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Please ask for/reply to Shifa Mustafa

Our Ref: SM/AL/0014
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Dear Sir / Madam,

Draft New London Plan

Thank you for the opportunity to provide our comments on the Draft New London Plan. This letter contains the response of Croydon Council to the draft Plan.

There is much to be welcomed and supported in the Draft New London Plan. It is both bold and ambitious and Croydon Council welcomes this. The Mayor's Good Growth vision echoes Croydon Council's own vision for Sustainable Growth of the Suburbs set out in the Croydon Local Plan 2018. We agree that dealing with the projected population growth of London and the current housing crisis are some of the biggest challenges of our time. Croydon Council looks forward to working with the Mayor on trying to tackle the challenges and embrace the opportunities that it brings; to deliver sustainable growth of the suburbs in Croydon. We particularly welcome the ambition to deliver more affordable housing as we recognise that affordability is one of the biggest issues facing London in 2018. Croydon also welcomes the vision to make London (including Croydon) a cleaner, greener city.

The Council also welcomes the fact that Croydon Metropolitan Centre has been identified as a Strategic Outer London Office Location reflecting its importance to the sub-region as well as its potential for growth.

It is further welcomed that the growth potential of the Croydon-Sutton-Wimbledon tram corridor has been identified in the Draft New London Plan. The Council has similarly identified it as such in the Croydon Local Plan 2018 and hopes that, working together with the Mayor, its growth potential can be realised.

Notwithstanding the above, the Council asks the Mayor to reflect whether the content of the Draft London Plan is all strategic in nature and in places too detailed as a strategic plan. However, taking together the Draft New London Plan and the Croydon Local Plan 2018, Croydon Council looks forward to working with the Mayor to enable and deliver his, and our own, vision for growth in the borough.

Croydon Council's detailed comments on the Draft New London Plan can be found in the attached appendix to this letter.

Yours faithfully



Shifa Mustafa
Executive Director – Place

Croydon Council's detailed comments on the Draft New London Plan

Chapter 1 – Good Growth

As a general comment, the different structure of this chapter compared to other chapters of the Draft New London Plan make it more difficult to use. **There should be a consistency across the London Plan with policies and their supporting text appearing in the same order in each chapter.**

Policy GG1 Building strong and inclusive communities

As a diverse borough, Croydon recognises the importance of achieving the aims of Policy GG1.

Policy GG2 Making the best use of land

The broad thrust of Policy GG2 is in line with the new Croydon Local Plan 2018 with GG2(A), GG2(C) and GG2(D) echoing the strategic approach to growth in Croydon.

However, whilst the need to intensify and make the most efficient use of land is supported, this needs to be sensitive to the local context, including all relevant Local Plan designations. High density development may not be appropriate in every District Centre which have different levels of anticipated growth as identified in Appendix 1. The application of a design-led approach needs to be clearly articulated so as not to promote development that is incongruous/inappropriate to District Centres which would be contrary to the principles of good growth. **Part C highlights the importance of understanding what is valued about places and strengthening London's character however it is not clear how this should be taken into account. It is considered that there is scope to provide further clarification about this and/or cross reference relevant design policies to assist with this, including local design and policies and evidence to be relied on.**

Regarding GG2(E), Croydon Council makes further comments under Policy T1 on the challenges facing Croydon in achieving the 80% mode share by sustainable transport.

Policy GG3 Creating a healthy city

The broad thrust of Policy GG3 is in line with the new Croydon Local Plan 2018. Our new Local Plan was supported by a Health Impact Assessment and includes a similar policy on promoting healthy communities.

Croydon Council offers support in principle to the healthy streets approach outlined in Policy GG3(C) with more detailed comments provided under Policy T2.

Croydon Council supports Policy GG3(G) which provides further weight to the Croydon Local Plan 2018 own policies on restricting development of hot food takeaways that sell unhealthy food.

Policy GG4 Delivering the homes Londoners need

The overall aims of this policy are supported. Detailed comments about how it is to be implemented are found in our comments on Chapter 4 Housing.

Croydon Council queries how Policy GG4(E) is to be implemented? Are early stage reviews of schemes that have affordable housing, the only mechanism that the Mayor proposes for implementing the Policy GG4(E)?

Chapter 2 – Spatial Development Patterns

Key Diagram

The boundaries of Green Belt and Metropolitan Open Land in Croydon have been changed in the Croydon Local Plan 2018. The Key Diagram will need to reflect those changes. Overall over 11ha of land has been added to Green Belt and Metropolitan Open Land. A GIS file of the revised boundaries can be provided.

Policy SD1 Opportunity Areas

In reference to the Policy SD1(B)(10), the Croydon Local Plan 2018 identifies capacity for up to 4,100 homes along the Purley Way corridor alongside the Strategic Industrial Location. The area predominantly consists of low density retail sheds (which are located outside of the Strategic Industrial Location) and has been identified as a potential growth area in the borough. Coupled with the intensification of the Strategic Industrial Location and growth along the tram corridor to Wimbledon, it has the potential to be a new cross-borough Opportunity Area.

It is noted that Figure 2.4 shows the extent of the influence of a potential Bakerloo Line extension as extending to East and West Croydon seemingly along the tram lines from Beckenham Junction and Elmers End. In Croydon Council's response to the initial Bakerloo line extension consultation, the Council suggested that the obvious choice after Bromley for extending the Bakerloo Line was the Croydon Metropolitan Centre. Does Figure 2.4 suggest that TfL is considering this? What is Croydon Council expected to do in response to this figure appearing in the London Plan? It is noted that Figure 2.4 has no relation to Figure 50 in the Mayor's draft Transport Strategy which indicated a limited role for the Bakerloo Line extension supporting homes and jobs but a major role for Tramlink. Is the shape of the Bakerloo Line extension diagram based on the Tram network and if so is it repeating the error in the Mayor's Transport Strategy Figure 50 that there is not much developable land (within the urban area) near many of the tram stops (beyond small sites covered by Policy H2 of the Draft New London Plan)?

The Trams Triangle/London-Gatwick-Brighton mainline section makes no mention of the Brighton Mainline. Paragraph 2.1.69 only refers the reader on to Strategic Infrastructure Priority (see Figure 2.15 (9))' but then this does not say what the priority is. There is only one mention of upgrading the Brighton Mainline and this is 'Brighton Mainline Upgrade (higher frequencies)' in table 10.1. The Thameslink programme does little in south London to support future growth. It deals with existing demand. Without upgrading the Brighton Mainline and removing the major bottlenecks including at East Croydon Station, no more trains can be run on the line. Fortunately, central government is currently providing the funding to take the Upgrade scheme through to Transport and Works Act Order application stage. **Figures 2.1, 2.12 etc. showing Thameslink through East Croydon needs to be changed to show 'Upgraded Brighton Mainline'.**

In the Trams Triangle, the Croydon Local Plan 2018 identifies capacity for up to 4,100 homes along the Purley Way corridor alongside the Strategic Industrial Location. The area predominantly consists of low density retail sheds and has been identified as a potential growth area in the borough. **Coupled with the intensification of the Strategic Industrial Location and growth along the tram corridor to Wimbledon, it has the potential to be a new cross-borough Opportunity Area.**

Figures 2.4 and 2.12 – The boundaries of Green Belt and Metropolitan Open Land in Croydon have been changed in the Croydon Local Plan 2018. Fig 2.4 and Fig 2.12 will need to reflect those changes. Overall over 11ha of land has been added to Green Belt and Metropolitan Open Land. A GIS file of the revised boundaries can be provided.

Policy SD2 Collaboration in the Wider South East

Croydon Council notes and agrees with the comment in 2.2.8 that locally-specific cross-border matters between individual London boroughs and authorities beyond London may be addressed most effectively by the relevant local authorities on the basis of their Duties to Co-operate. Croydon Council welcomes the London Plan's focus on collaborating with the wider South East. The Council believes it is crucial to work with our neighbouring counties and districts, particularly when so many of our residents travel between London and its neighbours every day for work, leisure and social reasons. Croydon Council also think it is critical that our neighbours recognise that Londoners and developers will not pay attention to administrative boundaries when looking for new homes and the Councils must work together on these issues.

Policy SD6 Town centres

Croydon Council recognises the importance of town centres and the need to maintain their vitality and viability. The new Croydon Local Plan 2018, therefore sets out in its policies a more flexible approach to land uses within main and secondary retail frontages to ensure their continued future in the light of changes to traditional shopping habits as a result of multi-channel shopping. Several District and Local Centres have also been reduced in size to address the issue of the changing nature of retail and commercial activity in town centres.

In principle, Croydon Council welcomes the approach to maximising growth both within town centres and in the areas around centres. However, whilst the potential to maximise growth within and around town centres will be a key part of trying to deliver the ambitious levels of growth in the draft plan, this should be carefully balanced with the need to respect the character and role of each town centre – some will be able to accommodate higher density development better than others. It should be for Local Plans to set Place Specific Policies to manage this growth.

However, the Croydon Local Plan 2018 also recognises that outside of main and secondary retail frontages, there may well be less demand for commercial space. In many cases commercial operations in such locations survive because of lower rental values in these locations and when sites are redeveloped, the replacement units command a much higher value, along with shells and cores needing to be fully fitted out. This results in more voids in our town centres. For this reason the Croydon Local Plan 2018 contains a policy that, within town centres but outside of designated frontages, mixed use development must either be for a specific end user on the ground floor, or guarantee a free fitting out of a shell and core, and if no end occupier has been found within two years, they must be converted to residential use (and the design of the development in the first place must accommodate this). Policy SD6(C) of the Draft New London Plan conflicts with this approach. The final part of part of Policy SD6(C) is also considered inappropriately detailed for a London-wide strategic policy. The acceptability of residential only applications in town centres outside of primary and secondary shopping frontages will depend on and need to be justified in response to local circumstances, including not undermining the core town centre functions. If it is to be retained **the Council requests that Policy SD6(C) be amended as follows to better reflect local circumstances:**

The potential for new housing within and on the edges of town centres should be realised through higher-density mixed-use or residential development, capitalising on the availability of services within walking and cycling distance, and their current and future accessibility by public transport.

Residential-only schemes in town centres ~~are often more~~ may be appropriate outside of primary and secondary shopping frontages where it can be demonstrated that they would not undermine local character and ~~commercial activity is less viable~~ the diverse range of uses required to make a town centre vibrant and viable.

Croydon Council has identified through its Strategic Housing Market Assessment that there is a need for more three-bedroom homes in Croydon, reflecting its outer London location. Current market-led development patterns in Croydon have delivered predominantly one and two-bedroom homes (over 85% of completions in Croydon since 2011). Croydon Council recognises that the traditional suburban form of development of detached and semi-detached houses needs to evolve due to the lack of land and the acute need for homes. Therefore, the Croydon Local Plan 2018 sets out a policy framework to both encourage more three bedroom homes in flatted developments in locations across the borough, not just outside of town centres, and to ensure that those developments provide adequate private amenity space for families with children. Even with this policy it is recognised that the full need will not be met (although it is also recognised that in light of under occupation it is probably only necessary to meet some of the need). In this light, in order to meet even just some of the need for three bedroom (or larger) homes in the borough, the Croydon Local Plan 2018 sets minimum levels of larger homes on schemes across the borough. This is described further in our comments on Policy H12 of the Draft New London Plan. Larger homes are needed in town centres as well as the development of sites outside of town centres cannot meet need alone, even if they provided 100% larger homes, which Croydon Council does not think is desirable given the need to boost housing supply in all areas of the borough, aid the development of sustainable communities, and provide options for people wishing to downsize near their existing homes. As such, Policy SD6(D) emphasising in particular the suitability of town centres for smaller households is unhelpful and arguably too focussed on housing numbers as opposed to developing sustainable communities. Whilst the wording of the policy does not preclude the development of a limited number of larger homes in town centres it will, in all likelihood, be utilised by parties trying to justify non-compliance with the Croydon Local Plan 2018's own policies on housing mix. This stores up problems for the future by potentially creating a shortage of three bedroom homes. This in turn makes remaining in London less attractive for families. It increases pressure on existing larger home stock in outer London boroughs making it even less affordable to families in particular. It could also increase pressure in future London Plan reviews to release Green Belt within London. **The London Plan needs to recognise that town centres can also help meet the need for larger homes if suitably designed, in order to meet the need for all types of home in London.** Otherwise the only needs that will be met are those for one and two bedroom homes. Which, given that the need for new homes is predominantly for low cost affordable rented homes, will mean that building 66,000 homes will result, not in meeting London's housing need, but in considerable unmet need for both larger and affordable homes, and an oversupply of smaller market units.

Policy SD6(E) is welcomed in conjunction with Policies E1(D)(1) and E1(E).

Policy SD6(J)'s reference to residential uses such that they can also be considered active frontages (if designed accordingly) is welcomed.

[Policy SD7 Town centre network](#)

It would be useful for boroughs to be engaged in considering how the changing role of town centres can be proactively managed in a dynamic and strategic way in order to assist with the implementation of SD7, part A. The review of the roles of centres as part of the network as a whole will require a consistent London wide data set that the GLA should lead on. Currently, London-wide health checks are produced every 5 years, however in order to proactively manage changes and identify trends more frequently updated London-wide data is likely to be required.

There is a wide mix in terms of characteristics and performance of district centres. The policy is considered to be prescriptive in encouraging consolidation of a variety of functions. In some cases,

as part of their proactive management (encouraged by part A) it may be necessary or desirable to expand or promote certain functions. **The second part of part E is also prescriptive and repetitive given the explicit reference to promoting higher density mixed use developments in policy SD6. It is considered that a more helpful and nuanced district centre approach could be worded as follows:**

'District centres should focus on ~~the consolidation of~~ providing a viable range of functions, particularly convenience retailing, leisure, local employment and workspace, whilst addressing the challenges of new forms of retailing. Opportunities for enhancing their ~~and securing opportunities to realise their potential for higher density mixed-use residential development~~ and improvements to their environment should be maximised.'

Policy SD8 Town centres: development principles and Development Plan Documents

Policy SD8(A)(3) goes beyond the requirements of the National Planning Policy Framework which only requires impact assessments for developments not in accord with an up to date development plan that have more than 2,500m² of floor space. There is also no requirement in the National Planning Policy Framework for an impact assessment for edge of centre or out of centre arts, culture and tourism developments. To require impact assessments for all town centre uses (including arts, culture and tourism) no matter the scale or whether they are edge of centre or out of centre is both going beyond the National Planning Policy Framework and disproportionate to the benefit that it will bring. There is a substantial cost, both the developers and Local Planning Authorities to preparing and assessing impact assessments. **As there is no need for the New London Plan to repeat national planning policy, Policy SD8(A)(3) can, and should, be deleted.**

Croydon Council welcomes Policy SD8(A)(4). The Council recognise that there is significant potential for growth in areas currently occupied by low density out of town retail sheds. The Croydon Local Plan 2018 includes several allocations for mixed use development on such sites. Many of these are along the Purley Way corridor previously highlighted as having potential to be part of a wider Tram Corridor Opportunity Area.

The Croydon Local Plan 2018 identifies low density retail sites and car parks in accordance with Policy SD8(B)(5)(a) and the overall policy is welcomed.

Croydon Council welcomes Policy SD8(C), in particular clause (2) which refers to situations that the Council has referred to in its response to SD6(C). However, the Council would advise that it is not usually possible to provide a basic fit out of a shell and core unit in a development as different users will have substantially different fit out needs. Nor is it possible to provide a basic fit out that is suitable for both an A1 and an A3 use. This is why the policy in the Croydon Local Plan 2018 simply seeks to secure a free fitting out instead as this overcomes this issue.

Policy SD9 Town centres: Local partnerships and implementation

Croydon Council supports the concept of non-statutory masterplans for District Centres forming design or planning briefs. However, it needs to be subject to borough's being able to determine which centres should be subject to this work, as it may not be applicable to all centres.

In relation to part A, the intention for town centres to fulfil their potential through partnership working is supported. Within town centres there can already be strategies/plans in place or being developed; this can include Neighbourhood Plans or community strategies as well as plans by BIDs. Such existing/emerging strategies need to be recognised and taken into account in considering the production of town centre strategies and in some cases they may result in their being no need for a further strategy to be developed.

Policy SD10 Strategic and local regeneration

Croydon Council questions the benefit of this policy. Requiring Local Plans to identify areas of regeneration will achieve very little in addressing issues of poverty and inequality which prevail in many areas of Croydon (and across London). Planning is a tool that can achieve many things; however, in this instance, in many cases, all it will be doing is expressing a statement of intent. There are other vehicles for doing this, not least Community Strategies. Croydon Council is also preparing regeneration and Place plans for specific parts of the borough to address issues of poverty and inequality.

There will undoubtedly be some cases where planning can make a direct difference to specific areas. The Croydon Local Plan 2018, for example, identifies particular locations where masterplans will aid the regeneration of a particular place. However, this works in locations where there are development sites that can deliver the goals of the masterplan.

In other areas where there is less obvious development potential, a Local Plan is more limited in what it can achieve. There are generic policies in the Croydon Local Plan 2018 about employment and skills training, and securing at least 20% of jobs associated with a development (both during construction and post completion) are advertised to local residents through the Council's own Job Brokerage Service. These will help to address issues of inequality and poverty in the borough but the impact is not limited to those areas with an IMD score in the bottom 20 nationally, and it would be wrong to do so. Local residents can face issues of inequality and poverty anywhere in the borough.

Croydon Council also already charges a Community Infrastructure Levy which can be used to support projects in areas with issues of poverty and inequality. However, a Local Plan policy cannot dictate that funding is directed to those areas.

Overall, the approach to addressing issues of inequality and poverty is best considered at a local level, not through the London Plan, save perhaps for a policy that says the Local Plan should try, where planning will have a direct or indirect impact, to reduce inequality and poverty within boroughs.

If the policy is to remain, the word regeneration should also be changed. Regeneration carries connotations of redevelopment (no matter what it says in the supporting text, which, it is appreciated makes clear that it does not just mean redevelopment). If the policy is about tackling inequality and poverty it should say so in the title.

Policy SD10 as drafted will not be effective in achieving what the Mayor would, rightly, like to achieve.

Chapter 3 – Design

The inclusion of a chapter for design is welcomed. Generally the chapter will help to bolster the policies within the emerging Croydon Local Plan. Most of the design policies appear to be more applicable to larger scale applications, rather than smaller applications, which is considered appropriate given the strategic nature of the London Plan and the strategic impacts larger scale developments can have. However, the design policies in the draft London Plan risk being overly detailed for a strategic level plan, stepping into local plan policy areas and may require refinement to ensure they operate at a strategic level.

Policy D1 London's Form and Characteristics

Croydon Council welcomes the introduction of a character specific policy in the Draft New London Plan as well as the inclusion of policy that steers developments to design in response to air quality, noise, greening, crime, storage for waste.

Croydon Council notes that there is a difference in wording between Policy D1(B)(4) and statutory guidance on listed buildings and Historic England guidance for heritage assets. This has potential to cause confusion.

Paragraph 3.1.9 appears to be confused between two differing concerns. The reference to changing use would usually refer to different forms of occupation of a place or building, where as the comment on lifespan of a building refers to the robustness of the materials, and not to adaptability. **A clearer link should be made between the two, or they could be separated into two different paragraphs.**

Croydon Council would welcome more detailed guidance on how buildings should be designed so that material elements can be maintained or replaced under paragraph 3.1.10. This reflects the continued shift towards prefabrication and component architecture, however it fails to recognise that a lot of very high quality architecture is more substantial/built to last in materials that cannot be easily replaced, such as poured concrete forms.

The point of designing for adaptability under paragraph 3.1.10 is repetitive of the first sentence of paragraph 3.1.9.

Policy D2 Delivering good design

Within the Croydon Local Plan 2018 and associated evidence, Croydon already responds to the majority of elements listed under D2(A). Sustainability is key within Policy D2 and is embedded within the Croydon Local Plan 2018 including optimisation/intensification of land. The response to character is welcomed and makes reference to an evaluation of the existing character; which aligns with the Borough's Character Appraisal already undertaken by Croydon Council to support the Croydon Local Plan 2018.

Croydon Council welcomes the steer towards using masterplans (particularly for intensification of town centres and the areas around them) and design codes, as well as design review, as set out in policy D2(D) and D2(F). The Council is preparing an SPD on Sustainable Growth of the Suburbs that will act as a design code for suburban growth, whilst the Croydon Local Plan 2018 has identified a number of locations where a masterplan will help guide development. Croydon Council has also set up a Place Review Panel to undertake design review in Croydon.

Policy D2(H) requires the inclusion of key detailed drawings with planning applications. Whilst in principal this is positive, to help secure design quality, this would be onerous for a lot of proposals coming forward that are of a smaller scale. **As such Policy D2(H)(1) should apply to major applications only.** However, the policy is considered positive in respect of giving importance to the conditioning of applications. **The use of 'referred matters' in D2(H)(3) is understood to be a typo and should read 'reserved matters'.** The use of architect retention clauses is anti-competitive and other means (such as conditions related to the design) should be used to secure the same objective. **Policy D2(H)(4) should be reworded to remove references to architect retention clauses. It could be replaced with a requirement to submit key details of design with the original planning application rather than relying on conditions to assess details of design that give rise to the policy on architect retention clauses.**

Policy D2 does not make any reference to landscaping. Croydon Council believes that this is an omission. Landscaping is an integral part of the design of a development. As such, when it comes to **landscape design within individual schemes it should be included as part of the main planning application and not devolved to conditions, and this should be included in Policy D2.**

Croydon Council welcomes the guidance within paragraph 3.2.7 on ongoing review of cases by qualified urban designers, outside of formal design reviews.

Paragraph 3.2.8 doesn't include 'massing' or 'form', both of which are crucial when assessing the impact of 'scale' or 'height'.

Paragraph 3.2.9 strengthens case for details and landscaping to be approved part of permission, rather than being deferred conditions. This is particularly important for landscaping which can become an after thought but have a significant impact on built environment.

Policy D3 Inclusive Design

Croydon Council believes that Policy D3 enters into the realm of Building Regulations. There is potential that guidance on fire lifts may be further confused if RIBA produces guidance covering same topic. Approach to fire safety should ideally be uniform across all bodies to ensure ease of understanding. The Council's view is fire safety should remain in the expertise of Building Regulations.

Paragraph 3.3.2 on creating more inclusive communities is welcomed. This strengthens the case for requiring applicants to think beyond the curtilage of their proposal and how it fits within the local context.

Paragraph 3.3.7 recommends the inclusion of 'Inclusive Design Statement' within planning application. For many schemes this would be onerous and therefore this should be commensurate with the scale of the proposal, however there is scope to suggest that small proposals should demonstrate a considered approach to inclusive design.

Policy D4 Housing quality and standards

Further guidance on minimum space standards (internally and externally), as noted under Policy D4(E), would be welcomed. Current guidance is limited and development proposals frequently fail to provide appropriately sized spaces. There is an increasing tendency amongst a small number of applications that these minimums can be challenged and that the need to provide adequate outdoor space is flexible. Outdoor space can be challenging in tall buildings and on windfall sites; there is a lack of clarity or guidance over the acceptability of providing communal outdoor space in lieu of private outdoor amenity space. The Croydon Local Plan 2018 does make clear that communal private outdoor space can be used in lieu of private (to the dwelling) outdoor space. This is in part to ensure that new higher density developments are suitable for families to reduce reliance on traditional forms of providing family housing.

Policy D4 could be strengthened with further reference to the impacts housing standards have on health and wellbeing (including mental health). As one example to counter this, increased floor-to-ceiling heights in urban locations and developments in close proximity to other buildings can be used to mitigate negative impacts.

Inclusion of qualitative aspects of design listed under 3.4.11 is welcomed as is further guidance on Housing Quality proposed in 3.4.12, however such guidance will need to be considerate of local characteristics/context which impact the design and delivery of housing specific to different areas of London.

Policy D5 Accessible Housing

Croydon Council welcomes the strengthened guidance on the need to provide accessible housing across a range of tenures.

Policy D6 Optimising housing density

Croydon Council welcomes guidance that density should be linked to future planned levels of infrastructure rather than current levels and that active travel should be taken into account. However, Policy D6 should recognise that in terms of public transport, it is relatively quick to put in new bus services, which may not be captured in future projections of PTAL. As such current and future PTAL levels should not be given significant weight in considering housing density.

Policy D7 Public Realm

Croydon Council welcomes the increased focus on the provision of shared public space that includes space for active modes of travel and the need to cater to a range of users.

Paragraph 3.7.12 highlights meanwhile uses are to be identified by boroughs. It is worth noting that Croydon is already active in this respect.

Policy D8 Tall Buildings

Policy D8(C)(1)(a)(iii) provides guidance particularly relevant to Croydon where tall buildings are often in close proximity to buildings of significantly lower heights. This policy is welcomed.

The acknowledgement that tall buildings can be standalone if appropriate in some instances in Policy D8(C)(1)(b) is welcomed and reflects Croydon's position that not all tall buildings necessarily have to be part of a cluster.

There is no mention in Policy D8 of active frontages on ground floor of Tall Buildings. Tall buildings have heavy servicing requirements which can take up a significant amount of floor area and if located at ground level reduces active frontages. **There should be policy that emphasises the importance of towers having active frontages along a significant portion of their ground floor. In line with Policy SD6(J) this could include residential uses if designed accordingly.**

Policy D8 lacks any mention of prejudicing neighbouring sites. There are many sites within central Croydon that sit side by side, and to ensure the best outcome across all sites there is a need for applications to consider how their proposal would not prejudice neighbouring schemes to come forward in the future. **Policy D8(C)(4)(a) refers to cumulative impacts of proposed, consented and planned buildings. This should be expanded to require all tall buildings to consider the development potential of neighbouring sites where no current proposals exist as part of their application, in line with local plans and policies for sites/areas.**

Policy D9 Basement development

Croydon Council recognises that this has particular relevance for inner London boroughs. However given Croydon's and much of outer London's topography there is significant potential for basement development to incorporate more floor area. Croydon increasingly sees developments that provide lower-ground floor flats in such a way. **Policy could be provided that highlights the importance of working with topography (so long as there are no potential issues with groundwater flooding) and with due consideration of local context, to assess suitability of basement developments in outer London, particularly if to be used as a separate dwelling.**

Policy D10 Safety, security and resilience to emergency

Policy D10 needs to be proportionate and there is a need to integrate these issues early in the design process, as mitigation measures added later in the process can have a significant negative impact on quality and function of place.

Policy D11 Fire Safety

Croydon Council has serious concerns on grounds of public safety and confusion regarding professional roles and responsibilities about the requirement in Policy D11 for a Fire Statement to be submitted with any major application. Fire engineering is a complex subject and planners, and planning committee members are not qualified to assess a Fire Statement. At best there would be significant cost and resource to both developers and boroughs in preparing and assessing any Fire Statement for no gain as the Council consider the matter is covered by Approved Document B of the Building Regulations. A worst case scenario is that planning permission is granted for an unsafe building because neither the borough's planners nor the borough's planning committee were able to understand the complexity Fire Statement and any deficiencies within it.

Any issues associated with the Building Regulations consent system with regard to fire safety are best addressed by reviewing the Building Regulation consent system rather than trying to do so through the planning system. There is a risk that the policies overlap with Approved Document B of the Building Regulations. Such guidance must not shift the responsibility of ensuring fire safety compliance from Building Control professionals to the local planning authority.

Policy D12 Agent of Change

Croydon Council welcomes placing responsibility for mitigating impacts of existing noise-generating activities on the proposed noise-sensitive developments. However, **this should take into consideration whether the existing noise-generating activities are creating undue harm to other sensitive receivers that already exist in the area.**

Chapter 4 – Housing

Policy H1 Increasing housing supply

The broad thrust of Policy H1 is in line with the new Croydon Local Plan 2018 in particular:

- Policy H1(B)(2)(a) applying to areas within 800m of a train station or town centre irrespective of the PTAL rating of the site as the Council believes that anywhere within a ten minute walk of a rail station or tram stop is still a sustainable location for development;
- Policies on mixed used redevelopment of car parks (Policy H1(B)(2)(b));
- Mixed used redevelopment of low density retail sheds (Policies H1(B)(2)(c) and H1(F));
- Housing densification on other low density commercial sites (so long as they remain mixed use) (Policy H1(B)(2)(c); and
- The emphasis on small housing sites (Policy H1(B)(2)(e).

Elements of Policy H1 that raise real concern include the overall housing target. Whilst Croydon welcomes the approach and does not object in principle to the new target, there are strong concerns about its deliverability in 2019 and beyond. That said, the Council suggests the Mayor has to be confident that the capacity of all boroughs to accommodate new homes has been objectively assessed and that boroughs like Croydon, that have a history of delivery, have not had their target increased on this basis. Croydon does not have that number of consents lined up to deliver from the start of the plan period, and the Croydon Local Plan 2018 is probably the most in tune with the new London Plan in all of outer London, as well as being the direction of travel of the borough itself

toward sustainable growth of the suburbs. Whilst there are small and medium sized builders delivering in Croydon, it is questionable whether they have the capacity to deliver the Mayor's ambitious targets for Croydon straight away from the outset of the new London Plan. The Mayor risks a situation of Planning by Appeal due to lack of Five Year Supply of Housing Land and, therefore, not being able to implement other policies of his London Plan where they constrain housing. These would include policies covering quality of design, and protecting employment land and social infrastructure. In other words, this scenario would leave London being planned by paragraph 14 of the NPPF; notwithstanding, the Croydon Local Plan 2018 and the London Plan. To mitigate against this **the London Plan should explicitly express support for the Liverpool method of assessing five year supply such that any shortfall will be ironed out over plan period not five years in London.**

It is noted that the Mayor's own monitoring indicator under Policy M1 for the supply of new homes is only an 'increase in the supply of new homes over the period... towards meeting the 66,000 net additional homes needed each year up to 2030'. This suggests that the Mayor recognises the concerns that Croydon Council has outlined above.

Croydon has concerns over the use of the Brownfield Register and Permissions in Principle. Neither are a tool for increasing housing supply, and the latter merely increases borough's workload without any real benefit in the case of Croydon, which is the most pro-growth borough in Outer London.

The Council supports H1(F) about no more low density retail sheds on allocated sites. This is in line with Croydon Local Plan 2018.

Policy H2 Small sites

Croydon Council welcomes in general Policy H2 and recognition that local character evolves over time. Croydon is preparing SPD on how to enable development of small sites as part of the Sustainable Growth of the Suburbs. However, Croydon Council is concerned about H2(D)(2)(d). Croydon has a policy on enabling development in larger gardens but recognises that gardens are an important amenity space as well as being an essential part of London's Green Infrastructure. Therefore, smaller gardens are in effect protected by the Croydon Local Plan as it would be impossible to meet the requirements of the Policy on any garden shorter than about 15m to 18m. These smaller gardens are likely to be more prevalent in the locations set out in H2(D)(2). The Croydon Local Plan 2018 also sets out standards on amenity space provision in new development to ensure that they provide a quality living environment and encourage people to stay in their homes for longer rather than moving on when they require/desire more open space (garden). Again these could be compromised by excessive development within the curtilage of houses in locations set out in H2(D)(2) and create areas of transient communities rather than creating new, longer lasting communities.

Croydon Council welcomes that Policy H2(D)(2) applies to areas within 800m of a train station or town centre, irrespective of the PTAL rating of the site. The Council believes that anywhere within a ten minute walk of a rail station or tram stop is still a sustainable location for development. **Policy H2(D)(2) should explicitly state that it applies within 800m of a tram stop** too. Fig 4.3 does show 800m buffers around tram stops and there is no reason for them to be excluded from the approach set out in Policy H2(D). Croydon Council also suggests that Policy H2(D)(2) could apply within 400m of a Neighbourhood Centre (which are not town centres in the Croydon Local Plan 2018). The Croydon Local Plan 2018 has identified four Areas of Focussed Intensification around areas with a PTAL of 2 or above and centred on either a Local Centre or a Neighbourhood Centre where existing

residential density is low and there are sites that could be redeveloped. Policy H2 should enable this type of approach to intensification.

Policy H2(H) is supported. Although Croydon does not currently seek affordable housing contributions on schemes of nine units or fewer, it is welcomed that the draft New London Plan contains a policy that would enable the Council to do so through a future review of its Local Plan. Croydon Council is concerned about under-development of sites but recognises that, whenever there is a threshold below which particular policies do not apply, it will incentivise the development of schemes that are just below that threshold.

Fig 2.12 identifies 14,500 new homes in Croydon Opportunity Area. Table 4.1 identifies 29,490 homes in Croydon overall. Table 4.2 identifies 15,110 on small sites less than 0.25ha. This would mean 14,380 homes on large sites in Croydon which is less than the total for the Croydon Opportunity Area. Does the Croydon Opportunity Area figure include some smaller sites? Croydon Council would be very concerned if it did as the much smaller plots in the Opportunity Area, with a notable exception of Tavistock Road and Sydenham Road, are much more constrained in development terms as they are either Victorian terraces in multiple ownership and/or Conservation Areas.

4.2.9 - New street trees are not acceptable replacement for lost green space in new development. There is an issue over management of these trees in the medium to longer term once a development has been completed. A stronger approach would be that set out in the Croydon Local Plan 2018 Policy DM10.4, which seeks no harm to protected species and habitats, plus the provision of quality private amenity space to all residents in a development in the form of balconies and communal gardens (and not just provision of balconies to flats above ground floor level).

Fig 4.3 - Welcome the inclusion of 800m buffers around tram stops in this diagram. However, **the diagram should show 800m buffers around stations outside of London where the 800m buffer would straddle London's boundary.** An 800m buffer around Whyteleafe station (which is in Tandridge District and outside of London) would include parts of Croydon, which are thus suited to the application of Policy H2(D)(2).

Policy H5 Delivering affordable housing

The London Plan is silent on the breakdown of the overall strategic target for affordable homes across London. Given that the SHMA identifies that 47% of London's housing need is for low cost rent (social or affordable rented) it is surprising that there is nothing in Policy H5 that sets a target for this type of affordable product. Whilst Croydon recognises that, with current levels of funding, and the delivery models that, through necessity, are used to provide affordable homes, it would not be possible to achieve 47% of all new homes to be low cost rent, Policy H5 should set a high target for the percentage of all affordable homes to be low cost rent. The SHMA suggests that 72% of all new affordable homes should be low cost rented homes so a target in the region of 60 to 70% would appear appropriate subject to deliverability. If there are specific deliverability issues around such a target, a lower target should be set with the reasons for the lower target clearly explained in the supporting text.

In particular Policies H5(A)(2, 3, 4 and 5), in the absence of a specific requirement to deliver low cost rented homes that are needed in London, could drive partners and providers towards delivery of Intermediate Rent (including London Living Rent), Shared Ownership, and Starter Home type products at the expense of Low Cost Rent. This is because there is less impact financially to partners and providers of delivering intermediate affordable products. As it stands Policy H5, therefore, risks

accentuating London’s affordable housing crisis, which in turn will have implications for future review of London Plan affordable housing policies.

The supporting text is also, worryingly, silent on the need for low cost rented homes.

Without an explicit target for different types of affordable housing it will not be possible to effectively monitor the London Plan, with implications for future review (including knowing when to review the policy if it is not delivering what is needed).

Policy H6 Threshold approach to applications

The proposed policy conflicts with Croydon’s own approach to enabling affordable housing. As such there is concern about the potential loss of affordable housing on those sites where more than 35% affordable housing is in theory viable. Based on evidence that supports the Croydon Local Plan 2018, an estimated 1,650 affordable homes would be lost as a result of the Mayor’s policy (equivalent to about 83 a year) as developers would have no incentive to provide affordable housing above a level of 35% even though it would be viable to do so. A comparison of Croydon’s approach in the Croydon Local Plan 2018 and the new London Plan policy position is set out in the table below.

Level of affordable housing (with right tenure mix)	Croydon Local Plan 2018 policy position	New London Plan policy position	Croydon Council comment about difference in position
Less than 15%	Not acceptable even if justified by a Viability Assessment and will be refused on grounds on non-compliance with the minimum requirement set out in the Local Plan.	Acceptable with a review mechanism if justified by a Viability Assessment.	No objection so long as the London Plan policy does not preclude the Croydon Local Plan policy position whereby any scheme with less than 15% affordable housing can be refused.
At least 15% but less than 30%	Acceptable with a review mechanism if justified by a Viability Assessment.	Acceptable with a review mechanism if justified by a Viability Assessment.	The policy position is the same.
At least 30% but less than 35%	Acceptable if justified by a Viability Assessment. No Review Mechanism required.	Acceptable with a review mechanism if justified by a Viability Assessment.	Although the policy positions are different, the only probable impact is to push developers who can deliver 30% affordable housing on site to deliver 35% on site instead, to which Croydon Council does not object.
At least 35% but less than 50%	Acceptable if justified by a Viability Assessment. No Review Mechanism required.	Acceptable if it does not require grant, is not a public sector site, or an industrial site. No Review Mechanism required or Viability	Although it is rare that Croydon Council considers a scheme in this range, it has concern about the different approach to that of the Croydon Local Plan 2018. It is estimated that over the entire Plan period of the

		Assessment required.	<p>Croydon Local Plan 2018, from the identified housing trajectory approximately 225 affordable homes would be lost as a result of the Mayor's approach in this category as developers would not have an incentive to provide more than 35% affordable housing. Croydon Council consider the lack of a review mechanism to be sufficient incentive to developers to deliver this level of affordable housing.</p> <p>However, the higher threshold for industrial sites is welcomed (Policy H6(B)(3)).</p>
50%	Acceptable. No Review Mechanism required or Viability Assessment required.	Acceptable if it does not require grant. No Review Mechanism required or Viability Assessment required.	<p>The policy position may be the same but because the Mayor would not require a Viability Assessment for any scheme providing more than 35% affordable housing, there is no incentive for developers to provide any more. As a result it is estimated that 1,440 affordable homes in Croydon projected in the housing trajectory supporting the Croydon Local Plan 2018, would no longer be provided. Croydon Council consider the lack of a review mechanism to be sufficient incentive to developers to deliver this level of affordable housing.</p>

It is noted that most development proposed in the new London Plan comes in boroughs where viability is identified as being more constrained in the Viability Study (predominantly bands D and E). This includes Croydon, which is almost entirely within bands D and E (bar the Norbury area in the north west of the borough).

It is also noted that it was tested against Low Benchmark values where as in Outer London most development potential lies in intensification of existing residential sites (with probable high

benchmark value). It is also noted that this type of development cannot avail itself of the fast track approach under proposed Policy H10.

Policy H6(C)(2) is welcomed.

Croydon Council questions how Policy H6(C)(4) is to be enforced and how, without a viability assessment, a developer can be required to deliver more than 35% affordable housing. As such, the policy approach appears to be less effective at delivering affordable housing.

Paragraph 4.6.3 – Croydon Council is concerned that the percentage of affordable housing should be assessed against habitable rooms. The Croydon Local Plan 2018, whilst expressing a preference for policy compliance to be assessed against habitable rooms, is flexible. This is because Croydon Council's own Strategic Housing Market Assessment has identified that the need for affordable housing is more weighted towards smaller units compared to private market housing. Using habitable rooms as the measure lends itself to providing fewer, but larger affordable units, meaning the need for smaller affordable homes is not met. The same issue applies to using habitable floor space as a measure. Therefore, **Croydon Council request that the London Plan contain the same flexibility as the Croydon Local Plan 2018 on how the percentage of affordable housing is calculated, to enable boroughs to meet the need for affordable housing that exists in their areas.**

4.6.11 – the reference to use of Existing Use Value Plus as the method for establishing the benchmark land value is welcomed and mirrors the policy contained in the Croydon Local Plan 2018.

[Policy H7 Affordable housing tenure](#)

This policy is welcomed.

4.7.10 – Given local affordability issues and need in the borough, **Croydon Council objects to the restrictions on local criteria on re-lets.** The Council supports the restrictions on re-sales.

[Policy H8 Monitoring of affordable housing](#)

This policy is welcomed.

[Policy H9 Vacant building credit](#)

This minimum length of vacancy is considerably longer than that prescribed by the Croydon Local Plan 2018 (5 years versus 18 months). However, the marketing period is less restrictive (2 years versus the entire period the building has been vacant). **Croydon Council would prefer the marketing period to be for the entire period of vacancy,** as the owner of a building that is truly vacant would make every effort to secure its reuse no matter how long the vacancy. The longer minimum vacancy period proposed by Policy H9 is supported.

[Policy H12 Housing site mix](#)

Croydon Council has strong reservations about this policy. Our own Strategic Housing Market Assessment has identified a need for more three-bedroom homes in Croydon, reflecting its outer London location. Current market led development patterns in Croydon has delivered predominantly one and two-bedroom homes (over 85% of completions in Croydon since 2011). Croydon Council recognises that the traditional suburban form of development of detached and semi-detached houses will evolve due to the lack of land and the acute need for homes. Therefore, the Croydon Local Plan 2018 sets out a policy framework to both encourage more three bedroom homes in flatted developments in the borough, and to ensure that those developments provide adequate private amenity space for families with children.

The restriction in H12(C) against boroughs setting mix targets for market and intermediate homes both undermines the new approach set out in the Croydon Local Plan 2018, and stores up problems for the future by potentially creating a shortage of three bedroom homes. This in turn makes remaining in London less attractive for families. It increases pressure on existing stock in outer London boroughs making it even less affordable to families in particular, and is liable to lead to the loss of London's Green Belt in authorities outside of London as they end up having to release land to meet the unmet need for larger homes arising from London. It could also increase pressure in future London Plan reviews to release Green Belt within London. **The London Plan needs to recognise that in order to meet the need for all types of home in London, boroughs need to be able to set size mix requirements (within reason).** Otherwise the only needs that will be met are those for one and two bedroom homes which, given that the need for new homes is predominantly for low cost affordable rented homes, will mean that building 66,000 homes will result, not in meeting London's housing need, but in considerable unmet need for both larger and affordable homes, and an oversupply of smaller market units.

For reference, the Croydon Local Plan 2018 sets out the minimum levels of larger homes (with three or more bedrooms) on sites across the borough, with the minimum percentage ranging from 5% to 70% depending on the location and PTAL. There is also provision up to 2021 for some three bedroom homes to be provided as two-bedroom four person homes instead. This too recognises that two bedroom four person homes are perfectly adequate for many families. These requirements for larger homes will enable the proportion of the overall number of new homes in Croydon that have three or more bedrooms to rise from less than 15% of all completions to approximately 30%. Whilst this is less than the need identified in our Strategic Housing Market Assessment, that need will have included many under-occupied three-bedroom homes, so only partly meeting the identified need is not likely to lead to the issues outlined in our response to Policy H12 above. Given the relatively non-prescriptive mix requirements, they are not likely or intended to constrain growth in any part of the borough or to lead to sub-optimal unit mixes on sites (although they will result in slightly fewer units on sites than if they had all been one and two bedroom flats as the market tends to provide). However, leaving it entirely to market to decide what gets built is unlikely to be socially or environmentally sustainable in the medium to long term as set out above.

You will note in the context of Croydon Council's response to Policy H7, that the Council are not objecting in principle to either the new housing targets for Croydon, the aspiration to meet London's housing need within London, or the presumption in favour of small housing sites. Neither is Croydon Council objecting in principle to the overall changes to policies on Design in the new London Plan.

[Policy H13 Build to rent](#)

This policy is welcomed.

[Policy H15 Specialist older persons housing](#)

Croydon Council offers support for this policy with the following caveats:

Extra care accommodation is treated as being in Use Class C2 in Croydon. Given the significant viability constraints associated with this type of development it is unlikely to result in the loss of any affordable housing. They are constrained in viability terms because the sales values of the units are no greater than a private flat of the same size, yet the developments contain significant amounts of communal floor space, which means that overall the sales price per square metre of development is much lower than a standard residential development on the same site. Often such schemes are not able to support any affordable housing or can only provide a token commuted sum that may not

even equate to one affordable unit. However, if it were treated as Class C3 development then Croydon's own affordable housing policies would apply. These would not permit any scheme delivering less than 15% affordable housing, which could stymie the supply of extra care accommodation in Croydon. Other policies of the Croydon Local Plan 2018 express general support for this type of accommodation.

The Croydon Local Plan 2018 has introduced a policy that states that planning permission for new residential care or nursing homes will only be granted if there is a need for the particular services provided by the home in supporting the care of residents of Croydon. This is because Croydon, as of September 2015, had 142 care homes with a total capacity of 2,796 bed spaces. Between April 2014 and November 2014, 761 of those bed spaces were occupied by people placed by Croydon Council and Croydon Care Commissioning Group (the grouping of GPs in Croydon that provides primary health care services in the borough). It was estimated that between 1,000 and 1,150 bed spaces were occupied by self-funders. The remainder of the bed spaces were either vacant or occupied by people placed from outside of the borough. Croydon experiences a range of challenges arising from the significant number of nursing and residential care homes that continue to be sited in the borough. These challenges include excess demands on a range of local health and social care services which are not reflected in national funding formulae for central Government funding towards local services. The Council, therefore, **suggests that the London Plan paragraph 4.15.10 be amended to state that the provision of residential or nursing accommodation needs to take place in all London boroughs and not just in outer London as has traditionally been the case.**

Policy H16 Gypsy and Traveller accommodation

Croydon Council has carried out a needs assessment using the definition proposed in Policy H16, and has allocated a site in the Croydon Local Plan 2018 to meet the first ten years of that need, when combined with an expansion of our existing Gypsy and Traveller site.

Croydon Council would like to point out that there are two errors in the supporting topic paper as follows:

- Fig.1 of the GLA Gypsy and Traveller Accommodation Topic Paper 2017 shows the existing authorised site in Croydon as being in Ashburton ward. It is in Broad Green ward; and
- Section 4 of the GLA Gypsy and Traveller Accommodation Topic Paper 2017 states that no new pitches have been provided in Croydon since 1996. This is not correct. Since the research underpinning the Fordham study was undertaken an additional four pitches were created on the existing authorised site in Croydon.

Policy H18 Large-scale purpose-built shared living

This policy is welcomed.

Chapter 5 – Social Infrastructure

Policy S1 Developing London's social infrastructure

This policy is supported.

Policy S2 Health and social care facilities

This policy is supported.

Policy S3 Education and childcare facilities

This policy is supported.

Policy S4 Play and informal recreation

This policy is supported.

Policy S5 Sports and recreation facilities

Croydon Council supports this policy. It is worth noting that Policy DM20 of the Croydon Local Plan 2018 supports the redevelopment of Selhurst Park as the home stadium of Crystal Palace Football Club. The Croydon Infrastructure Delivery Plan 2017 also supports the need to have an updated playing pitch strategy and has planned projects in place to support the growth, enhancement and regeneration of existing facilities (both indoor and outdoor). It is worth noting that some of these projects also include the provision of new swimming facilities across the borough to address demand.

Policy S6 Public toilets

This policy is welcomed.

Policy S7 Burial space

This policy is supported. Although it is not mentioned in the Croydon Local Plan 2018, the Council supports the re-use of graves as provision of burial spaces to meet need.

Chapter 6 – Economy

Croydon Council welcome the GLA's commitment to protecting employment floor space and placing equal importance on employment as well as housing growth. London's capacity to generate new high quality employment is important not just locally but nationally. It is also vital to the future funding of public services in London as the city becomes more reliant on its own business rates revenue for its budgets.

It is critical that growth is distributed not just in the Central Activities Zone but increasingly in our major town centres. This will help produce additional business rate revenue, provide a more efficient use of our existing transport infrastructure by encouraging counter commuting, and produce a better quality of life by allowing more residents to live close to work.

Therefore, Croydon Council are committed to both improving and growing office stock in our key town centres and maximising the use of our existing industrial land. The Council have commissioned an Industrial and Business Land Study that is identifying the industrial and commercial land requirements and potential across the South London Partnership sub-region. This work has already shown the enormous demand for industrial land in the sub-region and the renaissance in demand for office space. Croydon Council will be publishing conclusions from the study in spring 2018 which Council hopes to work with the GLA on delivering.

Policy E1 Offices

Croydon Council recommends that Part D should be re-worded to support the protection and enhancement of diverse office market to meet local needs. Consolidation/loss should be considered based on local evidence and where there are offices surplus to requirement. The default presumption should not be consolidation of office space as this may not be appropriate in all locations, particularly given the requirement for over 142,000m² of office growth in outer London alone from 2016-2041. As currently worded, this part of the policy is considered to be unnecessarily prescriptive and would potentially be unhelpful for town centre regeneration strategies. Linked to part E, the focus should be on supporting the retention and expansion of office space where this is not surplus, to meet demand/identified needs and where this is viable.

Policy E2 Low-cost business space

Croydon Council supports the policy in terms of the intentions to protect low-cost business space, to mitigate impacts on existing businesses and for proposals over 2500m² to provide a proportion of flexible space for SMEs.

However, the protections to low-cost business space only apply to B1 space. The exclusion of other B-class uses might be because they are seen to be dealt with through other policies or because of the desire to intensify industrial uses. However existing B2, B8 and some Sui Generis uses akin to industrial uses are often low value in their nature. Given the overall losses of industrial land, the importance of these remaining viable low value industrial spaces is also important. The desire to intensify industrial spaces should not mean the loss of existing and valuable low value space and the implications this can have for existing employment/businesses/sectors. Otherwise, these uses will be pushed further and further out of London and the connections they have in serving other businesses/sectors will be damaged. This is consistent with the Council's comments on Policy E7.

Croydon Council questions whether there is scope to expand the protection of B1 use classes to include other use classes, or alternatively to incorporate this into other policies around the management/intensification of industrial land.

Policy E3 Affordable workspace

This policy is supported.

The policy will support and complement the work of Croydon Council's regeneration and economic development teams. With increased pressure on low value employment uses and increased demand for space by SMEs, the draft London Plan policy will be helpful to Croydon Council to develop a local approach/guidance to increased demand and a response to specific applications which involve the loss/change of AW. The policy will help to create the right conditions/environment needed for the growth of latent Tech, arts/creative and light manufacturing SMEs and clusters in the borough.

Part A of the policy is useful in providing a broad range of circumstances in which planning obligations could secure affordable workspace, including where it supports regeneration. This could prove useful for district centres in Croydon.

Given the heavy losses of B-use spaces across the capital due to PD rights and that much of the new space created will be in opportunity areas, Croydon Council questions whether it would be useful to include Opportunity Areas in Part B. **The Council suggests that including Opportunity Areas in Part B may assist in securing affordable workspaces in the town centre as currently, many Opportunity Areas are not high value areas but will be and this is an important consideration.**

Policy E4 Land for industry, logistics and services to support London's economic function

This policy is supported.

Croydon Local Plan supports this through the strategic policy SP3 and detailed policies. The Mayor of London's Supplementary Planning Guidance on Land for Industry and Transport sets out an annual indicative industrial land release benchmark for Croydon of 0.5 hectare with a total release benchmark for 2011-2031 of 9ha. However, as Croydon lost 9ha of industrial land in a single 5 year period between 2006 and 2010, it is likely that expansion in Strategic and Separated Industrial Locations will be required to compensate for losses to the industrial stock elsewhere.

The Council identifies Strategic, Separated and Integrated Industrial locations for expansion to encourage greater density of occupation within the current boundaries to accommodate current and future demands for industrial and related functions.

Whilst there is a general principle of no net loss, this does not apply to non-designated industrial sites as set out in paragraph 6.4.7. Should it apply to these sites in boroughs that are expected to retain capacity? There are a number of industrial sites in and around the boroughs district centres which are important to the local economy. The ongoing protection, consistent with local policies, will be important.

Policy E5 Strategic Industrial Sites (SIL)

This policy is supported.

Council has adopted a '4-Tier' approach to the retention and redevelopment of land and premises relating to industrial/employment activity. Croydon Council identifies two Strategic Industrial Locations within the borough at Marlpit Lane and Purley Way (North and South), consistent with the draft London Plan's identification of Marlpit Lane and Purley Way as Strategic Industrial Locations for strategic protection. Under the Croydon Local Plan, SILs are identified as 'Tier 1' locations due to their strategic function and economic importance, and are subject to the highest policy protection.

This is consistent with the draft London Plan Policy E5 to identify SILs, develop local policies and protect and intensify the function of SILs and support development proposed within the broad industrial-type activities of Use Class B1c, B2 and B8.

Policy E6 Locally Significant Industrial Sites

This policy is supported.

Croydon Council identifies Separated and Integrated Industrial Locations in the Local Plan which is consistent with Policy E6 of the draft London Plan. Policy E6 states that boroughs should define detailed boundaries and policies for LSIS in policies maps and make clear the range of industrial and related uses that are acceptable in LSIS.

Croydon Council identifies Separated and Integrated Industrial Locations on the policies map and in Table 5.2, and Table 5.1 identifies the permitted uses in those areas. As per 6.6.1 in the draft London Plan, these areas have been designated based on evidence, as mentioned in the key supporting documents.

Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function

The redevelopment of industrial sites in order to intensify them could lead to the loss of existing businesses and lower value uses in and around the borough's district centres. There should be a clear cross reference to other policy objectives (e.g. protection of low value workspace) and for this to be taken into account. The intensification of industrial uses isn't always appropriate or desirable; this can lead to the eviction of long standing and valuable local businesses as well as increased rents which are no longer affordable for certain types of businesses/sectors.

Policy E8 Sector growth opportunities and clusters

This policy is supported.

Small businesses will need to be given support and guidance to form collaborations with appropriate HEIs and innovation organisations, as well as support to develop partnerships/joint ventures with similar businesses to take research and innovation to the next level.

Croydon has had aspirations to attract a University to the Borough and has the capacity to support the development of a campus here. Croydon Council needs the support of the Mayor's office to engage with and explore opportunities to build a relationship with a university that plans to expand. The population of Croydon consists of a high proportion of young people who would greatly benefit from a local HEI presence, from raising aspirations, to creating opportunities for work experience, higher level skills and higher quality jobs. Croydon's population, with its high proportion of young people and BAME residents, would see enormous benefits both economically and socially from access to higher education locally, as well as the resulting access to higher skills and better jobs. Croydon is especially keen to attract an international university as there is the capacity to build a campus in the borough. In addition, the access to more affordable housing and transport connections to central London and Gatwick make Croydon an ideal place for students/international students.

Croydon Tech City has operated in the borough for 5 years and has been crucial in creating a community for tech start-ups with opportunities for networking and business development. As these start-ups develop into scale-ups, the support of these businesses becomes even more important for the growth of the economy. It is important to identify constructive ways for clusters to be supported through the ongoing development and growth of individual businesses.

Croydon has a growing cultural offer and a growing pool of talent from emerging artists and musicians. There is a need for more performance space as well as hubs for creatives to congregate in order to develop their offer.

This is a relatively new area for Croydon, however developing fast due to the Borough of Culture Bid, Croydon's growing cultural offer of events, festivals and the new Cultural quarter under development at Fairfield Halls and College Green. Businesses and cultural organisations are in need of support and guidance to develop their offer further and attract more visitors to the borough. In addition, Croydon's proximity to Gatwick Airport and offer of a large number of mid-low cost hotels provides an alternative offer to international tourists/visitors to London who may want a lower cost alternative to central London hotels and Airbnb type accommodation.

[Policy E9 Retail, markets and hot food takeaways](#)

This policy is supported.

Croydon Council has already considered where it is appropriate to provide A5 and provides policy in its emerging Local Plan to manage over-concentration of A5 in Local, District and other town centres.

[Policy E10 Visitor Infrastructure](#)

This policy is supported.

The Croydon Local Plan does not have a specific policy on visitor infrastructure and accommodation, however the Council supports the draft London Plan.

[Policy E11 Skills and opportunities for all](#)

This policy is supported.

The draft London Plan policy provides Section 106 obligations as a mechanism to support employment and skills development. This is consistent with the Croydon Local Plan which seeks to reduce unemployment and improve skills and education through Section 106 planning agreements to provide skills and employment training within the borough.

Chapter 7 – Heritage and Culture

Policies on heritage are now grouped with culture in a standalone chapter ‘Heritage and Culture’. Previously, heritage and views policy were grouped with environmental policy including local character and design policy. This previous arrangement is reflected in the layout of the Croydon Local Plan 2018. Whilst acknowledging the close links between heritage and culture, the strong links with local character and design should not be lost or diluted.

Policy HC1 Heritage conservation and growth

The words ‘where applicable’ in Policy HC1(D) reduce the efficacy of the policy and are unnecessary, by implying that there may be circumstances where significant archaeological assets and landscapes shouldn’t be protected. **The policy would be more effective if it simply said:**

Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. ~~Where applicable,~~ Development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

Paragraph 7.1.7 emphasises that development should respond positively, but also states: ‘In particular, consideration will need to be given to impacts from development that is not sympathetic in terms of scale, materials, details and form.’ **This wording is not very clear as to what is meant.**

Archaeological Priority Areas are designated in Local Plans. At the time of publication on the Draft New London Plan the new four tier approach of Archaeological Priority Areas as shown on Figure 7.5 was not adopted in Croydon, although it subsequently has been as the Croydon Local Plan 2018 was adopted on the 27th February 2018. As such **Figure 7.5 should say, as on Figure 7.2, that:** ‘London boroughs designate and review Archaeological Priority Areas in partnership with Historic England, and as such the areas of London covered change over time.’

Policy HC3 Strategic and Local Views

Policies HC3(F) and HC3(G) are welcomed as it provides support to the approach already taken in the Croydon Local Plan 2018 and the management of our Local Views.

It is noted that **Policy HC4(C)** now includes assessment of impact of development in the background of a Protected Vista in a wider area than just the ‘Wider Setting Consultation Area’ – i.e. allowance for a more general assessment of setting. However, **the phrase ‘The SPG provides guidance on the treatment of all parts of the view...’ in supporting paragraph 7.3.4 may imply anything not mentioned in the SPG cannot affect the view and therefore could conflict with this more holistic view.**

There is a typo in **paragraph 7.3.2** – ‘The front and middle ground are the areas between the viewing place and/or the natural features that form its setting’ **should read ‘The front and middle ground areas are the areas between the viewing place and a landmark, or the natural features that form its setting’** as per the existing London Plan.

Policy HC5 Supporting London’s culture and creative industries

Croydon Council welcomes that the Draft New London Plan has a bigger focus on Culture than the current London Plan and is much more extensive. A lot of the policies apply directly to Croydon. There are areas where the policy could be broader however, and detailed comments are captured below.

Policy HC5(A) regarding supporting continued growth and evolution of London's diverse cultural facilities etc. is positive. However, **there should be a stronger emphasis on proactively facilitating and encouraging the growth.** This applies to Policies HC5(A)(1) to HC5(A)(5), Policy H2(D)(2) applies to areas within 800m of a train station or town centre irrespective of the PTAL rating of the site. The Council believes that anywhere within a ten minute walk of a rail station or tram stop is still a sustainable location for development, where, although the policies suggest support, there could be a clearer steer, particularly for large outer London boroughs to be pro-actively seeking and facilitating growth of culture and creative industries. **There is also no specific reference to sustainable growth with an emphasis on affordable and accessible facilities. This is something that is extremely important to integrate,** particularly for outer London Boroughs.

Croydon Council welcomes Policy HC5(A)(2) with its clear acknowledgement of cultural quarters being an anchor for regeneration and renewal, although it appears to be mainly referencing venues and related uses/permanent facilities. **It is important to also include shorter term, 'meanwhile' interventions and activations to activate places that are about to change, generate social-economic value etc.** Although HC5(A)(4) does refer to meanwhile uses in vacant properties and land, there may be other opportunities and underused spaces that need a broader policy to capture this potential unlocking.

Although **Policy HC5(A)(5)** seeks to 'ensure that Opportunity Areas and large scale mixed use developments include new cultural venues and/or facilities and spaces for outdoor cultural events', it **does not include commercial developments that could also be suitable for the typology. This would be beneficial,** particularly in Croydon. **Also, it does not cover meanwhile uses to activate edges and other dead pockets during construction phasing.**

Policy HC5(B)(2) regarding designating Creative Enterprise Zones is positive and could be extremely beneficial to Croydon. To this end Croydon Council has submitted a bid for this classification.

Policy HC5(C)(3) is focused on aiding delivery of affordable facilities which Croydon Council welcomes given its importance. However, **there should be a stronger emphasis on sustainable growth of this sector to ensure emerging creatives can continue to learn, work, live and exhibit in Croydon.**

Croydon Council recognises that **Policy HC5(C)(4) is important for Croydon, but that it is applicable to many parts of the borough already rather than any future CEZ only. This should be recognised in the policy.** It is an important policy to proactively facilitate and deliver.

Croydon Council notes that **policies around high quality creative education, up-skilling and learning opportunities and facilities are lacking in the Draft New London Plan. There is a big need for this (particularly in outer London boroughs), and should be included.**

Paragraph 7.5.1 is an important paragraph and Croydon Council welcomes that it opens up the definition of 'culture and creativity' beyond a limited view of fine arts or workspace. This encourages the growth of a multi-disciplinary and diverse sector which is key. One thing it **should include is a stronger emphasis on heritage in this section and markets/trade/culinary history.**

Paragraph 7.5.2 should also include a positive impact on creating more resilient communities and hospitality.

What paragraph 7.5.3 describes is a big issue in Croydon and ways to improve this going forward and having robust policies to proactively ensure this is addressed is important.

Paragraph 7.5.6 about encouraging creative meanwhile uses in vacant buildings and spaces is important. Croydon is doing this proactively through the Growth Zone in Croydon Metropolitan Centre. Further work is needed by the GLA and London Boroughs to get buy in from organisations like the Metropolitan Police and London Fire Brigade etc. to ensure that these facilities can begin to plan such activities into their future workstreams.

Paragraph 7.5.7 is positive and should be facilitated and delivered as much as possible.

Paragraph 7.5.9 needs to also include up-skilling and learning opportunities and facilities.

Paragraph 7.5.10 is positive although it **could also include a stronger emphasis on quality of the new places**. These should be of exceptional quality.

Croydon Council welcomes paragraph 7.5.12 and looks forward to working with the Mayor in setting up Creative Enterprise Zones in the borough. The Council notes the issues around affordability and suitability of space for artists and creative businesses.

In paragraph 7.5.13 the need to protect, develop and deliver creative/arts facilities, workshops and learning & education facilities is an important aspect missing from the list in the paragraph.

Policy HC6 Supporting the night-time economy

In Policy HC6(A) two areas of Croydon are identified as strategic areas of night-time activity. Croydon Town Centre is identified as being of regional/sub-regional importance, whilst Norbury is identified as being of more than local importance. **Further information about the evidence used to identify areas of strategic importance for the night-time economy should be set out.** How were the classifications reached/justified? It will be important for classifications to be proactively managed and reviewed as they are likely to change over time as with town centre designations.

Policy HC6(B)(5) is positive. However, appropriate coordination between the Council and TfL, as well as funding is required.

Although Policy HC6(B)(6) captures a range of related venues, it should also include civic and public spaces, night markets, arts spaces etc.

Policy HC6(C) positive. However, coordination with all relevant and affected services, teams and stakeholders at the earliest possible stage is important. Funding streams need to be revisited and capacity/resources to enable the industry is an important factor to address.

Policy HC7 Protecting public houses

Policy HC7 is welcomed and echoes Policy DM21 in the Croydon Local Plan 2018. It is noted that paragraph 7.7.7 suggests that a public house should have been marketed for a period of at least 24 months. The Croydon Local Plan sets out in Policy DM21 itself (as opposed to the supporting text) that the marketing period should be 18 months. There is a further provision for that marketing period could be reduced to 12 months if the public house has been designated as an Asset of Community Value. An equivalent **reference in the supporting text of the New London Plan as to how to deal with marketing in the light of a public housing being designated as an Asset of Community Value would be beneficial.**

Chapter 8 – Green Infrastructure and Natural Environment

G1 Green Infrastructure

Policy G1 Green Infrastructure seeks to protect London's network of green and open spaces. Council welcomes the protection of green and open space at a London Plan level, especially in light of the

removal of the Local Green Space designation by the Planning Inspector in the recent review of Croydon's emerging Local Plan. The Council will therefore be more heavily relying on London Plan policies to protect the borough's open spaces.

The production of borough level green infrastructure strategies is supported however this will have resource implications. It would be helpful if boroughs could be supported in their green infrastructure work through the production of London-wide green infrastructure data as well as further guidance around the method for producing strategies, in particular how the multiple functions/benefits of Green Infrastructure can be balanced to identify spatial priority interventions and the identification of a local green space factor.

The Council supports Local Plans and Opportunity Area Planning Frameworks identifying green infrastructure assets and opportunities for green infrastructure interventions as this is current practice in the Council. This should be aligned with the preparation of Infrastructure Delivery Plans and either planning obligations associated with planning permissions, or borough's Community Infrastructure Levies.

The Council believes policy SP6 (Environment and Climate Change) within the Strategic Policies of Croydon's Local Plan ensure green infrastructure is seen as an integral element of a development and not as an 'add-on'.

G2 London's Green Belt and G3 Metropolitan Open Land

The Council supports in principle the Mayor's strong support in the continued protection of London's Green Belt (Policy G2) and Metropolitan Open Land (Policy G3). The Council's detailed policy DM27 provides further protection of Green Belt land in the Borough and further protects Metropolitan Open Land from inappropriate development by applying the same level of protection afforded to Metropolitan Green Belt in National Planning Policy to Metropolitan Open Land. However, **the Council would caution that the absolute restriction on de-designation of Green Belt is both contrary to the National Planning Policy Framework (paragraph 83), and undermines the Plan-led system by steering applicants to the planning appeal process solely.** Paragraph 83 of the National Planning Policy Framework says that *once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.* Whilst, Croydon Council agrees with the Mayor's approach that London's housing need should be met without the loss of Metropolitan Green Belt, there may on occasion be exceptional circumstances for supporting infrastructure to be located in Metropolitan Green Belt. In particular secondary schools have a considerable land take (1.1ha being a desirable minimum size) and it is not always possible to find appropriate sites of that size in urban areas. As such sites should be allocated in Local Plans, the Mayor is undermining the Plan-led system by going beyond national planning policy in his approach to Metropolitan Green Belt.

It is noted that the Mayor references paragraph 83 of the National Planning Policy Framework in paragraph 8.3.2 but in the context of Metropolitan Open Land. It is contradictory that the Mayor would apply national planning policy to Metropolitan Open Land, but not the Metropolitan Green Belt.

G4 Local Green and Open Space

The Council strongly agrees with policy G4(A) that local green and open spaces should be protected. This is the way the Council sought to protect these spaces in the Local Plan by providing the Local Green Space designation. In light of the removal of the Local Green Space designation by the Planning Inspector, the Council welcomes the strong policy stance in protecting these spaces in the London Plan.

The Council will need to undertake a needs assessment of local green and open space (policy G4C) due to their designation being lost in the Local Plan process, to increase the protection afforded to them. However, **the Council requests that further guidance be provided on needs assessments and how these should be produced as part of a wider green infrastructure evidence base.** This should be supported by the publication of London-wide data.

G5 Urban Greening

The Council supports policy G5(A) which seeks for major development proposals to contribute to the greening of London. The Council has a number of local policies which also seek this.

Policy G5(B) introduces an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. This policy also seeks Boroughs to develop their own UGF which is tailored to local circumstances. **Further support on how this should be undertaken in practice would be of use. Clarity is also sought on the implications of not initiating a local factor.**

This policy correlates with policy DM11.4 of Croydon new Local Plan which sets out new standards for the provision of private amenity space and children's play space in new developments. Within Croydon's new plan however there is no local UGF.

G9 Geodiversity

This policy identifies three sites in Croydon (Croham Hurst, Happy Valley and Riddlesdown Quarry) that are recommended to be a Regionally Important Geological Site designation. **Clarity is required if Boroughs are required to designate actual boundaries. At the moment these three sites are identified on Croydon's Policies Map as symbols.** Clarification is also sought on why the three sites are identified as 'recommended' within the Draft Plan as Croydon has had them on their adopted Policies Map since 2006.

Chapter 9 – Sustainable Infrastructure

Policy SI2 Minimising greenhouse gas emissions

This policy is supported.

Policy SI3 Energy infrastructure

Policy SI3(D)(3) is welcomed.

Policy SI5 Water infrastructure

Due to the difficulty in achieving BREEAM Excellent for changes of use and conversions of existing buildings, the Croydon Local Plan 2018 only requires compliance with BREEAM Very Good. **The New London Plan should consider how feasible it is for developments that are not new build of achieving BREEAM Excellent.**

Policy SI6 Digital connectivity infrastructure

This policy is supported.

Policy SI7 Reducing waste and supporting the circular economy

This policy is supported.

Policy SI8 Waste capacity and net waste self-sufficiency

Together with the boroughs of Sutton, Kingston and Merton, Croydon intends to produce a new South London Waste Plan for adoption in 2021. Central to this plan will be the apportionments set out in the London Plan as a target for allocating sufficient waste sites. The council notes that the arisings for the four boroughs in 2041 is 845,000 tonnes while the apportionment is 944,000 tonnes.

The means that the four boroughs will have to find sites to manage 12 per cent more waste than they produce. Given that Table 6.2 of the plan acknowledges that industrial land is in short supply across the four boroughs (Sutton is to provide industrial land and Croydon, Kingston and Merton are to retain industrial land), the council considers there would be more justification to divert the additional 12% of waste management from the four constrained South London boroughs to boroughs which have excess industrial land capacity and are categorised for “limited release”.

Policy SI9 Safeguarded waste sites

This policy is supported. The South London Waste Plan safeguards sites for waste facilities serving the London Boroughs of Croydon, Kingston, Merton and Sutton. The four boroughs will start work on reviewing the South London Waste Plan in 2018.

Policy SI10 Aggregates

This policy is welcomed.

Policy SI11 Hydraulic fracturing (Fracking)

This policy is supported.

Policy SI13 Sustainable drainage

The London Borough of Croydon as a place is one of the most susceptible places in England to surface water flooding. For this reason the Croydon Local Plan 2018 requires that new developments should achieve less than greenfield run off rates, recognising that the geology of some areas of the borough would make this technically difficult. As such **Policy SI13(B) is disappointingly unambitious in its scope by only asking for as close to greenfield run off as possible. In an urban area which is planning for 66,000 new homes between 2019 and 2029, it is absolutely essential that surface water is dealt with at source, not just as close as is possible. To not do so is setting up significant problems of surface water flooding in the future as increased amounts of land is built on.**

Policy SI17 Protecting London’s waterways

Policy SI17 is welcomed and aligns with Policy SP7 of the Croydon Local Plan 2018.

Chapter 10 – Transport

Policy T1 Strategic Approach to Transport

Although Croydon Council welcome the aspiration for 80% of trips to be by sustainable transport by 2041, the Council challenges the scope for outer south London boroughs to achieve such a target. Currently Croydon’s proportion of trips by sustainable transport is just 50%. Central London is already past the 80% target and inner London is close to it. It is clear from the draft MTS that boroughs are meant to lead on policies to provide the ‘stick’ to meeting the 80% target such as local road charging schemes or workplace parking levies as part of Borough Traffic Reduction strategies. Croydon consider TfL should be leading on innovative schemes as the strategic transport authority for London. In principle, the Council supports the indicative transport proposals set out in Table 10.1. There is a lack of detail on the proposals meaning it is not possible to comment meaningfully on many of the transport schemes in the list. Moreover, only a very few are of potential direct benefit to Croydon: Brighton Main Line upgrade, Tram upgrades, Night Overground. The Thameslink programme benefits Croydon but as it is largely operational and scheduled for completion by 2019 it cannot be regarded as ‘indicative’. The lack of planned investment in sustainable transport infrastructure also highlights the challenges facing Croydon in achieving the 80% mode share by sustainable transport.

Policy T2 Healthy Streets

Croydon welcome the Healthy Street approach although **the Council are not clear how development plans will 'demonstrate' the application of this approach.** The Council particularly support the reference to this approach in Opportunity Areas such as for Croydon town centre. Croydon Council also welcome the Vision Zero approach to reducing road user casualties and road danger.

Policy T3 Transport capacity, connectivity and safeguarding

In **Policy T3(B)(2)** 'development plans and development decisions should ensure the provision of sufficient and suitably located land ... including by identifying and safeguarding new sites and route alignments ... including the proposals identified in Table 10.1' In a similar vein Policy T3(C) the Draft New London Plan states 'Development proposals that do not provide adequate protection for the schemes outlined in Table 10.1 should be refused.' **As the proposals in Table 10.1 are generic schemes with no details or specific locations identified, it is unclear how boroughs can implement this section of the policy in practice.** The wording of the policy also confuses obligations around blight and risks the Mayor having to provide compensation for existing land and property owners. **Croydon Council also asks that it be made clear that bus enhancements can be anywhere in London and will be a response to actual growth and its location rather than planned level of growth to reflect Croydon's approach to sustainable growth of the suburbs.** This will help to mitigate against the Mayor's assumptions about how the quantum small sites will be delivered in case the growth occurs in a different pattern.

In **Policy T3(D)** the Draft New London Plan states priority should be given to delivering upgrades for a number of specific transport schemes. **This list excludes the Brighton Main Line upgrade and Tram enhancements in Croydon (including extensions towards Streatham, Crystal Palace and Purley). These are essential projects to support the delivery of our challenging housing delivery targets as well as supporting housing and jobs growth across large areas of inner and outer south London.** Brighton Main Line upgrade would facilitate the suburban metro (included in the list of potential schemes). Tram enhancements are essential to support Croydon's Growth Zone ambitions. It is not readily apparent why this priority list has been identified. **The Draft New London Plan should be seeking to deliver all the transport schemes listed in Table 10.1 with boroughs required to provide support under policies T1 and T2.**

There is only one mention of upgrading the Brighton Mainline in the Draft New London Plan and this is 'Brighton Mainline Upgrade (higher frequencies)' in table 10.1. The Thameslink programme does very little in south London to support future growth. It deals with existing demand. Without upgrading the Brighton mainline you cannot run any more trains. **Policy T3(D) needs amending to include the Brighton Main Line as below:**

'In Development Plans and development decisions, priority should be given to delivering upgrades to the Brighton Mainline, Underground lines, securing Crossrail 2, the Bakerloo Line Extension, river crossings and an eastwards extension of the Elizabeth Line.'

Policy T4 Assessing and mitigating transport impacts

Croydon Council welcome the requirement for Healthy Streets approach as part of Transport Assessments but suggest that the 80% sustainable mode share target (draft policy T1A) also be explicitly addressed in Transport Assessments. In **paragraph 10.4.4**, the Council consider it is preferable for developments which generate a significant number of trips should be located in places well-connected by public transport. **Croydon suggest therefore the deletion of 'ideally' at the start of this paragraph.**

Policy T5 Cycling

The Council welcome the support for a London-wide cycle network and the requirement for cycle parking for developments. However, the Council would support the minimum provision for all use classes (Policy T5(D)) except for Class A uses.

Croydon Council support the minimum cycle parking standards set out in Table 10.2 for non-residential uses. However, **the Council consider the reference to GEA in relation to standards based on floor space confusing and it is not clear why there needs to be a differentiation between cycle and car parking standards in this respect.** For example car parking standards for retail and office are linked to GIA which seems a more rational approach as it takes into account the size of the whole development.

Croydon Council objects to the minimum cycle parking standards for residential development set out in Table 10.2. In a high density development of 200 flats typical of Croydon Opportunity Area, this results in a requirement for in excess of 500 cycle parking spaces. Croydon Council supports the provision of cycle parking in developments and believes that it is essential to encourage a shift to more sustainable modes of transport. However, seeking to accommodate possible demand in the distant future will impact on providing affordable housing in the short term and can result in a poorer quality provision of private amenity space as well. The cycle parking standards for C3-C4 dwellings should be tapered such that on larger developments the level of provision is reduced. A suggested approach would be to maintain the proposed level of provision for schemes of 1-35 units, then have lower rates for 36-100 units, and over 100 units and / or to require the provision of managed shared bike schemes i.e. the cycle equivalent to car clubs.

The Council support the higher minimum cycle parking standards for Croydon Opportunity Area (Table 10.2 and Figure 10.2). These higher standards would support sustainable development in the Croydon Town Centre and particularly focused on the Growth Zone.

In Table 10.2 for D1 Nurseries it should be made clear that some parking is for parents dropping off children and for scooter parking.

Croydon Council **welcome the development of a London-wide cycle route network (paragraph 10.5.1). However, the Council are concerned that the network would not be at a sufficient density to facilitate the growth in cycle usage into outer London Metropolitan centres such as Croydon** as identified by TfL (paragraph 10.5.4). **A high quality grid like cycle network similar to that planned for central London is needed to support the growth of cycling and the development of Healthy Streets particularly as higher cycle parking standards are suggested for such locations.**

The Council welcome the support for facilities for disabled cyclists. Croydon are developing a cycling strategy which sets out our aspirations for a cycle network capable of being used by all cyclists including those with non-standard cycles. **It would be helpful if guidance is given on the proportion of cycle parking to be provided for non-standard cycles.** Similarly, the London Cycling Design Standards should be updated to provide greater guidance on appropriate design and layout for such parking.

Policy T6 Car parking

Croydon Council strongly support the policy to restrict car parking provision in areas well connected by public transport. The Council also support the greater requirement for electric or other Ultra Low Emission Vehicles. However, the decision regarding where public electric vehicle charging points and infrastructure is located and its appearance should be a decision for the boroughs. Croydon is already requiring, through its Local Plan, all car parking spaces to have active or passive provision for

such vehicles. Reference is made to TfL's guidance on car parking management and design in Policy T6(H). It appears this is not yet available but the Council consider it should be developed prior to the EiP.

Croydon Council agree car parking standards should be linked to PTAL estimates. Many boroughs and developers use the on-line PTAL Webcat tool to estimate or check the PTAL score for a particular site. However, it is clear that the data within it is out of date as the base year is 2015. It is essential that the data is brought up to date and updated on a regular basis e.g. at least annually. The opportunity should also be taken to review the methodology used to estimate the PTAL score. Currently, rail, DLR and Underground services are scored for services in both directions. However, Tramlink services are only assessed for one direction as are bus services. It is not clear why two different values are used to assess connectivity.

Policy T6.1 Residential parking

The Council welcome the support for car club spaces in lieu of on-site car parking spaces. A similar policy exists in the Croydon Local Plan 2018. It would be useful if evidence based guidance could be provided to enable boroughs to assess the level of car club provision when Croydon consider development proposals.

In **Policy T6.1(G)(1)** and paragraph 10.6.11, the effect of the policy would be to only require one disabled parking space at the outset for developments of fewer than about 18 units. This **seems a very low standard even allowing for the passive provision for disabled parking in Policy T6.1(G)(2)**. Croydon Council would expect TfL to provide the evidence that such a low initial provision is justified. It is also not clear how Policy T6.1(G)(2) can be implemented in practice. Is this suggestion that the space which could be used for disabled parking is used for another use such as landscaping and then this is removed to allow more disabled parking spaces?

Policy T6.1(H)(2) is confusing in referring to 'dwelling'. It **would be clearer if 'dwelling' is replaced by 'site'** as parking would be provided in areas around the dwelling or block of flats.

By providing a disabled bay on-street, sub paragraph (H)(3), this could not be dedicated to residents of a dwelling and therefore would be of limited use.

In **Table 10.3** for Outer London, PTAL 0 -1 reference is made to a proportion of a development with small units influencing parking provision. It **would be helpful to have more clarity on what proportion of small units should influence total maximum parking provision.**

Policy T6.2 Office parking

Given the focus on PTAL assessment in parking provision, Croydon Council would be **seeking clarity on the definition of 'well connected' in Policy 6.2(B)**. The Council welcome the support for electric and Ultra Low Emission vehicles in Policy 6.2(F).

Policy T6.3 Retail parking

Croydon welcomes the suggestion of shared use between office and retail parking which the Council consider would contribute to more efficient use of total car parking demand.

In a similar way to the office parking policy, Croydon Council would like clarity on the definition of 'well connected' public transport in paragraph 10.6.15. Croydon welcomes the reference to Healthy Streets Approach in the same paragraph but it could equally apply to the consideration of office developments.

The Council consider the policy should require operational parking to provide infrastructure for electric or other Ultra Low Emission vehicles, as per the policy on office parking.

Policy T6.4 Hotel and leisure uses parking

The Council welcome the support for all operational parking should be for electric or other ultra-low emission vehicles.

Policy T6.5 Non-residential disabled persons parking

Croydon Council are **seeking greater clarity for 'some' in the last sentence in paragraph 10.6.18.**

Policy T7 Freight and servicing

The Council welcome the support for provision of electric vehicle charging points for freight vehicles.

In Policy T7(H), Croydon would be seeking guidance from TfL on what constitutes micro consolidation in large developments.

Policy T8 Aviation

In Policy T8(B) The Council welcomes the recognition of the role of airport growth in supporting jobs and housing in Opportunity Areas. For Croydon, the growth in Croydon Opportunity Area and between Croydon and Brighton through Gatwick is reliant on the Brighton Mainline Upgrade, which should be a priority for investment to support any increase in capacity at Gatwick as supported by the Mayor (paragraph 10.8.7). Croydon Council also supports the expansion of Gatwick Airport and, therefore, welcomes paragraph 10.8.7.

In paragraph 10.8.8 reference should be made to the Brighton Mainline Upgrade as well as to Thameslink as schemes which cater for background growth.

Policy T9 Funding transport infrastructure through planning

In Policy T9(B), Croydon Council support the idea of identifying strategic transport infrastructure and improvements to public realm. The Council are currently working with partners in south London and with TfL on the development of a sub-regional transport strategy which will identify priorities for investment.

Chapter 11 – Funding the London Plan

Policy DF1 Delivery of the Plan and Planning Obligations

Policies DF1(A), DF1(B) and DF1(C) are welcomed.

However, Croydon Council objects to Policy DF1(D) as it is not appropriate for a London wide policy to dictate what are the infrastructure priorities of a London Borough.

Croydon Council prepares annually an Infrastructure Delivery Plan which sets out the projects that are needed to mitigate and support the Croydon Local Plan 2018. The Infrastructure Delivery Plan sets out both the funding gap for each project, and its priority in terms of delivery of the Croydon Local Plan 2018. Some of the projects rated as of critical importance are transport projects. Others are not, and these include school expansions, public realm improvements, healthcare provision and improvements to the water supply and sewer networks. Conversely, some transport projects are seen as important but are neither critically important nor essential to delivering the Croydon Local Plan.

Croydon Council agrees that developers should factor in the cost of providing affordable housing as part of their schemes (in line with Policy DF1(A)). As such the Croydon Local Plan 2018 contains

London's only fixed minimum affordable housing policy so that schemes that do not deliver at least 15% affordable housing can be refused permission. This ensures that the provision of affordable housing is given priority up to a certain point but not to the exclusion of other critically important infrastructure.

The wording of Policy DF1(D) risks diverting critical funds towards non-essential projects at the expense of projects that of critical importance to boroughs.

Chapter 12 – Monitoring

Policy M1 Monitoring

Croydon Council supports the use of monitoring and measuring using Key Performance Indicators (KPIs) (paragraph 12.1.1).

Croydon Council supports the reporting of performance against the KPIs, and any commentary with additional corresponding performance figures in the Annual Monitoring Report (paragraph 12.1.2). The Council also supports, in principle, of the monitoring of the new, more strategic KPIs.

It is noted that the Mayor's own monitoring indicator for the supply of new homes is only an 'increase in the supply of new homes over the period... towards meeting the 66,000 net additional homes needed each year up to 2030'. This suggests that the Mayor recognises the concerns that Croydon Council has outlined in its response to Policy H1. **The indicator would be further strengthened if it includes the overall number of homes to be built during the London Plan period and not just the annual average.** Otherwise, there is a discrepancy in that borough's will be potentially penalised (through planning appeals primarily) because they are not achieving the ambitious target, whilst the Mayor is saying that the London Plan is working because housing completions are increasing year on year, even if it is not delivering the Mayor's ambition to meet London's housing need within London.

It is noted that the Mayor does not intend to monitor his own strategic target of 50% of all new homes in London to be affordable. Croydon Council suggest that, **for the London Plan to be effectively monitored, there needs to be a KPI on the overall cumulative percentage of affordable housing delivered over the London Plan period.**

Most points in paragraph 12.1.3 fall in line with the Croydon Local Plan 2018, and are welcomed. However, in terms of 'reduction of London's digital 'Not Spots', digital connectivity in the borough is not currently monitored by the Croydon Council.

Croydon Council welcomes the possibility of a new set of indicators to measure the performance of referable planning applications in terms of compliance with important policy issues (paragraph 12.1.4).

Annex 1 – Town Centres

Two areas of Croydon are identified as strategic areas of night-time activity – Croydon Town Centre is identified as being of regional/sub-regional importance, whilst Norbury is identified as being of more than local importance. **Further information about the evidence used to identify areas of strategic importance for the night-time economy should be set out.** How were the classifications reached/justified? It will be important for classifications to be proactively managed and reviewed as they are likely to change over time as with town centre designations.

Croydon Council notes that Addiscombe District Centre has been identified as having medium potential for residential growth. **There is a lack of development sites in Addiscombe District Centre**

so the Council questions how it has been identified as having medium potential for residential growth. Growth in Addiscombe District Centre will be incremental (and supported in principle by Croydon Council).

Croydon Council welcomes that Purley District Centre has been identified as having high potential for residential growth.

Croydon Council notes that Upper Norwood/Crystal Palace District Centre has been identified as having high potential for growth. Whilst this District Centre straddles three boroughs and Croydon Council can only commentate on that part of the District Centre within its own jurisdiction; **the availability of development sites within that part of the Crystal Palace District Centre located within Croydon would suggest that it only has potential for medium residential growth.**

Croydon Council notes that South Norwood District Centre has been identified as having medium potential for residential growth. The entire District Centre is a Conservation Area (and one that has been identified by Historic England as being at risk). The Croydon Local Plan 2018 has only identified one development site within the District Centre with capacity for 12 homes. Furthermore, the Place of South Norwood and Woodside within which the District Centre is located has been identified as having a low level of growth in the Croydon Local Plan 2018, in large part due to the lack of development sites. **The proximity to Norwood Junction station and the fact that it has a PTAL rating mostly of 5 does not mean that it has, in this instance, significant development potential. Growth in South Norwood District Centre will be incremental (and supported in principle by Croydon Council subject to its impact on the Conservation Area).**

Croydon Council welcomes the identification of Croydon Metropolitan Centre as having 'Speculative office potential'.

It is noted that Norbury District Centre is described in Table A1.1 as being in both the London Borough of Croydon and the London Borough of Lambeth. The boundary of Norbury District Centre has been amended by Lambeth's Local Plan (2015) and the Croydon Local Plan 2018, such that no part of Norbury District Centre now lies within the London Borough of Lambeth. The District Centre was consolidated to focus on the commercial core along London Road in Croydon.