

## Appendix 4

### A summary of the main comments received on CLP1.1 (Preferred and Alternative Options) consultation November 2015 and the Council's response and changes made to Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission)

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Over-arching comments	Comments about the complexity of the documents, their ease of use and the length of the consultation period.	<p>The consultation period complies with the Council's adopted Statement of Community Involvement which stipulates a period of 6 weeks.</p> <p>The Proposed Submission has included a table which lists the policies with have proposed changes in them in 'How to Use this document' and, where possible,</p> <p>The changes to text have been made clearer with removal of changes that are typing errors or titles updates.</p> <p>The proposed changes to the 16 Places are now clearly identified on maps in Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission)</p>
Over-arching comments	Comments about the location of consultation events and public transport links relative to the Places they were intended to serve.	The location of events was selected with public transport in mind and availability of venues and staff resources.
Over-arching comments	The Home Builders Federation want the Council to approach Bromley about	Bromley were approached as part of this consultation on the Local Plan

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	get them to meet Croydon's unmet housing need.	regarding Croydon's unmet housing need
SP1 The Places of Croydon	The intensification associated with an increase to 1435 homes a year and the split of homes over through the Croydon Opportunity Area, sustainable growth of the suburbs and urban sites beyond the opportunity area should go ahead only after a thorough traffic impact and management assessment.	No change to policy but Policy SP8.4 of the Croydon Local Plan: Strategic Policies remains unchanged and requires major development proposals to be supported by transport assessments.
	Coulsdon has been removed from Policy SP1- The Places for Croydon as a primary area for growth. Given the emerging development at Cane Hill, and the need to continue the regeneration of the town centre, this appears to be an unsubstantiated omission. We believe it should be re-instated.	The areas of growth are identified by comparing the amount of homes to be developed in each of the 16 Places. Based on these calculations Coulsdon will provide a similar number of homes to Thornton Heath and it is therefore now identified in the policy alongside Thornton Heath as accommodating moderate residential growth, and not as an area of major growth/broad location.
SP2 Homes	<p>Mole Valley District Council stated it will probably be unable to help meet our unmet housing need but that Croydon should publish a Green Belt review to demonstrate that there is no Green Belt that no longer meets the purpose of Green Belt.</p> <p>Tandridge District Council also says that Croydon</p>	A Green Belt review has been carried out and will be published alongside the Proposed Submission draft of the Plan. All areas of Croydon's Metropolitan Green Belt bar those already identified in Policy SP6 meet at least one of the tests for designation as Metropolitan Green Belt and, therefore there is no additional capacity to be

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	<p>should publish a Green Belt review for the same reason.</p> <p>Unmet housing need should be re-distributed across London (comment made both by some London Boroughs and authorities outside London).</p> <p>Given shortfall of housing against need a Green Belt review should be undertaken.</p>	<p>found on Metropolitan Green Belt without its absolute de-designation in parts of the borough.</p>
	<p>Though the borough's proposed supply target (1,588 pa) exceeds that in the London Plan (1,435 pa) it is still significantly below the need identified in its SHMA (2,146 pa). The borough is advised to demonstrate how it will seek to close the gap between need and supply in accordance with London Plan Policy 3.3</p>	<p>No change to policy. The Local Plan has minimum housing target, which, in conjunction with draft Policy DM31 (of the Croydon Local Plan – Detailed Policies and Proposals) in the preferred and alternative options consultation seeks to increase and maintain supply of windfall housing developments across the borough in locations where previously development may not have taken place. However, it is not possible to accurately quantify the level of development from the sustainable growth of the suburbs so it is not represented in numeric terms in Policy SP2.2. The SHMA has been produced fully in compliance with the National Planning Policy Guidance on preparing SHMAs, which, it is noted,</p>

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		<p>only references backlog in terms of affordable housing need. Croydon's SHMA specifically includes the backlog of unmet affordable housing need and also considers, beyond what is required by the guidance, backlog of unmet overall housing need through the application of pre-recession household formation rates to future population projections.</p> <p>Note that the Council has met with other Councils under the Duty to Cooperate and work is ongoing.</p>
	<p>Policy needs to be clearer on types of affordable housing that will be provided on site.</p> <p>The insertion of a 50% target for affordable housing provision (SP2.4) is not considered a sustainable or viable position moving forward. A target at this level, if adopted, will create an onerous policy position, and a sense of uncertainty in the delivery of housing sites across the borough. Similarly, the proposed 75:25 ratio between affordable or social rent and intermediate low cost shared home ownership would, in most cases, are</p>	<p>Policy (SP2.4) revised to be clearer and key changes are:</p> <ul style="list-style-type: none"> <li>• abolition of annual review</li> <li>• new fixed lower 30% minimum requirement based on a development viability assessment</li> <li>• introduction of review mechanisms outside Croydon Opportunity Area if minimum requirement is not met but still with a requirement for some affordable housing on site</li> <li>• 60:40 ratio between affordable rent and intermediate with starter homes explicitly referred to as an intermediate</li> </ul>

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	<p>unviable for Registered Provider's particularly since the July budget announcement regarding rent reductions.</p> <p>Starter Homes – we recommend that the Council considers the implications of the Government's wish to provide Starter Homes on all sites. It may be in this case that the 10% intermediate provision could become the Starter Homes element.</p>	product.
	<p>The proposed change from a 60:40 ratio to 75:25 between affordable or social rent and intermediate low cost home ownership is not the most appropriate approach to meeting strategic housing needs since it would deter residential developers from investing in Croydon (due to the financial impact of the ratio change) which will ultimately detrimentally impact the delivery of affordable homes.</p>	<p>Policy changed- the ratio between affordable rent and intermediate housing will revert back to 60:40 as the proposed higher ratio is unlikely to be deliverable without significant grant for the affordable rent, which is unlikely to be available.</p>
SP2 Homes	<p>The preferred approach of reviewing the 'viability' of affordable housing provision inside the Opportunity Area every year, rather than every 3 years, would undermine the certainty that developers and investors need, and could undermine such investment and development in the</p>	<p>The review of the minimum requirement for affordable housing will be removed across the borough as there is no longer any evidence to support it as house prices have now risen beyond the highest point envisaged in the original Dynamic Viability Model. Instead a new fixed</p>

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	Opportunity Area going forward.	minimum requirement of 30% based on a development viability assessment will apply borough wide with the same flexibility that currently applies in the Croydon Opportunity Area.
SP2 Homes	A very significant increase in the "minimum requirement" of affordable housing is proposed increasing from 15% to 50% both outside and within the Croydon Opportunity Area. In our experience across London, the complexity and cost of town centre development means that it is extremely unlikely for this level of affordable housing to be viable in current market conditions. Within the Croydon Opportunity Area this level of affordable housing is considered to be unviable and if treated as an absolute "minimum requirement" will make proposals unviable and undeliverable which will undermine the strategic objectives for the area. It is considered that this "minimum" would have significant ramifications for large scale development which is a strategic objective of the Council and that this policy would stifle development. Such policy changes should be seen in the wider context of	Policy SP2.4 rewritten to reflect the evidence of the Local Plan viability report. A new lower, minimum requirement will apply across the borough with similar flexibility arrangements as currently apply to sites in the Croydon Opportunity Area being extended to District Centres and other sites in the borough.

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	<p>Government changes to buy to let policy which is rippling through the investment and market and is particularly relevant to Croydon. The change from 60:40 to 75:25 ratio between affordable or social rent and intermediate low cost home ownership will exacerbate this viability concern. It is unclear as to how the review mechanism will operate in respect to "policy flexibility". The draft policy states that a review mechanism will be agreed "if it is not viable to provide affordable housing on site, on a donor site or through a commuted sum". Clarity should be provided as to how this relates to the "minimum requirements".</p>	
SP2 Homes	<p>In a number of areas in the south of the borough such as Coulsdon there are already too many large properties of four and five bedrooms and a lack of smaller two and single bedroom houses and apartments. This is reflected in the number of older large properties that are now being converted into multiple occupancies. There is clearly a need for smaller properties for first time buyers and children of existing families to remain in the area. The area of Coulsdon has a population with higher average age</p>	<p>No change to policy as the policy sets out a minimum percentage of three bed homes on sites with ten or more dwellings to ensure there is an appropriate mix on larger sites. This policy is also supported by the Croydon Local Plan: Strategic Policies SP2: Homes, which seeks to achieve socially-balanced and inclusive communities, setting a target for 50% of all new homes up to 2036 to have three or more bedrooms. Policy DM1 in Croydon Local Plan: Detailed Policies and Proposals also seeks to</p>

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	than Croydon as a whole and is in need of smaller accommodation for older people to down size, together with the need to provide more property designed for retired people.	retain smaller units of less than 130m2 to ensure there is no loss of residential units that serve smaller households.
SP2 Homes	Numerous comments on the strategic policy on Gypsy and Traveller pitches asking for extra clauses about “impact on area”.	These comments are not duly made as they are on policy that is not being consulted on for additional clauses.
SP3 Employment	Comments about the extent of the Office Retention Area (as the consultee wants their site removed from the area the Article 4 direction covers).	No change to policy as Policy SP3.13, Town Centres relates to the Office Retention Area rather than the Article 4 direction for the Croydon Opportunity Area and so this comment is not duly made.
SP4 Urban Design and Local Character	The following should be Local Heritage Areas Oakwood Avenue ,Stoats Nest Village and Whitgift Estate and the Woodcote Estate, West Hill, Dornton Road, Campden Road and Spencer Road and Hartley Farm area and Huntly and Sangly Road, Cheston Avenue, St. Helen's Road, St. Paul's Road, more of Pollards Hill, Ecclesbourne Road, Epsom Road, Chalfont Road, 15-55 Stanhope Road and Court Avenue.	Oakwood Avenue and Whitgift Estate, West Hill, Dornton Road, Hartley Farm, Huntley and Sangly Road, Cheston Avenue, St Paul's Road, Ecclesbourne Road and Epsom Road and more of Pollards Hill, and 15-55 Stanhope Road did not meet the criteria and reasons why are explained more fully in Consultation Log and the assessment evidence will be available on the Council's website for the publication of the Proposed Submission.



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		<p>The proposed Stoa Nest Homes for Heroes was examined against criteria and is now proposed for LHA designation.</p> <p>Campden and Spencer Road to be designated as LHA as they met criteria based on the supporting information from the Conservation Officer.</p> <p>Chalfont Road is already included in the South Norwood Conservation Area.</p> <p>St Helen's Road is now renamed as London Road (Norbury) and remains proposed as a LHA with some correction to the boundaries.</p> <p>Court Avenue to be partially included to Bradmore Green Conservation Area when this CA is reviewed. The part which does not meet criteria will be governed by general policies.</p>
SP4	Questioned the logic behind the decision for redefining the area for a Local Heritage Area at the Netherlands	Changes to the boundary of the existing LASC reflect on heritage significance of particular properties. No's 12-18 Woodplace Lane formed part of the original Dutch style estate designed by Dutch architect Wouter Hamdorff and therefore should be included in the designation area. Wilhelmina Avenue

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		contains later additions that were partly inspired but not designed or built by the Wouter Hamdorff.
SP4	Inglis Road proposed LHA includes Nicholson and Grant Roads and should be renamed to Addiscombe College Estate to reflect its heritage and as it is more than one road.	Renamed the proposed LHA as Addiscombe College Estate to reflect historical reference and that it is three roads, not one.
SP4	Views- suggested views from the top of Coombe Wood Hill/end of Ingleboro Drive, and from the 'Donkey Field' on Riddlesdown Drive of Croydon and London	These views were assessed but did not meet all the designation criteria. There is a full explanation in the Consultation Log and the assessment evidence will be available on the Council's website for the publication of the Proposed Submission.
SP4	Suggested views of the Town Centre, Croydon and Central London from Farthing Downs and Cane Hill	The view from Farthing Downs is included in the Local Plan as a Croydon Panorama (CP4) as this meets all the criteria. There is not a view proposed from Cane Hill, this was not identified from the previous consultation on the Detailed Policies in 2013 and as the site is under construction there is no public access available.
SP4	Views of the Downs and Happy Valley from local residential property should be protected.	Views from residential property do not meet the designation criteria. To meet the designation criteria the viewpoint must be in a publicly accessible

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		location in a major public area or the viewpoint is located in an area or on routes identified in Figure 5.1 Policy SP4 (Public Realm) map.
SP4	Cane Hill Water Tower and St Andrew's Church and Tower, Coulsdon Manor and the Fox and Tudor Rose public houses and the Whitgift Almshouses should be designated as Local Landmarks	Cane Hill Water Tower is already proposed as Local Designated Landmark. Coulsdon Manor, the Fox and the Rose Public House do not meet the criteria for designation as Local Designated Landmarks. St. Andrew's Church and the Whitgift Almshouses do meet the criteria and will be proposed as Local Designated Landmarks. There is a full explanation of the assessment in the Consultation Log and the assessment evidence will be available on the Council's website for the publication of the Proposed Submission.
SP4	There should be a view southward from Purley Way playing field up to the spire on the hill (St Thomas' Moore School).	The view southward from Purley Way playing fields does not meet all the designation criteria for a Croydon Panorama. There is a full explanation of the assessment in the Consultation Log and the assessment evidence will be available on the Council's website for the publication of the Proposed Submission
SP4	The view from the junction of Crown Hill and the High Street of Whitgift	The views of the Almshouses have been assessed and a view from

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	Almshouses should be protected from background clutter	Church Street of the Whitgift Almshouses meets the designation criteria for a Local Designated View
SP4	Protect the view of the Minster from Waddon Road and from Cromwell House.	The view from Waddon does not meet the criteria for designation, however there is a view from Roman Way near Cromwell House, from by the Fire Station that does meet the criteria for a Local Designated View and this will be included in the Proposed Submission. There is a full explanation of the assessment in the Consultation Log and the assessment evidence will be available on the Council's website for the publication of the Proposed Submission.
SP4	The views from Greenway Gardens towards Central London should be protected	The views do not meet the criteria for designation. There is a full explanation of the assessment in the Consultation Log and the assessment evidence will be available on the Council's website for the publication of the Proposed Submission
SP4	Objection to the de-designation of the New Addington to Addington Palace Local Designated View. This helps to protect the panorama from the high chalk ground at New Addington to the wooded hills arising up from Gravel	The Local Designated View was de-designated as it is not a unique view and a Croydon Panorama (Cp6) was identified that meets the criteria for designation and includes the view of Addington Palace and its surrounds

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	Hill and Addington Palace and helps to retain the landscape character of this part of Croydon.	
SP6 Environment and Climate Change	Policy SP6.3 should refer to the National Technical Standards to ensure the water efficiency target is conditioned as part of a planning approach and implemented through the Building Regulations	Policy SP3 refers to Technical Standards and now references Building Regulations Part G in the Proposed Submission.
SP7 Green Grid	<p>The Mayor welcomes the Borough's proposed continued protection and the consolidation of its Green Belt. When identifying land in the Green Belt for specific uses such as schools and gypsies and travellers sites the borough's approach is not currently considered to accord with the London Plan. To rectify this the Croydon would need to:</p> <ul style="list-style-type: none"> <li>- demonstrate that the sites selected effectively cause 'least harm' to the Green Belt in the terms and criteria set for release of Green Belt in the NPPF/NPPG</li> <li>- permit only the specified uses on the sites designated as Green Belt, open space and playing fields,</li> <li>- allocate the minimum site area necessary to provide the required educational facilities for these sites for the lifetime of the Plan, and,</li> <li>- explore the use of time limited de-designation to ensure that if these sites are not developed as schools</li> </ul>	The justification for the selection of these three sites for schools has been published. Once the school buildings are built the remainder of each of the sites will remain designated as Metropolitan Green Belt.

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	within the plan period the sites revert to their current protected designation of MOL, open space and playing fields.	
SP7	The Council should state explicitly the reasons behind any changes in designation to Green Belt or Metropolitan Open Land; the documentation presumes an understanding of the policy context and criteria	A Metropolitan Green Belt review has been carried out and will be published alongside the Proposed Submission draft of the Plan.
SP7	If the Council won't keep [land at Shirley Oaks] as MOL, it should at least designate it as Local Green Space so that it has some protection.	<p>The land at Shirley Oaks does not meet the criteria for Metropolitan Open Land and will continue to be de-designated, although the Peabody Close playing field, the allotments, the community garden at the Shirley Oaks Hospital, Shirley Oaks playing field &amp; wood, and land to the rear of Honeysuckle Gardens will be designated as Local Green Space instead providing the same level of protection as Metropolitan Open Land but a more appropriate designation for these areas.</p> <p>Whilst a green corridor does exist all the way from Wickham Road to Beckenham Cemetery, the green corridor justification for land being designated as Metropolitan Open Land can only apply in conjunction with one of the</p>

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		other three criteria, none of which the land at Shirley Oaks meets.
SP7	<p>Numerous objections to the re-designation of Croham Hurst, Purley Downs and Sanderstead Plantation and the de-designation of land at Shirley Oaks</p> <p>The Council should explicitly state the reasons behind any changes in designation to Green Belt or Metropolitan Open Land (regarding Sanderstead Plantation) and make clear why a designation has changed from one to the other, as this is not clearly understood by residents who have contacted us.</p>	<p>The designations to these spaces are proposed to be changed as they do not meet the criteria for designation as Metropolitan Green Belt. Croham Hurst and Purley Downs are important open spaces that require the same level of protection that their existing Metropolitan Green Belt designation affords them. As they are surrounded on all sides by built up area they are incorrectly designated as Metropolitan Green Belt (which should by definition surround a built up area or provide a buffer between it and the next built up area), so they will be re-designated as Metropolitan Open Land which provides an identical level of protection but is a more appropriate designation for this area.</p> <p>Sanderstead Plantation is surrounded on all sides by built up area and is therefore incorrectly designated as Metropolitan Green Belt (which should by definition surround a built up area or provide a buffer between it and the next built up area), so it will be re-designated as Local</p>

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		Green Space which provides an identical level of protection but is a more appropriate designation for this area.
SP7	The World of Golf site also does not meet criteria for designation as Metropolitan Open Land	All Metropolitan Green Belt and Metropolitan Open Land sites were reviewed, including World of Golf, and this site did not meet the criteria for de-designation.
SP7	TfL requests further discussions with the Council about the Green Belt boundaries in the Elmers End area. Although this is not included in the amended designation section, TfL would like to look at the options of changing the boundaries for this area to ensure it does not restrict the aspirations to provide a second platform or double tracking	The boundaries cannot be amended as no information has been submitted by Transport for London setting out their requirements for this site. In any case, local transport infrastructure which can demonstrate a requirement for a Metropolitan Green Belt location would be permitted, provided it preserves the openness of the Metropolitan Green Belt, as set out in paragraph 90 of the NPPF.
The Places of Croydon	Riddlesdown should be in one Place (not three as at present)	No change; however, the following changes were made to the text in order to reflect on the specific comment about Riddlesdown: (1) in Kenley and Old Coulsdon section to read: "11.95 Kenley and Old Coulsdon is a suburban area with green wooded hillsides (Dollypers Hill, Roydons



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		<p>Wood) and green open spaces (Kenley Common, Riddlesdown, Kenley Aerodrome) located within and around it. There is a strong link between the green infrastructure and the built environment. This creates a feeling of spaciousness or openness can be seen in the layout of the built environment." and " 11.97 Kenley and Old Coulsdon's shopping and community facilities are concentrated in the area between the Godstone Road and Kenley station. The area is framed by green space of Riddlesdown to the north and railway to the south." (2) in Sanderstead section to read: "11.127 Sanderstead is a suburban Place located on a hilltop, with residential areas of Purley Downs, Riddlesdown, Hamsey Green and Sanderstead surrounded by large scale green open spaces such as Mitchley Wood, Riddlesdown and Kings Wood."</p>