need to discuss First Homes with GLA.*

*• Reference to the Registered Provider will be removed as Intermediate products do not need to be managed by one.*

*• Ensure that 3 registered providers confirm that affordable housing cannot be delivered on-site before an off-site contribution is considered.*

*• Add policy support for the protection of family housing stock in areas where there is not potential to grow this size of unit through redevelopment.*

*• Para 4.5 - Remove reference to exceptional circumstances, and replace with a general exceptions position for when the policy cannot be achieved.*

*Chapter 5 – Employment*

*• Clarify that both non-SIL Tier 1 employment and Tier 2 employment assets fall under the London Plan LSIS designation.*

*• Add CEZ to Policies Map*

*• Amend Table 5.13 to reflect range of uses in London Plan Policy E4(A)*

*• Delete repetition in Para 5.94.*

*• Align affordable workspace policy with London Plan.*

*• Remove G&T from acceptable SIL uses*

*• Consider mechanism for securing affordable workspace.*

*• Add 71-79 Mitchley Avenue into borough’s shopping parades*

*• Reinstate Primary & Secondary shopping frontages into the Policy*

*• Change ‘other community facilities’ to ‘community facilities’ in Table 5.13*

*• Purley Rail Depot site to be marked as Integrated Industrial Site*

*Chapter 6 – Urban Design*

*• Identify areas suitable for tall building in line with London Plan Policy D9.*

*• Amend tall building definition to be in line with London Plan.*

*• Remove intensification areas and relevant referencing from the Plan.*

*• DM15 g - Change the wording to “seeking to minimise negative impact, and where possible improve all surrounding….”*

*• Add DM17. 4 “have regard to the setting of heritage, design and conservation designations adjoining the borough boundary in neighbouring boroughs”*

*• Introduce support for retrofitting energy efficiency infrastructure into older building stock.*

*• Introduced criteria-based wording to support the delivery of small sites housing target set in Policy H2 of the London Plan.*

*• Add Sport England’s Active Design Guidance to the key supporting documents*

*• Add Historic England’s Advice Note 4 of Tall Buildings to the key supporting documents*

*Chapter 7 – Community Facilities*

*• SP5.3b – Add wording to support the expansion of existing facilities*

*• DM19.2d - Change from town centre use to main town centre use.*

*• Reference to education on the Heath Clarke site removed.*

*Chapter 8 -Sustainable design and construction*

*• Paragraph 8.5 - include Mitchley Avenue as a place of significant episodes of surface water flooding.*

*• Paragraph 8.7 - Add ‘and the creation of new ponds and open water sites’, after ‘are delivered’.*

*• Paragraph 8.8 – Rewrite to include clay being the predominant soil.*

*• Paragraph 8.11 should be amended to clarify that the site is allocated as a safeguarded waste site.*

*• Paragraph 8.34 to be modified as ‘In addition, any new basement development connected to the sewerage network shall be fitted with a positive pumped device to protect the basement from the risk of sewer flooding.’*

*• SP6.5 c - Amend wording to "...enhancing landscape, biodiversity, heritage and culture..."*

*Chapter 9- Green Grid*

*• Use the term “Local Green Spaces” instead of ‘Very Special Community Green Spaces’*

*• SP7.3e – Add reference to including consideration of the use of locally sourced native species*

*• Table 9.1b -Update Table 9.1b align with the London Plan (change 200m to 400m)*

*• DM 28d - Additional text to be included - where development is close to ancient woodland, hedgerows or veteran trees, an appropriate woodland buffer, or root protection area for individual trees, will be specified.*

*• Table 9.2 – Specify type of SINC*

*• SP7.4 - Include Sites of Importance for Nature Conservation, Local Nature Reserves, National Nature Reserve, Sites of Special Scientific Interest, Locally Important Geological Sites, etc under SP7.4a*

*• SP7.4 g -Include reference to biodiversity net gain*

*• Include reference to priority species in DM27e & Para 9.33*

*• Paragraph 9.38 – Replace the London Tree and Woodland Framework with London Urban Forest Plan (2020)*

*Chapter 10 – Transport & Telecommunications*

*• SP8.6 – Reinstate Parts a-I, and remove text that is explanatory, not policy.*

*• SP8.7 – Reinstate policy wording.*

*• SP8.8 Add text “Support the improvement to the quality, accessibility and safety of tram stops and tram facilities to make the network easier to use and more attractive for all”.*

*• SP8.9 re-insert deleted text “Facilitate ‘Metroisation’ of South London’s rail services*

*• Update SP8.10 (d) to “Improve bus journey times and reliability, with particular focus on orbital services”*

*• SP8.15 amendment: “Car free development will be encouraged required in Centres where there are high levels of that are PTAL 3+.*

*• Para 10.10 - Remove reference to the Croydon Corridors Improvement Study.*

*• Para 10.15 – Add wording setting out the current set of bus improvements.*

*• Para 10.17 – Reinstate wording.*

*• Include reference to cumulative impact*

*• DM30.3 Amend to “Where motorcycle parking is provided, it should be in Provide a dedicated area for motorcycle parking with ground anchors. (in any location in the borough).”*

*• DM30.4 Amend to “Ensure that there is not a significant detrimental impact on the movement of pedestrians, cycles, walking, cycling, public transport and emergency services due to the provision of car parking.”*

*• Ensure wording that makes all new routes publicly accessible, 24 hours per day is included*

*• Include reference to the GLA’s healthy streets approach.*

*Chapter 11 – Places*

*• Remove Intensification Areas from Maps*

*• Remove Intensification Areas from text*

*• Update allocations, including capacities, taking into account recent permissions.*

*Broad Green & Selhurst*

*• Site 13 – Change Industrial/ Warehousing use to “Employment”*

*Croydon Opportunity Area*

*• Review capacity of sites in the Croydon Opportunity Area to optimise density in this area.*

*• Sites will be clearly identified whether they fall into either of the Transformation Areas within the town centre.*

*• Site 142 – Update to reflect granted planning consent (Appendix 7).*

*Kenley & Old Coulsdon*

*• Include a range of minor referencing updates.*

*Purley*

*• Clarify status(s) of Purley Depot Site allocation 324 – note the error was in Appendix 7*

*Sanderstead*

*• Reference will be amended to reflect how character changes as Limpsfield Road moves from a local centre to a rural road.*

*Chapter 12 – BML/ East Croydon*

*• Continue to engage with partners to ensure latest CARS position is referenced in the document*

*• Ensure that a flexible policy position is retained to deliver a satisfactory outcome around East Croydon whether or not CARS goes ahead within the Plan period.*

*Chapter 13 – North End Quarter*

*• Revise to reduce repetition within the chapter.*

*• Relocate Sites 393 & 220 into this Chapter from the Croydon Opportunity Area Chapter.*

*• Ensure that the total open space interventions in the area accord with other policies in the Plan (i.e. the Green Grid policies)*

*• Clarify that not all applications will be able to deliver all policy outcomes for the area, but rather it is important that they are able to justify making a contribution to meeting the overall objectives for the area, including through reference to area-wide masterplanning work.*

*• Produce a quantum for retail and other uses within the centre (either here or in the COA chapter)*

*Chapter 14 – Purley Way*

*• Engage with Ikea with the aim of making the allocation a long term, master planned approach which does not compromise their short term aspiration.*

*• SP1.1e, para 14.33, Site Alln16 – Site allocation & capacity needs updating to include the residential permission in place of the school.*

*• Site 153 – Consider removal of SIL designation*

*• Morrisons – Include reference to parking being consolidated to reduce land take as part of mix of uses on the site.*

*• Check capacities, trajectory, and complementarity between allocation capacities.*

1. *Conclusion*

*8000 responses were received from 846 respondents. As demonstrated above the London Borough of Croydon has fulfilled the requirements of regulation 19 as par of the preparation of the revised Local Plan in accordance with the Statement of Community Involvement.*

*Schedule 1: Details of the consultation undertaken*

*Statutory bodies consulted for as part of the Reg.19 consultation*

* *Natural England*
* *Highways England*
* *Thames Water*
* *National Grid*
* *Environment Agency*
* *Historic England*
* *Sutton and East Surrey Water plc*
* *Surrey County Council*
* *Network Rail*
* *London Borough of Lambeth*
* *Transport for London*
* *NHS Croydon CCG*
* *London Borough of Bromley*
* *Reigate & Banstead Borough Council*
* *London Borough of Sutton*
* *Network Rail Infrastructure Limited*
* *Greater London Authority*
* *London Borough of Merton*
* *Department for Education*
* *Sport England*
* *Met Police*
* *Tandridge District Council*
* *UK Power Network*
* *London Borough of Southwark*

*Other consultees*

*those identified or registered as Residents Associations, interest groups, members of the public or organisations on the LDF database*

*Schedule 2: Details of the consultation methods undertaken*

|  |  |
| --- | --- |
| ***Method*** | ***Detail*** |
| *Croydon Website* | *The Local Plan Partial Review webpage had on it the Reg.19 consultation documents and details of how to make a representation including a link to the online survey platform* |
| *Letter* | *Sent to Local Development Database without registered email address.* |
| *Email* | *Sent to:*   * *Statutory consultees* * *Local Development Database* * *Residents Associations* * *Small/Medium Developers* |
| *Council’s Social Media* | *Various posts across all Council channels: Twitter, Facebook and Instagram* |
| *Press Release* | *Was released announcing the consultation* |
| *Posters* | *Posters displayed at various libraries within the borough* |

Appendix 3- Regulation 19 undertaken in July 2024

* 1. *Introduction*

*The Council published the Local Plan Submission document for consultation on 1st July, 2024 pursuant to Regulation 19 of the of the Town and Country Planning (Local Planning) (England). The Plan was subject to 6 weeks of consultation.*

*2) Who was consulted under Regulation 19 and how that was undertaken?*

*Upon publication, a formal notification letter or email was sent to statutory consultees, members or public or organisations to invite them to make representations on the consultation document. Consultation documents were made available on the Council's website and available at public libraries and the Council offices in accordance with the SCI. In addition, Council’s Social Media pages, posters and press releases were used to advertise the publication.*

*3) Main Issues raised in Plan order including the Council response/action*

*The main issues raised in the Reg.19 consultation and the details can be found in Section 3 of this document.*

*As demonstrated above the London Borough of Croydon has fulfilled the requirements of regulation 19 as part of the preparation of the revised Local Plan in accordance with the Statement of Community Involvement. The total number of representations received were 124 and shown per chapter and type are as follows.*

|  |  |  |
| --- | --- | --- |
| **CHAPTERS** | **PUBLIC REP** | **DtC** |
| 1 | 5 | - |
| 2 | 2 | - |
| 3 | 51 | 7 |
| 4 | 89 | 8 |
| 5 | 17 | 9 |
| 6 | 44 | 39 |
| 7 | 18 | - |
| 8 | 21 | 3 |
| 9 | 67 | 1 |
| 10 | 22 | 44 |
| 11 | 40 | 17 |
| 12 | 7 | 5 |
| 13 | 34 | 3 |
| 14 | 19 | 10 |
| Appendix 1 | 1 | 2 |
| Appendix 5 | - | 1 |
| Appendix 7 | 45 | 23 |
| Appendix 9 | 1 | 1 |
| Miscellaneous | 12 | 6 |
|  | 495 | 179 |

*Schedule 1: The following are the details of the statutory bodies consulted as part of the Reg.19 consultation*

* *Natural England*
* *Highways England*
* *Thames Water*
* *National Grid*
* *Environment Agency*
* *Historic England*
* *Sutton and East Surrey Water plc*
* *Surrey County Council*
* *Network Rail*
* *London Borough of Lambeth*
* *Transport for London*
* *NHS Primary Care Trust*
* *London Borough of Bromley*
* *Reigate & Banstead Borough Council*
* *London Borough of Sutton*
* *Network Rail Infrastructure Limited*
* *Greater London Authority*
* *London Borough of Merton*
* *Department for Education*
* *Sport England*
* *Met Police*
* *Tandridge County Council*
* *London Borough of Southwark*
* *UK Power Network*
* *Southern Gas Network*
* *Royal Borough of Kingston*
* *Civil Aviation*
* *Office of Rail Regulation*

*Schedule 2: Details of the consultation methods undertaken*

|  |  |
| --- | --- |
| ***Method*** | ***Detail*** |
| *Croydon Website* | *The Local Plan Partial Review webpage had on it the Reg.19 consultation documents and details of how to make a representation including a link to the online survey platform* |
| *Letter* | *Sent to Local Development Database without registered email address.* |
| *Email* | *Sent to:*   * *Statutory consultees* * *Local Development Database* * *Residents Associations* * *Small/Medium Developers* |
| *Council’s Social Media* | *Various posts across all Council channels: Twitter, Facebook and Instagram* |
| *Press Release* | *Was released announcing the consultation* |
| *Posters* | *Posters displayed at various libraries within the borough* |