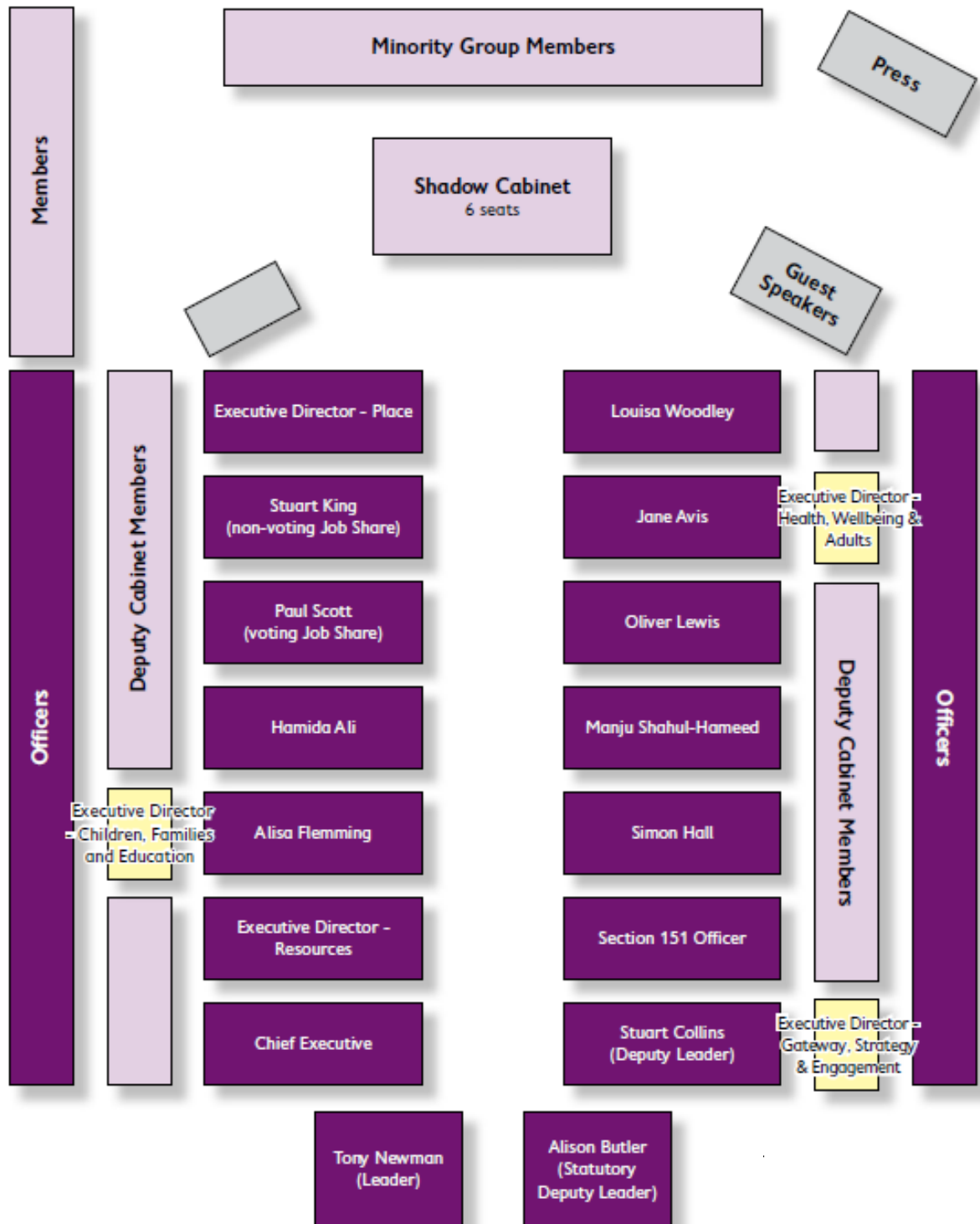




**CABINET
AGENDA**
for the meeting
on
25 March 2019 at
6.30 pm

Cabinet Seating Plan



To: Croydon Cabinet Members:

Councillor Tony Newman, Leader of the Council - Budget and Strategic Policy

Councillor Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes & Gateway Services

Councillor Stuart Collins, Deputy Leader and Cabinet Member for Clean Green Croydon

Councillor Hamida Ali, Cabinet Member for Safer Croydon & Communities

Councillor Jane Avis, Cabinet Member for Families, Health & Social Care

Councillor Alisa Flemming, Cabinet Member for Children, Young People & Learning

Councillor Simon Hall, Cabinet Member for Finance & Resources

Councillor Stuart King, Cabinet Member for Environment, Transport & Regeneration (non-voting - Job Share)

Councillor Oliver Lewis, Cabinet Member for Culture, Leisure & Sport

Councillor Paul Scott, Cabinet Member for Environment, Transport & Regeneration (voting - Job Share)

Councillor Manju Shahul-Hameed, Cabinet Member for Economy and Jobs

Invited participants:

Councillor Louisa Woodley, Chair of the Health & Wellbeing Board

All other Members of the Council

A meeting of the **CABINET** which you are hereby summoned to attend, will be held on **Monday, 25 March 2019 at 6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

JACQUELINE HARRIS BAKER
Council Solicitor and Monitoring Officer
London Borough of Croydon
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15 March 2019

Members of the public are welcome to attend this meeting. If you require any assistance, please contact officer as detailed above.

The meeting webcast can be viewed here: <http://webcasting.croydon.gov.uk>

The agenda papers are available on the Council website

www.croydon.gov.uk/meetings

AGENDA – PART A

1. Apologies for Absence

2. Minutes of the previous meeting (Pages 7 - 20)

To approve the minutes of the meeting held on 25 February 2019 as an accurate record.

3. Disclosure of Interests

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

4. Urgent Business (If any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

Cabinet Member: Cabinet Member for Safer Croydon & Communities

5. Council Voluntary, Community & Social Enterprise Sector Strategy, and Community Fund Progress Report (Pages 21 - 118)

Officer: Hazel Simmonds

Key decision: no

Cabinet Member: Cabinet Member for Children, Young People & Learning

6. 0-25 Special Educational Needs and Disabilities Strategy (Pages 119 - 194)

Officer: Robert Henderson

Key decision: no

Cabinet Member: Cabinet Member for Children, Young People & Learning

7. Post-16 Travel Assistance Policy Changes (Pages 195 - 236)

Officer: Shifa Mustafa

Key decision: yes

Cabinet Member: Cabinet Member for Environment, Transport & Regeneration (Job Share)

8. Parking Policy 2019-2022 (Pages 237 - 274)

Officer: Shifa Mustafa

Key decision: no

Cabinet Member: Cabinet Member for Safer Croydon & Communities

9. Equality Annual Report (Pages 275 - 322)

Officer: Hazel Simmonds

Key decision: no

Cabinet Member: Cabinet Member for Environment, Transport & Regeneration (Job Share)

10. Adoption of Supplementary Planning Document 2 - Suburban Design Guide (Pages 323 - 560)

Officer: Shifa Mustafa

Key decision: yes

Cabinet Member: All Cabinet Members

11. Stage 1: Recommendations arising from Scrutiny (Pages 561 - 570)

Officer: Jacqueline Harris Baker

Key decision: no

Cabinet Member: Cabinet Member for Finance & Resources

12. Investing in our Borough (Pages 571 - 576)

Officer: Jacqueline Harris Baker

Key decision: no

Cabinet Members: Cabinet Member for Children, Young People & Learning, Cabinet Member for Families, Health & Social Care and Cabinet Member for Finance & Resources

a) Award of Passenger Transport Dynamic Purchasing System (DPS) (Pages 577 - 584)

Officer: Shifa Mustafa

Key decision: yes

13. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

PART B AGENDA

Cabinet Members: Cabinet Member for Children, Young People & Learning, Cabinet Member for Families, Health & Social Care and Cabinet Member for Finance & Resources

**14. Award of Passenger Transport Dynamic Purchasing System (DPS)
(Pages 585 - 590)**

Officer: Shifa Mustafa

Key decision: yes

Cabinet

Meeting held on Monday, 25 February 2019 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillor Tony Newman (Chair);

Councillor Alison Butler, Stuart Collins, Jane Avis, Alisa Flemming, Simon Hall, Stuart King (non-voting - Job Share), Oliver Lewis, Paul Scott (voting - Job Share) and Manju Shahul-Hameed

Also Present: Councillors Margaret Bird, Jan Buttinger, Janet Campbell, Mario Creatura, Jason Cummings, Patsy Cummings, Nina Degrad, Sean Fitzsimons, Clive Fraser, Maria Gatland, Lynne Hale, Simon Hoar, Yvette Hopley, Shafi Khan, Vidhi Mohan, Jason Perry, Helen Pollard, Tim Pollard, Robert Ward and David Wood

Apologies: Councillor Hamida Ali

PART A

12/19 **Minutes of the previous meeting**

The part A minutes of the Cabinet meeting held on 21 January 2019 were agreed. The Leader of the Council signed the minutes as an accurate record.

13/19 **Disclosure of Interests**

There were none.

14/19 **Urgent Business (If any)**

There were no items of urgent business.

15/19 **Budget and Council Tax 2019/20**

a **General Fund and HRA Budget 2019/20**

The Leader began with a presentation and noted that despite local government experiencing cuts of 76% since 2011/12 the Prime Minister claimed that austerity had ended. The Leader stated he was proud to be presenting a budget which would see a modest increase of £1.54 per week in Council Tax in light of the large cuts experienced by the council. A budget, it was noted, which allowed for investment in areas including libraries, culture, young people, leisure centres and youth zones. The

Leader further welcomed the Mayor of London's budget being approved by the London Assembly, a budget which would provide additional funding for the Metropolitan Police Service which had also experienced large cuts in funding in recent years.

The Leader thanked Richard Simpson for his work on the budget and previous budgets. It was noted that in his role of S151 Officer, he had guided the council through some of the toughest times experienced in local government, and Members wished him well for the future. The Cabinet Member for Finance & Resources noted the huge contribution of Richard Simpson, and welcomed Lisa Taylor into the role of S151 Officer stating that Croydon continued to be in very safe hands financially.

The Cabinet Member for Finance & Resources gave a presentation to the meeting, stating the local government had experienced the largest cuts from central government and as a result local government across England was in crisis. Alongside the real term cut in spending power there had also been increases in demand which put further pressure on local government, and as such a multi-billion pound shortfall in funding had been identified nationally. Furthermore, it was raised that uncertainty remained in regard to the funding formula to be used by the government in future, and the council's response to the proposal was included within the agenda papers.

Whilst it was noted that funding cuts had placed a large pressure on local government, additional responsibilities such as Public Health and care leaver responsibilities, had also compounded the issue. Additionally, the Cabinet Member informed Members that demographic changes with an older population and more children in care, had increased pressures on the budget.

The Section 151 Officer noted that the Medium Term Financial Strategy in 2018 had reported a gap in 2019/20 and the following two years; however it had become possible to close the gap for 2019/20. The funding gap for the following two years, however, remained in place but work would continue to close the gap.

Members were informed that in addition to the central government funding reductions experienced since 2011, the council would see a further reduction of 8.2% in funding in 2019/20. Additionally, funding per head was significantly below that received by inner London boroughs despite Croydon experiencing the same issues as those experienced by inner London boroughs.

The Cabinet Member highlighted some areas where shortfalls in funding had been experienced; including Unaccompanied Asylum Seekers which saw a shortfall in funding of £7m and the Public Health grant had decreased by £2m per annum. Additionally, the council received only half the amount required for Council Tax Support.

Despite these shortfalls, the Cabinet Member noted that the council had focussed on delivery and having a tight control of the finances over recent years. The council, it was stated, had protected frontline services and had invested in the future of the borough. Furthermore, the council had introduced the London Living Wage and continued to encourage suppliers to also pay the London Living Wage. In relation to suppliers, the council was working to ensure that suppliers performed through improved commissioning and contract management, and penalties were imposed where necessary.

The Cabinet Member stated that the council remained committed to implementing the Labour manifesto despite the historic massive underfunding, which saw Croydon receiving £31m per annum less than inner London boroughs. A renewed focus on prevention and locality working would help to protect vulnerable residents and deliver high quality services for every resident.

It was noted that the proposed Council Tax rise of £1.54 per week would include a 77p rise in Council Tax, 26p for adult social services and 51p for the Greater London Authority which included greater funding for the Metropolitan Police Service. The Council Tax rise would include growth of £11m in Children, Families & Education which would help deliver support to Unaccompanied Asylum Seekers, children in care and education improvements, whereas the proposed growth in the Health, Wellbeing and Adults budget was due to the increase in number of adults in care and young adults requiring support. It was noted that a number of departments were making savings; including landfill tax reductions due to increased recycling rates, solutions being found by the Gateway team and back office savings.

In regard to capital expenditure, the Cabinet Member stated the largest area of expenditure was in relation to investment in housing. The Growth Zone, it was noted, would improve the infrastructure in the borough thereby bringing further benefits to Croydon. Investment in education would enable the delivery of greater SEN provision in the borough.

The Cabinet Member for Finance & Resources commended the budget to Council, which would be voted upon on Monday 4 March 2019.

The Cabinet Member for Homes & Gateway Services presented the Housing Revenue Account which would see a rent decrease of 1%, in line with government requirements, and no increases in ground rent or maintenance. The proposed repairs budget would ensure robust work continued to be undertaken, especially in the wake of the Grenfell tragedy, and as such £5m would be further invested into fire safety works.

The formal view of the Section 151 Officer was highlighted; that the budget must be considered in the context of the financial standing of the authority. The Section 151 Officer noted that in the 2018/19 outturn

earmarked reserves were expected to drop by £5m; however it was planned that the reserves would be replenished in 2019/20.

Despite the rising demand and cuts experienced by the authority the Section 151 Officer stated the council had not been using the reserves to plug any gaps in the budget. Furthermore the authority expected to receive £30m in capital receipts over the following three years which would facilitate the budget.

It was noted that £28m of growth was proposed within the budget which was in line with the detailed work that had been undertaken to forecast expected increases in demand and growth. Additionally, the Section 151 Officer highlighted that savings of £27m were set out in the budget, each saving had a clear delivery plan and the relevant Cabinet Member was clear of the expectations.

The Section 151 Officer informed Members that there were risks in relation to the delivery of the budget; including the increasing demands on social care, continuing Brexit uncertainty and continuing Unaccompanied Asylum Seeker underfunding by the Home Office. Additionally, it was noted, there remained uncertainty in regard to local government funding nationally, however as the Fair Funding Review continued further reports would be taken to Cabinet outlining the impact.

In conclusion, the Section 151 Officer considered the proposed budget to be robust.

Members of Cabinet welcomed the budget as it delivered in terms of Croydon's ambitions for culture, both in terms of investing in the Fairfield Halls but also ensuring savings were realised in the long term maintenance of assets. The budget also enabled the council to ensure better outcomes for communities.

In response to Member questions the Cabinet Member for Finance & Resources stated there was a quirk in local government finance regulations that if the authority collects more than was budgeted for then the council cannot recognise that additional money until the following financial year. This had been recognised by the external auditors within their audit report and was not considered inappropriate.

Members noted that there were a number of factors which caused uncertainty in local government funding; however despite the difficulties Members stated that investment in services, such as education and supporting the local economy, continued which delivered for local residents.

The Cabinet Member for Families, Health & Social Care stated the 6% precept for adult social care over the last three years was a repressive tax which burdened those who could least afford it. Despite the precept a £2b funding gap for adult social care remained nationally, and the Local

Government Association anticipated this funding gap to increase to £25b by 2025. It was suggested that the government should not push forward with the NHS long term plan until the funding for adult social care was sorted as the two were linked.

In response to questions the Cabinet Member for Families, Health & Social Care confirmed that a consultation was undertaken before Christmas 2018 in regard to the proposed charging schedule and while it was noted that there was a low response rate from some residents, such as eight responses in terms of learning disabilities, organisations which supported those residents were consulted and responded. It was not felt that the consultation could have gone further, and when the Cabinet Member had spoken to service users they had understand the fairness of the proposal.

The Cabinet Member for Finance & Resources further stated that the consultation had been undertaken properly and the proposals had been carefully thought out. The council continued to work with the voluntary sector and support services to assist those affected, and would work to ensure people did not fall through the net. The Leader stated that if the council received the proper funding then different proposals would have been put forward, but while the council continued to be underfunded difficult decisions were necessary.

In response to Member questions the Cabinet Member for Environment, Transport & Regeneration (non-voting – Job Share) confirmed that the capital budget for TfL was the council's contribution to the capital programme and was linked to improvement to cycle provision in the borough.

Councillor Alisa Flemming arrived at the meeting at 7.28pm.

The Leader proposed recommendation 1.1 (III) of the report be amended to read: "To welcome the GLA increase of 8.93%, of which 91% of which is being used for the Metropolitan Police service and 9% is being used for the fire service". Cabinet agreed to this amendment.

The Leader of the Council delegated authority to the Cabinet to make the following decisions.

RESOLVED:

1. That Cabinet recommend to full Council:
 - a. A **2.99%** increase in the Council Tax for Croydon Services (a level of increase Central Government has assumed in all Councils' spending power calculation).
 - b. A **1.0%** increase in the Adult Social Care precept (a charge Central Government has assumed all councils' will levy in its spending power calculations).

- c. To welcome the GLA increase of **8.93%**, of which 91% of which is being used for the Metropolitan Police service and 9% is being used for the fire service.
With reference to the principles for 2019/20 determined by the Secretary of State under Section 52ZC (1) of the Local Government Finance Act 1992 (as amended) confirm that in accordance with s.52ZB (1) the Council Tax and GLA precept referred to above are **not excessive** in terms of the most recently issued principles and as such to note that no referendum is required. This is detailed further in section 3.5 of the report.
 - d. The calculation of budget requirement and council tax as set out in Appendix D and E of the report. Including the GLA increase this will result in a total increase of 4.88% in the overall council tax bill for Croydon.
 - e. The revenue budget assumptions as detailed in the report and the associated appendices :-
 - f. The programme of revenue savings and growth by department for 2019/20 (Appendix A of the report).
 - g. The Council's detailed budget book for 2019/20 (Appendix B of the report).
 - h. The Capital Programme as set out in section 16, table 16 and 17 of the report.
 - i. To note there are no proposed amendments to the Council's existing Council Tax Support Scheme for the financial year 2019/20.
 - j. The adoption of the Pay Policy statement at Appendix H of the report.
 - k. Approve the increase in premium for long-term empty dwellings with effect from 1st April 2019 as set out in section 9.10 of the report and Appendix I of the report.
 - l. The adoption of the Adult Social Care Charging Policy with effect from the 1st April 2019 as set out in section 8.11 and appendix J of the report.
2. That Cabinet agree:
- a. A rent decrease for all Council tenants for 2019/20, in line with the Government's social rent policy which has legislated to reduce social rents by 1%.
 - b. No increase to Garage and Parking space rents.
 - c. No increase to the service charges for caretaking, grounds maintenance and bulk refuse collection as detailed in section 17 of the report.
3. That Cabinet note:
- a. That in respect of the Council's public sector equalities duties where the setting of the capital, revenue and HRA budget result in new policies or policy change the relevant service department will carry out an equality impact

- assessment to secure delivery of that duty including such consultation as may be required.
- b. The progress being made towards balancing the Council's financial position for 2018/19 as at Quarter 3 and the current projected outturn forecast of £5.466m as set out in the report at item 5b on the agenda.
 - c. The response to the draft local government settlement which is attached at Appendix F of the report.
 - d. That pre-decision scrutiny of the proposed budget 2019/20 took place at the Scrutiny and Overview Committee on the 15th January 2019. The Scrutiny and Overview Committee agreed to recommend that the Cabinet Member for Finance and Resources be invited to attend a meeting of the Committee early in the new municipal year to discuss with Members the process for setting the following year's budget.
 - e. The statement on reserves and balances and robustness of estimates from the statutory Section 151 Officer.

b Quarter 3 Financial Performance Report 2018/19

The Cabinet Member for Finance & Resources introduced the report, noting that the total overspend of £5.466m was due to the budget pressures experienced by the council, in particular with regard to social care pressures. However, the council continued to have a tight grip on its finances as investment continued in the borough.

In response to Member questions the Cabinet Member stated that in 2017/18 the parking team had been very prudent in calculating anticipated parking charges, and as such had massively underestimated the projected income; however officers were confident that the budget had now been corrected. The Cabinet Member for Environment, Transport & Regeneration (non-voting – Job Share) further confirmed that officers did not go out looking to fine people and half of fines were given to those who did not live within in the borough. Members also noted that additional income was received due to the expansion of Controlled Parking Zones in the borough.

The Cabinet Member for Finance & Resources noted that the council's ability to forecast trends, particularly in relation to adult and children's social care, had improved. However it was recognised that there had been some underestimates in the level of demand but it was felt that it was improving which was enabling the council to budget more effectively, barring external factors such as the underfunding of Unaccompanied Asylum Seekers.

The Cabinet Member for Children, Young People & Learning welcomed the budget, noting that borrowing was taking place for the right reasons to provide stable and safe homes and education facilities for young people.

The Leader of the Council delegated authority to the Cabinet to make the following decisions.

RESOLVED:

1. Note the current revenue outturn forecast at the end of the third quarter of 2018/19 of £2.8m, this is before exceptional items of £2.666m, resulting in a total overspend of £5.466m. If the £5.466m is not reduced by the end of the year up to £5.5m will need to be drawn down from earmarked reserves in 2018/19. Reserves will then be replenished reserves in 2019/20 from the anticipated collection fund surplus and dividend payable to the Council by Brick by Brick, which forms part of the draft 2019/20 budget.
2. Note the ongoing engagement with and lobbying of Government by the Council for additional funding for Croydon, both in general terms and specifically Unaccompanied Asylum Seeking Children given Croydon's gateway status, fire safety measures and mitigation of the impact of the Universal Credit implementation.
3. Note the HRA position of a £1.87m forecast underspend against budget.
4. Note the capital outturn projection of £373.316m, forecast to be an underspend of £74.684m against budget.

c Treasury Management Policy Statement, Minimum Revenue Provision Policy Statement & Annual Investment Strategy 2019/20

In response to Member questions the Cabinet Member for Finance & Resources confirmed the Section 151 Officer would be able to provide details in relation to the authorised borrowing limit; however it was felt that it was right to borrow to enable investment in the borough; such as in Fairfield Halls, SEN school provision, and temporary accommodation. It was noted that the benefits from investments were realised. The Cabinet Member further stated that details in relation to any borrowing which had been reclassified in line with the Minimum Revenue Provision Statement and any decision taken under delegated authority in relation to this would be provided by the S151 Officer after the meeting.

The Leader of the Council delegated authority to the Cabinet to make the following decisions.

RESOLVED:

That Cabinet recommend to Full Council that it approve:

1. The Treasury Management Policy Statement 2019/2020 as set out in the report including the recommendations:
 - a. That the Council takes up the balance of its 2018/2019 borrowing requirement and future years' borrowing requirements, as set out in paragraph 4.5 of the report.
 - b. That for the reasons detailed in paragraph 4.14 of the report, opportunities for debt rescheduling are reviewed throughout the year by the Director of Finance, Investment and Risk (S151 Officer) and that, she be given delegated authority, in consultation with the Cabinet Member for Finance and Resources and in conjunction with the Council's independent treasury advisers, to undertake such rescheduling only if revenue savings or additional cost avoidance can be achieved at minimal risk in line with organisational considerations and with regard to the Housing Revenue Account (HRA) as set out in the Council's Medium Term Financial Strategy 2018/2022.
 - c. That delegated authority be given to the Director of Finance, Investment and Risk (S151 Officer) in consultation with the Cabinet Member for Finance and Resources, to make any necessary decisions to protect the Council's financial position in light of market changes or investment risk exposure.
 - d. That the Council adopts the 2017 edition of the revised Treasury Management Code of Practice and Prudential Code issued by CIPFA in December 2017.
2. That the Council adopts the Annual Investment Strategy as set out in paragraph 4.16 and 4.17 of the report.
3. That the Authorised Borrowing Limits (required by Section 3 of the Local Government Act 2003) as set out in paragraph 4.18 and as detailed in **Appendix C** of the report be as follows:

2019/2020	2020/2021	2021/2022
£1,486.05m	£1,550.30m	£1,615.40m

4. That the Council approve the Prudential Indicators as set out in **Appendix C** of the report.
5. The Annual Minimum Revenue Provision Policy Statement (required by the Local Authorities (Capital Financing and Accounting) (England) (Amendment) Regulations 2008SI 2008/414) as set out in **Appendix D** of the report.
6. That the Council's authorised counterparty lending list as at 31 December 2018 as set out in **Appendix E** of the report and the rating criteria set for inclusion onto this list be approved.

7. That the Council adopts the Capital Strategy Statement set out in section 3 of the report.

16/19

Housing Asset Management Plan

The Cabinet Member for Homes & Gateway Services informed Members that the Plan ensured the upkeep of council homes and enabled residents to be engaged with improvements which were to be undertaken. Whilst it was noted that the Housing Revenue Account budget was not entirely controlled by the local authority, the council continued to work to ensure homes were up to the required standard and improvements were effectively delivered to ensure the homes were compliant, decent and energy efficient.

Members were informed that it was the ambition of the council that residents were proud to call the properties 'homes', and felt that their views were being heard by using a variety of means to engage with the residents. The Cabinet Member thanked the housing team which had worked on creating the Plan, and who were incredibly passionate in ensuring residents had the best quality homes and were engaged in improvements.

The Leader of the Council delegated authority to the Cabinet to make the following decisions.

RESOLVED: To

1. Note the proposed implementation and progression of the draft Housing Asset Management Plan which sets out the overarching direction, specific strategies, policies and procedures to manage the Council's housing assets over the period of 2019 to 2028; and
2. Recommend to Full Council that the Housing Asset Management Plan 2019-2028, Appendix 1 of the report, be approved and implemented.

17/19

Brick by Brick Annual Business Plan

The Cabinet Member for Homes & Gateway Services stated it was an exciting year for Brick by Brick as residents would begin to move into the homes which had been built and Fairfield Halls was due to open in September 2019 following a full renovation. Members were informed that the Croydon First mantra was being delivered as the homes that were built were available primarily to Croydon residents.

Colm Lacey from Brick by Brick delivered a presentation and outlined that the company was set up with the clear ambition of delivering for Croydon. Homes were being built on sites which were typically small and across the borough, and around 13,000 homes were in the process of planning or delivery. The strategic target for Brick by Brick was to deliver around 500

homes per year, with around 50% being affordable. At the time of the meeting, Members were informed that 48% of consented schemes were to be affordable.

Brick by Brick stated that they were continuing to actively work on the pipeline programme which was anticipated to deliver 50% affordable homes, with work currently taking place on pre-application for the Fairfield Homes. Work continued to develop a new staffing structure, with staff numbers having grown from 19 to over 35, and a marketing suite was due to open the following week in George Street which would enable the company to market available properties to Croydon residents.

Mr Lacey confirmed that profits from the schemes were reinvested into ensuring the delivery of affordable homes in other projects. Members were informed that quality of design and build were paramount as it was important that the homes which were built were homes which people were proud to live in.

In terms of Fairfield Halls, Members were informed that the internal works were due to be completed in 2019, and that the refurbishment works had been sensitive to all that was loved about the Halls.

Cabinet Members noted that the renovation of Fairfield Halls was the biggest statement for culture in south London in ten years, and the Halls would be an exciting asset to the borough and would deliver exciting partnerships with organisations which sought to enhance the culture of the borough.

In response to Member questions, Mr Lacey stated the lease for the marketing suite was for 10 years with a rent of around £40,000 per annum which was a favourable level and gave the company a high street presence. The marketing suite also had office accommodation above which was to be used by Brick by Brick staff.

Whilst it had been planned that Brick by Brick would be self-financing before 2022, it was now planned that more units would be delivered. The Cabinet Member for Finance & Resources confirmed the council supported the increased delivery of housing units which was crucial for families in the borough, and that the additional borrowing would be repaid. It was noted that the dividends received would be favourable to the council as the amount received would be higher than the amount the council had been charged in interest for the loans; however a prudent view had been taken on the level of dividends given the property market at the time of the meeting.

The Leader of the Council delegated authority to the Cabinet to make the following decisions.

RESOLVED:

That Cabinet, on behalf of the Council as sole shareholder of Brick by Brick Croydon Limited ("**BXB**"), approve the 2019/2020 Business Plan of BXB as set out in Appendix 1 of the report.

18/19

Stage 1: Recommendations arising from Scrutiny

The Leader of the Council delegated authority to the Cabinet to make the following decisions.

RESOLVED:

To receive the recommendations arising from the Scrutiny & Overview Committee (11 December 2018) and from the Children & Young People Scrutiny Sub-Committee (27 November 2018) to provide a substantive response within two months (i.e. at the next available Cabinet meeting on **25 March 2019**).

19/19

Stage 2 Response to Recommendations arising from Scrutiny & Overview Committee on 30 October 2018 and Streets, Environment & Homes Scrutiny Sub-Committee on 6 November 2018

The Leader of the Council delegated authority to the Cabinet to make the following decisions.

RESOLVED:

To approve the response and action plans attached at Appendix A of the report and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

20/19

Investing in our Borough

The Leader of the Council delegated authority to the Cabinet to make the following decisions.

RESOLVED: To note

1. The contracts over £500,000 anticipated to be awarded by the nominated Cabinet Member, in consultation with the nominated Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader.
2. The list of delegated award decisions made by the Director of Commissioning and Procurement, between 12/12/2018 – 11/01/2019.

3. Property acquisitions and disposals to be agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.

21/19

Exclusion of the Press and Public

The item was not required.

The meeting ended at 8.11 pm

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For General Release

REPORT TO:	CABINET 25 March 2019
SUBJECT:	Council Voluntary, Community & Social Enterprise Sector Strategy, and Community Fund Progress Report for 2018
LEAD OFFICER:	Hazel Simmonds Executive Director Gateway, Strategy and Engagement
CABINET MEMBER:	Councillor Hamida Ali Cabinet Member for Safer Croydon & Communities
WARDS:	All

CORPORATE PRIORITY / POLICY CONTEXT

The Corporate Plan recognises the importance of working in partnership to deliver the priorities and outcomes we have promised in new and creative ways. This includes working with the voluntary, community and social enterprise sector.

The Council's Community Fund Progress Report 2018 provides an update on the progress made during the second year of delivery.

The Community Fund has clear outcomes that are aligned with the recommendations made by the Opportunity and Fairness Commission as well as the Community Strategy and Corporate Plan. The Community Fund is a three year outcome focused programme that builds on the assets of the voluntary and community sector, promoting enterprise, volunteering and social value. Overall, it supports the Council's ambitions to reduce inequality and promote fairness for all communities.

FINANCIAL IMPACT

The Council provides a range of financial support to the Voluntary, Community and Social Enterprise Sector. The new strategy will provide a framework for how the Council works with the sector in future. The report provides an update on the Community Fund, which is a discretionary grants programme with a budget commitment of nearly £6 million over a three year period from October 2016 – September 2019. An extension of six months has been agreed, thus current contracts will terminate on March 31 2020.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below.

1. RECOMMENDATIONS

The Cabinet is recommended to:

- 1.1 Approve the Council's Voluntary, Community & Social Enterprise Sector Strategy, as attached (Appendix 2);
- 1.2 Subject to compliance with consultation requirements in relation to stakeholders, delegate to the Executive Director (Gateway, Strategy & Engagement), in consultation with the Cabinet Member for Safer Croydon & Communities, authority to amend the strategy as necessary and to ensure publication of any

amendments. Any proposed amendments shall be reported back to Cabinet as soon as reasonably practicable;

- 1.3 Note the progress on the annual milestone outlined in the attached annual impact report (Appendix 1) due to be published in March.

2. EXECUTIVE SUMMARY

- 2.1 This report outlines the council's aim to develop a Voluntary, Community and Social Enterprise Sector Strategy which provides a framework for how the Council works with the sector. It summarises the Council's corporate priorities and engagement work with the sector, comments from the Scrutiny & Overview Committee and seeks Cabinet approval of the proposed strategy.
- 2.2 In addition, this report provides a progress update on the Community Fund programme delivery for Year Two. The Community Fund programme is a significant proportion of the Council's financial support to the sector and was focused on delivering five key outcomes. The attached report provides a summary of the key achievements, outcomes and impact to date through a series of case studies and service user testimonials.
- 2.3 In September 2016, the Cabinet approved the Community Fund programme 2016-2019 to provide grant awards totalling nearly £6m. This demonstrated a clear and strong commitment to the Voluntary, Community and Social enterprise, (VCS) sector.
- 2.4 Croydon's VCS sector has a strong history of innovation and enterprise, providing imaginative, community based solutions. This report summarises the commissioning approach and showcases key achievements during the past year displaying the innovation, life-improving outcomes and impacts that we aim to deliver through this investment.
- 2.5 The report highlights the essential contribution that the VCS sector makes to the social and economic wellbeing and health of Croydon. The report notes the key role that the VCS sector plays in responding to the current challenges that face Croydon and the Council's continued commitment to investing in the sector to support this work. This commitment is confirmed in the recently approved Corporate Plan.
- 2.6 The Council is committed to further investing in the VCS sector and to commissioning the next stage of the Community Fund, to start in April 2020.
- 2.7 Engagement with the VCSE to inform the recommissioning has already started. Engagement will continue and will be further informed by the VCS Strategy.

3. BACKGROUND

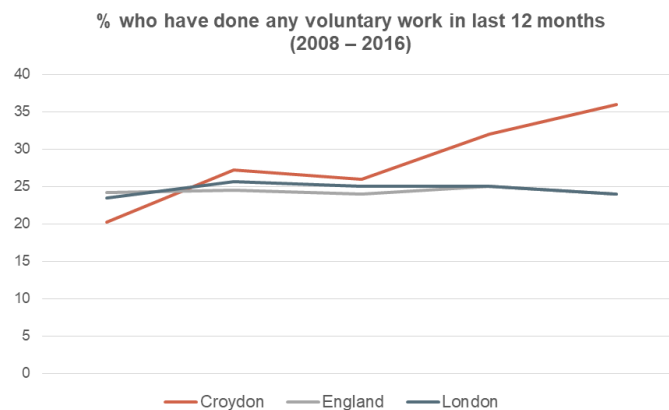
- 3.1 During 2015 the Council commissioned the Opportunity and Fairness Commission to recommend ways to reduce inequality. This was noted as one of the widest conversations with the community of any London Borough. The

findings from the Commission reported to Cabinet in January 2016 influenced the Community Fund outcomes framework and key principles. During the two years of the programme to date the focus on outcomes allowed the VCS to deliver creative and innovative programmes and commissioners to work with VCS organisations to agree clear measurements for performance and impact.

4. VOLUNTARY & COMMUNITY SECTOR: CROYDON CONTEXT

- 4.1 Croydon benefits from a strong Voluntary & Community Sector (VCS) which makes a vital contribution to the borough.
- 4.2 The VCS delivers significant services, support and advice to residents across a wide range of council services. The sector also supports community cohesion, empowerment and resilience.
- 4.3 According to the Charity Commission there are 819 registered charities in Croydon. This only captures those charities with their registered office within the borough. There are many more charities, such as national VCS organisations, that are not included within this figure but still provide a vital role in Croydon.
- 4.4 Croydon CVA have over 2,000 individuals registered within local VCS organisations, demonstrating the broader scope of the sector beyond registered charities.
- 4.5 When referring to the Voluntary & Community Sector, we are in fact referring to over a dozen different forms of organisations, including:
 - Community associations
 - Community groups
 - Co-operatives and social enterprises
 - Faith organisations
 - 'Friends of' Groups
 - Grant making trusts
 - Housing Associations
 - Non-constituted groups of residents working together to make a difference in their local area
 - Registered charities
 - Charitable Incorporated Organisations
 - School/parent groups
 - Social enterprises
 - Sports, environmental, arts and heritage organisations
 - Tenants and residents' groups
- 4.6 Whilst some organisations will employ staff, most are reliant on volunteers, at least in part. In recent years Croydon has benefited from an increase in volunteering levels. In the 3 years to 2015/16 (the most recent data available), the DCMS survey confirmed that 36% of people in Croydon had volunteered in the previous 12 months (see Chart 1). This was the third highest level of volunteering in London, and an increase from 20% in 2011/12.

Chart 1: Percentage of residents in Croydon, London and England who volunteer



Data from the Department of Digital, Culture, Media and Sport Taking Part survey showing levels of volunteering among the adult population (16+) by borough and region. It combines valid responses to the question 'During the last 12 months, have you done any voluntary work?' from three years of the survey, excluding 2009/10 when there was no volunteering question in the survey. It is a continuous face to face household survey.

4.7 Data on registered charities operating in boroughs suggests that the VCS in Croydon is the largest in outer South London. However, when the total income of active local registered charities is compared across the sub-region, Croydon is overshadowed by Richmond and Bromley even though those boroughs have smaller populations. The level of spend in registered charities between 2001/02 and 2016/17 rose markedly in Richmond and Bromley, and steadily in Kingston, and Sutton. This may in part be due to outsourcing to the VCS in those areas. It should be noted that this comparative analysis relates only to registered charities, which may represent only two-thirds of the VCS in Croydon; 35% of VCS organisations responding to the Council's survey stated that they were not/are not registered charities.

5. CROYDON COUNCIL CONTEXT

- 5.1 The Council adopted a new Corporate Plan in October 2018. This plan sets out the Council's promises to residents, business and partners across nine priority themes.
- 5.2 It should, therefore, be no surprise that there are multiple references to the VCS across the Corporate Plan. The VCS delivers significant services, support and advice to residents across a wide range of council services. The sector also supports community cohesion, empowerment and resilience.
- 5.3 In order to deliver the Corporate Plan, the Council is seeking to radically change the way services are delivered, with a strong focus on prevention and locality based working. This approach is evidence-led, recognising that services need to differentiate to respond to the differing needs across the borough. It also recognises the importance of collaboration and community-based networks in order to succeed. The VCS therefore has a significant role to play in this new approach.

5.4 The Council is a strong contributor to the VCS in Croydon, providing significant funding and staff support through council teams, its commissioning and procurement function and its One Croydon partnership. It also funds infrastructure organisations (CVA, Asian Resource Centre Croydon, Croydon BME Forum and Croydon Neighbourhood Care Association) to deliver specialist support to the VCS. The table below summarises of some of the support provided directly and indirectly.

Table 1: Support provided to the VCS in Croydon

Council teams	<ul style="list-style-type: none"> • Building capacity within the sector • Identification of funding opportunities / bid-writing support • Administering ward budgets, discretionary business rate relief and rent subsidy programmes • Organising community events
Infrastructure bodies	<ul style="list-style-type: none"> • Capacity Building • Training • Identification of funding opportunities / bid-writing support • A specialist skills and employment service • Building local networks • Brokering support from other sectors • Co-ordinating engagement activities • Promoting equality and cohesion within communities
Commissioning and procurement	<ul style="list-style-type: none"> • Publishing the commissioning pipeline • Developing the commissioning policy, including commitments to social value including buy local • Engaging and supporting the VCS sector and local businesses to be part of the council’s supply chain • Commissioning and contract management of Community Fund
One Croydon	<ul style="list-style-type: none"> • Development of Local Voluntary Partnerships (LVPs) model supporting people with complex needs in a locality and the link to social prescribing • VCS input into development of the models of care and commercial arrangements

5.5 However, there is no over-arching framework to inform the Council’s approach to working with and funding the VCS. Developing a VCS strategy provides an opportunity to establish a framework that informs our funding priorities and wider support for the sector, and strengthens our relationship with voluntary and community sector organisations of all types and sizes.

6. COUNCIL FUNDING SUMMARY

6.1 The Council provides significant direct financial support to the VCS.

Community Fund

- 6.2 The Community Fund has a prevention focus and was commissioned against the Opportunity and Fairness Commission priorities. £5,861,870 was allocated for the three year period, with a declining amount each year, designed to encourage VCS organisations to seek alternative funding and improve sustainability. In 2017/18, total funding was £1.935m, which was granted to 31 VCS organisations. Grants range from £4,700 up to £270,000. 54% of funding was allocated to 5 organisations.

Prevention Fund

- 6.3 The Prevention Fund focused on services aimed at the over-65s. Funded services include lunch clubs, befriending, outings, hospital transport and shopping services. Under the Prevention Fund, £450k was allocated to 21 VCS organisations in 2017/18. Grants ranged from £1.4k up to £72k, with nearly 60% of funding allocated to five organisations. In 2018/19 the total allocated was £561,400, with a similar pattern of distribution.

Community Small Grants

- 6.4 Under the Community Fund, £100k per year is retained for small grants to VCS groups. Grants of up to £5k each are available through a simple application process. The grants are allocated up to six times per year to support community resilience, community development and sustainability.

Premises and associated subsidies

- 6.5 Premises are a critical area of support for VCS organisations. They are also, however, an expensive resource that is often in short supply. The Council supports VCS organisations in a number of ways.
- 6.6 The Communities Team and Property Team work together to identify appropriate venues for VCS organisations. This includes seeking the right location and ensuring the building is fit for purpose. In order to improve the affordability for these premises, many are charged only a peppercorn rent (51 premises), or the Council provides Rental Grant Subsidy to support the premises costs.
- 6.7 The Council currently provides £247k in Rent Subsidy. This benefits a range of organisations including sports clubs, scouts associations, residents associations, youth and community centres as well as larger organisations such as the CAB, Law Centre and CVA.
- 6.8 The Council also provides Discretionary Business Rate Relief (DRR) in addition to the 80% mandatory rate relief that may apply. In 2018/19 just under £156k was awarded. 112 organisations received the 20% top-up to their mandatory rate relief, whilst 5 payments covered 100% discretionary relief. Most of the payments were low value; however, nearly 50% of the total budget is paid to six organisations. The budget is fully allocated against historic commitments, and the Council is therefore not able to consider any new applications for discretionary rate relief.
- 6.9 The Council's approach to premises related subsidy and support to the VCS has lacked an integrated approach, with no formal adopted policy or procedure for determining which organisations should benefit from rent subsidy and discretionary rate relief.

Community Ward Budgets

- 6.10 In addition to the above funding, each Councillor has been allocated a Community Ward Budget of £8k per year. These budgets are a dedicated and flexible resource for supporting specific local issues within their Ward. The funding is intended to encourage activities that are independent and self-sustaining. The majority of these budgets are allocated to VCS organisations, including £67k to Residents' Associations, £39k to faith groups and £30k to 'friends of' groups in 2017/18.

Other sources of funding

- 6.11 There is also significant spend not covered by these grant schemes. The Council has a £400m annual commissioning budget and is working to increase opportunities for VCS organisations to bid to provide services in the same way as any other public or private sector organisation. In addition, since the Community Fund and Prevention Fund were allocated, additional funding has often been announced by Government (e.g. Best Start, Early Help Strategy initiatives). Delivery of many of these projects involve VCS groups.
- 6.12 The Council is not the only organisation that provides funding to the VCS in Croydon. The CCG has a significant VCS spend, with £4.7m in 2018/19. Through One Croydon Alliance, Local Voluntary Partnerships will be allocating £329k in small grants. The sector has also had success in bidding for funding from other organisations, such as Big Lottery, national grant schemes and the Mayor of London (e.g. MOPAC projects).

7. GOOD PRACTICE

- 7.1 A key part of the research phase has involved considering different councils' approaches to VCS strategies, speaking with peers and reading national materials. This research provided practical insights around some familiar challenges, as well as serving to highlight areas of good practice.
- 7.2 It was notable that the majority of councils did not have a VCS strategy. Greenwich took a similar approach to Croydon's engagement, with a survey and events (see section 11 below). Their strategy included an analysis of key issues, many of which have also been identified in Croydon, priorities, outcomes and objectives. In particular, Islington Council's VCS strategy stood out from the others due to its clarity and simplicity. Islington segments its VCS sector by income, structure, activity, premises and location. This key information is used to inform how the Council can best interact with each organisation in order to best serve local needs and to further collaborative working. Both Islington and Greenwich recognise the need for wider support beyond funding, and the critical role of the VCS in working with local government.

8. PROPOSED VOLUNTARY & COMMUNITY SECTOR STRATEGY FOR THE COUNCIL

- 8.1 The proposed Voluntary & Community Sector Strategy is attached as Appendix 2. It is recommended that the Cabinet approve this strategy.

- 8.2 The strategy has been developed following extensive engagement with the sector (see section 11 below).
- 8.3 It is important to recognise that this strategy is to guide how the Council works with the sector, and how we prioritise our resources in this area. It recognises that the VCS are equal partners in our ambitious plans to deliver for the residents and businesses of Croydon. It does not seek to impose a strategy on the sector, which by its nature is diverse, varied and continuously evolving and responding to local needs.
- 8.4 The strategy is structured as follows:
- Foreword by the Cabinet Member
 - Background and context information regarding the VCS in Croydon
 - Findings from the consultation and engagement
 - A statement on why the VCS is important to use
 - Priority areas for the Council to work with VCS, and how we will support the VCS
- 8.5 The priority areas for the Council to work with the VCS have been grouped-around key priority outcomes of the Council's Corporate Plan. They capture the areas that the sector themselves identified as priorities that they could most effectively support.
- 8.6 The priority areas within the strategy are:
- People live long, healthy, happy and independent lives. We want people to be able to stay well and to manage well. Should they need support or services they will be closer to home.
 - Visible, cohesive and resilient communities
 - Croydon becomes a more equal place
 - Healthy, happy and independent lives are lived by as many as possible for as long as possible
 - Access to effective health services and care services when needed
 - Our young people thrive and reach their full potential
 - Children and young people in Croydon and their families are safe, healthy and happy; young people aspire to be the best they can be
 - Every child and young person can access high-quality education and youth facilities
 - Getting more young people involved in taking part in local democracy and in tackling the issues that matter most to them
 - Access to homes and prevention of homelessness
 - all have the opportunity to access a suitable home and avoid homelessness, with no one forced to sleep on the streets
 - Everyone feels safer in their street, neighbourhood, home. We pledge to treat serious youth violence including knife crime, as a public health issue
 - Working in partnership to reduce crime; including serious youth violence, domestic abuse and sexual violence, and hate crime
 - Anti-social behaviour and environmental crime are reduced throughout the borough, through work with partners and local community involvement
 - Everybody has the opportunity to work and build their career

- More residents can develop their skills through apprenticeships, academic and technical courses and access employment opportunities
 - We value arts, culture, sports
 - Croydon's cultural offer enhances our town and creates places where people want to live, work and visit
 - Good, affordable and accessible sports and leisure facilities enable people to be as active and healthy as they want to be
 - Our parks and open spaces are safe, pleasant, thriving places where everyone can exercise and have fun.
- 8.7 The strategy includes potential ideas that could be supported under each priority. However, the expectation is that the sector will innovate and bring forward new proposals and ideas that have not been seen in Croydon before. The strategy outlines that in future the Council will be more likely to support proposals that:
- Involve collaboration with other VCS groups
 - Are locality and prevention focused
 - Have a focus on early identification and intervention
 - Support the priority areas within the VCS Strategy
 - Are evidence-based and innovative.
- 8.8 Whilst we are seeking sector-led proposals and innovation, and benefit from a strong and diverse sector, we must continue to support voluntary and community sector organisations in Croydon. The strategy therefore recognises that we will continue to support the sector, directly and indirectly, in the following ways:
- Funding and commissioning
 - Facilitate collaborative working and partnership
 - Build the capacity of VCS organisations and groups
 - Premises: maximise use of assets for the VCS
- 8.9 The range of the strategy recognises the ambitious plans that we have for Croydon, and the important role that we see the voluntary and community sector playing in delivering this. Whilst we are committed to providing support and resources to the VCS, this is in the context of significant cuts to our own budget as a result of government cuts. Efficiency and value for money will therefore need to be central to all the work we do in partnership with the sector.
- 8.10 The VCS strategy will inform the way the Council works with the sector in the future. This includes the recommissioning of the Community Fund, which is intended to commence with soft market engagement in April / May 2019, with the formal commissioning process running from June until November, giving significant time for the sector to work collaboratively and develop proposals.
- 8.11 When the Community Fund was commissioned in 2016, all £6m was allocated. When the fund is recommissioned, it is proposed that not all funding is allocated. This will provide the Council with the opportunity to divert resources to priorities that emerge in 2020/21 and beyond.

9. COMMUNITY FUND PROGRESS – YEAR 2

9.1 This section of the report provides an update on progress within the Community Fund programme. It is structured thematically against each of the five outcomes areas, as follows:

- Vibrant, responsible and connected communities
- A connected borough where no one is isolated
- Supporting residents to better times
- Leaving no child behind
- Homes for All

Overall the good work of year one has been further built upon in year two, ensuring that projects have extended their reach and improved on their delivery. The report illustrates this by detailing the various outcomes and achievements to date alongside accounts of the work from residents, staff and volunteers.

9.2 **Vibrant, responsible and connected communities** features infrastructure services and capacity building organisations including Green Spaces and Croydon BME Forum, Croydon Voluntary Action and Citizens' Advice Croydon. These organisations are providing much needed support to nurture the positive environment which people are keen to build to make their locality a better place to live in. They are supporting volunteering and encouraging people from all backgrounds and abilities to get involved in their local communities. They are also supporting work with the most disadvantaged communities, promoting access to services and challenging discrimination.

9.3 **A connected borough where no one is isolated.** This theme features a wide range of carers services, including statutory assessments and respite, which are delivered by carers organisations. This includes a focus on Mind in Croydon – Carers Support Partnership as well as Empowering the Women of Croydon, which supports women, especially those from BME communities, to develop their financial skills and abilities.

9.4 **Supporting residents towards better times:** The life chances, life experiences, incomes and wealth of residents vary markedly across the borough. This theme focuses on creating employment opportunities, access to affordable childcare, better work experience and job opportunities for young people, support for long-term sick and disabled people, improving health, particularly mental health and supporting the return to work. In this theme, there is a wide range of programmes including Active Mind – Mind in Croydon, Metro Charity – the Croydon HIV Healthy Living service and Parents in Partnership, Croydon. All these organisations are supporting individuals and families to be healthy and resilient and able to maximise their life chances and independence.

9.5 **Leaving no child behind:** This theme is focused on developing a children and young people's offer, creating an environment so that young people can be confident and resilient. A broad range of organisations are delivering within this theme, illustrated in the report by St Francis Church Youth Action for Monks Hill, the Asian Resource Centre of Croydon and Reaching Higher – Full Circle and Summerblitz. Between them they are providing support and help targeted

at young people transitioning from care to independent living, children requiring additional support, including educational support, and young people who want to contribute to their local community and need help with developing the skills to do so.

- 9.6 **Finding homes for all:** This theme focuses on preventing homelessness, providing advice and information to those people in housing need and at risk of homelessness, and engaging with and supporting people sleeping rough with a view to helping them “move off” the streets. The report details the work of South West London Law Centres – Croydon Legal Advice Clinic and the Crisis Skylight Croydon Project. Both programmes, alongside others funded by the Community Fund, provide advice and support in relation to housing, welfare, mental and physical health support needs.

10. CONTRACT MANAGEMENT

- 10.1 The contract management of the Community Fund represents a different approach for the Council with an enhanced focus on delivering outcomes and creating and tangible improvements for some of the borough’s most vulnerable communities.
- 10.2 In order to support and enable this change, the Council has developed a proportionate and flexible contract management framework. This has been an iterative process. The programme consists of 37 contracts with a diverse range of provision in contract value, size, scale, and scope. A one-size fits all approach, therefore, will not work; rather a bespoke level of the right checks and balances has been created which is reviewed annually. Following consultation with stakeholders a set of outcomes measures and quality assurance has been set with on-going discussions around the delivery of improved outcomes taking a proportionate and risk-based approach. This approach has worked successfully during the first two years of the programme and will inform the next stage of the programme.

11. CONSULTATION AND ENGAGEMENT

- 11.1 It is critical that a VCS strategy is informed by strong evidence and engagement with a range of VCS organisations across Croydon.

VCS Survey

- 11.2 In order to use the latest evidence and feedback, the Council implemented an engagement programme. It ran a survey between 7 December 2018 and 8 February 2019 to seek feedback from voluntary and community sector organisations. The survey was developed with input from across the Council, as well as through external challenge from another council and meetings with the infrastructure organisations in Croydon.
- 11.3 The survey was hosted online through the ‘Get Involved’ section of the Council’s website. It was circulated through the Council’s existing VCS networks across all services. It was also shared via the VCS infrastructure organisations, which have regular newsletters, e-bulletins and network meetings.

11.4 The survey included questions across a range of issues:

- Challenges and opportunities
- Support for the VCS
- Service sector and beneficiaries
- The size of VCS organisations
- Financial matters
- Geographical area of operation

11.5 216 responses to the survey were received. It is difficult to confirm a response rate; as we encouraged organisations to forward the link to the survey, we do not know the total number of organisations it was sent to.

Engagement events

11.7 In addition, two engagement events were held, on 22 January and 5 February, attended by a total of 113 representatives of VCS organisations and groups, both large and small. A wide range of needs groups and localities were represented.

11.8 The event included a number of questions that were considered in breakout group discussions.

Scrutiny & Overview Committee

11.9 A report was provided to the Scrutiny & Overview Committee on 11 February. This included information on the VCS sector, initial findings from the engagement activities and sought Member views to inform the strategy. An extract from the Minute of that meeting is attached as Appendix 3.

Findings from VCS Engagement

11.10 A SWOT analysis has been produced based on VCS responses through the survey, engagement event and interviews (see Table 2).

Table 2: SWOT analysis of the VCS in Croydon

STRENGTHS	WEAKNESSES
<ul style="list-style-type: none"> • Passion and volunteers. • Resilient, given limited funding. • Able to access grants from other sources • People-oriented – listen to voice of user • Know their community and market: <ul style="list-style-type: none"> ○ reach places and people that statutory agencies cannot ○ act as mediator/link with community ○ increase community self-reliance ○ offer opportunity to get involved • Support people who fall below statutory service threshold • Flexible, personalised service: able to address complex needs • Focus on prevention and early intervention • Willing to collaborate, especially in a crisis, to counter hate crime • Faster: less red tape/governance rules 	<ul style="list-style-type: none"> • Some of VCS are unaware of funding available or lack bid writing and fundraising skills • Lack of skills to generate income • Staffing recruitment/retention due to low pay • Ability to expand services to meet demand • Governance: hard to attract skilled trustees • Many volunteers older/disabled; burn out. • Smaller organisations lack capacity to train volunteers • Unaware of other VCS services, limits partnership opportunities; risks duplication • Partnership development (for some organisations)

<ul style="list-style-type: none"> • Lower costs (use of volunteers helps) 	
<p style="text-align: center;">OPPORTUNITIES</p> <ul style="list-style-type: none"> • Collaboration within the VCS • Involving the community/service users • Delivery of statutory services through VCS (some resent this) • Work on employment and skills • Council/CCG commissioning • Social prescribing, Local Voluntary Partnerships • High volunteering rate in Croydon: tap potential of young people • Locality meetings – to gain knowledge of local provision and good practice. • Share back office functions and premises to cut costs • Sell services, let premises, crowd funding. • Cross-borough delivery. • Corporate Social Responsibility. • Regeneration of Central Croydon 	<p style="text-align: center;">THREATS (CHALLENGES)</p> <ul style="list-style-type: none"> • Funding: trust funds tend to support new projects; core funding is a challenge. Turns collaborators into competitors • Premises – unavailable or costly • Increasing demand • Sustainability of volunteering: more people work or are carers; young people needed • Not enough support to recruit/train volunteers • Increased training requirements: GDPR, safeguarding, social media. • Disproportionate monitoring • Council staff turnover: loss of knowledge and silo working –don't think of overall impact of decisions.

11.11 The main observations and recommendations made by VCS respondents are set out in Appendix 4.

12 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Revenue and Capital consequences of report recommendations

12.1 Section 6 of this report provides a summary of the financial support provided to the voluntary and community sector.

12.2 In relation to the Community Fund, the total three year community fund budget is £6m. Further details of the groups who have received these fund are contained in Appendix 1 to this report.

12.3 Funding is distributed based on applications and outcomes and it is expected that this funding will generate significant benefits for the residents of Croydon, with outcome and benefits measured and reported periodically.

12.4 The Council recognises the important role the Voluntary Sector undertakes in this borough and will continue to work towards establishing schemes that target funding as appropriate to localities.

Risks

12.5 There is a risk that funding is misused and this is mitigated against by strong and close working relationships between the Council and fund recipients.

Future savings/efficiencies

12.6 At this stage no change in funding is expected for 2019/20, in line with the administration's commitment to maintain funding for the sector. It is anticipated

that investment in the Community Fund and community groups will continue to provide future benefits for Croydon, both financial and non-financial.

Approved by: Lisa Taylor, Director Finance, Investment and Risk and Section 151 Officer

13 LEGAL CONSIDERATIONS

- 13.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that offering incentives and assistance as suggested within the body of the report, the Council will need to be mindful of the State Aid rules which currently remain in force and which are proposed to remain in force during any transitional arrangements in relation to Brexit. Furthermore the UK government have stated that in the event of a no-deal Brexit, it is the government's intention to transpose EU State Aid rules into UK domestic legislation so that they will remain applicable post Brexit.
- 13.2 State aid rules apply as a matter of course to any assistance or advantage given on a selective basis by a public authority (such as the Council) to any organisations that could potentially distort competition and trade in the EU. The definition of state aid is deliberately very broad because 'an advantage' can take many forms. It is anything which an undertaking (an organisation engaged in economic activity) could not get on the open market. "Undertaking" in this context can include voluntary and non profit-making public or private bodies such as charities or voluntary sector bodies when they engage in activities which have commercial competitors. It includes self-employed/sole traders. State aid specifically includes such things as grants, loans, tax breaks, rate relief, the use or sale of a state (or Council) asset for free or at less than market price (such as peppercorn rent) etc. Not all State Aid is unlawful as there are certain defined exemptions. The De Minimis Regulation allows small amounts of aid – less than €200,000 over 3 rolling years – to be given to an undertaking for a wide range of purposes. In calculating whether any assistance or advantage falls within the exemption, it is worth bearing in mind that the €200,000 sum encompasses any assistance or advantage from any public body during the 3 rolling years, not just monies that the undertaking may have received solely from the Council. Records of aid granted must be kept and all the rules of the de minimis regulation must be followed in order for it to be claimed. If the EU Commission determines that assistance or advantage amounts to State Aid not falling within the exemptions, it can impose a range of sanctions, including a requirement that the state recover the aid in question, with interest. Any proposed indemnity to the recipient of aid will not only be unlawful and invalid, but also itself constitute aid. However a recipient of aid may themselves be able, on appropriate facts, to recover damages from the state/council on the basis of the recipient's legitimate expectation that the state/council would act lawfully
- 13.3. Beyond the state aid implications, there are no additional legal considerations arising from the recommendations within this report.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance

14. HUMAN RESOURCES IMPACT

- 14.1 There are no direct Human Resources implications for LBC staff arising from this report.

Approved by: Sue Moorman, Director of Human Resources

15. EQUALITIES IMPACT

- 15.1 An Equalities Analysis has been carried out to ascertain the impact of the proposed change on groups that share a protected characteristic. The key findings were that the VCS strategy does not have any potential negative impact on protected groups that share a protected characteristic. The strategy is robust and that the evidence shows no potential for discrimination and that all opportunities to advance equality have been taken.
- 15.2 Under the council's locality service model, partnership with the VCS is essential in order to achieve the priority outcomes set out in the Corporate Plan. Whilst the council is committed to maintaining the overall level of funding of the sector, a key aim of the VCS strategy is to ensure that the funding and other support that is given is focussed more effectively on those VCS organisations that are supporting the council's priority outcomes.
- 15.3 In developing the priorities that the VCS will be encouraged to support, regard has been had to the council's Corporate Plan and its equality objectives contained in the Opportunity and Fairness Plan 2016-20. In future, not only funding decisions, but also allocations of council community assets and subsidies, such as rent subsidy and discretionary rate relief, will take account of the degree to which the work of the VCS organisation in question supports the council's priority outcomes set out in the strategy. Policies will be developed and consulted on that implement this principle. Future decisions are expected to result in resources being focussed increasingly on activities that support priority outcomes and the council's equality objectives.
- 15.4 The council's equality objectives, adopted at Cabinet in April 2016, were developed on the basis of the findings of Croydon's Opportunity and Fairness Commission which provide a qualitative evidence base relating to the equality and inclusion issues in Croydon. Equality analysis of geographic inequality and that related to people who share a protected characteristic and those who do not is embedded in the Borough Profile that was published by the Council in December 2018. The equality objectives are:
- To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market
 - To reduce the rate of child poverty especially in the six most deprived wards

- To improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked After Children, particularly at Key Stage 2 including those living in six most deprived wards
- To increase the percentage of domestic violence sanctions
- To increase the reporting and detection of the child sexual offences monitored
- To reduce the number of young people who enter the youth justice system
- To reduce social isolation among disabled people and older people
- To reduce differences in life expectancy between communities

15.5 The VCS strategy invites the sector to propose activities that will support the council's priority outcomes, based on Corporate Plan priorities, and includes examples of activities that could be supported. A number will have a positive impact on aims of the Equality Act and address the Council's equality objectives and are set out below:

Social exclusion

Activities to help Croydon to become a more equal place, including information, advice and advocacy, community based support to tackle financial and digital exclusion, action to tackle poverty and gaps in equality (including health inequality), in particular through support for isolated and marginalised groups.

Age

Older people: Support for community interventions and activities that enable older people to live healthy, happy and independent lives for as long as possible, avoiding isolation and loneliness. Community support for older people with long term health conditions or dementia, and carers support services.

Children and young people: Services, activities and facilities that support the physical and emotional wellbeing of children and their families and encourage young people to aspire to be the best they can be. Awareness raising and prevention of trafficking, exploitation and FGM. Integrated youth work with young people in school and excluded from school that will divert them from offending and keep them safe from violence

Disability.

Support for community interventions and activities that enable disabled people to live healthy, happy and independent lives, avoiding isolation, loneliness and anxiety and improving access to employment. Community support for disabled people with long term health conditions, and carers support services.

Preventative early intervention enablement and support activities for physical and mental wellbeing. Community support for people with particular conditions, including HIV and mental health conditions. Contributing to partnership work to reduce hate crime.

Gender

Awareness raising and prevention of trafficking, exploitation and FGM. Support for lone parents (overwhelmingly women) that improves access to employment. Community responses to domestic abuse and sexual violence, which affects all parts of the community, including people in marriages and civil partnerships.

Sexual orientation and gender reassignment

Activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse. Partnership work to reduce hate crime

Marriage and civil partnership.

Community responses to domestic abuse and sexual violence, which affects all parts of the community, including people in marriages and civil partnerships.

Religion and belief.

Activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse. Partnership work to reduce hate crime

Race

The strategy pledges to ensure that VCS organisations from all of Croydon's diverse communities are aware of and able to access the infrastructure support that they need. It also invites VCS organisations to support activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse. It also seeks support for migrants and people with no recourse to public funds, including help into jobs and reconnection to their home country. Contributing to partnership work to reduce hate crime.

Pregnancy and maternity.

Services, activities and facilities that support the physical and emotional wellbeing of children and their families. Support for lone parents (overwhelmingly women) that improves access to employment.

Approved by: Yvonne Okiyo, Equalities Manager

16. ENVIRONMENTAL IMPACT

- 16.1 The Council's financial contribution to the VCS includes funding to support projects that enhance the local environment, particularly from Community Ward budgets. It is not expected that there will be significant change in this area as a result of the strategy.

17. CRIME AND DISORDER REDUCTION IMPACT

- 17.1 The proposed VCS Strategy includes priorities that will contribute to the delivery of the Community Safety Strategy priorities.

CONTACT OFFICERS:

Gavin Handford, Head of Policy & Partnership and Sarah Warman, Director of Commissioning and Procurement

APPENDICES TO THIS REPORT:

Appendix 1: Community Fund Progress Report 2018

Appendix 2: Council Voluntary, Community and Social Enterprise Sector Strategy 2019-2023

Appendix 3: Extract from minute of Scrutiny & Overview Committee meeting on 11 February 2019

Appendix 4: Main observations and recommendations made by VCS respondents

BACKGROUND DOCUMENTS: None



CROYDON COUNCIL'S COMMUNITY FUND PROGRESS REPORT

YEAR 2 • 2018



DELIVERING BETTER OUTCOMES FOR LOCAL PEOPLE

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Cabinet Member for Safer Croydon
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FOREWORD

Councillor Hamida Ali, Cabinet Member for Safer Croydon and Communities

Croydon is one of London's most wonderfully diverse boroughs and a place where inspirational residents and communities live and work. With 93,000 young people, we are proud to be London's youngest borough and proud to be a place where we celebrate our diversity, we celebrate our successes, and in tough times we stand together as one community. The Voluntary, Community and Social Enterprise (VCSE) sector sits at the heart of our communities and makes a significant and essential contribution to the social, economic and health and wellbeing of local people.

In 2015, the Opportunity and Fairness Commission (OFC) gathered views from across the borough to understand the issues and challenges faced by the people of Croydon in order to build and create a fairer and better place to live for all. In meeting the key inequality and poverty challenges residents face, the OFC made a series of recommendations. The Council was asked to show leadership in this area by promoting community involvement, supporting asset based development approaches and devolving power to local communities.

This is why we created the Community Fund. By reshaping the grant support to the Voluntary Sector around the OFC themes and including support for asset based community development, we were able to secure circa £6m of funding for three years. This report takes you through the progress that has been made

and the outcomes that have been delivered through the Community Fund in the second year of the programme.

On behalf of the Administration, I would like to extend my sincere gratitude towards the Voluntary and Community Sector. The Council would not be able to achieve its objective of a fairer and better place to live for all without the vital contribution that the VCSE sector makes. They play a key role in delivering services that rebalance and address inequality, improve cohesion and increase community leadership.

I know through my experience of working with the sector and visits to the partner organisations, that the Community Fund programme harnesses a culture of putting people at the heart of solutions, as we all move from dependence on traditional services towards enabling greater independence, self-reliance and putting in place preventative approaches. There are several case study examples in this report, which demonstrate the power of community solutions in helping improve the lives of local residents.

We are now in year three of the Community Fund, and I look forward to another exciting year of the projects ahead. The Council in the recently approved Corporate Plan recognised the important role the VCSE plays in the Borough and has confirmed its commitment to funding the VCSE, including the Community Fund. We have extended the existing Community Fund projects for a further six months and are currently developing

a Voluntary and Community Sector Strategy which will set out how the Council will continue to work with and support the sector, which will in turn shape the future commissioning of the VCSE.

To conclude, I would like to say a heartfelt thanks to the committed staff, volunteers, and hardworking partners who make a difference day in day out to local communities.



Councillor Hamida Ali
Cabinet Member for Safer
Croydon and Communities

EXECUTIVE SUMMARY

The Voluntary, Community and Social Enterprise (VCSE) sector makes a significant and essential contribution to the social, economic and health and wellbeing of communities. The VCSE sector has a strong history of innovation and has continued to strive and play a crucial role in providing a wide range of services. They are the gateway to our diverse communities, widening the reach of residents who sometimes feel excluded from mainstream services.

Page 42 Public services are under increasing pressure as a result of both increasing demand and reducing resources. The Third Sector remains key to helping the Council and its partners to respond to this challenge. To support the required changes, in 2014/15, the Council reviewed its Third Sector investment and commissioning arrangements to ensure they were delivering the desired outcomes, driving maximum value for money, meeting community need and effectively supporting the Sector to improve and thrive.

In October 2016, the Council adopted a new approach to supporting and investing in the VCSE sector. Its focus was on unlocking and recognising the need to focus on outcomes for our residents and to harness the social value of the voluntary sector as equal partners. The Council moved to an outcomes based commissioning approach, focused on five priority areas which are set out later in this report.

This report sets out the current funding arrangements and themes and outcomes delivered so far. It presents the emerging findings, key achievements and a selection of case studies to illustrate the difference that the Community Fund is making to people's lives.

The initial three year term of the Community Fund was due to end September 2019. The Council has extended the existing contracts for a further six months until March 2020.

The Council in the recently approved Corporate Plan recognised the important role the VCSE plays in the Borough and has confirmed its commitment to funding the VCSE, including the Community Fund. The Council is developing a Voluntary and Community Sector Strategy which will set out how the Council will continue to work with and support the sector. The intention is that the strategy will be developed by spring 2019 and will help shape the future commissioning of the VCSE.

The re-commissioning of the Prevention Fund and Community Fund will start after the VCSE Strategy has been approved and following this, there will be a period of engagement with the sector on the new approach.



BACKGROUND

During 2015, the Council commissioned the Opportunity and Fairness Commission (OFC) to recommend ways to reduce inequity and advance equality and diversity. The work of the OFC was one of the widest conversations with the community of any London borough, with over 3,000 residents and stakeholders involved. The findings from the OFC report, reported to Cabinet in January 2016, have influenced the outcomes the Council sought to achieve through the Community Fund programme 2016-19.

Croydon Opportunities and Fairness Commission published its final report on 28th January 2016. The report highlighted the key inequality and fairness challenges for the borough and presented recommendations on how these could be addressed by the Council in partnership with the VCSE sector.

The Community Fund programme adopted the OFC key themes and built a dynamic approach to supporting and investing in the VCSE sector to deliver improved outcomes. The proposal was developed in collaboration with the sector through a range of meetings and discussions.

The programme was established on a number of important principles:

- A focus on key outcomes that needed to be influenced and changed across the borough. This meant that we moved away from funding organisations and instead funded programmes and activities which would achieve the intended outcomes;
- Alignment to the Council's Corporate Plan, Ambitious for Croydon, and the borough's Community Strategy;
- Shaped and influenced by the recommendations of the Opportunities and Fairness Commission;
- Supported community empowerment by helping residents to live independent lives; and
- Supported VCSE strengths in developing community responses to the identified key outcomes while building the capabilities of the sector to adapt to the difficult financial climate and become more sustainable.

In October 2016, the three year funding arrangements for the Council's new programme were implemented. Overall, nearly £6m will be invested in the programme delivery over three years. A detailed breakdown will be provided in appendix 1.

Year two of the Community Fund spans from 1st October 2017 until 30th September 2018. Some of the stories and achievements of the Community Fund have been captured in this report. Over the next five sections you will be able to see how the Community Fund services have been able to support people living in Croydon.

The programme has 35 delivery partners, see Appendix 1 for details.

NB – Please note, the case studies described in this report are a mixture of anonymised case studies where explicit consent was gained to publish their story in this report from the person in the description, or where sensitive topics are described, an amalgamation of true events has been used to protect individuals' identities.

This report also contains photos taken from services where consent was obtained from the subject.

THEME 1

Vibrant, responsible and connected communities

£2.2 million was committed to the Vibrant, Responsible and Connected Communities theme over three years. With this funding the Council wanted the VCSE sector to work with us to create an environment which engenders responsibility and nurtures the positive things which people are willing to do to make their locality a better place to live.

The priority outcomes for this theme are:

- To drive fairness for all communities, people and places
- To improve wellbeing across all communities through sport and physical activity; and
- To create a place that communities are proud of and want to look after as their neighbourhood

The key outcomes achieved over the last year include:

- The Asian Resource Centre of Croydon in partnership with 23 delivery partners, have engaged with 10,397 people, including 7833 people who attended health related activities

- 3560 people accessed the Purley Cross Centre for information and advice, the top three most popular type of enquiries were computer training, Legal/ Power of Attorney and Age UK services
- 58 training sessions provided on setting up a charity / social enterprise
- 110 training sessions held to support local organisations fundraise
- Over £1m in financial gains for clients in benefits, tax credits, grants, refunds and debt written off
- Over 12,000 advice issues supported by Croydon Citizen's Advice
- Over 90 Voluntary and Community Organisations have received support
- More partnerships between Voluntary and Community Organisations to secure funding
- Numerous capacity building events held providing training on starting up a charity/social enterprise, fundraising, monitoring, evaluation and impact measurement as well as systems, policies and procedures

- Over 80 targeted campaigns to recruit volunteers living in Croydon with over 700 individuals placed into volunteering

The case studies below demonstrate the difference that this funding is making.



Case study 1

GREEN SPACES –
CROYDON BME FORUM

Green Spaces provided by Croydon BME Forum at the Elmwood Community Centre provides a range of activities for black & minority ethnic (BME) communities to help reduce social isolation whilst allowing people to get familiar with nature and green spaces in and around the borough. People participating in the activities are aged between 35 to 90 and may be lonely and have health and care needs. Many have difficult lives and have struggled with exercise, keeping healthy, retaining their independence and managing conditions like arthritis. However, thanks to the Community Fund, Green Spaces has helped change this.

"I have enjoyed the nutrition talks as we can adapt the information to what is useful to us individually. The physical activity sessions were good as they helped us reduce stiffness in our joints. We also learned about stretches we can do at home. Also, the visit to Kew Gardens last September was really enjoyable as we could socialise among ourselves. It was fun to be together with people of different ages!"

Members have enjoyed:**A visit to Kew Gardens**

The group really enjoyed visiting Kew Gardens in September to appreciate nature. Many said it was the "experience of a lifetime".

Walking in Winterbourne and Streatham parks

September saw the start of a programme of walks in two Croydon parks, led by a volunteer. Members of different ages joined in and really enjoyed the contact with nature and socialising. Afterwards people said they now understood the benefit of walking as a form of physical exercise – especially as it didn't require too much effort or money.

Physical activity sessions

A fitness instructor engaged the group in gentle, slow-paced yet energizing aerobics classes, suitable for both older people and those with reduced mobility.

Healthy eating sessions

A qualified nutritionist discussed various topics with the group aiming to educate members on essential nutrients and balanced eating.

“experience of a lifetime”



Case study 2

CROYDON VOLUNTARY ACTION

**John's Story:**

During John's search for voluntary work, he searched online, sent lots of expressions of interest and made numerous phone calls. Open to working with many different service users, all of his efforts were with reading the websites of the charities and approaching them directly, leaving his details and sending off emails, explaining his situation and offering his time of one day per week. It was time consuming and he did not seem to be getting much response or return calls/emails.

A neighbour suggested that he try the local Volunteer Centre in Croydon. Making an appointment was straightforward on an electronic booking system and he was sent a reminder. 'When I attended I was greeted warmly and seen more or less right away. The chap that interviewed me, listened to my situation and needs and responded to my questions. I was registered onto the system and a statement was uploaded describing my skills and interests. It was all very pain free!' While at the interview opportunities for volunteering were shown to him which he applied for on the spot with the adviser.

Within a few days of visiting the Volunteer Centre, he was being interviewed for an opportunity through

MENCAP to work with learning disabled adults as a Volunteer Teaching Assistant locally in Croydon. Since starting in February, he has attended weekly and helps the teachers and tutors with role play, tasks and activities as well as working with the learning disabled people towards achieving their goals.

John had not worked with learning disabled people before and feels that the experience has been tremendous in bringing a better understanding of their needs, especially around communication. 'I have learnt to become more creative in my approach and work in a person centred way. I have also gained richly from the expertise of the staff, all of which is vital for my development as a student social worker. My overall experience on the project has helped me to decide that this is the user group I would like to specialise in for my chosen area in social work.'

'Thank you. Without the help of the Volunteer Centre I would not have been paired with this project or had such a wonderful time!'

“ When I attended I was greeted warmly and seen more or less right away ”



Volunteer Centre Croydon is the first step into volunteering within Croydon, making it easier for Croydon's residents from all backgrounds and abilities to get more involved in their communities.

Case study 3

CITIZENS ADVICE CROYDON

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Citizens Advice has been running an advice service in Croydon for nearly 80 years, operating within the core principles that services are free, confidential, independent and impartial. A truly unique service, embedded in the community, the service is available to anyone who needs it.

Support from the Community Fund is essential to the delivery of the organisation's core service and has enabled us to help over 6,000 Croydon residents this year, helping them to resolve around 15,000 advice problems.

The Citizens Advice Service is accredited with the Advice Quality Standard and covers a broad spectrum across English Civil Law. This means that what we do ranges from helping someone who has purchased faulty consumer goods, or someone who has not been paid correctly by their employer, to providing crisis advice to someone who has bailiffs at the door. A significant element of our work relates to welfare benefits and, in particular, Universal Credit, where our advice ranges from eligibility checks to helping to appeal a welfare benefits decision. We have supported Croydon's Windrush generation resolve problems with Citizenship and the multiple problems that arose as the legal status of this group of people came under scrutiny.

In an increasingly complex world, problems tend to be multi-faceted and often interconnected. The holistic nature of our service means that we can deal with the whole person, saving someone from having to re-tell their story to several different agencies all dealing with separate aspects of a problem. Liaising with social workers, housing officers, council tax officials, housing associations, NHS Trusts and GPs, negotiating with creditors and landlords and working with other voluntary organisations can be all part of trying to resolve a client's problem and all in a day's work for our hardworking and dedicated group of staff and volunteers.



Case study 3 continued

CITIZENS ADVICE CROYDON

DAVID'S STORY:

David lives alone in privately rented property. He has been living with a chronic health condition for over 10 years, affecting the functions of some of his limbs. David then suffered a stroke causing further debilitation. Despite the weaknesses in both sides of his body severely impairing his ability to undertake daily living tasks such as dressing, bathing, walking and preparing meals, David was refused Personal Independence Payment (PIP) (additional payments to help people with a disability or long-term condition with extra costs). David had difficulty with communication and concentration and relied on his nephew for support.

Receiving regular treatment from NHS services, David was referred to Citizens Advice Croydon by clinicians involved in his treatment.

A specialist adviser from Citizens Advice Croydon made an assessment of David's advice needs and identified that not only did the decision regarding PIP warrant an appeal, but that David also had a shortfall with rent and housing benefits.

Working with David and his nephew, the Citizens Advice adviser:

- Supported David to challenge the Department of Work and Pensions (DWP) decision to refuse PIP. The appeal went to the First Tier Tribunal and the Citizens Advice adviser attended the appeal hearing with the client. The appeal overturned the previous DWP decision and David was awarded PIP at the enhanced rate of both the daily living and mobility components.
- As David's payments from Housing Benefits wasn't enough to meet his rent, the adviser applied for a Discretionary Housing Payment (DHP). The Local Authority awarded £53.00 per week towards the rent.

David was very anxious and worried about his financial position but receiving professional support to prepare for the appeal was hugely reassuring for him, as was having the Citizens Advice adviser attend the tribunal hearing itself. The success of the appeal together with the DHP award means that David is now over £10,000 a year better off.

Outcome/Financial gain	
PIP Appeal	£7,558.20 per year
Discretionary Housing Payment (DHP)	£2,756.00 per year

For every £1 invested in Citizens Advice in Croydon, we generated at least:

£3.05 in fiscal benefits: Savings to government by reducing health service demand and local authority homelessness services.

£13.13 in public value: Wider economic and social benefits such as improvements in participation and productivity for clients and volunteers.

£13.01 in benefits to individuals: Real money for some of Croydon's most disadvantaged residents, through benefits gained, debts written off and consumer problems resolved.

“Wonderful service. I found everyone really helpful, taking a lot of the strain off us, the people”

THEME 2

A connected borough where no one is isolated

£1.8 million was committed to the Connected Borough Where No One Is Isolated theme over three years. For this the council wanted to support organisations working with carers across the borough and to reduce loneliness and social isolation.

The priority outcomes for this theme are:

- A thriving and lively cultural offer which engages communities and supports regeneration
- A place that is easy and safe for all to get to and move around in
- A supportive network for carers that enables them to sustain relationships whilst continuing their caring role

The key outcomes achieved over the last year include:

- Almost 25,000 contacts with carers have been made at the Carers Support Centre over the course of the year
- CNCA provided befriending service (telephone and/or home visit) to over 120 people, over 80% of these people were aged 75 years and over
- Horizon Care and Welfare Association provided short breaks to over 600 carers
- Croydon Accessible Transport provided invaluable transport support to its 130 member groups and its team of volunteers provided transport to residents affected by the Whitestone Way gas leak
- 1038 counselling sessions for carers held by Mind in Croydon
- 814 health and wellbeing activities/sessions offered attended by 5,021 carers

The case studies below demonstrate the difference that this funding is making.



Case study 4

MIND IN CROYDON - CARERS SUPPORT PARTNERSHIP



Here is an example of the help the Community Fund Carers Support project has provided:

James & Helen have recently been reunited with their son who had left home at a young age, ten years earlier. They had not seen or heard anything from him after the first few years and believed he was living rough. They had a vague idea of where he was and visited this area once or twice a week hoping that they would see him and be able to make contact. Eventually they had word from a family friend on his whereabouts. They were able to speak with him and persuade him to come home with them.

Although delighted to have their son home and safe, his behaviour was very difficult for the family to understand and manage. He was very withdrawn and displayed many unusual and disturbing behaviours. They recognised that there were mental health problems as well as physical health problems. However, their son was resistant to any medical intervention. The parents then contacted Carers Support Partnership to access help to be able to support their son.

They wanted their son to be able to manage the usual daily living skills that we all take for granted

and to be able to interact with other family members and the wider community. They wished to reduce his isolation and help him to build his confidence and access the health care that they felt he needed.

The Carers Support Partnership arranged regular weekly meetings with James & Helen to discuss the behaviours they found challenging and the more practical issues of their son accessing health care and benefits services. The practical issues took some time to resolve. The behaviours and living skills were the focus of regular meetings over a period of months to help the family understand and put in place communication skills that would encourage and nurture their son back into family life.

The family are now managing very well, with the young person attending the Hub drop in service at Mind on a regular basis and, from September last year, undertaking a college course. This is a massive step for the young person who was anxious, fearful and withdrawn. The family also recently took a family holiday together to visit relatives.



The Carers Support Partnership provides support for people over the age of 16 years who care for a relative, partner, friend or neighbour who has a mental health problem.

Case study 5

PHASE 1 ENTERPRISE
TRAINING LTD.**Anisha's story**

Anisha who is married and has three children, moved to the UK ten years ago from India. She came to the project looking for training on how she could save money and stay safe online.

Anisha attended financial capability training and had one to one sessions. She also attended the Digital Zone sessions in the Central Croydon Library to learn about online safety and digital platforms.

After doing all this, Anisha said she would review the workshop notes with her husband and use the information to discuss ways of saving money, especially as, according to her religion, a certain percentage saved would go to charity. She remembered she had many toys, buggies, and clothes she had gathered in her loft that she was considering throwing away. She decided to use Ebay to sell some of the unwanted items. Anisha found this very helpful, as she said,

'It's really very useful knowledge, with the workshop and activities I have improved my skills and learnt about finance. I have also learnt how to be safe online and what platforms I can use to sell things online. Thank you very much for the knowledge and practical tips that I can now use to save some money and use online platforms like Ebay and Facebook to sell things I do not need and provide for those in need in the local community'.

“ It's really very useful knowledge, with the workshop and activities I have improved my skills and learnt about finance. ”

Empower Women of Croydon' project aims to support women, especially those with children from BME communities, to become more financially sustainable via financial capability and digital skills training, one to one support and peer to peer support groups.

Case study 6

THE RAPE AND SEXUAL ABUSE CENTRE (RASASC)



RASASC
Rape & Sexual Abuse Support Centre
RAPE CRISIS SOUTH LONDON

The Community Fund provides help for those who are coping with very challenging and stressful situations. Camille is a worker for the Family Justice Centre (FJC) project, at RASAC, which receives money from the Community Fund. Camille tells the story of one such person. Not only were the FJC able to help her with the immediate issues, they left her better off and feeling better able to cope with future challenges.

Camille's story

"The client came to FJC for help because she was in an abusive relationship which was having a massive impact on her life. She felt that she could not cope anymore. She felt that if she stayed in the relationship, she would come to serious harm. During their relationship she had suffered from physical, emotional, and verbal abuse as well as being stalked and subject to coercive and controlling behaviour. The client lived in her own property, and the perpetrator was not on the tenancy so had no legal right to the property.

Because of the fear of further physical abuse, the client was initially reluctant to engage with legal orders or police. The service worked to engage with the client, using the resource 'the wheel of power' and control.

The client agreed to obtain a Non Molestation order, legal aid was applied for and a Non Molestation order was obtained, supported by FJC's Duty Solicitor. This

gave the client the tools to stop the perpetrator from coming to her property or near her. The client did not wish to move, as property had been adapted for her needs, and felt that she would notify the Police if there were to be a breach of the order. The legal intervention provided had empowered the client.

In addition to this, the service made a referral to Sanctuary and arranged for the property's locks to be changed, and safety measures put in place, such as window locks and garden gate locks installed. A referral was also made to Turning Point, to support the client with on-going alcohol misuse, further empowering her to take control of her life choices. The client was offered counselling and access to the Freedom Together Programme but at this time she does not feel able to engage with these resources.

The client has now been stepped down to Community IDVA level to support to help her feel more in control of the situation, to have the necessary support when she needs it and to help her feeling less isolated. Potential on-going support will be provided by an FJC Volunteer to keep in touch with her. The risk to the client has been significantly reduced and steps have been put in place to enable her to ask for help when she feels that she needs it."

The Rape and Sexual Abuse Centre ensures that that fewer women suffering from domestic violence are isolated, that they and their children are protected from harm and exploitation and that perpetrators are brought to justice to prevent further domestic crimes being perpetrated.

THEME 3

Supporting residents towards better times

£610k has been committed to the Supporting Residents Towards Better Times theme over three years. Through this funding we wanted to work with the VCSE sector to support flexible and inclusive employment opportunities for local people and to support the health and well-being of local communities.

The key outcomes achieved over the last year include:

- Families and individuals are more financially resilient and live affordable lives
- People from all communities live longer, healthier lives through positive lifestyle choices
- Families are healthy and resilient and able to maximise their life chances and independence

The key outcomes to date include:

- Phase 1 Enterprise Training CIC, provided one-to-one mentoring support to 78 BME mums to set up their own businesses or get into employment and supported 20 women to complete accredited training in Level 1 Business Accounting

- 172 people with a mental health illness were supported by Mind in Croydon to attend a sports activity they've never tried before and/or increased the use of health and wellbeing technology for motivation, information and improved health; using health and wellbeing apps
- Parents in Partnership provided individual support to 150 families with children under 5

The case studies below demonstrate the difference that this funding is making.



Case study 7

MIND IN CROYDON - ACTIVE MINDS



The service is available to anyone with a mental health problem or who is isolated and would like to improve their wellbeing by developing a healthier lifestyle. Where possible groups are led by volunteers who have attended the groups themselves and are ready to take the next step in their recovery.

436 people have been referred to the service, with 262 people taking part in new activities and seven service users have gone on to volunteer for Mind in Croydon.

The football group has enabled group members to join the grass roots mental health football league and take part in regular matches, winning the end of league tournament. The group members have developed friendships and often meet socially outside of these events. "I just wanted to say I'm really glad I came today, I feel really good" – service user after attending the Active Mind football group.

The cycling group runs each summer from April to October. This year, 17 people attended the group building up from cycling in the shelter of Croydon sports arena and South Norwood Country Park, to learning road safety skills and gaining the confidence and fitness to cycle all over Croydon and the surrounding boroughs. Group attendees went on to attend independent cycle rides and take part in the local women's BMX group. "I can't tell you the difference it has made to him. The change we see in him" – Carer of a group attendee.

"This is such a good thing, you can really see what people get from it, you can see in their faces, it's just brilliant it really is" – Member of staff supporting a patient to attend an activity.

“I just wanted to say I'm really glad I came today, I feel really good”



Active Minds service delivered by Mind in Croydon was commissioned by the Community Fund to run healthy lifestyle activity groups and provide one to one support for people with mental health problems to improve their social networks, wellbeing and recovery.

Case study 8

METRO CHARITY - THE CROYDON HIV HEALTHY LIVING SERVICE

People living with HIV in the UK can now live as long as someone without HIV owing to the great advances in HIV treatment. However, there are still many challenges that people with HIV face in coping with their diagnosis, the stigma that still exists and the pressure that can be felt on relationships.

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The Croydon HIV Healthy Living Service brings together services for people with HIV in Croydon. They provide a range of services that sit together including peer support groups for people with HIV, advice and advocacy support, family and children's support, counselling support and services for young people.

Jo at Metro tells us about the Croydon HIV Healthy Living Service funded by the Community Fund.

"A common experience for clients accessing these types of support services is to go on a journey, from feeling often isolated, anxious and depressed, to feeling supported, more confident and outgoing. Clients goals achieved include: successful housing and benefits support; better psychological health and wellbeing;

being supported to talk within families about HIV, for example parents appropriately disclosing HIV status with children when they are old enough for this to make sense.

Many of our clients have problems taking their medication when they first come to us, this is for a range of physical and psychological reasons. We support them to view HIV as just one issue that affects their lives, and to put things in perspective and get back on their feet, feeling happier and healthier. Often talking to our workers, or a peer, or a counsellor can make all the difference in the world to clients, and it enables them to feel supported and often results in disclosure of HIV status to partners, and also helps with key life goals, such as changing jobs or finding work that is more supportive for them.

Some of our clients come to us in crisis, and are able to work through the next steps to get them back on track, feeling empowered to just take one day at a time, and address the most important issues first. Sometimes, this is finding a safe place to stay, to avoid homelessness; sometimes this is meeting someone else with HIV and sharing their story, which makes them feel so much less isolated."



This is what service users say about the service:

"Thank you METRO for helping me with my Personal Independence Allowance (PIP) appeal... I have been awarded an enhanced rate for daily living component"

"I had the happiest week ever...seeing animals like sheep was fun. Campfire stories and songs were fun too. It was happy times, for once I did not think about my HIV and had a great opportunity to travel away from London (A young person living with HIV who attended the respite week away).

"Meeting someone else with HIV at the peer support group made all the difference. It's so good to know that I'm not alone anymore".

“ Thank you METRO for helping me with my Personal Independence Allowance (PIP) appeal ”

Case study 9

PARENTS IN PARTNERSHIP, CROYDON (PIP)

Parents in Partnership, Croydon (PiP) is a charity working with parents and carers of children and young people with special educational needs and disabilities (SEND) aged 0-25 in Croydon.

Direct feedback from parent carers who received support from PiP over 2017-19 shows that:

- 100% felt better informed, more supported and better able to cope;
- 81% felt less isolated;
- 78% gained useful skills;
- 69% met other carers;
- 53% thought their health and wellbeing have improved
- 23% were able to have a break from caring

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Sharon's Story:

Sharon heard about Parents In Partnership through a friend who used to live in the same area as her. Sharon was told about the service because she really needed someone to listen to and help her. Within two days of contacting PIP, Sharon was visited by someone from the organisation who introduced themselves and let Sharon know how they could help her situation. She was really surprised that there was a service available to help her.

Sharon initially needed help because she was living in a basement flat with two young sons, aged two and eleven, of which her oldest had some disabilities. Sharon's eleven year old son had been diagnosed with ADHD, Congenital Glaucoma and chronic lung disease. There were also problems when they got evicted from their home due to the landlord wanting the property back. They were moved to an industrial estate where a lot of other families with young children lived. She then

encountered difficulties with transport and changing school as they had been moved out of Croydon. Sharon felt she had completely lost hope and was feeling very down, however PIP were there to help by providing emotional support and by supporting her to resolve the issues. When asked about Parents in Partnership, Sharon said: "To be honest, you were my rock. Even when we were waiting for things to happen, every day you were there. The support was absolutely brilliant, I couldn't ask for more" Sharon says about her advisor at PIP.

“The support was absolutely brilliant,
I couldn't ask for more”



THEME 4

Leaving no child behind

£830k was committed to the Leaving No Child Behind theme over three years. There are nearly 100,000 young people living in Croydon – more than anywhere else in London. Through this funding we wanted to work with the VCSE sector to reduce child poverty in the most deprived wards and to support well established youth providers to help young people make positive life choices.

The priority outcomes for this theme are:

- Children and vulnerable adults are protected from harm and exploitation
- Domestic abuse and sexual violence is prevented where possible, victims are supported and perpetrators held to account
- People of all ages are able to reach their full potential through access to quality schools and learning
- Children, young people and parents are healthy and physically well
- Youth community provision is supported

The key outcomes achieved over last year include:

- Play Place have worked across 11 estates across the borough, working with 8 grass roots partners. Together they have provided 1,622 sessions in year 2, supporting 13,889 attendants
- 320 young people attended 2 community events in Ashburton Park organised by Oasis Community Hub
- 7,090 people visited the Croydon Drop In (CDI) Talk Bus, which visits 4 areas of the borough a week to provide information and advice
- Metro Centre have delivered 4 professional development training sessions on LGBTQ support for staff and volunteers in the voluntary sector
- Metro Centre provided 79 support sessions for LGBTQ young people, with a total of 327 attendances
- Monk's Hill Youth Club provided 39 football sessions and 37 youth club sessions. Moreover, they had 3 new volunteers joining last year who all completed their level 1 coaching qualification

The case studies below demonstrates the difference that this funding is making.



Case study 10

ST. FRANCIS CHURCH YOUTH ACTION FOR MONKS HILL



At the beginning of each youth club session, the young people participating came together to work on the project. The first session involved them coming up with ideas and then voting to decide which idea to pursue. The idea they chose was to hold a charity bake sale. In the second week, the young people began to plan the sale, identifying how it would work, and what they would need to do. They also voted on the charity that they wanted to raise money for. Many young people put forward charities and Great Ormond Street Hospital was voted the winner. In the third week, the young people created flyers to help them advertise the bake sale. They raised £50 for the charity, and welcomed members of

the community into their youth club for the evening. The only contribution by the leaders of the youth club was to facilitate the group, provide materials to make the flyers and the cash float. The young people (about 12 were involved) enjoyed the experience, and were proud of their achievement. They demonstrated impressive leadership and planning skills, as well as a willingness to take on responsibility.



Each year, this project, encourages young people aged between 11-14 years who attend Monks Hill Youth Club, to contribute to their local community. The project is designed to enable young people to demonstrate their abilities to their local community, to be a visible presence and to make a difference. This year the project took place in the summer term.

Case study 11

ASIAN RESOURCE CENTRE OF CROYDON



With funding from the Community Fund, Asian Resource Centre of Croydon (ARCC) has been able to offer free educational support to children and parents from poorer and more challenging backgrounds. The weekly tutoring support is designed to support both the parents and children to become an effective and supportive partnership in helping children make the most out of their transition years to secondary school and to develop their potential to succeed in core subjects.

The workshops have a dual focus; firstly they support parents in understanding the English curriculum and how they can better support their children in their schoolwork. Secondly, they support children from ages 8 to 10 in maths and English tuition to prepare them for SATs and 11+ Exams.

This funding has raised the ability of parents that are unfamiliar with the British educational system to support their child's education. The Community Fund has resulted in increased participation by these parents in their child's homework and school life. Many of these parents would not be in a position to be able to afford private tuition services. Our programme has enabled them to make the most of this opportunity. Many of the pupils have gone through this programme to achieve

great results in their exams. One such example is that of Jakub who has a learning disability and is a wheelchair user. Shortly after the project launched, his family contacted us resulting in Jakub and his brother enrolling on our programme and, since then, both their results at school have improved noticeably. Jakub recently took part in the entrance exams for Wallington Grammar School and achieved a remarkable result. This was a fantastic and unexpected result to the family and the teachers.

Jakub's mother has attributed this to the tuition support they have received from ARCC through our Community Fund Programme. "I am really grateful for the Tuition Classes offered by the Asian Resource Centre of Croydon to both my boys during the past two years, one of them who has special needs requirements. During that time I noticed huge improvements on both the core subjects English and Maths".

Our educational support partner Asim Khan also said: - "Jakub is a delightful child with a bubbly personality and a keen attitude to learning, he has great potential and these classes provide a great facility for children like Jakub to develop in a small group where we can give children greater focus and attention".



Case study 12

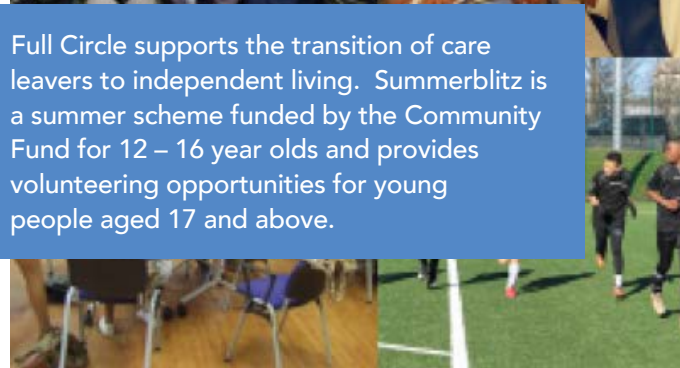
REACHING HIGHER - FULL
CIRCLE & SUMMERBLITZ**Stacey's story**

Stacey is a care leaver involved in the Full Circle programme. She found her transition to independence overwhelming, particularly the pressures of finding housing, a job and paying her bills. Full Circle provided a sense of stability for her and helped her to find support when needed. Since joining the programme, Stacey has been assigned a mentor who meets with her fortnightly, supporting her to generate work and financial plans which helped her manage her work load and budget more effectively.

Stacey expressed her interest in volunteering at the SummerBlitz summer scheme. This was her first time volunteering for an organisation and she committed to working two days a week. Stacey was an asset to the team and contributed greatly to the programme, welcoming

young people onto the scheme and supporting them during sessions. This was a great achievement for Stacey. It helped her improve her time management and communication skills greatly, so much so that she put herself forward to represent Reaching Higher at a presentation held at the Jack Petchy Foundation.

As a volunteer Stacey wants to contribute to her community and aims to help others the same way she has been helped. Stacey is now in her final year of college and hopes to finish with her desired grades. Her CV now demonstrates her productivity since joining the Full Circle and she is able to evidence the new skills she has acquired since being on the programme.



Full Circle supports the transition of care leavers to independent living. Summerblitz is a summer scheme funded by the Community Fund for 12 – 16 year olds and provides volunteering opportunities for young people aged 17 and above.

Case study 13

SHPRESA PROGRAMME AIMING HIGHER



Agnesa's story

Agnesa was referred to Aiming Higher by her social worker. When she first attended she appeared very shy, stressed, lonely, apologetic and sensitive. She had little idea of how to get support. She said that she wanted to better understand her rights and responsibilities, especially those concerning asylum and trafficking. She wanted to learn more about life in UK. She missed her mother and was always worried about what might have happened to her.

At first, Agnesa rarely spoke during the group sessions. After a couple of months she would stay behind, when the young people left, and talk to staff about some of her worries. After attending workshops on Health and Wellbeing, Life in UK, Criminal Justice, personal money management, Immigration, and the ARISE programme on domestic violence she became more confident, trusting and active in the group.

She began to take part in all activities and to attend the weekend workshops at Shpresa Programme's centre in East London. The project also referred her to get support at Solace Women's Aid. She attended the ARISE programme there, as well as participating in the programme of psycho-education groupwork run by Women's therapy centre. She was also referred for counselling.

After attending the immigration workshops Agnesa asked for help with her immigration case, as she had recently been denied leave to appeal a negative decision. The project referred her to a new solicitor who won her one year leave. This news changed further how she felt. Agnesa became even more involved in the project.

As part of her volunteering she gained a number of qualifications, including ABC Level 1 Award Personal Money Management, Leadership training and Asdan qualifications.

Currently Agnesa is studying law and is involved with other young people designing training for lawyers.

During her time attending Aiming Higher Agnesa moved from an isolated, lonely young woman to wanting to build a new and meaningful life, strong enough to care both for herself and others. Agnesa has become a role model for many young people in our project. She says:

"In this country I was given a chance to rebuild my life, I was not judged and supported. I will use all this experience to help and support others to grow."

**“The support was absolutely brilliant,
I couldn't ask for more”**



The Aiming Higher project which operates at John Ruskin College, helps young Albanian unaccompanied minors reach their potential. This includes support for young people to be better able to make positive lifestyle choices, to reduce their risk of gang involvement, to feel less socially isolated, to gain new skills and be better able to study and prepare for work.

THEME 5

Finding homes for all

£381k has been committed to the Finding Homes for All theme over three years. How homelessness occurs is complex and there is no one factor that can trigger it or is necessary for it to occur. Through this funding we wanted to work with the VCSE sector to prevent homelessness, provide advice and information to those people in housing need and at risk of homelessness, and engage with and support people sleeping rough with a view to helping them "move off" the streets.

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The priority outcomes for this theme are:

1. Tackling street homelessness and destitution
2. Preventing homelessness where possible
3. Providing a efficient and effective statutory homelessness service
4. A minimum use of emergency accommodation
5. Improving health outcomes for homeless households

The key outcomes achieved over the last year include:

- 167 homeless people have been supported by a Housing Coach
- 73 people improved their housing situation, for example moving from rough sleeping to a night shelter or from a night shelter to a homeless hostel
- 105 mediation cases supported in the community
- South London Law Centres supported 1677 people in the year with a legal issue in Croydon
- 97% of users of South West London Law Centres legal clinics reported increased ability to help themselves with their legal issue.
- Over 1,200 Croydon residents who cannot afford a lawyer have been supported by the South West London Law Centre on a broad range of issues such as housing, employment, consumer, debt, family and benefits

The case studies below demonstrate the difference that this funding is making.



Case study 14

SKYLIGHT CROYDON FIRST STEPS AWAY FROM HOMELESSNESS

Crisis is funded through the Community Fund to support the delivery of the Skylight Croydon Project, which supports anyone who is homeless or at risk of becoming homeless. Crisis offer's free practical and creative workshops, individual advice and guidance sessions in their centre in Surrey Street, as well as local hostels, day centres and libraries.

Page 63 This offer includes one to one advice and guidance on education, training and housing, support to find work, accommodation and a home to rent, help funding for rent in advance and to pay for a new qualification and also provides support around physical and mental health.



Mike's story

Mike first approached Skylight Croydon in September 2018, having lost his job and home, and having been sleeping rough for three months.

Mike had substance misuse issues, using both cocaine and alcohol heavily, which resulted in him not being able to manage his money or pay his rent and, ultimately, ended up in his being evicted. Mike started sleeping at work. His employer noticed this and terminated his contract.

A friend agreed to store his belongings but couldn't take him in. Mike's drug use and drinking increased whilst he was rough sleeping until he reached a point when he decided he'd had enough, stopped using and drinking, and looked for help.

Mike approached Crisis and was seen by a duty worker. He asked for help getting ID as he had lost his passport and birth certificate when he was homeless. He also asked for support with finding somewhere to live, accessing courses in IT and getting his Constructions Skills Certification Scheme card to help him to find work for himself. Mike also needed a care of address for his post.

The duty worker referred Mike to a Work and Learning coach. During his first one to one Mike explained he



had found a room and had paid a holding deposit, as he believed he would be in work soon and needed to move his belongings out of a friend's house as soon as possible. The work and learning coach quickly referred him to a housing coach to see if the tenancy he had been offered was legitimate and safe.

The Crisis housing coach confirmed the tenancy was appropriate and negotiated with the landlady to offer him the tenancy, despite her concerns that she would be housing someone who had been rough sleeping. A rent in advance was sourced through Croydon Council to enable Mike to move in.

The Work and Learning coach supported Mike to update his CV and apply for jobs. He also started his construction skills course and was provided with practical and financial help to obtain a new passport. In the meanwhile, Mike saw an opportunity for a trial as a kitchen porter at a hotel and was helped to apply. Mike did brilliantly and was offered the job. Whilst waiting for his first pay, Crisis gave Mike an Oyster card and topped it up so he could get to work.

The Community Fund and Crisis supported Mike to go from rough sleeping and unemployment to having his own tenancy and a new job in just over a month.

Case study 15

SOUTH WEST LONDON LAW CENTRES – CROYDON LEGAL ADVICE CLINIC

The Community Fund helps Croydon Legal Advice clinic to see over a thousand clients each year. They offer one-off advice in issues ranging from housing and family matters to immigration and advice on criminal issues.

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Edna's story

Edna approached Croydon Legal Advice Clinic for help with retrieving her deposit in a property that she had left over a year and half ago. The property had been rented through an estate agent and the deposit of £1300 was paid in full at the beginning of the tenancy. The contract, which Edna signed, clearly stated that the deposit would be returned within 10 days of check out.

However, Edna did not receive the deposit back within the correct timeframe and spent several months trying to recover her entitlement, during which she was regularly ignored and signposted from pillar to post between the estate agent and the landlord. Sadly, after nine months of trying, Edna became ill and had to temporarily give up any effort to retrieve the deposit to focus on her wellbeing.

Edna was feeling quite helpless when she decided to visit Croydon Legal Advice Clinic. The volunteer advisor researched the agency (who had changed their name) and subsequently wrote to them requesting the money be returned. When this first attempt



didn't work, a volunteer solicitor spoke directly to the manager of the estate agent, who confirmed that the client's details were still on file. The estate agent could not justify the delay in dealing with the client's return of deposit. They got in touch with the client shortly after the call from Croydon Legal Advice Clinic and finally, after 18 months, the deposit was released in full to the client.

Needless to say, the client was delighted and wrote:

"I am just writing to you this last email to appreciate your dedication in helping me to get my money back. If there was a big world then a sincere thank you I would say. Thank you to all your team and especial to you P. to help me to recover my money back. I could never have managed by myself. You all have been amazing, keep doing this great job help people like me less fortune. God bless."

APPENDIX 1

Total Community Fund investment broken down into themes

Theme

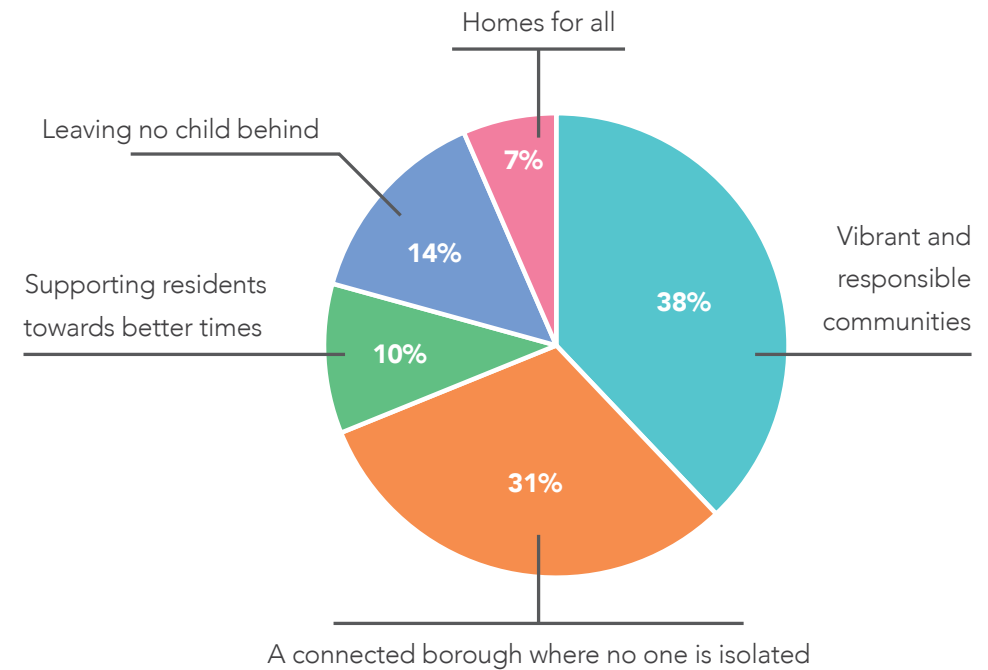
1. Vibrant and responsible communities
2. A connected borough where no one is isolated
3. Supporting residents towards better times
4. Leaving no child behind
5. Homes for all

Total

Total funding

£2,216,860
 £1,809,588
 £609,504
 £829,918
 £381,000
£5,846,870

Total funding awarded by theme



APPENDIX 1

Theme 1



asian resource centre
CROYDON

Asian Resource Centre of Croydon Limited

Partnership approach of 15 community organisations, our mission is to support, develop and promote voluntary and community activity that enhances the quality of life in Croydon.

Our programmes offer a core strengthening of the Asian VCSE, using an asset based community development methodology. We have created a strong partnership to build family resilience, combat social isolation, enable volunteering opportunities.

Contact



Ima Miah, CEO



CVA Resource Centre, 82 London Road,
Croydon, CRO 2TB



ima.miah@arccltd.com



020 8684 3784



Croydon BME Forum: Specialist Local Infrastructure Services

Empowering BME voluntary and community sector organisations and social enterprises in developing their people, systems and structures so that they are better able to deliver quality services to their users.

Contact



Andrew Brown



56a Mitcham Road, Croydon, CRO 3RG



info@bmeforum.org



020 8684 3719



Croydon BME Forum – Green Spaces

Activating BME communities in Green Spaces and supporting emotional and physical health. Croydon BME Forum are running Nature Connectors to explore these questions and get more people into nature.

We'll be providing a free programme of training to BAME volunteers who sign up to be Nature Connectors. Teaching woodland skills, exploring local green spaces and with plenty of campfire conversation, the course is designed to help people pass on what they've discovered, or rediscovered to friends, families and members of their communities.

Contact



Andrew Brown



56a Mitcham Road, Croydon, CRO 3RG



info@bmeforum.org



020 8684 3719



APPENDIX 1

Theme 1





croydonvoluntaryaction

Croydon Voluntary Action (CVA)

CVA is a membership umbrella organisation providing leadership and support to voluntary sector groups, residents and communities in Croydon. Our services under the Community Fund include:

- **Information service:** a regular newsletter for voluntary sector groups and social enterprises, packed with information on local projects, events, training for professionals, funding and commissioning opportunities. We can publicise your community events on the newsletter and our website!
- **Training provision:** a range of free and/or affordable training sessions and events for employees and volunteers of local community groups. Training includes 'Basic Fundraising skills', 'How to set up a charity or social enterprise', 'Meet the Funder' events and more. We also provide some one-to-one support by email, telephone or in person.
- **Support for groups managing volunteers:** good practice support (training and one-to-one) to voluntary sector groups, helping them to maintain high standards in the management of volunteers. Organisations can also join our Volunteer Management Forum to share experiences and ideas about how to develop and manage volunteer programmes.









- **Hire a venue:** we provide affordable meeting and office space to charitable and community groups in Croydon at four community centres.
 www.cvalive.org.uk/venue-hire
- **Networking opportunities:** regular meetings of our network for voluntary sector groups, the Croydon Voluntary Sector Alliance (CVSA), allowing local organization to network, shape potential partnerships, influence local decision making and discuss important topics. We also host and support Faiths Together in Croydon, a network of local faith leaders.
 <http://faithstogetherincroydon.org.uk>
- **Empowerment of citizens based democracy:** we elect voluntary sector representatives, who sit on a range of Partnership Boards and Steering Groups within the Council, bringing the voice of the sector and users on the table. CVA also attends the local Strategic Partnership Boards, Chief Executives Groups, thematic partnerships and associated executive/task and finish groups to represent the voice of its members. They provide asset based community development (ABCD), although not funded through the Community Fund, we offer a UK wide training programme in strategic partnership with Nurture Development and mentor/support to other Croydon based and UK wide groups wanting to deliver ABCD.

- **Volunteering:** if you are a local resident and would like to volunteer your time, make friends and gain new skills, come to our Team Croydon shop, which is based on the ground floor of the Centrale shopping centre! There are hundreds of opportunities available, these range from regular volunteering at a local community group to occasional support to Croydon's vibrant cultural, sports and other events/festivals.

 www.cvalive.org.uk/volunteering

Contact

-  Sara Milocco and Sarah Burns at the CVA Resource Centre, telephone 020 8253 7060
-  Karen Chillman at the Team Croydon Shop (Volunteer Centre), telephone 020 8253 7070
-  CVA Resource Centre, 82 London Road, Croydon, CR0 2TB (for our information, training and networking support)
-  Team Croydon Shop, Centrale Shopping Centre, North End, Croydon, CR0 1TY (for our volunteer centre)
-  CVA Resource Centre:
9:30am - 5pm Monday to Friday
-  Team Croydon Shop (volunteer centre):
Monday to Thursday 10am - 5:30pm
Friday to Saturday 10am - 5pm

APPENDIX 1

Theme 1



Neighbourhood Watch CROYDON



Croydon Borough Neighbourhood Watch Association

Croydon Borough Neighbourhood Watch Association (CBNWA) supports Croydon residents who are concerned about crime such as burglary, scams and antisocial behaviour.

The aim of Neighbourhood Watch is to bring neighbours together to create strong, friendly, connected communities where crime and anti-social behaviour are less likely to happen.


CBNWA is a charity which encourages neighbours to get together to combat local problems and enables them to work more closely with the police and the local council to take action to resolve them.

It encourages people to be good neighbours and look out for each other, especially those more vulnerable and the elderly. It aims to create a united, caring community and ultimately a safer environment.

Our members act as co-ordinators, looking after the area in which they live which is called their 'Watch'. By sharing information with other watches in the area and the CBNWA, members benefit from a network of support and up to date information of crime and nuisances in their area.

Members receive window stickers and street signs to show that they live in an active Neighbourhood Watch area and this may help to deter crime.

Contact




 nhw@cbnwa.com for information on how to become a NHW Co-ordinator or visit our website www.cbnwa.com



Citizens Advice Croydon

Citizens Advice Croydon provides the advice people need for the problems they face and improves the policies and practices that affect people's lives. They provide free, independent, confidential and impartial advice to everyone on their rights and responsibilities. It values diversity, promotes equality and challenges discrimination.

Contact

-  Claire Keetch
-  48-50 Portland Road, South Norwood, SE25 4PQ
-  ceo@croydoncab.org.uk
www.citizensadvicecroydon.org
www.citizensadvicecroydon.info
-  020 8684 2236

APPENDIX 1

Theme 1



Croydon Disability Forum (CDF)

CDF supports and helps disabled people to live a fully independent life. They raise awareness of the issues and barriers facing disabled people on a day to day basis, especially in Croydon. We challenge those who, through ignorance or thoughtlessness, act to make life more difficult for the disabled and those who care for the disabled.

We hold regular Forum meetings that include presentations and speakers to explore what may affect or benefit our members. We also work with other like-minded groups for the benefit of people with disabilities.

Contact

-  Adrian Dennis, CDF Chair
-  C/O Croydon Vision, 72 - 74 Wellesley Road
Croydon, CR0 2AR
-  info@croydondisability.org.uk
-  020 8653 7256







Phase 1 Enterprise Training Ltd CIC

Empowering Mothers of Croydon. Set up by mothers of Croydon for mothers/carers of Croydon to target local mothers/carers most at risk of social isolation and disadvantage. My OutSpace offers the following services under Community Fund:

- Digital skills training
- Financial capability training with an opportunity to gain a Level 2 qualification
- Employability training
- Business advice and mentoring
- Access to networking opportunities

Contact

-  Yuliana Topazly
-  Weatherill House Business Centre, New South
Quarter, 23 Whitestone Way, Croydon CR0 4WF
-  yuliana@myoutspace.co.uk
-  020 3603 1140

APPENDIX 1

Theme 1



Purley Cross Centre

The Purley Cross Centre is a community information service located in the heart of Purley. Our purpose is to provide appropriate information, training, support and advice services to people across the borough which help to tackle social and financial isolation and inequalities and to improve mental health. The services provided by the Centre cover a multiplicity of issues such as housing, finance, health and wellbeing, family, leisure, legal and employment matters. It refers users to appropriate services; collaborates with charities and agencies; hosts a variety of onsite clinics and provides in-house IT training and volunteering opportunities. Its aim is to train volunteers; increase social connectedness and engagement with the local community; improve employability; promote the regeneration and the development of a vibrant, culturally rich community.

Contact

-  Leo Cardow, Manager
-  Purley Cross Centre, 24 High Street, Purley, CR8 2AA
-  manager@purleycrosscentre.org
www.purleycrosscentre.org
info@purleycrosscentre.org
-  020 8668 4189



APPENDIX 1





Theme 2



Croydon Accessible Transport (CAT)

Croydon Accessible Transport (CAT) provides accessible community transport, training and vehicle pooling services. The service aims to improve mobility and health in Croydon's older citizens and, so improve wellbeing among Croydon's more isolated citizens.

Contact

-  Robert Macchi
-  Cornerstone House 14 Willis Road Croydon, Surrey, CR0 2XX
-  robmacchi@croydonaccessibletransport.org.uk
-  020 8665 0861



Croydon Neighbourhood Care Association (CNCA)

Carer's Befriending service for over 65s. A bespoke intensive service for carers, looking after someone with complex needs over 65 years. The befriending service provides a home visit and intensive support around day-to-day care and hospital appointments. There is also a telephone befriending service. Our "keeping in touch" service takes the form of a text or email, and also uses Facebook and Twitter to keep carers informed about local events and support networks. There are also various events and trips held throughout the year.

Contact

-  Susan McVicker
-  CNCA, Central Hall, Davidsons Lodge, Freemason's Road, Croydon, CR0 6PD
-  info@cnca.org.uk
-  020 8654 4440



Whitgift Foundation & Croydon Mencap - Carer Assessment Service

An independent carers assessment is undertaken by a professionally trained and sensitive assessment officer. Assessments can take place in the Carers Support Centre on George Street or over the phone.

Contact

-  Helen Thompson
-  Croydon Carers Support Centre, George Street, Croydon, CR0 1PB
-  assessments@carersinfo.org.uk
-  020 8649 9339, option 1

Carers Respite Allocation Service

A free 75 hours of homecare is available for carers in Croydon. Adminstrated by the Carers Support Centre, this service allows eligible carers to choose their own care agency to provide the support and allow them time off from caring.

Contact

-  Helen Thompson
-  Carers Support Centre, 24 George Street, Croydon, CR0 1PB
-  assessments@carersinfo.org.uk
-  020 8649 9339, option 1



APPENDIX 1

Theme 2



Horizon Care and Welfare Association

The Carers Support Project provides short breaks and respite which can be organised on an emergency basis. We also offer pre-booked and scheduled appointments. We have an emergency contact number that allows carers who need emergency support to get a break.

We provide weekly support group meetings and organise outings twice a year for carers overcome with stress. We also organise health workshops.

Contact

-  Anab Osman
-  Horizon Care and Welfare Association,
79 Park Lane, Croydon, CR0 1JG
-  horizoncareandwelfare@hotmail.com
-  020 8665 0921



Royal Association for Deaf people

Royal Association for Deaf people (RAD)

Croydon Deaf Choice, in the Community aim to cater for deaf Croydon residents aged 16-65, parents with deaf children, young carers, children of deaf parents, deaf carers and carers of deaf adults. Founded in 1841, The Royal Association for Deaf people (RAD) provides services to Deaf people in their first language which is usually British SignLanguage (BSL) and supports mainstream providers to be more accessible to Deaf people. Funded by the Croydon Community Fund, RAD hosts topical events and educational workshops fully accessible to Croydon's Deaf Adults, Parents of Deaf Children, Carers and Children of Deaf Adults.

Contact

-  Damaris Cooke or Linda Parkin
-  Royal Association for Deaf people, Block F, Parkside Office Village, Nesfield Road, Colchester CO4 3ZL
-  damaris.cook@royaldeaf.org.uk
linda.parkin@royaldeaf.org.uk
contact info@royaldeaf.org.uk
www.royaldeaf.org.uk
-  **Voice phone:** 0300 688 2525
Text phone: 0300 688 2527
SMS: 07851 423 866

APPENDIX 1

Theme 2



Carers Support Partnership

The Carers' Information Service runs the Carers Support Centre in George Street, the one stop shop for carers in Croydon. Carers can drop in Monday to Friday, 10am-4pm for information, advice and support. Support available for carers at the Centre includes drop-in information and advice, casework support for carers with more complex issues, a Carers Café open on weekday mornings, health and wellbeing events, specialist advice surgeries, a comprehensive range of informative publications, a quarterly newsletter, monthly carers' e-bulletin, emotional support, support groups and carers' workshops.

Contact

-  Helen Thompson
-  The Whitgift Foundation – Carers' Information Service, Carers Support Centre, 24 George Street, Croydon, CR0 1PB
-  enquiries@carersinfo.org.uk
-  020 8649 9339



Carers Counselling

Are you a Croydon resident providing unpaid support for family or friends who could not manage without your help? Are you caring for a relative, partner or friend who is ill, elderly, disabled or has mental health or substance misuse problems? If so, you can apply for six free counselling sessions with our Carers' Counselling Service.

As a carer you may face a number of difficulties which are hard to deal with emotionally and which cause you distress. Counselling can provide you with an opportunity to talk about these emotional difficulties with someone who is trained to listen. It can help you to understand what you are experiencing and to see the difficulty in a more manageable way.

If you are a carer, 18 and over and live, work or are educated in the borough of Croydon, or if the person you care for is 18 or over, lives, works, or is educated in the borough of Croydon then you are eligible to apply for Carers Counselling at Mind in Croydon.

Contact

-  counselling@mindincroydon.org.uk
-  020 8763 2064



Carers Support


Are you living in Croydon, 16 years or above and looking after someone with a mental health problem? If so you are a carer. Carers can be relatives, partners, friends or neighbours.

As a carer you may not be aware of what help is available to you. The Carers' Support Service can provide you with:


- Information on services available
- Support to access help you need
- An advocacy service
- Emotional support
- Access to events and workshops
- An opportunity to meet other carers
- Opportunities to get involved in the planning and development of services for carers

We hold weekly meetings for mental health carers on Tuesday evenings 6pm - 8pm. Please let us know if you are coming to the meeting in advance. The meetings are free and are held at:

Contact

-  Fairfield House, 10 Altyre Road, East Croydon, CR0 5LA

Please note that the meetings are for the mental health carer only. If you would like more details please get in touch.

-  020 8688 1210

APPENDIX 1





Theme 3



The Rape and Sexual Abuse Support Centre

Provision of an Independent Domestic/Sexual Violence Advocate in the Family Justice Centre. We ensure that women suffering from domestic violence that are isolated, and their children, are protected from harm and exploitation and that perpetrators are brought to justice.

Contact

-  Yvonne Traynor
-  The Rape and Sexual Abuse Support Centre
RASASC, PO Box 383, CR9 2AW
-  info@rasasc.org.uk
-  020 8683 3311



Revivify Community Initiative



GOOD FOOD MATTERS

GROWING A HEALTHY COMMUNITY

Good Food Matters and Revivify Community Initiative

A joint initiative to ensure fresh produce is distributed to those who may not always have access to it and develop Food skills for life. The project includes:

- Cookery skills
- Introduction to nutrition and a balanced diet
- Food budgeting and planning
- Foodbank basics cooking – using the average provisions and cooking balanced meals
- Developing online/recipe/resources book

Contact

-  Amanda Mcgrath
-  Good Food Matters and Revivify Community Initiative (previously community food bank)
Mickleman Way, New Addington, CR0 0PN
-  amanda@goodfoodmatters.org.uk
revivifyci@hotmail.com
-  01689 847 605 / 07715 905 033 and
020 8633 1630 / 07757 754 637







Metro Centre Ltd – Metro Croydon HIV Healthy Living Service

This programme brings together various services for people living with and affected by HIV in Croydon. These services include:

- Advice and Advocacy for people living with HIV (housing, welfare benefits)
- Family Support (support for children and parents)
- Positive Peer Support groups (youth groups and adult groups)
- Counselling services for people living with HIV
- Volunteering and professional training services

Contact

-  Edith Ntabyera
-  Services provided in various locations in Croydon
-  edith@metrocharity.org.uk
-  020 8305 5000 / 020 8305 5006 / 07964 450 930






APPENDIX 1

Theme 3



Mind in Croydon Ltd – Active Minds

Physical and mental wellbeing are intertwined, a healthy mind needs a healthy body and a healthy body needs a healthy mind. Active Minds can encourage you to look after your wellbeing by supporting you to become more physically active and develop your knowledge on healthy living issues, like the importance of nutrition, sleep, relaxation and leisure time.

-  Active Minds, Orchard House, 15A Purley Road, South Croydon, CR2 6EZ
-  activeminds@mindincroydon.org.uk
-  020 8253 8205/6



GOOD FOOD MATTERS
GROWING A HEALTHY COMMUNITY

The Conservation Volunteers (TCV)

The Croydon National Health Service is a consortium consisting of five organisations TCV, Wild in the City, Good Gym, Wheels for Wellbeing and Good Food Matters. It uses nature to support individual wellbeing and the development of resilient and healthy communities

Contact

-  Alan Marchant
-  TCV, 4th Floor, Charles Darwin House 2, 107 Gray's Inn Road, London, WC1X 8TZ
-  a.marchant@tcv.org.uk
<http://naturalhealthservice.london>
-  07801 686 044



APPENDIX 1

Theme 3



The Family Centre

The Family Centre Community Café, promotes healthier cooking methods, utilising fruit and vegetables sourced locally. The Community Cafe is operates four afternoons per week targeting specific groups. We serve fresh home cooked healthy meals at affordable and subsidised prices for the local community.

The Community Cafe and Food Stop Shop have just been awarded a 5 star Food Hygiene rating by the Food Standards Agency.

Day	Target Group
Monday	Parents/carers of children/family members who special or additional needs
Tuesday	The Birchwood over 50s club
Wednesday	Low income families, Job seekers and marginalised communities
Thursday	Open to all

Tea and Talk sessions (with a crèche) run two mornings per week Wednesdays and Thursday from 9:30am - 12noon and compliments our Food Stop shop.

Contact

-  Julia Weller
-  The Family Centre Fieldway New Addington
Fieldway, new Addington, Croydon, Surrey,
CR0 9AZ
-  familycentre.fieldway@virgin.net
-  01689 844277
-  07498058733



APPENDIX 1

Theme 4



Croydon Drop-in (CDI)

CDI Talkbus provides outreach into all parts of the Borough offering Information, Advice & Guidance to all members of the community. Especially helping children & young people stay safe, feel more self-confident, find strategies to cope with stress and talk about themselves, their health, their relationships and their futures.

Contact





-  Gordon Knott
-  Croydon Youth Information and Counselling Services Limited (CDI) 132 Church Street, CR0 1RF
-  gordonknott@croydondropin.org.uk
www.croydondropin.org.uk
-  020 8680 0404



Crystal Palace FC Foundation

The develop through Sport' Community Programme (DTSC Programme) helps young people be less confrontational and more understanding of other cultural differences through regular participation in sport or other physical activities. Promoting positive interaction with others to create a sense of connection through co-operation and teamwork. This will hopefully support young people to identify and be more likely to stay away from gangs and other negative behaviour.

Contact

-  Jamie Broughton
-  Palace for Life Foundation, Selhurst Park, London, SE25 6PU
-  jamiiebroughton@palaceforlife.org
-  020 8768 6047

APPENDIX 1

Theme 4



METRO Bridge

A holistic service for LGBTQ young people. The Bridge is a free and confidential service for lesbian, gay, bisexual, trans and questioning (LGBTQ) young people aged 11-25 in Croydon. The Bridge runs two weekly youth groups; one for those aged 11-16 and one for those aged 17-25. These groups provide a safe and social space to meet other LGBTQ young people, get support and enjoy activities, trips and workshops.

This service also includes

- One-to-one advice and support sessions for LGBTQ young people aged 11-25
- Free training sessions for professionals to help them develop their knowledge and confidence to support LGBTQ young people in Croydon

Contact

-  Jevany Thompson
-  METRO Charity, 1st Floor Equitable House, 7 General Gordon Square, London, SE18 6FH
-  jevany@metrocharity.org.uk
-  07850 308841



Oasis Community Hub Ashburton Park

Developing friends of Oasis groups. Support communities to be healthy, safe and full of opportunity, where each individual is supported to reach their full potential in life.

Contact

-  Kat Simmonds
-  Oasis Community Hub, Ashburton Park, Shirley Road, Croydon, CR9 7AL
-  info@oasisuk.org
-  07474 575 732

APPENDIX 1

Theme 4



Play Place Inov8 CIC

The Our Space and Community Fun Clubs projects aim to:

“Harnesses the energy and social capital of each chosen community and use an asset based community development (ABCD) approach; volunteers, under-used buildings and partnership working”.




Our Space

The project supports a strong community constructed youth offer to target the most deprived neighbourhoods in Croydon. The project sites represent a pan Croydon spread and target estates and communities identified as having high levels of deprivation or where a clearly identified community need exists.

A key element of the programme is to support and upskill local people who want to play a more active role in their community. The AQA Accreditation in Volunteering commenced in February 2016. The project has recruited 52 volunteers; we currently support 20 volunteers on a regular basis.

Contact

 info@playplace.org
www.playplaceinnov8.org

 www.facebook.com/play-place-532087400261547



Family Fun Clubs

The Play Place Family Community Fun (FCF) Programme brings together residents, volunteers, community groups and activity providers to offer family and resident community engagement activities across 10 neighbourhoods in Croydon. A range of positive activities have been developed for all ages, these are listed below:

- Work with communities to help plant local events, festivals and activities – increasing community ownership, neighbourhood relationships, pride, aspirations and making the locality feel a better place to live
- Stimulate better use of open spaces on community estates – safe place to play and activities for whole families to play and learn together
- Promote well-being and physical health through outdoor sports, play and physical activities
- Promote creativity and community arts in each estate
- Tackle gaps in equality by supporting deprived children and families and reducing isolation for marginalised communities

We are working with a range of partners, community volunteers and young leaders. FCF helps to plant new events and support existing events and activities at each site.

APPENDIX 1

Theme 4







REACHING HIGHER

Reaching Higher – Summer Blitz

Promoting positive activities for young people, estate based community based activities. It is a jam-packed 4 week programme aimed at young people aged 12-16, with volunteering opportunities for young people aged 17+. The programme aims to keep young people engaged in positive activities during the summer holidays. You can expect: performing arts workshops, sports and activities such as cooking and day trips to some of London's most popular destinations!





Contact

-  Nicola Coke
-  Reaching Higher South Norwood Methodist Church, Suffolk Road, SE25 6EG
-  nicola@reachinghigher.org.uk
info@reachinghigher.org.uk
-  0208 945 5560

Reaching Higher – Full Circle Life Skills Programme

Full circle is a mentoring programme aimed to support care leavers transitioning into independent living. We focus on building key life skills including cooking, food shopping, financial literacy including budgeting and account management as well as key employability skills such as CV writing, work experience and productive job search.

Contact

-  Nicola Coke
-  Reaching Higher South Norwood Methodist Church, Suffolk Road, SE25 6EG
-  nicola@reachinghigher.org.uk
info@reachinghigher.org.uk
-  020 8945 5560

APPENDIX 1

Theme 4



Shpresa Programme

Shpresa Programme delivers the Aiming Higher programme – which helps unaccompanied Albanian young people reach their potential

Thursday – “Aiming High” project

Come and dine with me/English classes women and young people/volunteer support


Patrolling at Croydon town

 194 Selhurst Road, London SE25 6XX

 3pm - 8pm

Friday – “Aiming High”

Youth activities/football/dancing/badminton/networking

 Old Town Youth Club. Duppas Hill Terrace, Croydon, Surrey, CR0 4BA

 6:30pm - 8:30pm

Thursday – Working together to develop resilience


121 support/mentoring and youth support group

Motto: Your career starts here!


 John Ruskin College, Selsdon Park Road, South Croydon, CR2 8JJ

 9am - 3pm

Contact

 shpresaprogramme@yahoo.co.uk
www.shpresaprogramme.com

 shpresaprogramme

 020 7511 1586

APPENDIX 1

Theme 4



Sir Philip Game Youth Centre





The service is for young women and men 12-21 years of age who are not currently engaged in health and fitness or youth activities in the East Croydon and Addiscombe area. The health and fitness activities take place several days a week during the school term at the Sir Philip Game Centre. On Fridays these activities overlap with the evening youth club, thereby encouraging the young people to take part in other youth activities as well.

The service provides a range of safe, age-appropriate physical activities such as stretching and dance exercises, circuit training, gym activities, basketball and five a side football. There is a health bar providing fitness smoothies and drinks for the young people.

Training is provided for young volunteers to help them achieve fitness and exercise qualifications and become assistant fitness instructors at the centre. The health bar coordinator trains young people to make health and

fitness smoothies and drinks. There are plans for health and fitness open days and joint events with Surrey Clubs for Young People, including encouraging visitors to try out a range of fitness activities and healthy sports drinks at the centre, thereby increasing regular users of the health and fitness and youth activities in the area. Sir Philip Game Wellbeing Youth Community – meeting fitness, health and vocational aspirations and Sir Philip Game Centre's.

Contact





-  Sally Thorpe
-  Sir Phillip Game Centre (SPG), 38 Morland Avenue, Croydon, Surrey, CR0 6EA
-  sallythorpe3861@yahoo.co.uk
-  020 8662 5752



St Francis Monks Hill

The Youth Action for Monks Hill project provides Monks Hill Youth Club, Monks Hill Football Academy and a Mentoring service to young people, working constantly to reduce anti-social behaviour and encourage them to develop personally and socially, reaching their potential. Monks Hill Youth Club welcomes young people aged 11-16, for activities such as cooking and sport. Monks Hill Football Academy for school years 5-9 is open to all for football skills training and matches.

Contact

-  Alice Price
-  Our activities are run on Monks Hill
-  alicejprice@hotmail.com
-  07985 936 185



APPENDIX 1

Theme 5





Crisis UK – Skylight Croydon First Steps Away from Homelessness


If you are homeless, have been homeless in the last two years, or are at risk of becoming homeless, they can help you.

Crisis offer free practical and creative workshops, individual advice and guidance sessions in our centre in Surrey Street, Croydon as well as local hostels, day centres and libraries.

Contact

 croydon@crisis.org.uk
www.crisis.org.uk

 Unit 3 Bridge House 13 Surrey Street
London, CR0 1RG
Opening hours
9am - 5pm Monday to Friday

 020 3848 1700



Croydon Community Mediation

Croydon Community Mediation (CCM) offers a professional and effective mediation service. If you have a problem with a neighbour, they can help.

Their trained and experienced mediators will help you cope with problems such as noise, boundaries, repairs, parking, animals and boisterous children which disturb those living nearby.

Contact

 office@croydonmediation.org.uk
www.croydonmediation.org.uk

 020 8686 6084



South West London Law Centre

South West London Law Centres provides specialist legal advice and representation to people who could not otherwise afford access to justice. Their solicitors focus on social welfare law issues such as community care, discrimination, employment, housing, immigration & asylum, debt and welfare benefits to people living in Croydon.

They run free evening advice clinics in Croydon on a Monday, Tuesday and Wednesday covering a wide range of legal issues such as Housing, Immigration, Family, Crime and Wills and Probate.


They receive 60,000 calls for help each year and get 1 million website hits each year.

Contact

 Patrick Marples

 South West London Law Centres, 5th Floor Davis House, Robert Street, CR0 1Q

 info@swllc.org
www.swllc.org

 020 8767 2777



Croydon Council would like to thank all the organisations commissioned via the Community Fund for their continued support and for delivering outcomes for residents in Croydon. We would also like to extend a special thanks to all those who submitted case studies to this report



Croydon Council

Council Voluntary, Community and Social Enterprise Sector Strategy 2019-2023

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Purpose of this strategy

The purpose of this strategy is primarily to inform the council's engagement with the voluntary and community sector (VCS) in Croydon and, in addition, to align how partner organisations in Croydon work jointly to support and develop the sector.

Through it, we are seeking to set out how we want to work in partnership with the VCS. The strategy has been informed by research and engagement across the sector and by the priorities of the council and its partnerships.

We want to see a thriving VCS, with improved community cohesion and the foundations of wellbeing and resilient, empowered, supportive communities. We will play our part to support the sector. However, this is not a strategy for the VCS; the sector is an equal and self-determining partner. But the priority outcomes set out here provide an open and honest framework for prioritising our support and resources for working in partnership with the VCS to deliver for Croydon.

1. Foreword

Croydon's voluntary and community sector is one for other parts of London and the UK to envy. Our borough benefits from a wonderfully diverse voluntary and community sector that makes a vital contribution to Croydon. More than a third of residents undertake some form of volunteering which represents a huge contribution to society and the local economy.

We value our rich and vibrant culture, which contributes significantly to our success. It should be no surprise that there are multiple references throughout the council's Corporate Plan to working with the voluntary and community sector. We will only be able to achieve the ambitious objectives that we have set out in the Corporate Plan by working together on an equal basis with our partners, especially the voluntary and community sector.

The voluntary sector is at work across all public services and beyond. I have had the pleasure of meeting staff, volunteers and service users across the sector. I have seen first-hand the positive impact that the work of charities, community groups, faith organisations and many others have on the lives of our residents. Often it is our most vulnerable residents who benefit the most and it is critical, therefore, that we continue to support the sector. This support includes a commitment not to reduce the overall financial contribution that the council makes to the sector, despite the continued reductions in funding that we face. Our support, however, will extend beyond grants and contracts, with advice, guidance and a commitment to work together for the benefit of Croydon.

There is, however, need for change. The continued reduction in government funding for local government shows no sign of ending. It is essential that the council secures the best value for money from our investment in the sector. We need to work with our partners such as health to align our approaches with the VCS to ensure the delivery of our joint plans, such as the Health and Care Transformation Plan, and to make best use of our resources for the people of Croydon. We need the voluntary and community sector to help us implement a different service model, focused on place based prevention, with services tailored to local needs to make them more effective.

Through this strategy we have sought to outline how we want to work with the sector in future and we welcome partners who work with the VCS in this way. The strategy is not about telling the sector how to operate – it is not our place to do so, and the sector is far too diverse and constantly evolving for one document to do this anyway. Instead, this framework seeks to outline the positive way in which we want to work with the sector, for the benefit for our residents and communities across Croydon.

Councillor Hamida Ali

Cabinet Member for Safer Croydon and Communities

2. The Voluntary and Community Sector (VCS) in Croydon

Who are the VCS?

The VCS is a fundamental part of Croydon. It is a key partner in delivering services and support to our residents. The VCS in Croydon is made up of a diverse range of socially driven, not-for profit, voluntary and community groups that have a unique role in supporting the borough at a neighbourhood or community level. Groups differ greatly in their size, area of operation and the users their services reach, but when referring to the VCS, this includes organisations such as:-

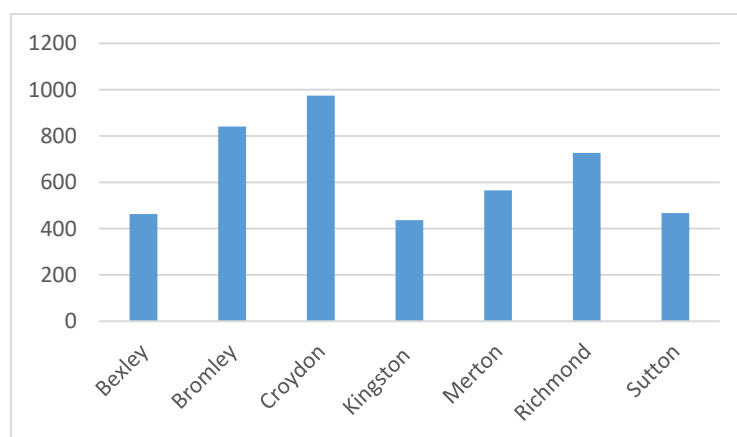
- Community associations
- Co-operatives
- Faith organisations
- Grant making trusts
- School/parent groups
- Tenants and residents' groups
- Sports, environmental, arts and heritage organisations
- Community groups
- 'Friends of' Groups
- Housing Associations
- Registered charities
- Charitable Incorporated Organisations
- Social enterprises
- Non-constituted groups of residents working together

We value a strong, independent VCS. It has developed in areas that statutory organisations have not reached. Its responsiveness to local need is a great strength. These are qualities that we hope to benefit from by working more closely with the sector in future.

The size of the VCS

Data from 2016/17 suggests that the VCS in Croydon is the largest in outer South London, based on the number of registered charities operating in borough (see Chart 1).

Chart 1: Number of registered charities in outer South London boroughs



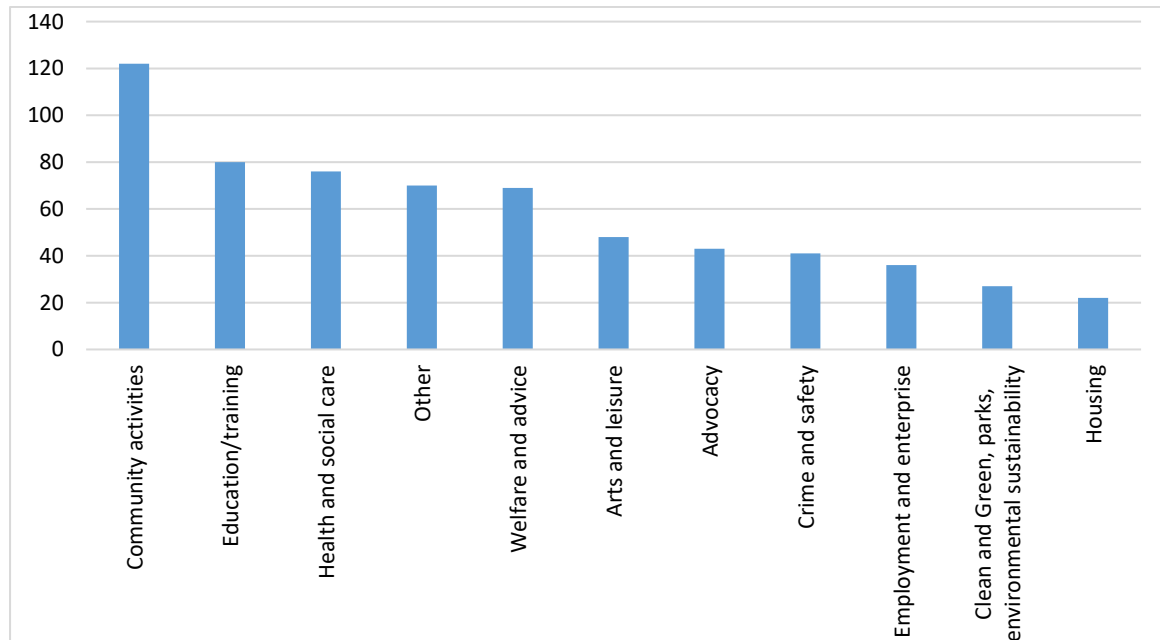
Data produced by National Council for Voluntary Organisations in conjunction with South London CVS Partnership and Croydon Voluntary Action based on Charity Commission data: registered charities operating in borough (excludes national and regional charities based outside each borough but operating services within it): <https://data.ncvo.org.uk/areas/croydon/intro>

We recognise that this is only a partial picture as it only considers registered charities; 35% of VCS organisations responding to the council's recent survey of the sector stated that they

were not registered. Nor does it include the many charities that are based outside Croydon but operate services within the borough.

VCS organisations provide a broad range of services and activities addressing a variety of needs in the borough, as evidenced by respondents to our survey (see Chart 2 below).

Chart 2: Service sectors supported by VCS providers



The size of organisations varies considerably. Among respondents to our survey, 37% had an annual turnover of less than £10,000, 41% had a turnover of between £10,000 and £249,000 a year, and 22% had an annual turnover of £250,000 and over.

[The importance of the VCS to Volunteering in Croydon](#)

Whilst some VCS organisations will employ staff, most are reliant on volunteers, at least in part. 66% of respondents to our survey solely or mainly used volunteers. Only 7% did not rely on them at all. In recent years Croydon has benefited from an increase in volunteering levels. In the 3 years to 2015/16 (the most recent data available), the DCMS survey confirmed that 36% of people in Croydon had volunteered in the previous 12 months. This was the third highest level of volunteering in London, and an increase from 20% in 2011/12. Despite the positive trend in the rates of those undertaking volunteering, our engagement showed clearly that the need for more volunteers who were prepared to commit time regularly and reliably is one of the major challenges facing VCS groups in Croydon.

There are significant benefits to individuals who volunteer in terms of their sense of wellbeing and belonging, sense of purpose, and their health and that of their families. It can provide a route into work too. In addition, volunteering and the whole VCS promotes community cohesion in particular in a time and place where traditional family bonds and support are increasingly absent.

How we work in partnership with the VCS

The council is a strong contributor to the VCS in Croydon, providing significant funding and staff support through various teams, our commissioning and procurement function and the One Croydon partnership. We also fund infrastructure organisations to deliver specialist support to the VCS. However, we also recognise that this support has met the needs of a relatively small proportion of the VCS, and that we need to reach and support more.

The council provides in excess of £4m in financial support to the VCS. Some of this is provided directly through the Community Fund, which delivers on our Corporate Plan outcomes and supports delivery of the recommendations made by Croydon's Opportunities and Fairness Commission; the Prevention Fund that funds support and activities to prevent social isolation and people requiring specialist support; and Community Small Grants. It also provides support indirectly through advice, guidance and the allocation of premises and associated subsidies, such as affordable rentals, rent subsidies and discretionary business rates relief. There is substantial multi-million pound additional investment that the VCS accesses through various commissioning programmes as part of our supply chain, for example delivering services for children and adults.

Our partners also provide substantial support: Croydon Clinical Commissioning Group (CCG) provided funding totalling £4.7m in 2018/19, including its contribution to the One Croydon Alliance and the Alliance's Local Voluntary Partnerships with the VCS.

The different support mechanisms have their own focus and priorities but we will work in unison to ensure there is a robust offer to VCS organisations of all sizes.

3. Findings from the VCS consultation

Engagement Process

This strategy has been informed by strong evidence and engagement with a range of VCS organisations across Croydon. The council conducted a survey between 7 December 2018 and 8 February 2019 to seek feedback on a range of issues:

- Challenges and opportunities
- Support for the VCS
- Service sector and beneficiaries
- The size of VCS organisations
- Financial matters
- Geographical area of operation

In total, 216 responses were received.

In addition, meetings were held with the main infrastructure organisations in Croydon and engagement events were held on the 22 January 2019 and 5 February 2019, attended by a total of 113 representatives from VCS organisations and groups, both large and small. The aim of these events was to bring people together to look more extensively at the issues and feedback raised in the survey in small group discussions.

The main observations and recommendations made by VCS respondents are set out below.

Strengths of the Sector

Croydon benefits from a strong VCS which makes a vital contribution to the borough and provides support for some of Croydon's most vulnerable residents. The sector puts users at the heart of its work, supporting community cohesion, empowerment and resilience. Passionate and dedicated volunteers are the lifeblood of the sector.

VCS groups and organisations are able to reach places and people that statutory agencies often cannot and have a greater ability to adapt quickly to the evolving needs of the community. Their specialist knowledge and rich understanding of local communities, along with networks that have been developed over many years, are vital in delivering the prevention and early intervention that will address the complex needs of residents. In recent years, the sector has demonstrated its resilience in the face of reducing funding and come together in times of greatest need.

Issues raised by the Sector

Respondents to our survey also indicated where they thought some VCS organisations needed to improve. Some are unaware of funding available or lack bid writing and fundraising skills. Almost a fifth of respondents relied on one source of funding. Many lacked awareness or lacked the skills for generating income, though for some organisations this was not an option. They had difficulty in recruiting or retaining staff due to the low level of pay that they could offer. Some linked this to a concern about their ability to respond to increasing levels of demand.

With their higher reliance on volunteers, some smaller organisations were concerned about their ability to recruit and capacity to train volunteers. To this was added concern about the

difficulty of attracting trustees with the skills that they needed to ensure adequate governance.

It was felt that there was a lot of competition among VCS organisations for funding and increasing user numbers and that this could make them less inclined to collaborate. It was felt that there was scope for developing stronger partnerships and that this could strengthen bids. The lack of awareness of what services other VCS organisations provided limited opportunities for partnership as well as increasing the risk of duplication.

Funding

This was identified as the biggest challenge facing VCS groups in Croydon. In the current financial environment, all VCS groups are having to explore different sources of revenue in order to sustain delivery of services.

It was a particular concern for smaller VCS groups and organisations that lack capacity to make bids and feel unable to compete with larger organisations that have more resources. Rejection often discouraged small organisations from applying; they would benefit from more support.

A key strength of the sector is to bring funding into Croydon for the benefit of our residents and communities. Alternative funding sources are available including Government programmes, the Greater London Authority, the National Lottery and charitable trusts. Maximising this alternative funding for the benefit of Croydon is critical

Whilst there was widespread support for collaborative bidding in theory, many expressed a concern that a lack of funding turned potential collaborators into competitors and this undermined attempts to work together. The council could better support collaboration through network events and allowing more time for VCS groups to come together and foster partnerships and consortiums. Training, mentoring and toolkits on how groups can develop and maintain effective partnerships would also be beneficial.

There is a lack of awareness in the sector about funding and support that is available. It was suggested that the council could update the VCS more effectively and regularly with information on different funding streams, amounts available, guidance and support and deadlines so that every organisation could have an equal opportunity to know what funding is available.

Information about organisations already receiving funding, where they are delivering services and who is benefitting from them, could help to identify gaps in the provision for certain needs and localities. This could help to avoid duplication in the sector.

Premises

Availability of affordable premises and space for events was a major challenge for the VCS. It was suggested that a directory of available venues would be useful, allowing VCS groups to seek premises and venues for events. In order to increase the pool of premises available,

the council could encourage owners of long-term empty properties to offer them to VCS organisations for temporary use.

There was a desire for greater transparency and clearer guidelines about how and why organisations are allocated council premises or paid rent subsidy or Discretionary Rate Relief (DRR), when many others do not receive such support. The view was that support is allocated on a historical basis, rather than through a transparent process that offers all organisations an equal opportunity to apply.

There should be more monitoring of performance and usage of allocated premises and a mechanism for ending leases that are not being used appropriately.

Volunteers

Despite data showing a high volunteering rate in Croydon, one of the largest challenges facing VCS groups and organisations is a lack of regular volunteers, putting a large strain on the organisations' ability to deliver services.

There was a need for a larger pool of volunteers and an improved offer from the sector to attract volunteers of all ages at different stages of life. Supporting organisations to recruit volunteers and match them with opportunities based on their interests and capabilities was therefore essential for a strong and sustainable VCS. Most VCS groups, particularly smaller ones, said they do not have the capacity to train volunteers and require support from the council or infrastructure groups.

Infrastructure Support

The survey revealed that VCS groups and organisations received a range of support from infrastructure organisations. Most commonly, this included funding/commissioning information, training, developing consortiums and developing funding bids. Overall, 51% of respondents stated that they were satisfied or very satisfied with the support they receive from infrastructure groups and the council. Only 15% were dissatisfied or very dissatisfied.

However, 72% of respondents to the survey stated that they had unmet support needs.

Further support needs were identified as:

- Advice, information and training
- Sustainable funding, paid promptly, with sufficient notice of decisions
- Affordable premises
- Capacity building / business planning
- Help with bid writing, fundraising, income generation and brokering sponsorship
- Marketing, IT, social media, finance, advice and guidance
- Sharing best practice, skills and knowledge.
- Partnership development, facilitation of collaboration.
- Recruitment and training of volunteers
- A peer review process.
- Up to date contacts of individuals who could provide support or information and share best practice.

VCS participants in engagement events said that there is insufficient support available, while others said that there was not enough publicity, preventing them from taking up support that did exist. The feedback stated that the role of infrastructure organisations needs to be more clearly defined and information about how to receive support should be made more accessible to VCS groups. It was felt that the responsibility to ensure this support is actually delivered should fall on the council.

There was also a perceived lack of knowledge about which VCS organisations are delivering what services, increasing the risk of duplication and lessening the opportunities for partnerships. This also makes it difficult for the public to know what is available. It was suggested that there is a need for significant asset mapping across the sector to support a more joined up approach.

Opportunities for the VCS

Whilst we recognise that the VCS, like the public sector, faces many challenges, there are opportunities too. Many of these were identified by respondents to our survey:

- Collaboration with other VCS organisations
- Involving the community and service users
- The delivery of statutory services through VCS and the funding that goes with it
- Work on employment and skills
- Partnership work with the council and Croydon CCG
- Social prescribing and Local Voluntary Partnerships, the Delivery Fund to support them and potential income from adults on direct payments who can purchase services
- The high volunteering rate in Croydon and the possibility of tapping this potential source of support
- Locality meetings offering the opportunity of gaining knowledge of local provision and good practice and intelligence on local demand.
- Generating income through selling services, letting premises and crowd funding.
- Cross-borough delivery
- Tapping support that could be brought to the VCS through Corporate Social Responsibility.
- The income, business and people being brought into Central Croydon through regeneration.
- Sharing back office functions and premises to cut costs – and creating opportunities for collaboration.

Role of the Council

The survey and feedback in engagement events suggested that the council should play a wide role in supporting the VCS sector as an equal partner:

- Facilitating collaboration and partnership, identifying useful contacts / connections
- Promoting the work, services and achievements of the VCS
- Providing access to space and premises that are affordable
- Providing information and signposting
- Recognising the importance and value of the VCS

- Funding
- Capacity building, allowing VCS to draw on advice and expertise
- Proportionate monitoring – with constructive feedback
- Challenging VCS organisations where the governance or services are poorly delivered and managed, or possibly duplicated.

Our joint challenge

We have said that our aim is not to reduce the overall funding that the council gives to the VCS. We recognise that demand will continue to rise. So how to meet increasing demand when resources do not keep pace with it? It is not for us to tell VCS organisations how to respond, but we have implemented significant change to manage this, such as restructuring, increasing our efficiency, and transforming the way we work.

Some VCS organisations have been undergoing a similar transformation too, and some of the opportunities they listed (set out above) support this process. Other organisations have not. It has been, and will continue to be, a continuous process of change and re-evaluation. We will want to ensure that infrastructure support is available to provide access to guidance and good practice where VCS organisations want it.

The transformation we have done so far is not enough to enable us to meet our challenge. This strategy supports the next phase of change in the way we work. Partnership with the VCS is vital to unlock the power of individuals and communities, to prevent needs from arising, to enable necessary interventions to happen as early as possible. The feedback from VCS groups and organisations has informed the development of our strategy. However, as our funding and resources are outstripped by the demands we face, we have not been able to adopt all recommendations. We have had to make choices about where to focus our resources and will need to continue making such choices in future.

4. Why the VCS is an important partner

Our Corporate Plan priorities

Croydon Council adopted a new Corporate Plan in October 2018. This plan sets out the council's promises to residents, business and partners across nine priority themes:

1. People live long, healthy, happy and independent lives
2. Our children and young people thrive and reach their full potential
3. Good, decent homes, affordable to all
4. Everyone feels safer in their street, neighbourhood and home
5. A cleaner and more sustainable environment
6. Everybody has the opportunity to work and build their career
7. Business moves here and invests, our existing businesses grow
8. An excellent transport network that is safe, reliable and accessible to all
9. We value the arts, culture, sports and activities

We can only deliver against these ambitious priorities by working with our partners, including the VCS and the community itself. Partnership work through the One Croydon Alliance and through our Local Strategic Partnership, including the Health and Well Being Board, will help to deliver many of these priorities. In particular, the Health and Wellbeing Strategy sets out how we will improve health and wellbeing in Croydon. Croydon's Health and Care Transformation Plan sets out the priorities for transforming our models of care and services to do that.

As well as One Croydon Alliance, other examples of partnerships already in place include Gateway, Don't Mess with Croydon, Choose your Future, Live Well Croydon and Community Connect/Food Stop. Work with our partners will help to reduce inequalities between people and places, ensuring that every resident and community has the opportunity to improve their health, happiness and independence. It will also lead to greater community cohesion, a sense of belonging and purpose and thus a greater sense of wellbeing and better mental health. The Corporate Plan commits to safeguard the most vulnerable Croydon residents and ensure that everyone has an equal chance of benefitting from the opportunities that living and working in this borough have to offer.

How we want to work with the VCS and other partners

In order to achieve these priority outcomes, the council has developed an operating model with six themes, which collectively represent the way we will deliver services in partnership.



Whether it's integrating services, prevention and proactive care, or organising our services around localities, the driving force is to radically transform the way we work, ensuring that we respond to the needs and aspirations of Croydon's residents and communities. As council funding continues to decline while the demand for services becomes greater and more complex, we need to develop a joint approach with our partners to meet these objectives.

We understand, endorse and support the self-determination of the VCS sector. This strategy is not about telling VCS organisations and groups what to do. Its focus is on setting out how we can work together. We know that the sector has developed in areas that statutory organisations have not reached. We also know that VCS organisations bring their own expertise and desire to innovate. Indeed we want the VCS to help us to radically transform the way we work. The VCS will have a significant role in supporting both our priorities and our operating model, considering that VCS groups deliver services, support and advice that cut across different areas. The sector can also leverage additional external investment into the borough. Given the strength of the sector, we believe it is already well equipped to achieve this, given there is already a strong focus on prevention, locality, and resident-centred working amongst VCS groups.

To achieve our ambitious goals, we recognise the importance of collaboration, community-based networks and formal partnerships between the council, other public services, business and the VCS. These ways of working will be crucial in achieving a seamless system of information, engagement and service delivery in Croydon. We will also seek to foster

collaboration and partnerships between VCS groups/organisations in supporting a range of priorities, encouraging and supporting new entrants to the sector.

One Croydon Alliance: a partnership between statutory and VCS organisations

One Croydon Alliance is a good example of a partnership with statutory and VCS organisations. Formed in April 2017, it includes Age UK Croydon as an equal partner of our One Croydon Transformation Board. The focus to date has been designing and implementing integrated health and care services to support older people and those with complex needs and long term conditions to be as independent and healthy as possible; and providing seamless care at times of need, such as before, during and after an admission to hospital. Our Corporate Plan and our One Croydon Health and Transformation Care Plan commit us to further transformation and integration of health and social care services for our whole population. This means that we will need to engage the wider support of the VCS to focus on proactive interventions and supporting resilience to prevent increasing need for all ages and types of need. As we progress we will also consider how membership of the Alliance partnership needs to develop and the commercial structures and infrastructure support required to deliver new models of care.

At the heart of our progress towards integration is a focus on prevention and proactive care. We want to support local people before things become a problem and the VCS is well placed, rooted as it is in local communities, to be part of how we identify and support people early on. Unlocking the power of individuals and communities will help to keep people well and prevent escalating need in a number of ways. People stay fit and healthy for longer when they are connected with their neighbours and communities. Personalising care and using community-led, strengths and asset-based approaches will mean people have choice and control over the way their care is planned and delivered. A strong, vibrant VCS sector working with statutory services is an essential partnership in this new way of working.

The One Croydon's Integrated Community Networks model of care is being developed further around six GP networks, with wider council services delivered around its three localities (see the box below). Levels of need, types of care required and affordability will determine whether services should be delivered at a locality level, across localities or borough-wide. We will aim to fully integrate health and care services and develop a multi-skilled workforce that can work across professional boundaries. The model therefore includes an ambition to develop capacity and co-ordination of access to the VCS, so that people, particularly those with complex health and care needs, can be supported well with their non-medical issues, or those issues that exacerbate or cause long term conditions. The model of care design includes the development of Local Voluntary Partnerships to provide the support and coherence of access and information. One Croydon has been co-designing the Local Voluntary Partnerships model with the VCS and this work has helped to develop a platform for funding decisions to support additional direct local delivery or support and activity for Croydon residents. NHS funded social prescribing and Croydon's 'Social P' programme work in tandem with this, unlocking community resources and assets and

working with General Practice to provide support and activity for people with their social and emotional needs.

A Locality way of working: North Croydon

We will increasingly work through place-based, integrated services, tailored to local need, to help residents find the information and support they need within their local community. It will mean all partners – children’s services, general practice, community health and social care services, pharmacies, mental health services, the VCS and the community itself - collaborating in new ways to integrate services where appropriate and build connections with and for people in their communities.

We are starting in North Croydon. The data that we have informs us that there are an above average number of children and families who could benefit from extra support. So we aim to initially focus on early intervention and prevention work with children and families, building on existing work taking place in the area, often delivered or supported by the local VCS.

This locality way of working will require close working with small grass roots organisations as well as larger VCS organisations. Where appropriate, services will be delivered in the local area, from the most appropriate community space. This may include the use of assets such as Thornton Heath Library, which has had some cosmetic improvements to allow for flexible use. Examples of local partnerships include:

- Partnership Early Help, based at Winterbourne Youth Centre, which brings together council and partner services to support children, young people and their families
- Thornton Heath Library hosts job clubs, homework clubs, parent and baby classes and older people’s sessions
- NHS-led ‘Social Prescribing’, coordinated from the Parchmore Medical Centre, provides a range of non-medical interventions to patients
- Community Connect/Food Stop provides a single access point at Parchmore Methodist Church & Community Centre. A community-led, multi-agency alliance, it focuses on targeted early intervention and prevention and offers a range of tailored support including, homelessness prevention support, personal budgeting, benefits advice, housing options, debt management, job club, health and wellbeing advice. Food Stop shop membership helps families save money on their food shopping bills.
- Integrating our social work and social care workforce and community healthcare staff such as district nurses to work for the residents of Thornton Heath.

5. Priority outcomes which we want VCS organisations to support

Given the unprecedented budgetary pressures public sector organisations will continue to experience in the coming years, we will focus the allocation of our resources in the form of funding, subsidies or the use of our local estate, on VCS organisations that support our key priorities.

The organisations we support will be expected to work with others in localities, focussing on preventing issues before they become problems and intervening early. We will work with the VCS to design place-based, integrated offers to help residents to find the information and support they need within their local community and tailored to their local need.

Whilst we recognise it won't always be totally applicable, we will favour those bids for funding or other forms of support that can say yes to as many of the questions below as possible.

<ul style="list-style-type: none"> • Does the bid involve collaboration with other VCS groups?
<ul style="list-style-type: none"> • Is it tackling particular need in a locality?
<ul style="list-style-type: none"> • Does it have a focus on prevention, early identification and intervention?
<ul style="list-style-type: none"> • Does it support the priority outcomes in this strategy?
<ul style="list-style-type: none"> • Does the bid meet more than one of the priority outcomes?
<ul style="list-style-type: none"> • Is it evidence based?
<ul style="list-style-type: none"> • Is it innovative?

The Table below sets out the priority outcomes we want the VCS to help us deliver and provides a framework for the work of the council and Croydon CCG with the VCS.

Priority outcomes that VCS organisations can support The examples given beneath each outcome are indicative and not exhaustive.
<p>1 People live long, healthy, happy and independent lives</p> <p>We want people to be able to stay well and to manage well. Should they need support or services they will be closer to home.</p> <p>a. Visible, cohesive and resilient communities</p> <p>Potential approaches that we are looking for from the VCS include:</p> <ul style="list-style-type: none"> • Promoting community cohesion and resilience – activities to promote neighbourliness and intergenerational activities • Encouraging community festivals and local cultural activities that are inclusive and diverse, and develop pride in the community • Encouraging people to volunteer in their own communities • Encouraging and supporting local community networks to work in partnership with us, for example to ensure that regeneration plans best reflect local needs and result in sustainable positive outcomes for our communities

Priority outcomes that VCS organisations can support

The examples given beneath each outcome are indicative and not exhaustive.

- Enabling local community engagement

b. Croydon becomes a more equal place

Potential approaches that we are looking for from the VCS include:

- Accessible high quality information, advice and advocacy, including specialist advice on welfare benefits, debt, money management
- Community based support (e.g. buddies) to enable people to use digital technology and access financial services
- Tackling poverty, gaps in equality and inequality in life expectancy and in healthy life expectancy – supporting isolated and marginalised communities, combating food and fuel poverty through holistic services, networks and groups
- People actively involved in decisions over their care and support

c. Healthy, happy and independent lives: are lived by as many as possible for as long as possible

Potential approaches that we are looking for from the VCS include:

- Preventative, early intervention, enablement activities and interventions and supported living to help maintain physical and mental wellbeing and prevent illness
- Wrap around support for people living in their own homes, preventing or delaying any need to go into hospital, acute care settings, residential or nursing care.
- Community based approaches to reduce social isolation, loneliness and anxiety, e.g. activities, clubs, befriending, exercise and outings
- Safe and accessible community transport, including through Local Voluntary Partnerships and NHS funded social prescribing
- Approaches that build on the strengths and resources that individuals and communities already have

d. Access to effective health services and care services when needed

Potential approaches that we are looking for from the VCS include:

- Services that support the integration of health and social care to provide for seamless access to services and support
- Volunteer based community health and mental health champions
- Community support for people with particular conditions, including HIV and mental health conditions, for people with long term conditions and other issues such as dementia; and support or befriending for frail elderly with complex needs
- Actions that increase safeguarding engagement and referrals from BME communities
- Carers support services, including specialist advice, statutory carers assessments, information and advocacy, support networks, promotion of the physical and mental health of carers, and respite care networks

Priority outcomes that VCS organisations can support

The examples given beneath each outcome are indicative and not exhaustive.

- Giving residents as wide a choice and control over their care and support options as is possible.

2 Our young people thrive and reach their full potential

a. Children and young people in Croydon and their families are safe, healthy and happy; young people aspire to be the best they can be.

Potential approaches that we are looking for from the VCS include:

- Holistic evidence-based support for the physical and emotional wellbeing of children and their families, working in partnership with statutory services
- Volunteer mentoring schemes and support to take up work experience and development activities
- Raising awareness and support to reduce teenage conception
- Awareness raising and prevention of trafficking, exploitation and FGM

b. Every child and young person can access high-quality education and youth facilities

Potential approaches that we are looking for from the VCS include:

- Free and/or low cost activities for children and young people, in particular 5-11 year olds
- Integrated youth work, involving young people at school, those excluded from school and those at risk of reoffending – this activity also supports the reduction of serious youth violence (see priority 4a)
- A diverse range of creative and innovative projects for adolescents
- Positive activities that meet the needs of young people in Croydon

c. Getting more young people involved in taking part in local democracy and in tackling the issues that matter most to them

Potential approaches that we are looking for from the VCS include:

- Activities that engage young people and enable them to develop their leadership potential

3. Access to homes and prevention of homelessness: all have the opportunity to access a suitable home and avoid homelessness, with no one forced to sleep on the streets

Potential approaches that we are looking for from the VCS include:

- Specialist advice, advocacy and mediation services to prevent homelessness and enable people to live in a decent home
- Services to reduce street homelessness and enable people to move on from hostels and temporary accommodation to more long-term homes
- Support for EEA migrants with no recourse to public funds into employment or reconnection to their home country.

Priority outcomes that VCS organisations can support
The examples given beneath each outcome are indicative and not exhaustive.
<ul style="list-style-type: none"> • Providing support, day services (such as advice, food, clothing, engagement activities) and access to health services for vulnerable homeless households, migrants and people with no recourse to public funds. • Accessible accommodation for those with disabilities and specific needs.
<p>4 Everyone feels safer in their street, neighbourhood, home</p> <p>We pledge to treat serious youth violence including knife crime as a public health issue</p> <p>a. Working in partnership to reduce crime; including serious youth violence, domestic abuse and sexual violence, and hate crime</p> <p>Potential approaches that we are looking for from the VCS include:</p> <ul style="list-style-type: none"> • Community responses to domestic abuse and sexual violence–prevention and support to those who have experienced abuse • Integrated youth work and diversion activity to reduce serious youth violence including knife crime and gang violence (see other examples under priority 2 above) <p>b. Anti-social behaviour and environmental crime are reduced throughout the borough, through work with partners and local community involvement</p> <p>Potential approaches that we are looking for from the VCS include:</p> <ul style="list-style-type: none"> • volunteering schemes to promote community safety and encourage the community to improve and protect the local environment
<p>5 Everybody has the opportunity to work and build their career</p> <p>a. More residents can develop their skills through apprenticeships, academic and technical courses and access employment opportunities</p> <p>Potential approaches that we are looking for from the VCS include:</p> <ul style="list-style-type: none"> • Create and promote opportunities for volunteering, work experience and traineeships – creating pathways into employment • Work in partnership to support residents (in particular people with long term health conditions, disabilities, lone parents, care leavers, over 50s and long term unemployed) to access training and employment opportunities
<p>6 We value arts, culture, sports</p> <p>a. Croydon’s cultural offer enhances our town and creates places where people want to live, work and visit</p> <p>Potential approaches that we are looking for from the VCS include:</p> <ul style="list-style-type: none"> • A rich, diverse and accessible range of cultural and arts activities • Free and low cost activities available to ensure that all communities are able to access culture on their doorstep • Collaborative work to increase access to street art, proven to reduce anti-social behaviour

Priority outcomes that VCS organisations can support

The examples given beneath each outcome are indicative and not exhaustive.

b. Good, affordable and accessible sports and leisure facilities enable people to be as active and healthy as they want to be

Potential approaches that we are looking for from the VCS include:

- Provide free and low cost opportunities promoting healthy lifestyle behaviours
- Co-design services and environments that stimulate participation in areas of need

c. Our parks and open spaces are safe, pleasant, thriving places where everyone can exercise and have fun

Potential approaches that we are looking for from the VCS include:

- Stimulating better use of open spaces and using streets as a safe place to play
- Cultural, sport and leisure events in parks and green spaces that are accessible for the community.

6. How we will support the VCS

We want the VCS in Croydon to thrive. We will support the VCS in a variety of ways to work with us and deliver against the priorities set out in this strategy. Whilst we will deliver some support directly, other support may be commissioned from another provider (including VCS organisations). We will also share regional and national support and advice.

1. Funding and commissioning

- **Our funding programmes.** We aim to maintain the overall level of funding to the VCS for the duration of this strategy, subject to matters beyond our control such as local government settlements. However, funding allocated to different programmes may vary and allocations will focus more on our priority outcomes. Our future commissioning will be governed by the following principles:
 - **outcome based:** commissioned services will support one or more of our priority outcomes and be able to demonstrate the value they bring to Croydon residents
 - **evidence based:** will follow the principles of best practice and be able to evidence outcomes achieved for people accessing them
 - **prevention and early intervention:** commissioned services will support the principles of prevention and early intervention and enable people to access the support they need in their local communities
 - **locality focussed:** commissioned services will be tailored to meet local needs; and be part of wider local networks of support;
 - **collaboration encouraged:** our funding terms will favour collaborative bids that make the best use of expertise available
 - **commissioning processes and monitoring are proportionate:** lower value funding amounts will receive less scrutiny than larger amounts and will follow simpler processes for accessing funds
 - **a balance between stability for the sector and the ability to respond to emerging needs:** not all funding will be allocated immediately; some will be held in reserve to enable support for the VCS to respond to emerging need
 - **support considered in the round:** applications for funding will be considered in the context of overall support given by us from various sources and services that are already funded to deliver in a similar way.

- **We will maintain funding for the VCS across a range of provision.** We are committed to working with the sector in shaping our commissioning plans. Ways to access this funding will vary:
 - **Community Fund**
 - **Small grants:** awards (usually one-off)
 - **Prevention Fund:** for support and activities to prevent social isolation and people requiring specialist support.
 - **One Croydon Alliance including the Local Voluntary Partnership.**
 - **Locality Fund:** to work towards establishing schemes that target funding as appropriate to localities

- **Other VCS funding programmes:** focussed on specific needs or issues with a focus on youth culture, young people not in education, employment and training, and other programmes as announced will have their own governance arrangements.
- **Coordinating our approaches across partners:** We will work with partners such as Croydon CCG to streamline processes and align funding opportunities where possible.
- **Information on our funding opportunities:** We will ensure that information on funding opportunities that we offer is easy to find, with clear guidance, funding amounts available, localities where services are needed and contacts for further information. We will promote these opportunities to the sector to ensure transparency and access, with a timescale that allows collaborative bids to develop. We will publish a list of services already funded, priority outcomes they support and the localities they serve. We will publish lists of successful bids as decisions are made.
- **Value Croydon** is our approach for delivering social value through our contractors. We are updating the Value Croydon website to advertise all opportunities and grants available to the VCSE sector and others. It will include support for VCS organisations to access tender opportunities with us and our contractor partners. We will actively engage with VCSE organisations in order to build market intelligence/understanding of what we need and what they can offer us. We will encourage other local anchor organisations, such as local hospitals and colleges, to offer supply chain opportunities to the VCS.

2. Facilitate collaborative working and partnership

- **Networking events:** We will hold regular networking events for VCS organisations and stakeholders. We will enable VCS organisations to share information, ideas, best practice and opportunities through support networks and themed networking events that bring together organisations that provide similar services or deliver to similar groups or localities.
- **We will work with the VCS to share information on available services across the sector** through the promotion, maintenance and provision of information and advice, a directory of services and transactable services using digital solutions such as the e-marketplace.
- **Share good data and intelligence about the needs of our local communities**
- **Develop joint bids between the council, partners and the VCS** to support priorities. We will notify VCS interest groups of opportunities, bringing together VCS physical and human assets, resources, volunteers and their project support into agreed outcomes and supplement our support with external funding, Corporate Social Responsibility approaches and crowd funding.

- **Support collaborative bids by VCS organisations:** we will facilitate the creation of partnerships for projects to access external funding bids
- **Co-production partnerships:** e.g. Local Voluntary Partnerships, One Croydon Alliance including the council and Croydon CCG are working with the VCS to co-design support services to reduce social isolation, loneliness and health inequality
- **Increasing our understanding of the work of the VCS** through targeted engagement by relevant councillors and officers
- **Consultations:** When we respond to Government consultations that affect the VCS, we will consult with the sector to inform our response.

3. Build the capacity of voluntary and community sector organisations and groups

- **We will continue to provide infrastructure support directly and indirectly through commissioned services, to make the following support and training available** for the VCS in Croydon, ensuring that VCS organisations and groups from all of the borough's diverse communities are aware of and able to access the support that they need
 - ***Support for bid writing, accessing fundraising opportunities, crowdfunding and developing ways of generating income:***
 - ***Skills and training*** on matters including starting up and developing project ideas, business planning, developing and managing partnerships, finance, marketing, IT, social media, creating digital resources and skills to respond to people with specialist needs and complex issues. This could include the facilitation of peer mentoring.
 - ***Governance and policy advice***, including on legal requirements on safeguarding, GDPR
- **We will promote and support volunteering** through matching volunteers with suitable volunteering opportunities and facilitating training for volunteers. We will encourage our partners to consider doing the same.
- **Corporate Social Responsibility (CSR)** The council currently allows its staff 14.4 hours a year paid time to volunteer. We will develop a policy on Corporate Social Responsibility in 2019/20 that will seek to harness our resources as an employer to support local communities including VCS organisations.
- **We will provide challenge and constructive feedback** on monitoring provided by funded VCS organisations where the governance or management and delivery of services could be improved

- **Brokering support from other sectors**
 - We are continuing to build relationships with the private sector to encourage them to provide support for VCS as part of their corporate social responsibility. The Social Enterprise Network meets quarterly to facilitate best practice, information sharing, learning and collaboration for our social enterprises and charities. Croydon Business Network provide monthly clinics that offer dedicated business advice and funding support.
 - Our ambition is to seek to link social value provided by our contractors more closely with the local VCS. Potentially this could be financial support for the VCS, or provision of surplus equipment or furniture, volunteering, mentoring or skills transfer. Just as the council is developing a CSR policy, we will ask them to consider doing the same.

4. Premises: maximise use of assets for the VCS

- **To make best use of our community properties**, we will develop clear criteria for allocating properties and rent subsidy, requiring organisations to support our priorities and making the sharing of premises a desirable requirement. Allocations will be for a limited term. Performance and the level of use of the premises will be monitored regularly. To improve transparency we will transition from using peppercorn rents to market rents with rent subsidy.
- **We will encourage organisations to share available space** by amending our leases to allow occupiers to sublet to approved organisations and by developing proposals in 2019/20 to facilitate the exchange of information on spaces offered and spaces sought by VCS organisations
- **Community hubs**: we will increasingly deliver services with our statutory and VCS partners on a locality basis tailored to meet local needs. The approach will use existing community spaces owned by us (like the local library or youth centre), by other statutory organisations (like a health centre) and by the VCS. To prepare, we are mapping community assets in each area and will adapt libraries if appropriate to provide flexible community spaces. We will seek opportunities to develop further community hubs, ensuring that use is maximised, both during the day and into the evening. Where appropriate, we will consider short term 'meanwhile' letting uses that benefit the community.
- **VCS Incubator**: we will explore opportunities to develop a VCS Incubator in a property suitable for sharing, to support fledgling VCS organisations through access to small, extendible units for a time-limited period and an initially subsidised rent.
- **Community asset transfer (CAT)** – we will continue to consider the potential of existing properties in our local estate for CAT on a case by case basis.

- **Empty properties:** Where appropriate, we will encourage and work with owners of long-term empty commercial properties to accommodate temporary uses created by local VCS partners and broker opportunities with developers to create meanwhile uses for their development sites in partnership with the VCS.
- **Planning powers:** We will use opportunities arising from [Croydon's Local Plan 2018](#) policy and allocations to encourage the development and protection of new community facilities which are flexible, adaptable, accessible to the whole community and capable of multi-use as part of development projects.

Scrutiny Recommendations: Stage 1

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	The Committee agreed that there were locality issues with some areas being underrepresented by voluntary organisations than others.	That the final Strategy should set out how it will identify the unmet need within the Borough and how it will work with the voluntary and community sector to meet this need.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	The Committee agreed that there were locality issues with some areas being underrepresented by voluntary organisations than others.	That more funding should be made available for grass root organisations than at present.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	There was a concern that feedback from service users was not being taken into account, as it could be used to help measure the success of a service.	That feedback from service users should be taken into account when monitoring the outcomes from grant funding.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	There was a concern that feedback from service users was not being taken into account, as it could be used to help measure the success of a service.	That feedback from service users should be used to inform future needs and priorities.	Hamida Ali	Gavin Handford

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	It was agreed that the Council should not be too prescriptive on the type of grants it offered.	Within the Community Grants fund the majority of funding should be retained for three year contracts, but an increased amount should be retained for flexible funding as required.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	The Committee had significant concerns about the benefit provided by the infrastructure support organisations supported by the Council and felt that the current relationship should be reviewed.	There should be a fundamental review of infrastructure support organisations to ensure they were achieving their expected outcomes.	Hamida Ali	Gavin Handford

Appendix 4: Main observations and recommendations made by VCS respondents

Funding

Some representatives were surprised at the range of VCS funding available and felt that the Council supported the usual recipients. A lack of funding turned potential collaborators into competitors: organisations might come together in partnership bids, but this might not continue into delivery. Lead bidders might not pass funding on.

Suggestions concerning funding included:

- Updating the Council website with funding streams, amounts, guidance, deadlines, support provided, contacts and Croydon Observatory data.
- The Council should provide core funding especially for VCS organisations delivering statutory services.
- Split infrastructure funding from the Community Fund to avoid a conflict of interest between bidding for funding and supporting smaller organisations to bid.
- List not just funding priorities, but localities where services are needed.
- Provide a list of organisations already funded and services provided to avoid duplication.
- Have a process proportionate to the funding involved, offer pre-application chats, bid-writing support and publicise the work of the Invest to Save Officer
- To support collaborative bids:
 - Provide pre-application networking events focussed on each Corporate Plan outcome and invite VCS organisations thinking of bidding for contracts that support that outcome
 - Allow time for partnerships and consortium bids to form
 - Provide access to community hubs
 - Arrange training, a toolkit and mentoring on developing and maintaining partnerships.

Premises

Affordable premises and free event space are major challenges for the VCS and the disappearance of the Community Space was a huge loss. The Council is not considered to be transparent about how and why organisations are allocated premises or receive rent subsidy or rate relief (DRR), when so many others do not receive support. Too much support was allocated on a historical basis. There was a strong call for clear guidelines that are communicated via the web page, so that all organisations have an equal opportunity to apply and understand how decisions are made.

The main suggestions were:

- Develop clear criteria, provide an opportunity to apply, and make time-limited (5 year?) allocations.
- Monitor performance/intensity of use of premises and have mechanism for ending leases in cases of unsatisfactory performance or usage.
- Provide a directory of venues, allowing VCS groups to offer/seek premises.
- Review council leases to allow sharing/subletting and offer some properties as hubs
- Encourage owners of long-term empty properties to offer them to the VCS free

Infrastructure support

Information on funding/commissioning opportunities was identified by survey respondents as the most common type of support being received. Support was also widely received for training, developing consortiums and developing funding bids. Generally, a high proportion of the support received was from Croydon Voluntary Action (CVA) or Croydon Council, particularly for information on funding/commissioning opportunities and for premises (over half said support was received from Council or CVA) and training, developing consortiums and developing funding bids (just under half).

Overall only 50% of respondents stated that they were satisfied or very satisfied with the support they receive from infrastructure groups and the council. However, two-thirds of organisations delivering services in New Addington/ Fieldway said they were satisfied or very satisfied. Those dissatisfied or very dissatisfied range between 8% and 16% across the borough, with the highest levels among organisations with borough-wide, north and central Croydon coverage. Organisations delivering services across London or across all or part of the country were the least dissatisfied with support. Some respondents considered that infrastructure groups are not fulfilling their responsibilities. Respondents suggested that there is too little information about available funding; and some specialist interest infrastructure organisations are not promoting the relevant groups.

Some VCS participants at the event said that insufficient support was available, while others said that there was not enough publicity, preventing them from taking up support that existed. Overall, 72% of VCS organisations responding to the survey stated that they had some support needs that were not currently met. However, in organisations delivering services in North Croydon and New Addington/Fieldway, the proportion of stating that they had unmet support needs was higher, at 89% and 92% respectively. Further support needs were identified as:

- Sustainable funding, paid promptly, with sufficient notice of decisions
- Affordable premises
- Capacity building / business planning
- Up to date support contacts
- Advice, information, training and help with bid writing, fundraising and income generation
- Marketing, IT, social media, finance
- Sharing best practice, skills and knowledge.
- Sponsorship – matching VCS organisations with businesses interested in supporting community projects
- Partnership development, facilitation of collaboration.
- Recruitment and training of volunteers
- A peer review process.

There was a lack of knowledge of which VCS organisations deliver what services, with a widespread call for a directory of services. This was seen as having a dual impact:

- increasing risk of duplication and lessening opportunities for partnership
- leaving the public unaware of what is available.

Recommendations concerning infrastructure support included:

- the VCS Strategy should list and set out roles for infrastructure organisations, what the offer is and how VCS organisations can access it

- the Council should ensure that support promised was actually delivered
- a directory of support/training available from the Council and other organisations, supplemented by an email newsletter
- One organisation should be responsible for asset mapping – current arrangements involved duplication and time-wasting.
- Increase the frequency and publicity of training, particularly on bid writing and ways to enable the VCS to become more sustainable
- Capacity building ensuring accessibility for groups that may have a language barrier.

The Role of the Council

The survey and feedback in engagement events suggested that the Council should play a wide role in supporting the VCS sector:

- Facilitating collaboration and partnership, identifying useful contacts / connections
- Promoting the work, services and achievements of the VCS
- Providing access to space and premises that are affordable
- Providing information and signposting
- Recognising the importance and value of the VCS
- Funding
- Capacity building, allowing VCS to draw on advice and expertise
- Proportionate monitoring – with constructive feedback
- Challenging VCS organisations where the governance or services are poorly delivered and managed, or possibly duplicated.

The Council should link Corporate Social Responsibility (CSR) to the VCS:

- Promote CSR to other organisations in the form of mentoring, sharing skills, access to low cost premises and reusable goods (like IT equipment and furniture) for local VCS organisations, and adopt it as Council practice. Have a webpage to advertise what is on offer.
- Make CSR support of VCS organisations a condition of funding agreements for larger organisations.

In addition to its current practice of enabling access to supply chain opportunities for local VCS organisations through its 'Value Croydon' approach, the Council should encourage local anchor organisations (such as the Police, hospitals and local colleges) to do the same.

Feedback from VCS infrastructure organisations

Interviews were conducted in November/December 2018 with the four infrastructure organisations in Croydon: Croydon Voluntary Action (CVA), Croydon BME Forum, Croydon Neighbourhood Care Association (CNCA) and the Asian Resource Centre (ARC).

Partnership

There was a strong basis for partnership, but no setting for regular coherent VCS-Council dialogue. Council staff turnover was high, so there was limited continuity of knowledge of services or organisations and it was hard for VCS organisations to keep track. A wish was expressed for an equal level of partnership to be offered to infrastructure organisations by the Council.

Recommendations included

- Establish a regular corporate Council-VCS dialogue avoiding multiple separate dialogues, possibly involving Croydon Clinical Commissioning Group and Croydon University Hospital.
- Have a council 'Who's Who Directory' for the VCS
- Provide handovers for new staff about contracts & groups
- Continued partnership work with Council
- Council officers to continue sharing their skills with VCS: media team training on social media, marketing and communication; Communities team training on fundraising.

Funding

The question was how to resource the VCS strategically to ensure maximum impact. If funding priorities were changed after three years, it would be difficult to demonstrate the impact of funding decisions as outcomes were likely to become evident over a longer term (say seven years). It was thought that some funders believe the VCS can deliver services for little funding, ignoring the cost of venue, staff and volunteers. Paying staff low salaries (due to low funding) affects the calibre, skills and length of stay of staff. Organisations worry that social prescribing will overwhelm them with demand unless funding is increased. There was a concern also that One Croydon Alliance would focus exclusively on social isolation and mental health, when older people still need to be taken to the GP and chemist.

The funding climate was seen as fostering competition between VCS organisations, when partnerships and consortiums are more effective. Some organisations were not skilled at winning funding bids, even though their work was good. They needed support. Other funding sources that can be tapped include Government programmes, the Lottery, the Bridge Trust, and the Council's Regeneration Team. However, trusts only fund new projects, not existing work and core costs. They rely on councils to fund salaries. Big trusts and the Lottery are very prescriptive in their criteria: one organisation said 75% of grant applications fail, so they avoided this source of funding.

Recommendations concerning funding included:

- Continue infrastructure organisation's leadership and brokerage between Council and small organisations to give groups confidence and enable them to engage with commissioning and monitoring
- Devolve grants budgets to VCS infrastructure organisations that know bona fide VCS organisations
- Provide a realistic level of funding for the outcomes sought.
- Train up community builders in each funded project, so Asset Based Community Development can continue sustainably
- In recommissioning the Community Fund consider how to maximise investment in Croydon
- Provide time in the commissioning process to set up workshops to develop partnerships and consortiums
- Tap into other funding: government programmes, Big Lottery, Trusts, work with the Council's Regeneration Team
- The Council should consider funding salaries; anonymous funders and non-trust money with no conditions can also help to support ongoing work
- Fund a tiered service to achieve better outcomes for older people in tiers 2 and 3
- The Council should involve infrastructure organisations when planning bids for the community

- Infrastructure organisations would continue to help organisations with funding bids, bid for external funding and earn fees from conducting training.

Monitoring.

Monitoring was regarded as disproportionate to the sums involved and sometimes the new data requests were made after the work had been done, overwhelming smaller groups. Council staff turnover meant that some officers did not know about the schemes concerned and were less effective at challenging performance. The Community Fund did not build in the capacity for infrastructure organisations to evaluate and learn from the schemes.

Recommendations concerning monitoring included

- Designing proportionate monitoring with a VCS organisation after funding has been allocated and before the service starts.
- If monitoring changes during a project, this should be acknowledged and agreed with the group before the relevant period has started.
- Centralise analysts so that an overall picture is achieved, not one by funding programme
- Celebrating the outcomes achieved by Community Fund projects.

Gaps in services

Social care: Croydon has a lot of Tier 1 services but very few Tier 2 and even fewer Tier 3, so there is no scope for transition as a person's condition changes (Tier 1 is for people who are walking, talking and able, with no cognitive impairment; Tier 2 is for those needing some support, walking aid, have had a fall, with early stage dementia or a long term condition such as COPD; Tier 3 is for the frail elderly, at a high risk of falls, housebound, with advanced dementia or incontinence. Possibly there is only 1 FTE service in Croydon: CNCA's complex befriending service)

Mental health: there was not enough early intervention and a suggestion that hospital stays were longer and medication administered stronger for people with BME backgrounds. Croydon BME Forum is working with South London and Maudsley NHS Trust. Mental health and dementia are taboo in Asian society. The ARC is aiming at coproducing services with agencies.

Young people: services should think of all young people, not just those in gangs, and work with them holistically as part of families, friendship networks and school. There was a lack of activities in Purley and Coulsdon.

Domestic abuse and sexual violence, honour killings and forced marriage. The ARC said that women were frightened of being recognised if they used the Family Justice Centre and so they used a discrete drop-in run by ARC.

Locality differences: Partnership work can be seamless in New Addington and North Croydon, but not as strong in other areas, so various approaches are needed. North Croydon has younger, working, less settled population with fewer volunteers, so more paid staff are needed. The South has a more settled population with more retired people and volunteers. They can afford smaller funded groups. They are affiliated with churches that offer premises at a low cost.

Content of the Strategy

The VCS Strategy should be a long term plan with consistent aims, sticking to the Opportunity and Fairness Commission's recommendations. The most important work for strategy is Partnership and Communications. It should recognise the massive VCS contribution to prevention in Community safety; health and wellbeing, social regeneration and localities. The needs of older people should be differentiated. The VCS would like to feel trusted by the Council, with the strategy celebrating the good news of level of volunteering in Croydon.

REPORT TO:	CABINET 25 March 2019
SUBJECT:	0-25 Special Educational Needs and Disabilities Strategy
LEAD OFFICER:	Rob Henderson - Executive Director of Children, Families & Education Alison Farmer - Head of Special Educational Needs 0-25
CABINET MEMBER:	Councillor Alisa Fleming – Cabinet Member for Children, Young People and Learning
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON	
Corporate Plan 2018 – 2022	
<p>The recommendations in this report are in line with the new operating model – ‘getting the basics right for residents’ and will contribute to the delivery of the following key priority / outcome: ‘Our children and young people thrive and reach their full potential:</p> <ul style="list-style-type: none"> • Children and young people in Croydon are safe, healthy and happy, and aspire to be the best they can be • Every child and young person can access high quality education and youth facilities • Ensure there are high quality school places for Croydon’s increasing numbers of children and young people 	
FINANCIAL IMPACT	
<p>1.1. The Council has statutory duties under the Children & Families Act 2014 and the Care Act 2014 to provide for children and young people with special educational needs and disabilities. The 0-25 SEND Strategy sets out an approach which supports the achievement of positive outcomes for young people with SEND, within the framework of the legislative duty to ensure efficient use of public resources.</p> <p>1.2. The education provision for children and young people with SEND and for whom the Council maintains an EHC Plan is funded through Dedicated Schools Grant (DSG) High Needs Block Funding (HNB), decisions about which are made by Schools Forum, under Education, Skills Funding Agency funding Regulations. Croydon’s High Needs Block has an overspend; the SEND Strategy (see Appendix) includes measures which support increased local provision in state-funded schools and the focus of the Five Year High Needs Funding Strategy is to establish a balanced budget within a five year period. This strategy was approved by Schools Forum (July 2018).</p> <p>1.3. The implementation of the 0-25 SEND Strategy will result in an increase in places within local state-funded special schools; the introduction of specialist post 16 SEN college places and increased and improved inclusion in mainstream schools. This will result in a more efficient use of public resources.</p>	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

Cabinet is asked to:

- 1.1. Consider the draft proposed 0-25 Special Educational Needs and Disability Strategy and accompanying report concerning the consultation exercise and the Equality Impact Assessment; and
- 1.2. Delegate authority to the Executive Director of Children, Families and Education, in consultation with the Cabinet Member for Young People and Learning to:
 - a. taking into account any comments made by Cabinet, take such steps as are necessary to finalise, publish and implement the Council's 0 – 25 SEND Strategy (noting the decision to finalise and publish is a Key Decision and will be advertised accordingly).

2. EXECUTIVE SUMMARY

- 2.1. Croydon Council has consulted on a 0-25 Special Educational Needs and Disabilities (SEND) three year strategy. This strategy sets out the Council's vision, guiding principles and the key areas of development that will be the focus for Croydon's children and young people with SEND over the coming three years.

3. 0-25 SEND STRATEGY

- 3.1 A draft strategy for Croydon children and young people who have special educational needs and disabilities (SEND) was developed during 2018 to take forward a shared vision for children and young people with SEND and a shared strategic direction of travel for the local area, including key partners in health and education settings.
- 3.2 The Strategy was informed by the views of parents and young people and focuses on key areas for improvement, across the Council, health, care and education with the key aim of improving the opportunities for young people with SEND to live fulfilled lives and achieve independence in or near their local community.
- 3.3 The draft strategy set out the views of parents and young people that had informed the strategy, identified four key areas for strategic development (see below), a set of principles for delivery and specific changes that would be achieved:
 - Early identification of children and young people's special educational needs and disabilities

- Improved joint working across education, health and social care to meet needs, so that parents and young people experience joined up support and there is a shared understanding of the impact of joint commissioning.
- A better graduated response, which provides the right support at the right time; with a particular focus on inclusion and SEN support for children in mainstream schools
- Improved post 16 pathways and transition to adulthood so that young people gain independence in or near their local community

4. CONSULTATION

- 4.1 Consultation on Croydon's draft 0-25 SEND Strategy started on 3rd December 2018 and ran until 31st January 2019. The consultation was far reaching with views sought from parents/carers, young people and other agencies and stakeholders all of whom offered important views and feedback to be taken into consideration.
- 4.2 The consultation was extensively promoted through a number of channels. This included direct contact with young people, families and stakeholders through focus groups. There was online availability of consultation documents including surveys available through the Local Offer and Get Involved webpages and social media. There were ninety-nine responses to the on-line survey and feedback was given in face to face meetings by one hundred and twenty members of the public, with the majority of stake-holder feedback being from young people and parents.
- 4.3 The report of the consultation has been included in the Appendices to this document. Findings have informed the revision of the SEND Strategy as set out below.
- 4.4 Broadly, those consulted agreed with the four key areas that had been identified for development and stakeholder views coalesced around these themes. Feedback was greatest in the area of 'Post 16' and 'Joint Working'.
- 4.5 Following feedback and during the initial period of the consultation a fifth key area, 'workforce development' was identified as a recurring theme which was not sufficiently addressed in the draft SEND Strategy and as a consequence this was added part way through the consultation period.
- 4.6 Feedback on early identification drew attention to the need to consider 'identification' across the age spectrum, not just in the early years. Stakeholders indicated they considered there was an issue in regard to resources in relation autism services, health visiting and other provision, such as speech and language therapy, was raised. The recent re-instatement of the Portage service was welcomed by parents. In general, parents indicated that reduced waiting times was important, consideration of the wider family, including siblings and the need to identify children's needs before 'crisis point' is reached. These issues are now reflected in the updated SEND Strategy

- 4.7 Stakeholder feedback in regard to the area of Joint Working highlighted the significant work that is needed to join up the Council priorities of education and care with Health priorities, in addition to processes for Governance. There was a sense that parents sometimes felt as though they and their child were ‘stuck in the middle’ of services that lacked coherence and a shared approach. Parents were keen to play a greater part in developing approaches to joint working in Croydon.
- 4.8 The eligibility of children with autism for social care and out of school short breaks was raised. In general, the lack of a joined up autism pathway across health, education and care was a recurring theme. Issues were raised regarding the link between GPs and paediatricians and a need to have a shared information and commonality of approach, so that parents do not have to re-tell their story.
- 4.9 The Graduated response feedback focused on key issues relating to children’s mental health and the capacity of mainstream schools to meet children’s needs. The need for training for parents and practitioners, in particular, in regard to autism was identified. A repeated concern was the lack of graduated response for children and young people with mental health needs, which families indicated, left them desperate and not knowing where to turn for help.
- 4.10 Discussion about Post 16 pathways generated the greatest volume of feedback. There was feedback that parents welcomed the development of local college provision and would like to play a part in shaping this development. There was a consensus that the current approach to transition from childhood to adulthood for young people with SEND was not working, did not start sufficiently early and, as a consequence, there was anxiety about young people leaving school. Parents felt there was no respite and a lack of engagement by health and that, as young people became adults, some families struggled to cope. Young people themselves indicated their aspiration to gain employment and the need for support to help them achieve this goal.
- 4.11 Workforce development was added as a theme partway through the consultation. Feedback on this area of development indicated that there was a need for the wider workforce to have a better understanding of SEN legislation, autism, sensory needs and speech and language needs and intervention. Specific feedback focused on autism outreach for mainstream schools so that children could have their needs met at SEN Support.

5. 0-25 SEND STRATEGY IMPLEMENTATION

- 5.1 An implementation plan with key milestones, clear accountabilities and agreed measures of impact is being developed and will be subject to the Governance of the Children’s Partnership Board with links into the Health and Well-Being Board.

Parents will be represented on each of the work groups, with Parents in Partnership (Croydon’s parent/carer forum) providing co-ordination of parent representation to ensure a cross-section of parents have the opportunity to inform developments

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 Funding for children with SEN comes to the Local Authority through a High Needs Block Grant from the Department for Education. This funding is announced annually and the total allocation for Croydon for 2019/20 is £61.347 million.
- 6.2 The High Needs Block forecast at the end of Quarter 3 is an overspend of £5.745 million in year with a cumulative overspend of over £13.176 million. Increased demand, with numbers of children with an EHC Plan standing at over 3000, compared with 1800 statements of SEN in 2013, an over-reliance on the independent sector, in particular post 16, and a need to improve transition to adult services are key drivers.
- 6.3 The pressures on LAs as a result of funding levels not keeping pace with that demand is a national issue, with growing press coverage and professional association interest over the past six months. Pressure on high needs funding will increase further with the introduction of the National Funding Formula for schools that removed council flexibility to move funding from the general schools block to the high needs block of the Dedicated Schools Grant to help plug this funding gap. Schools also face funding pressures and should not be expected to meet shortfalls in high needs funding.
- 6.4 Further, the DfE has introduced, as a condition of the 2019/20 DSG, the requirement to provide recovery plans for DSG deficits (which will apply to Croydon). Further guidance on the process and format for submitting the recovery plan will be issued in early 2019.
- 6.5 The scale of the challenge of managing a balanced High Needs budget is such that this requires all partners within the Council, in education, children's and adults social care, schools and health partners, including CAMHS and the voluntary sector to work together to better meet needs in local state-funded education. This strategy helps to address this challenge over the medium term.
- 6.6 Financial commitments and risks associated with the 0-25 SEND and which relate to the Education Estate have been approved through related Cabinet decisions (January 2019 and July 2018).

Approved by: Lisa Taylor – Director, Finance, Investment and Risk

7. LEGAL CONSIDERATIONS

- 7.1 The Head of Social Care and Education comments on behalf of the Director of Law and Governance that that the SEND strategy conforms with current legislative and guidance.

Approved by: Head of Social Care and Education, on behalf of the Director of Law and Monitoring Officer

8. HUMAN RESOURCES IMPACT

- 8.1 Not applicable. Whilst there are no direct human resources implications arising from this report the information presented will help to shape and influence HR practice, policy and procedures in relation to roles and responsibilities that relate to Special Educational Needs and Disabilities Strategy

Approved by: Nadine Maloney, Head of HR; Children, Education and Families

9. EQUALITIES IMPACT

- 9.1 An equality analysis was undertaken to ascertain the potential impact the strategy will have on groups that share protected characteristics. The equality analysis concluded that the strategy will have a positive impact for children and young people and those living with disabilities as it will set out to improve the outcomes and life chances for children and young people with Special Educational Needs and Disabilities.

Approved by: Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

- 10.1 There are no direct implications contained in this report.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no direct implications contained in this report.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 Cabinet is asked to:

- Consider the consultation and approve the process
- Approve the draft proposed 0-25 Special Educational Needs and Disability Strategy.
- Approve the Equality Impact Assessment.
- Delegate final sign off of the Council's 0-25 SEND Strategy to the Executive Director of Children, Families and Education so that it can be implemented

13. OPTIONS CONSIDERED AND REJECTED

Not relevant

CONTACT OFFICER: Alison Farmer, Head of SEND Service

APPENDICES TO THIS REPORT:

1. Report on SEND strategy consultation
2. Special Educational Needs and Disability (SEND) Strategy revised following consultation
3. Equality Analysis report

BACKGROUND PAPERS: Initial draft SEND strategy

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PUBLIC CONSULTATION REPORT

SEND Strategy 2019-22

**Public consultation report on proposed
Special Education Needs and/or
Disabilities Strategy.**



**Draft Summary Report of
Methodology, Feedback and Responses**

February 2019

1. EXECUTIVE SUMMARY

- 1.1 This report brings together Croydon Council's consultation findings on the proposed changes to the SEND Strategy 2019-22 together with recommendations.

With grateful thanks to all involved in supporting the delivery of the consultation.

The consultation process started on the 3rd December 2018 and ran live until the 31 January 2019. The consultation was far reaching with views sought from parents/carers, young people and other agencies/stakeholders all of who offered important views and feedback.

The consultation was extensively promoted through a number of channels. This included direct contact with young people, families and stakeholders through focus groups. There was online availability of consultation documents including surveys available through the Local Offer on Get Involved. All documents were also available in Easy Read. All information about the consultation was circulated widely. This included education settings, Youth Clubs, neighbouring local authorities, and parent support groups. Social media for example Twitter and Facebook was also used to promote the consultation.

The consultation was on the proposed 3 years Strategy spanning Education, Health and Social Care, 2019-22.

The consultation exercise reinforced the main strands of the Strategy which are:

- 1) *To improve early identification of needs.*
- 2) *To improve joint working across education, health and social care.*
- 3) *A graduate response, which is a wider range of support and provision.*
- 4) *Post 16 opportunities*

During consultation it became necessary to add a 5th objective which is:

- 5) *Workforce development*

2. BACKGROUND

The original version of the strategy was consulted on with 6 parents at Parents in Partnership on 19.9.18. The feedback was reviewed at the SEND Strategic Board meeting on 25.9.18 and instruction was given to all 3 services (health, social care and education) to re-write the Strategy together.

3. METHODOLOGY

The target cohort for the consultation was parents, carers and young people with special education needs and/or disability. And we have also consulted with associated practitioners and professionals.

Materials were produced in plain english and Easy Read versions. The on-line survey was also in plain english and in Easy Read.

Printed versions were distributed in all face-to-face sessions and the link was also provided to the online survey.

Distribution and Communications

A series of communication and publicity activities also took place including:

- Publishing details on school bulletins
- Croydon website banners and links to the survey
- Tweets

4. CONSULTATION PROCESS

4.1 Focus Groups

A number of focus groups were run across the borough, targeting parents and carers of Children and Young People with Special Education Needs and / or Disabilities. Please see table below.

We engaged with:

- 45 Children and Young People
- 40 parents
- 32 Practitioners of professionals

The format for consultation was that a senior member of the SEND management team briefed the participants of the key aims of the strategy and the four themes for improvement:

- 1) **Improved early identification of need**
- 2) **Improved joint-working**
- 3) **Better graduated response with better joint working:** a continuum of provision to meet a continuum of need to ensure children and young people who have SEND needs have their needs met whenever possible and they make best progress.
- 4) **Improved post 16 opportunities and outcomes.**

A standard set of questions were used:

1. Is the vision clear?
2. What do you like about the draft SEND Strategy?
3. Is there anything in the draft SEND Strategy that worries/concerns you?
4. What impact do you think the Strategy will have on you, your child/ren, family, school or wider community?
5. Is there anything missing from the Strategy that you feel should be included?

Date	Organisation	Audience	Number of attendees
5.12.18	CAMHS services SLAM	Professionals	15
7.12.18	Waddon Youth Centre	Parents	6
12.12.18	Bensham Manor	Parents	1
17.12.18	NHS Community Services	Practitioners	13

	Practitioners		
20.12.18	Parents in Partnership	Parents	1
7.1.19	Waddon Youth Centre	Young People 18-25	6
9.1.19	Parents in Partnership	Parents inc. Advisor	4
10.1.19	Parents in Partnership	Parents	2
16.1.19	Autism Partnership Board	Parents, Councillors inc. A Fleming	9
16.1.19	Waddon Youth Club	Young People age 7-16	34
17.1.19	St Giles School	Parents	7
24.1.19	SENDIASS	parents	1
28.1.19	Beckmead School	Young People	5
	1 hr YP 1 hr parents	Parents	7
29.1.19	St Nicholas School	Parents	6
TOTAL			117

4.2. Questionnaire: online survey questions

To help us get a good idea of who is completing the survey, please indicate in what capacity you are responding	
A child or young person	
A parent/carer of a child or young person with special educational needs and/or disabilities (SEND)	
A professional such as a teacher or social worker	
An organisation representing young people, families/carers or those with SEND needs	
Other	
	Grand Total

Other:	
Resident	
Disabled person, Professional disability practitioner and representative of professional organisation for staff working with disabled students.	
Volunteer involvement with a college and Croydon Drop In	
Someone who cares	

Do you agree with our aim: "Children with SEN and/or disabilities will achieve independence and employment, whenever possible, in or near their local community so that they can live fulfilled lives and be active contributors to Croydon's future. Croydon has high aspirations for children and young people with SEND" (%)	
Yes	
No	
Not sure	
	Grand Total

Do you support the principles that form the basis of the SEND strategy?	
Yes	
No	
Not sure	
	Grand Total

Do you agree with our aim: "Children with SEN and/or disabilities will achieve independence and employment, whenever possible, in or near their local community so that they can live fulfilled lives and be active contributors to Croydon's future...."?	
	%
Do you support the principles that form the basis of the SEND strategy?	
	%

Do you support the area of development?
<i>Improve early intervention</i>
Yes
No
Not sure
Grand Total

<i>Better graduated response with better joint working</i>
Yes
No
Not sure
Grand total

<i>Improved post 16 opportuntiies and outcomes</i>
Yes
No
Not sure
Grand Total

Do you think we should adopt the SEND Strategy?
Yes
Yes with changes
No
Not sure
Grand total

Gender
Female
Male
Prefer not to say
Transgender
Grand Total

Please tell us how old you are
Under 15 yrs old
16-19 yrs
20-25 yrs
26-34 yrs
35-44 yrs
45-54 yrs
55-64 yrs
65+ yrs
Grand Total

Do you consider yourself to have a disability
Yes

No
Prefer not to say
Grand Total

If you said yes, please specify
Mobility
Visual impairments
Hearing impairments
Mental health
Learning disability
Prefer not to say
Other
Total

Other, please specify
dyslexia and ASC
None
Grand Total

What describes your ethnic group?
Arab
Bangladeshi
Black Caribbean
Chinese
Indian
Mixed / multiple ethnic groups
White and Asian
White and Black Caribbean
White English / Welsh / Scottish / Northern Irish / British
White Irish
Any other ethnic background
Grand total

Any other background (specify)
British Asian
British Mauritian
Bulgariq
mixed family with several ethnic groups
Prefer not to say
Grand Total

5. FINDINGS

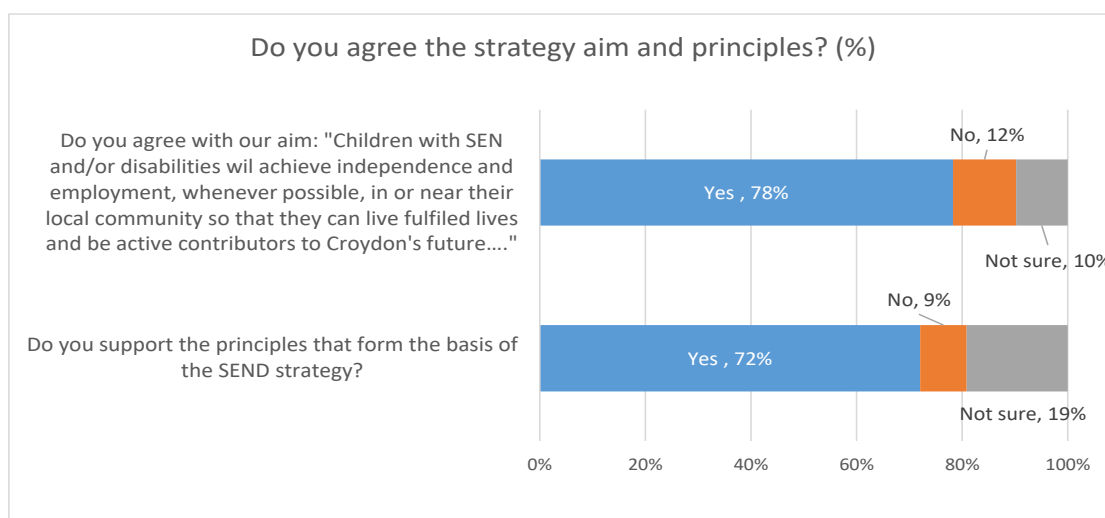
5.1 Presenting Qualitative findings

As the main topics of the consultation were the four themes we grouped the feedback accordingly. All the topics generated discussion. However, Post 16 Opportunities and Joint Working created most comments. Discussions also informed us that a fifth area of development was needed, which is Workforce Development across the services.

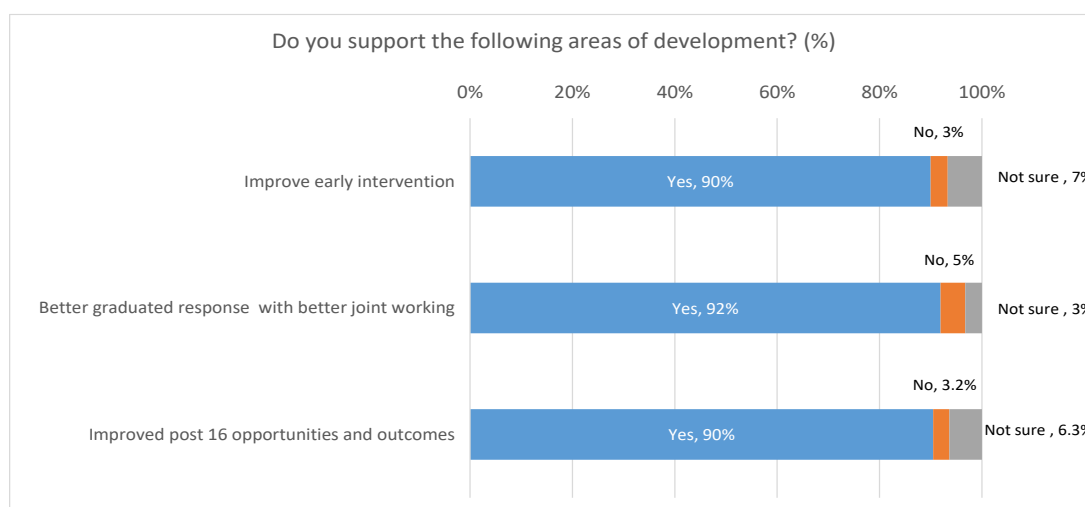
There is a theme of questioning if the intentions will actually be delivered, a sense of having heard it all before.

5.2 Presenting Questionnaire findings

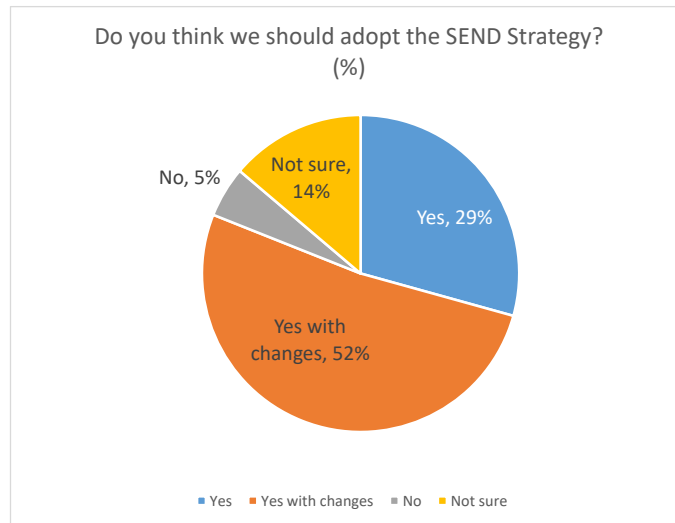
The key questions and findings are as follows:



Above: actual count 92 and 68



Above: actual count 63,62 and 60



Above: actual count 58

6. Conclusions

The overall response enabled Croydon to prioritise the four themes in the Strategy. It informed the Council of parents and families of the frustrations of services not being joined up and of the anxiety for parents and young people about Post 16 provision and employment within the borough.

7. Recommendations

Recommendations about how to proceed will be discussed amongst the three services: education, health and social care.

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Special Educational Needs and/or Disabilities (SEND)

Draft Strategy 2019-2022

 Croydon Clinical Commissioning Group

CROYDON | Delivering for Croydon
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Special Educational Needs and/or Disabilities (SEND) Draft Strategy 2019-2022 for Children & Young People in the London Borough of Croydon

Our vision is:

‘Children and young people in Croydon will be safe, healthy and happy, and will aspire to be the best they can be. The future is theirs’.

INTRODUCTION

This is Croydon Council's and Croydon Clinical Commissioning Group's (CCG) draft strategy for improving outcomes and life chances for all children and young people with Special Educational Needs and/or Disabilities (SEND).

The strategy sets out our aspirations for children and young people with SEND and the approach to meeting their needs and addressing barriers to learning, in partnership with parents and local education settings. Croydon's strategy focuses on young people's well-being and attainment, building on young people's strengths with a focus on local education, health and care pathways to adulthood.

OUR AIM

Children with Special Educational Needs and/or Disabilities will achieve independence and employment, whenever possible, in or near their local community so that they can live fulfilled lives and be active contributors to Croydon's future. Croydon has high aspirations for children and young people with SEND.

PRIORITIES

We asked parents and young people with SEND what they wanted and what was important to them going forward – these are some of the things that they said:

Parents have had varied experiences early on when their child's needs were being identified, there was too much variability:

One parent said:

My son had fantastic early intervention. What made it great for us was them coming to us. I couldn't take on the special needs label, I wasn't ready for it. Having people come to the home where he could play, and I could talk was incredible.

Another parent said:

We had to wait a lot, there was never a sense it was going anywhere or that it was linked up – it felt like it was all on me and what if I don't make the right connections in the right place.

Parents would like better communication and a clear sense of what to expect:

I don't want a Rolls Royce, I'm happy with a bike but it has to be going in the right direction...

Young people want to be included in planning for adulthood, they are thinking about transition:

You can't leave this school and not know what you're doing in life, you need to sort out what you're doing.

Parents have mixed experiences of different educational provision, both compared to other parents and at different points of their children's journey:

Present year great so far but last year awful – dependent on staffing.

To be fair my Croydon primary was excellent.

It is a small school so not too overwhelming. SENCO is brilliant, and some teachers are very proactive in finding ways to support my child.

Although parents had strong views about which individual school would be appropriate for their child, this was personalised, and there was no consensus on the best sort of provision (e.g. mainstream vs special).

In general, there was a shared view between parents and head teachers about areas for development over the next three years, they were keen to see:

1. Improved early identification.
2. Improved joint working with health, social care and education.
3. Better graduated response, so that children have their needs met in the right way at the right time and, if and when, a child's needs are met through an Education Health and Care (EHC) Plan, the EHC Plan is co-produced and accurately reflects a child's needs and provision.
4. Improved post 16 opportunities and outcomes with a greater number of young people with SEND gaining employment and having choices about how they achieve independence to stay in or near their family and local community.
5. Workforce development – so that children are supported by practitioners who have the skills and knowledge to meet their needs and parents have the information they need.

Key to achieving priorities is shared information about the children in Croydon with special educational, care and health needs. This information allows us to work with the right families to meet the specific needs of children; this is done by joint planning, commissioning and targeting of resources. Outcomes for young people are tracked so that there is a continuous cycle of improvement that has a positive impact on children's lives.

THE CROYDON CONTEXT

In Croydon we have made a commitment to providing effective support for our children and families, working in partnership with others. Our aim is to provide the right support at the right time.

Nationally and in Croydon, about 93% of children are educated in the state-funded school system without the need for help or support beyond that which a mainstream school can provide. The January 2018 Census indicates that 15% (9750) of the 65,029 Croydon school age children had a special educational need, compared to an outer London average of 13.6%. Of these, between 12-13% had been identified as needing SEN Support, additional support to address a learning need for varying periods of time.

This help comes from the skills, expertise and resources available in the child's mainstream school and is co-ordinated by the school's Special Educational Needs Co-ordinator (SENCO).

Croydon Council maintains an EHC Plan for approximately 3% of school age children, these are young people with long-term complex special needs such that additional and different provision is needed.

The Children & Families Act 2014 raised expectations and extended the age range for which an EHC Plan can be maintained. Nationally there has been an increase in the number of EHC Plans maintained by Local Authorities; the increase in the number of EHC Plans maintained by Croydon mirrors that of other Local Authorities.

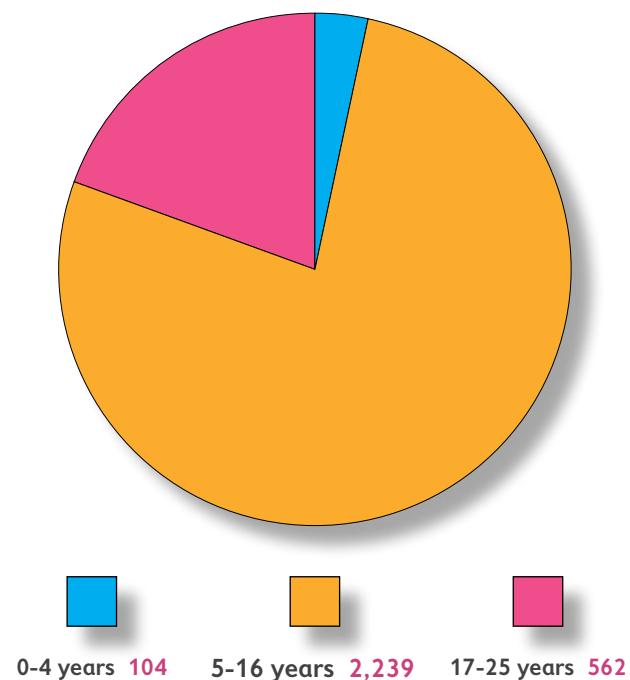
The London Borough of Croydon maintains 2900 EHC Plans (September 2018) and has seen an increase in demand such that more than 300 new EHC Plans have been issued and less than 50 ceased during the period January 2018 to October 2018. The funding allocated to Croydon through the Dedicated Schools Grant is set to increase by 2.2% over three years. There is an assumption that as schools find the financial climate increasingly challenging, this has driven demand for funding through EHC Plans. Croydon has historically placed a number of children and young people out of the borough and in the independent/non-maintained sector, in particular those in the older age range, due to a lack of suitable education and care provision pathways locally. In the academic year 2018/19 55% of young people with an

EHC Plan 16 years old and over are placed in schools and colleges outside of Croydon; this compares with 15% of under 16 year olds. Placement outside of the borough has financial implications with increased transport costs and does not support the long-term outcome of independence in or near a young person's local community.

While legislation endorses inclusion for children with SEND in mainstream schools, national drivers in the school system have led to increased demand for special school places and, in particular at secondary age young people with learning difficulties have told us that they have not felt that their needs were understood or met (PPL 2017).

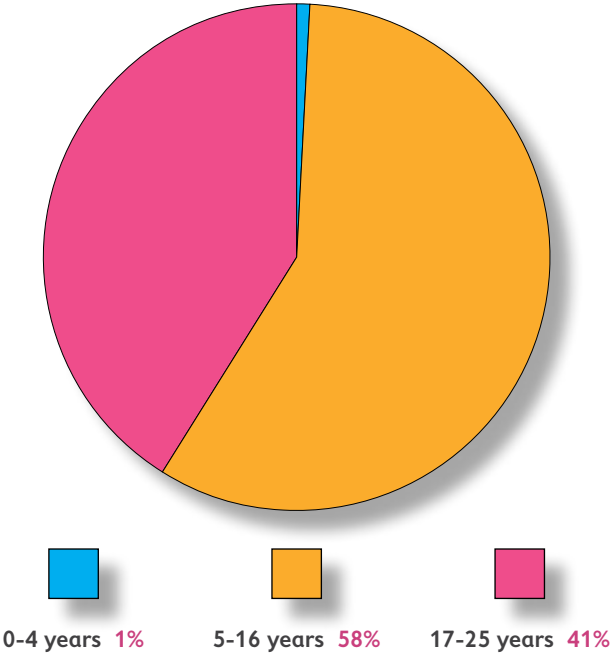
By age range the number of EHC Plans maintained by Croydon (October 2018) is:

EHCP Ages of children and young people



The percentage of High Needs Funding that is spent by age group (October 2018) is:

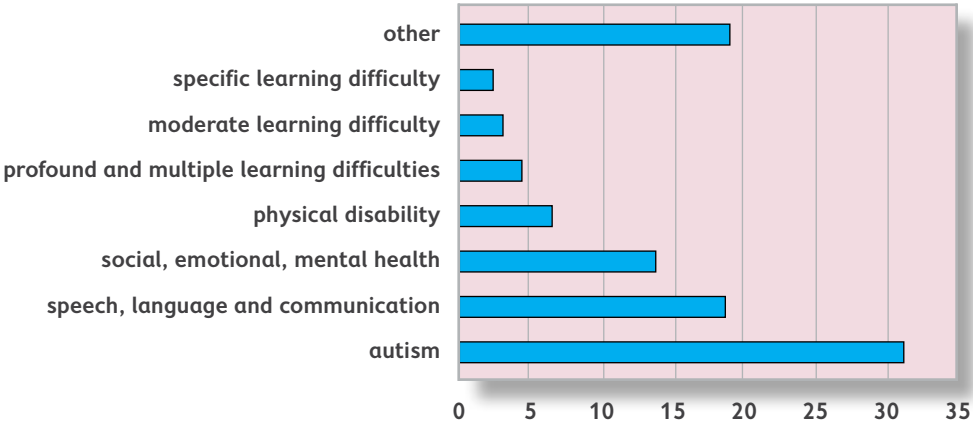
High needs funding by age



In terms of improving outcomes and life chances, Croydon had the second highest rate of 16/17 year olds, 10.5%; nearly double that for the whole of London at 5.3%. in 2016. The percentage of adults with learning disabilities in employment is lower than the national and London average.

By type of need for children with an EHC Plan (School Census 2017):

Children with an EHC Plan by type of need (%)



Looking to the future, the numbers of children needing SEND support will most probably be affected by the overall numbers of children and young people in the population. There are an estimated 131,493 0-25 years olds living in Croydon in 2018, with this figure set to rise by 7.5% by 2026. However, this rise is not equal across the age groups which needs to borne in mind when planning services. For example, by 2026:

- the 0 to 1 group is predicted to decrease by -2%. The number of live births in Croydon decreased for example between 2016 and 2017
- the 0 to 4 group is predicted to grow by 2.2% (621 children)
- the 5 to 11s are predicted to increase by 6% (2385 children)
- the 12 to 19s are predicted to increase by 22.3% (8148 children)
- the 20 to 25 group is predicted to increase by 3.4%.

Research (Frank Field, 2011, EPPE: 1997-2003, Taggart, B.) indicates that early intervention makes a difference for children and young people with SEND. The current financial constraints on public services make it important that resources are used effectively and that there is a joined-up approach to meeting children's special educational needs earlier.

What our current provision looks like

So that young people with SEND live fulfilled lives in or near their community this strategy sets out to enable children and young people's special educational and developmental needs to be identified early; to ensure children with SEND attending local early years settings, state-funded schools and colleges which can meet their needs and a pathway to adulthood which is effective in enabling a young person to achieve the outcome of living independently. This will take the commitment of the Council, the Clinical Commissioning Group (CCG), parents, young people, education settings, health and care practitioners to work together better to support young people with SEND achieve in Croydon.

Croydon has a range of state-funded mainstream and special education provision. Mainstream schools have a special educational needs co-ordinator (SENCO) who is responsible for organising provision for children with SEND. The SENCO is the key point of contact for parents and professionals. Croydon mainstream schools provide support through quality teaching which differentiates the curriculum to meet children's needs and carefully tracks children's progress.

For children with a need for SEND support, mainstream schools provide access to individual or group interventions to address key areas of need, including access to support from staff with additional training and expertise. SEND support in mainstream schools may include precision teaching and will often be informed by expert advice from a specialist. For all children in mainstream schools with SEND support, parents/carers can expect termly review of a child's progress with a record of intervention and future support recorded in a SEND support plan.

There is a range of state-funded special school and resource base special education provision in Croydon:

- special schools (two primary, two secondary and two all through) all of which have been judged good or outstanding by Ofsted.
- primary (11) and secondary (6) enhanced learning provisions (resource bases), which provide specialist teaching alongside and in mainstream school lessons. All specialist education provides a personalised curriculum matched to a child's needs and to support progress.
- specialist nursery classes (3).

Additionally, alternative provision for children educated other than at school.

PRINCIPLES

Croydon's strategy for children with SEND has been informed by legislative duties, the views of young people and parents, schools and practitioners.

The principles that will form the basis of the proposed SEND Strategy are:

- **Inclusion** – schools and colleges increase participation of young people and make accessible the curriculum and facilities which enable engagement in everyday life. Schools and colleges respond to the diversity of students in their locality. Young people feel safe and are included in their community.
- **Dignity and independence** – so that children with SEND and their families feel welcomed. They have the right information and the right services at the right time so that they and their families can live a dignified life, as independently as possible, the same as any other child.
- **Choice** – children, young people and parents are supported in participating fully in decisions that promote young people's aspirations.
- **Best Value** – effective use of resources for better outcomes, with pooled resources and integrated health, care and education pathways. Better partnership work across education, health and care, and with other partners e.g. housing and the voluntary sector. Increasing provision and places for children with SEND in state-funded mainstream and special education in Croydon, so that there are local pathways for young people, without the need to travel outside the borough.
- **Better outcomes** – young people with SEND achieve sustained employment, entering supported internships and/or living independently in their community in Croydon.



CROYDON'S SEND STRATEGY – KEY AREAS FOR DEVELOPMENT ARE SET OUT BELOW

Improve early identification of need

1. Through improved health visiting services. The Health Visiting Service (HVS) leads on the delivery of the Healthy Child Programme for the 0 to 5's and plays an integral part in ensuring the young people of Croydon have the best possible start in life for good health and wellbeing later in life.

The Health Visiting Service is integral to early identification of developmental issues primarily through the one and two year developmental health checks. If developmental progress causes concern the child is then referred onto other services as appropriate. However, the levels of one and two year checks being carried out has been low.

To help address this and other issues, the Health Visiting Service has a transformation plan one of which aims is to create more capacity for the universal developmental checks; these are available for every child so that the state may know if the child needs extra provision. The integrated 2 years check with early years providers is being introduced across the borough. The aim is to improve the early identification, appropriate referral of children with developmental issues so that children's needs are met and parents have confidence and understand how to access support through services and provision within the community. This will be done by increasing antenatal, universal 1 and 2 years development checks. In particular, through the implementation of the three year SEND Strategy integrated health visitor and early years education setting assessment will be established with targeted early intervention for Early Years settings to support practitioners in meeting children's needs.

The service plan for Health Visiting Service 2019 -20, will incorporate improved reach for the 2, 2.5 year checks and improved completeness of the Ages and Stages Questionnaire (ASQ) information. Through the improved level of mandated checks and ASQ data, the early identification

and referral of children with developmental delay and potential SEND, will be improved. This will requirement will be ongoing in the services commissioned for 2020 onwards.

2. Through improved early help there will be better co-ordinated support based in localities and matched to community needs. This will include provision of Early Support/Inclusion Co-ordinators who help families of children with SEND navigate social care, health and the universal offer. Support for families will help to maintain children's progress with access to universal and targeted support, including SEN Support in schools.

3. Improved timescales for diagnosis of autism. The current diagnosis pathway in Croydon is fragmented with a long waiting list and waiting time for a diagnostic appointment. A new Autism Spectrum Disorder diagnostic pathway for children under 5 is being reviewed so that over the course of the 3 years strategy, Croydon CCG will provide more timely diagnoses and reduced waiting times (which are currently over 12 months).

- Under 5s – (currently a wait time of 14-15 months)
- 5s and over – (currently a wait time of 8 months).

Additional CCG funding has also been provided to South London and Maudsley NHS Foundation Trust to reduce wait times. Work with paediatricians is also planned around timely diagnoses.

The Clinical Commissioning Group's aspiration is to reduce the waiting times for both age groups to be in line with the National Institute for Health and Care Excellence (NICE) guidance standard which states that the diagnostic assessment should commence within 3 months of referral.

4. **Improved communication** - establishing an early years' passport for children with SEND which brings together developmental information, assessment and intervention information; is owned by the child's family and supports preparation for and start of school.
5. Improving communication through the Local Offer website, with a stakeholder user group including representation (champions) from across parent and young people groups, the Council, Health and the wider community, established to take forward communication about the offer for children and young people with SEND in Croydon so that families can be independent in accessing the right resource at the right time.
6. For children from one year old, provision of 'Portage' home-based learning to support the development of children with severe, profound and multiple needs early, before attendance at an early years setting. There will be robust annual reviews of these interventions; these reviews will inform the future model for home-based learning. Outcomes will be monitored and the programme adapted. A key outcome of the strategy will be improved developmental outcomes and better support for families through targeted referral for early help and the provision of parenting support. This provision will lead to effective planning for these children's start to education and transition into school. Details will be set out in an Action Plan.



Better graduated response

A continuum of provision to meet a continuum of need to ensure children and young people who have SEND needs, have their needs met whenever possible and they make best progress.

1. The introduction of guidance for schools and families about the support available in mainstream schools for children who have their needs met through SEND Support.
2. Development and publication of local eligibility guidance for children for whom the council undertakes an EHC needs assessment and maintains an EHC Plan.
3. Early years education settings supported to identify and meet children's needs and prepare children for school through the early years area Special Education Needs Co-Ordinators (SENCO) forum and early years support for inclusion. The introduction of high needs inclusion funding to the end of Foundation Stage (from birth to aged 5) to provide support for transition into school, and until the end of reception year in school for children with additional learning needs.
4. Groups of schools in the same area working together to apply high needs inclusion funding to include children with SEND Head teachers working collaboratively with the council to provide for a wider range of children and young people through mainstream SEN support and without the need for an EHC Plan. This will support effective transition from primary to secondary with reduced fixed term and permanent exclusion. The aim is for schools to be supported in providing mainstream education for children with SEND that live in their community and to support children with SEND to be included in their local community.
5. Improve the provision of local state-funded special education so that children with more complex needs have a special school place in state-funded education provision within Croydon. Increased special school places through the new free special school we are building for 2-19 year olds with Autism spectrum disorder (ASD) and increased places in existing special schools through capital investment. Alongside these developments will be the introduction and development of admission guidance for specialist education to support equity of access and transparent decision-making and resource allocation.
6. Through the three year SEND strategy there will be a commitment by the Council to maximise accessibility in public spaces and Council settings so young people with SEND feel included and welcomed. Improved access to universal services – there are numerous universal services offered in the borough for all children and young people. However, some need to be made more accessible for children and young people with SEND.

By way of example, in Croydon centre young people who are disabled there are no sign-posted disabled changing facilities. Additionally, a service that is targeted at improving health outcomes is the council commissioned children's weight management service. Accessibility for children with SEND and their families requires improvement.

Joint Working

1. For children with disabilities the SEND 3 year strategy will drive development of the short breaks offer so that there is equity in provision and families are better supported to live an ordinary life. It is recognised that currently some children access short breaks at the Council run short breaks and respite provision while others may struggle to find providers which can meet their child's needs and use their direct payments to do so. The aim is to support families and help them keep children in the community, reducing family breakdown and promoting child's right to family life through a short-breaks offer that is responsive to family needs.
2. The Council and CCG have widened a previously joint commissioned contract for solely speech and language therapy to include occupational therapy. Over the course of this 5 year contract it is intended that the joint commissioning of these services will lead to further improved quality, effectiveness and efficiency and build on the levels of integration. We will undertake a review of speech and language needs and therapy provision so that we are confident that the likely prevalence of speech, language and communication and occupational therapy needs – including across vulnerable populations (e.g. PRU attendees; CLA; Elective Education etc.) are identified, and jointly commissioned. And that SALT/OT services are adequate to address need for provision across – (Health, Care and Education) i.e. Virtual School/CLA; YOS; PRUs; CWD and SEN. The review will provide recommendation for a strategic, evidence-based and system-wide approach to improving speech, language and communication. Commissioning resources for SLT and OT to meet education needs are currently under review by Council.
3. For children for whom the Council is undertaking an Education, Health and Care needs assessment, the aim is that there will be better joined up assessment and review of a child's progress through the introduction of a new IT system with a portal to facilitate transparent and open sharing of communication.
4. Develop coherent pathways across health, education and care for children with autism, including diagnosis, support for education and mental health, support for parents and siblings, workforce development and pathways into employment. Make Croydon an autism-friendly borough.
5. South London and Maudsley NHS Foundation Trust are planning to put mechanism into place to be able to identify the number of EHCP assessments being conducted, that receive CAMHS assessments and treatments.
6. The 2018 Local Transformation Plan refresh references the changes to Children's and Families Act 2014 for children and young people with SEND and the need for joined up strategic working across health, education and social services in partnership with families. One of the top priorities in the plan is to review pathways and access to treatment ensuring referral processes are clear.



Improved post 16 opportunities and outcomes

1. Support for emotional wellbeing and mental health through the Local Transformation Plan and the commitment to improved transition planning and access to services for children with complex needs and multiple diagnoses including mental health needs. This support will be available for young people with or without an EHC Plan. Discussions with Adult Mental Health to ensure children aged 16 are picked up with transition plans put into place. Pathways for children to Adults Services with continuing health care needs are identified and addressed. Transitions are a priority in the Local Transformation Plan.
2. The development of local specialist college education provision, the post 16 SEN Centre of Excellence at Croydon FE College. This post 16 centre is due to open in September 2020 with 75 places. A key focus will be pathways into supported employment for those for whom this is an option and for others there will be support for transition to adult care services in the community. The college is expected to provide job coaches and to work with local employers to establish pathways into supported internships and employment.
3. The adult social care offer for young adults with SEND is being reviewed. During the coming three years there will be consultation and engagement with young adults and their carers so that sufficiency of provision can be established, and decision-making can be based on local pathways for local young people.
4. Improved pathways into supported accommodation. Croydon Council currently has a programme of work to deliver more units of 'settled accommodation' for people with a disability. This means increasing the amount of housing available for people to live in with the security of having their own tenancy. This housing stock is being developed by working with the Council's own property department, with registered social landlords/housing associations in the borough and with the private rental market.
5. For young people with an EHC Plan, transition planning to adulthood will start from age 13 years. The SEND Service has been re-organised with a new 12-25 SEND Team established. The outcome of better early planning is intended to be a clear pathway and progression post 19, improved outcomes of employment and better tracking of young people's destinations.
6. A clear pathway from children to adults' health services for young people with complex medical needs who have continuing healthcare needs.

Workforce Development

1. Establish a core training offer for all practitioners across agencies so that there is a shared understanding of legislative duties and children and young people's special educational needs.
2. Work in partnership with education settings and schools to develop evidence-based SEN Support for children in Croydon so that children's needs are identified; assessed; met and reviewed and parents have confidence that children and young people are making progress. Particular focus on meeting the needs of autism and social, emotional mental health needs in school.
3. In partnership with community organisations, the Council and health provide a core offer of training for parents – in particular regarding behaviour management at different ages and stages and autism.

Next Steps

This strategy has been informed by a wide-range of parents, young people and practitioners' views.

The SEND Strategy is being taken forward through an implementation plan led by Senior Officers from across the Council and Health. The Implementation Plan will be subject to Governance by the Children's Partnership Board.



APPENDIX ONE – FOCUS GROUPS

Autism Society consultation 16.1.19

Present: J Fitzpatrick Chair (JF)

3 councillors

6 parents

A Farmer, J Wright, T Butler (AF, JW, TB)

P = parents

AF: want feedback on the transition to adult social care and adulthood

P: do parents see the next version before it goes to Cabinet?

AF: will be putting together a small group of representatives, a sense check is useful but speed is of the essence

JF: it would be good for a group to feedback but keep expectations low in changing the strategy.

JF: is travel training customised?

JW: yes

P: I have been on the bus day, it is great, good role-playing

P: can young people who attend be trainers in the future?

JW: yes, there are two student internships, we are planning offering apprenticeships to develop accredited travel trainers.

P: would it be at Croydon?

JW: yes

P: are there other apprenticeships in Croydon?

JW: yes

JF: I'm interested in workforce, education and partners.

P: my son is struggling with education, the biggest factor is the environment not being looked at i.e. Croydon itself is an "exclusion zone"

Cllr: here to listen, my focus is to ensure more opportunities for young people to work in the borough.

P: my one thing is mental health

P: my one thing is; son has complex medical needs, what about the post 16 transition? adult world, pathways, choice and how complex the world is?

P: my child has been a Chaffinch for eight years with ASD; focus must be to improve early identification and health visiting for siblings' needs.

Cllr: my focus is earlier EHCPs, quicker diagnosis and parents need help more quickly.

Cllr: there is cross-party support, document should be fluid focusing on joint relationship between NHS and the borough, despite separate outcomes. The government and the budgets are not aligned and it is the user who is left with difficulties.

P: no one has mentioned social care, Croydon does not recognise autism as a disability.

JF: governance is a problem Health are not accountable to the public and this is an issue for the community

- P:** NHS do have EHCP obligations?
- JF:** how can we persuade the NHS to respond?
- AF:** once agreed there will be an implementation plan with governance and milestones. Rob Henderson, DCS, is keen to link Family Partnership to the HWB as well as Autism Board.
- JF:** start with the 4 priorities, any thoughts to siblings?
- AF:** this is the first time that broader needs of the family have been raised, we will take this back and may reference this in the implementation plan.
- P:** particularly in girls who tend to mask and are therefore missed.
- AF:** workforce awareness and understanding should be the fifth priority
- JF:** and GPs and health visitors
- P:** when I was a nurse, I sent a crib sheet to all
- P:** this links to an early identification and support for siblings, also MH. The effect of behaviour on siblings. The service needs look at history of family. Families buckle under pressure. Services are not here
- JF:** there is an impact on all the Family and there's a lack of support
- P:** this was mentioned at the parent forum meeting for 0-5, with David Garrett in the NHS
- P:** we designed it.
- P:** we need more portage and health visiting
- P:** early identification may not be early years
- JF:** cannot identify unless parents are ready, we need improved awareness, is this partly workforce development and parental education?

- P:** what about the other surrounding issues?

Improved joint working

- P:** it should all be under MH to me, EHCPs have so little traction from social care and NHS. The idea was to work together but it does not happen.
- P:** Health had no place in the plan and there is lots of misunderstanding
- P:** my son is now out of education so the EHCP was not reviewed
- P:** if they did work together my son would have a better chance, it was a waste of time.
- P:** we need clinical psychology reports and input from CAMHS- must be part of the plan
- AF:** in complete agreement. The law says EP only, the rest as required. Mental health should have a clinical psychologists Report but this is not legislated. LBC depend on resources which are accessed via the Designated Medical Officer. And there are probably resource issues in Occupational Therapy.
- P:** EHCP is a passport for life, how will services support me to run a life?
- CIr:** what is the ASD proportion of the cohort?
- AF:** approximately 33%
- P:** they may not have a plan
- CIr:** if diagnosed earlier may there be less uptake later, but cannot say?
- P:** School refer to CAMHS, who refer to autism Society as health refuse.
- AF:** this must be clear to mental health services

- CIlr:** can the process being improved
- P:** we must look at all angles: MH, counselling, Place to Be etc
- CIlr:** is the lack of resources?
- CIlr:** yes
- P:** kids are stuck in the middle
- CIlr:** we need to refocus all agencies, like a passport. The plan can change over time. Parents hit a brick wall at transition. They need updates on their plans. We must push on the HWB.
- AF:** no mental health representation is here so we cannot respond directly. However we must address mental health earlier.
- CIlr:** there are lots of families in crisis that should be dealt with earlier
- P:** families are in crisis; can we have in house mental-health resource? Particularly for teens.
- AF:** we do need practitioners on the ground
- CIlr:** HWB is the way forward for joint commissioning and hospitals are looking at resourcing at the direct point of need
- AF:** particularly for transitions where the passport would help.
- P:** In the parent rep training that we held in PIP we focused on common issues and one that always came up was mainstream v specialist provision, the outcome was always that both were needed and wanted by families. I noticed this was mentioned on the draft. Awareness in mainstream is vital

Transitions and Transport and provision

- JF:** transitions are meant to start at year nine and this should include health and social care
- P:** year nine is a critical year for GCSEs choices
- AF:** year 11 is challenging because the majority of EHCP pupils then go out of borough, hence post 16 is a priority
- CIlr:** there is work going on around the offer in the borough, all CYP should have the opportunity to learn in the borough i.e. the new preschool and Croydon FE development. Currently there is no provision.
- P:** if someone prefers to go out of borough, would transport not being met? This would be removing family choice and therefore discriminatory.
- CIlr:** the provision will be of quality, we are doing our best however it would be a family choice. It will not be enough.
- P:** special schools are very large so out of Borough may be a better choice
- P:** yet to see a school for high functioning autism
- P:** 15 years ago there was a discussion about a special school
- P:** kids are very vulnerable to bullying or are sent to PRU's
- P:** MH and behaviour deteriorates
- AF:** currently there is no provision but things are in the strategy response i.e. ELPS which don't always work.

- CIlr:** it is important to remember that needs are not being understood nor met. What about inclusivity for high functioning autistics? A lot to do with resource, some should be in mainstream but mainstream can fail them.
- P:** High Functioning Autism needs not met anywhere
- CIlr:** we do not have enough money
- P:** mainstreams are inflexible and kids go on detention
- P:** is it knowledge? With the passport help?
- P:** A unit would be a good idea but some kids do not want to be in the unit they want to be treated normally.
- JF:** the headline is that particular needs require customised provision. This rigidity in treatment. Needs workforce development.
- AF:** adults' transition across different ages in education, health, and care (the latter 2 start earlier). We want to give CYP voice, and plan to promote independence. There will be less uncertainty with new schools.
- JF:** would we have EHCP's into their twenties?
- AF:** yes
- JF:** the numbers of 25-year-olds will increase, would plans not stand because they are no longer in education?
- CIlr:** E could be for employment
- AF:** the plans would be about pathways to employment, supported employment and adult hood

- CIlr:** why there is such a focus on Croydon college is because it provides links to long-term employment, apprenticeships etc
- AF:** CROYDON FE is working better with LBC, there is a very good new management team driving employability
- JF:** autism is not recognised as a disability?
- AF:** that is too big a topic we want to incentivise inclusion i.e. inclusion marks and recognition have value
- P:** There is recognition for autism. It is sad to talk about inclusion in mainstream schools, ranging from very difficult. There is discriminatory language just like racism.
- P:** social care do not recognise autism disability, 9/10 do not get a social care assessment

Last points

- AF:** joint strategy
- JF:** give us feedback
- CIlr:** very useful, it would be nice to meet young people, are easy read documents fit for purpose?
- JF:** workforce development, more YP included, preparing for life.

SEND Consultation, Community Health Team meeting

17.12.18

A Farmer, J Wright, T Butler (AF, JW, TB)

13 practitioners

SEND

- Are the adults in the CCG involved? Continuing care is required.
- What are the main differences in this document from the earlier version?
- AF explained the situation with the SEND inspection and that the EHCP is really across all services now, the Health Visiting figures are poor and so is the narrative from parents there is not enough provision. It may take eight more practitioners.
- There are not enough therapies on offer
- An ambition is to devolve money to school clusters to help bring down the number of EHCPs
- Pathways to adults is very poor, we will need to offer eligibility guidance
- DMO was not asked about health, and the autism school is confusing, autism at aged 2 – not many but could be included in broader outreach from aged 2, focusing on social and communication skills. Paediatrics could recommend outreach. She also suggested that the autism school could just have a school name, instead of being called school for autism. We need to engage parents with the right language.
- Waiting times too long, teams must be resourced to manage caseloads which are double what they should be. NHS is doing its best to cope with the demand; it is simply struggling with 60 HVs. There has to be recognition and a large part is based on resources

- Autism diagnosis timescales far longer than they should be and wait times must be reduced, there's a huge increase in referrals
- AF: do give us better health data and do please send to public-health, these are the aspirations versus resource and it is not just the council who is responsible.
- We cannot just increase the diagnosis and not treat them
- The targets in the document do need to stand and this will link to the HWB.
- “the future is theirs” was not liked but this is the borough vision and there is no dispute
- Aspirations are good but how do we achieve this for children with complex needs
- It is great to see the early years review as part of the strategy, fortunate. Now supporting practice within education.
- Speech and language therapy is commissioned as a balanced model, but not enough money for training and less ring-fenced money. Parents want one-to-one therapy. Some Tribunal judges do understand the group sessions can be good.

What are your concerns?

- How will communication change to help plan the provision across schools?
- This will be in an action plan i.e. a communication strategy
- Joint working come together and talk about ideas, the right people at the right time
- The action plan will be sponsored by Alison Farmer, Stephen Warren, Amanda Tuke, Suzanne Toomer

- A business case is to be put together to help the DMO i.e. a designated clinical officer
- DMO's role needs to be clarified as per the code of practice and reviewed against capacity, what is missing?

Transitions

- Transition endings do not synchronise across services, nor with adult services. There are gaps in management and we need to map all this out. For a lot of services there is nothing often it is a 'hole'. Or sometimes wait up to 12 months, no join, no link.
- Action: to form a transition group, where is the old transition strategy?
- There is a disproportionate spend on 16 to 24.

SEND STRATEGY CONSULTATION

24.1.19

Our Vision

- Easy read should have the current provision
- Other booklet should be more attractive like the easy read (pix)
- Both papers give us relevant information
- The easy read contains a minority of statistics meanwhile the harder read has a vast majority of stats.
- The harder read has parents comments on SEND

- Both provisions should contain how they are going to help young people with mental health (SEND)
- Easy read contains more relevant information
- Students should be given a card to give them a few minutes of time out.
- Teachers get more training and awareness about SEND
- Educate all children about different Special needs
- People with a diagnosis should have chance to meet others with the same diagnosis
- List of what support people get
- Not much saying how they are going to achieve goals
- Teachers help student feel less isolated and make friends
- EHCP? What is it?
- Page 7 explain how
- CAMHS- what CAMHS is and how they're going to work together.

Missing Key facts/spelling errors

1. P4 State how you going to improve for the children Post 16 and how the strategy is going to be achieved
2. How are they going to be supported? It doesn't state what funding goes towards
3. Check specialist in each school who can be trusted to speak with student.
4. Different range of teachers at different school

5. Overlook safeguarding at each school
6. What is going to take place in the post 16 centre

Additional information

Include how teachers are understanding

How to help certain students and specific time.

SEND Consultation

Waddon youth club, 18-24. Date 7.1.19

18 Young people

D Cooper, J Wright, T Butler, P Cullen (plus 3 staff) and K Sinclair.
(DC, JW, TB, PC)

YP = Young People

SEND Strategy

- DC:** As young adults what could Croydon do better? Or is not doing at the moment?
- YP:**
- You don't get responses from work people
 - Social media needs to be better
 - College does not give enough help to find work, it is No, No
 - They don't help us
 - They forget us (most YP put their hand up to this)
- DC:** How does working effect benefits and money?
- YP:**
- Not good (refer to SENDIASS)
 - College goes too fast for us, we want to live independently, more leisure and more clubs

SENDIASS SEND STRATEGY CONSULTATION

24.1.19

12 parents

Plus: A Farmer, R Henderson, J Wright, S Wadsworth, R Tilford, T Butler
(AF, RH, JW, SW, RT, TB)

P = PARENTS

- AF:** we will add workforce development, training for practitioners and parents will be part of the implementation.
- P:** can we see revised draft strategy before Cabinet?
- AF:** yes
- AT:** we do not change the document until all consultation is complete
- P:** it should link to Post 16 Travel and Transition plan, and the links should be clear
- P:** where is the carers' strategy/
- AF:** this is not the Carers' strategy
- RH:** will work to link the 3
- P:** parents want a manual, "it is s a minefield", where to they go?
- AF:** we want parents to work with us, it will be on the implementation plan. Jane Speller will be involved and link to PiP.
- P:** joint working is appalling, it is an aspiration but need to make savings. I had to take LBC to Tribunal, letters were ignored. Lots of arguments. Should have had health consultation around a kidney transplant. My son was moved to Yr 6 without talking to us and the NHS were not consulted. LBC ignores us for financial reasons.
- RH:** we are now working together
- P:** YP does not need 2:1 support, though it is a great aspiration, suits them to ignore the situation. Parents get a brick wall from AF.

- AF:** can we please talk outside of the meeting
- P:** good intentions but practically will it happen. I have been waiting a year for a place. YP now in Lambeth because no school in LBC. Bensham School did not work out and not in school. YP went to mainstream and was excluded. Waiting list huge for CAMHS. Social worker was very bad and said YP's needs were not specific enough. SEND request more reports. Now suspended from Lambeth mainstream as no support.
- AF:** RH is commissioning research about the schools
- P:** they don't understand autism, the sensory needs are not met in mainstream
- AF:** there is a theme
- P:** new school will not accommodate high functioning autism
- AF:** Oasis are developing more capability
- P:** demand is too great for the good schools, what about N Croydon?
- P:** mental health and challenging behaviour. YP are impacted in settings. Referral process to CAMHS is v difficult. Siblings are affected. Schools do not know how many vulnerable kids there are. The process is so arduous to get SEN provision. Siblings are casualties waiting to happen. What happens at 18 and transition to adulthood? 16- 18 yr olds sometime have capacity of kids. Must protect our children with MH problems.
- SW NHS:** we are reviewing access to CAMHS, very aware that we are not doing enough. And reviewing pathways to Autism
- P:** soon, soon... youngest kid copying the oldest. His brain is different. Been waiting over a year for initial consultation. Being abused by kids. Impact on family.
- P:** delivering non-violent support for parents has been a success.
- P:** 16 yr old daughter has had no help since nursery. Struggle to raise her domestic violence. She has been excluded, and in PRU. Begging for an assessment at Archbishop Tennyson. Bounced from Croydon to Lambeth and location of GP. No support from CAMHS nor social care. School says it is bad behaviour. No help.
- AF:** we understand the boundary issue and difficult to access CAMHS.
- P:** Lambeth are quicker to respond.
- SW NHS:** we need to learn to work across borders
- AF:** and same issues with SLT
- P:** joint working with EP: parent not consulted. Suicidal aged 8. EP did not consult with CAMHS. Younger child wants to die too, parents forced to tribunal. LBC should look at desperate situations and conflict resolution.
- AF:** we are currently getting involved
- P:** 4 years waiting for ASD diagnosis. He is running away from school
- P:** refer to a named GP to get a referral to ASD assessment
- P:** diagnosis helps but still v hard, getting no education at school, they give him lego and shut him up. He was taken from ELP to mainstream but cannot read nor write.
- P:** tell the school what to do and get an EHCP, the Head said you can 'cure' anxiety.
- RH:** Gov is planning health provision for schools and waiting for guidance

P: I have 2 kid and nowhere to go and play. On swimming lesson wait list for over 1 yr.

RH: these are evolving needs and the plan will not be set in stone, we will work together and continue to lobby gov for more money.

SEND Consultation, 5.12.18 SLAM – Alexander House, Croydon

AF – Alison Farmer (Service Lead SEN 0-25)
JW – Jackie Wright (Travel Assistance Commissioner)
TB – Tom Butler (Programme Lead)
P – Professionals
CC – Minute Taker
13 Attendees

AF: Croydon Council and CCG are consulting on a 3 year strategy. In order to implement we are consulting on 4 key areas. Improved early identification, improved health, improved post 16 employment and opportunities.

This is especially important regarding information sharing across agencies.

TB: It's important that the survey is distributed so that we get a wide range of feedback. There is an online survey to be completed. Also on the Croydon Council website go to the 'Get involved' link.

Parents /Carers/Professionals can comment on strategy – Leaflets/Surveys to be left in reception. Consultation is taking place until 31st Jan 2019. Any feedback is most welcome.

St Giles School, 17.1.19 SEND Strategy Consultation

7 parents
D. Cooper, J. Wright, T. Butler (DC, JW)
P = PARENTS

p: EHCP has taken over a year and still not final

P: it is over a year and it overlaps the annual review

P: back and forward

DC: College opens 2020, some 19-year-olds in pilot, build is in initial stages. Hoping to open special ASD school 2020/2021

P: what age group?

JW: starting at 2

P: who are you talking to regarding the college design especially for complex needs.

DC: there is a whole team?

P: will they be talking to school such as St Giles? What are they going to put in the room? Who are they speaking to?

DC: Croydon is talking to specialists I'm sure they will be talking to people have the experience. LBC have planning team

- P:** re 0-25, how long would PM LD transition be if he was to go to college at 19? Would you be there until 25?
- DC:** it would be adjusted to individual plan and needs, and it may not be five days a week
- P:** would it just be about education?
- DC:** for CWD there would be other activities
- P:** biggest worry is constant about the Young person's future and who will care for them
- DC:** early identification could help
- P:** I don't want them in a room with television
- P:** it sounds brilliant, kids are near 19 to 25. I don't know what to do I cannot cope, I can't keep up with the care.
- P:** facilities are not there, changing is hard, we are made to feel guilty. Once they are out of borough they are gone.
- P:** there's no respite and no after-school support
- DC:** the strategy is long-term
- P:** do you think there's other day-care? Have you looked at day centre facilities?
- DC:** strategy is to get it right i.e. by working with social care
- P:** 19 to 25, may not be in education, they are in no man's land
- P:** my son would always need education
- DC:** that would be part of the plan
- P:** it feels like there's nothing after 19
- DC:** we want to get it right
- P:** the young people are not really adult even at 19
- DC:** we are improving joint working and talking with social care in the NHS
- P:** disappointing
- P:** do professionals live in another person shoes i.e. our shoes?
- DC:** it is about co-production
- P:** you cannot reach everybody, just get first-hand experience
- DC:** we should be talking to families
- P:** with CWD team, we have to fight to every single thing, the worst scenario. Constantly filling in forms no one tells us what we can have.
- P:** a cynical crowd
- DC:** our vision must be Right - must have joint working
- P:** how many disabled people are in the SEND team?
- P:** come into the school to see the needs
- P:** get hands-on experience for a day- getting the kids up at 5 o'clock for 7:30 bus- otherwise never ready if kids don't cooperate.
- P:** we don't feel listened to, you don't walk the talk
- DC:** co-production will work with families
- P:** Heard it before
- P:** our children -my kids cannot do that, what about adult hood?
- P:** I want half day respite, social worker gave me direct payment, and I need to ensure the babysitter. It was made so hard and convoluted; filling out forms. Just to get service. "it is a joke that you offered it because you know how hard it is to get"

- P:** LBC have get out clauses with health and safety. No one wants to work with disabled schools. Transport. discrimination in public. How can we help YP who must be sheltered? they cannot be in mainstream.
- P:** seen unbelievable mainstream examples i.e. kid was left in the wrong school
- DC:** we are increasing special schools
- P:** some kid staying home all weekend between schools because there is no supervision. Family shut themselves away!
- P:** the biggest thing- we need changing rooms
- P:** changing in a public toilet cannot be done there is no disabled toilet in Croydon Centre- Will there be one in Westfield?
- P:** what council has a good stance all another country?
- P:** 25 years ago, most of these kids would not have survived; we need more
- P:** School closes at 3:30 and holidays
- P:** there is no after-school provision of the kids who have nursing needs. And cannot get into Saturday clubs
- P:** respite!!
- P:** EHCPs were delayed not accurate, medical information was missing. You can't even do an EHCP.
- P:** does LBC have the right people because you don't live it
- P:** not trying to find a way out
- P:** parents are down in the dumps and losing their confidence
- P:** red tape, might get results? 40 pages for each condition!
- P:** how do you access a place in the new special school with only 75 places?
- P:** how to get information? Is not the one place
- P:** it is too hard to apply for things
- P:** there is nothing in the school holidays
- P:** costs? So much more, I had respite in Sutton but it will be closing. This is not inclusive. it is discrimination.

St Nicholas School Consultation, 29.1.19

6 parents

3 SEN team

Saskia Van Vliet (SVV), Ronny Burfield, Tom Butler

P = parents

P: are we talking about GPs? A&E is very good for kids with autism now with the new department Croydon U Hospital. it is amazing and with separated rooms. Old unit was crap. Cancellation means you only wait for 12 weeks

P: portage was very helpful, it gave us a strategy and happy it is coming back. The team was very SEN focussed, even SLT came.

P: it was v difficult during the assessment, but we got lucky and got SLT at 2 years old- it made such a difference to his communication.

P: early ID quite good

P: how would you get portage?

P: mainstream very difficult.

P: is the autism school primary?

No parents knew about the local offer.

Respite:

P: we don't get respite and don't know where to go? Maybe get vouchers for carers? Go to Young Carers group, her son is only 4.

P: we want to enter information online

P: will the autism school promote independent living?

P: what happens as he grows up? Where does he go? He can hear but does not have words, is there a specific school for non-verbal?

P: where does the funding go when it is for a unit? There is different provision in each setting, how about enrichment? Otherwise it is basic learning. How is this addressed?

SVV: contact your co-ordinator

P: there is a mismatch between ability and the lesson,

P: what are my rights?

P: need a smaller class.

P: will portal be linked to GPs

SVV: GDPR means we have to be asked to share information and therefore information may not be shared.

P: every time you go to a GP you have to explain your situation, paediatrics should know.

P: it would be ideal to share via the portal

P: the link should be between GP and paediatrician but it is NOT

P: my daughter was seen in Great Ormond and at GP. I asked them to email me all docs and got them.

P: I want to my child to be reassessed. They are not listening to me, he has not been assessed for 4 years. I don't know the process, I do what the school tells me.

P: home schooling is very different and getting more anxious.

P: St Nicks is brilliant

P: go to Carers Centre to get help in writing the EHCP, you will get a better understanding of a child's needs and how to work with teachers. And complete the EHCP in a good way.

P: EY passport is a very good thing

Everyone understands the strategy

- P:** liked the portal, the Post 16 -25, the reduced waiting times for autism diagnosis and portage
- P:** what is missing: pre16 travel, more infor re portage, a post 16 passport (not visible), when portage was too late, identified too late. "I did not know".
- P:** how do you access portage?
- P:** what about a compass card for all SEND... like a discount card, from CWD
- P:** should have priority paediatric service and not made to wait.
- P:** after school activities, I have not seen activities, after school clubs.
- P:** are there support groups, no NHS support, given a pack
- P:** too many papers, no post diagnosis meeting! Which is required.

Waddon Youth Centre SEND Strategy Consultation 16.1.19

Present:

Children and young People x 34
David Cooper – SEN Business Relations Manager
Jackie Wright – Travel Assistance Commissioner
Cheryl Cordwell – Minute Taker

- DC –** SEN strategy
- DC –** Would like to talk to you about how Special Education Needs can deliver our support to you in a better way. Part of the strategy would be to identify your specific needs sooner so that we can give you better support as soon as possible.

We would like to work alongside your parents, teachers, social workers, carers and doctors. Getting everyone involved in the assessment process ensuring all your needs are met fully.

First of all we would like to make sure that school is a safe environment for you. This is also about preparing you for life after school/college. Developing a strategy so that better opportunities exist in Croydon. We will also discuss these ideas/plans with your parents to get more feedback.

This would be about making your lives better.

- What is good about your schools now?

Reaction:

- 7 said they love the school they currently attend.
- 1 asked if they could get more help with lessons.
- 9 think there should be more leisure activities and Youth Clubs.
- Who wants to get a job when they finish school/college?
 - 7 children raised their hand.
- When you're grown up who would like to earn money?
 - 7 children raise their hand immediately.

We are aiming to provide a good sound college base for to ensure you have a bright future.

Thanks for taking part today.

Waddon Youth Centre, 7.12.18 SEND Consultation Notes

6 parents present

J. Wright, D. Cooper, T. Butler (JW, DC, TB)

P = parents

SEND

- P:** Are there any colleges for boarding?
- P:** I have a 19 year old at Priory and want him to be independent, I want to keep him in the borough?
- P:** Are there housing associations or respite?
- P:** We have a 19 year old at university, his allowance has stopped and does not have job yet. We have to top up. However he is not really independent and struggles with his speech; employers are not sure.
- P:** He is unsure about travelling from Portsmouth. He does not have local support at university. He did get assessed at college through student loans.
- P:** What are Post 16 Options? Croydon and Carshalton. Schools should advise
- P:** Few go from Bensham to Carshalton. Croydon is taking a long time. Difficult to get to NESOT
- P:** Do they get transport and courses may not be available in LBC.
- P:** Do they still get prioritised to get onto courses? Yes and internships etc
- P:** What age does EHCP go to? Answer: it depends on progress and needs.

- P:** LBC explained the increase of EHCPs and overspend: the strategy was played back.
- P:** How many mainstream schools and maintained have SEND pupils?

SEND Strategic Board 21.1.19

9 practitioners and many

What do we like?

The 4 priorities – but could there be a 5th? (Communication and the Local Offer)

The inclusion aim

Speech bubbles for quotes – make it more visual

Put Croydon context first

What are we worried about?

Needs to set out why improvement is needed and what impact will be like

Add partnership with parents

Success measures – KPIs, CYP & parents feedback

More integrated working include HWB

Transitions at all ages 0-25

Clear table at the end showing how we will know change has happened

Accessibility – how certain are we that everyone will have a voice?

More family engagement

Aim = 0-25 less adult focussed

Nothing on local offer for post 16 cohort of young people

Integration and prevention

Best practice and upskill workforce including school staff to better meet needs at SEN support and before

Data underpinning strategy & knowing our children and young people

PEPs low processing and take up, align with EHCP reviews

Keeping up with the pace of change (project management); implementation (keeping momentum) evidencing impact

Parents report Local Offer still hard to use

Silo working & better joint working between SEND & CWD

Tier 2 CAMHS offer is poor

More DMO time needed and carry through post 16

Do we need a DCO?



APPENDIX TWO:

EQUALITY ANALYSIS: INITIAL EQUALITY ANALYSIS

Stage 1: Initial Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

The Initial Equality Analysis helps to determine if the proposed change will have no impact, a positive or negative impact on groups that share a protected characteristic and ascertain if you will need to undertake a full equality analysis.

An Equality analysis enables us to target our services, and our budgets, more effectively as well as understand how they affect all our communities. It also helps us comply with the Equalities Act 2010.

Please note that an equality analysis must be completed as early as possible during the planning stages to ensure information gained from the process is incorporated in any decisions made. [If you are not at the beginning stage of your decision making process, you must inform your Director and the Equalities Manager that you have not yet completed an equality analysis.](#)

In practice, the term 'proposed change' broadly covers the following:

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service Review;
- Budgets;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

Directorate: **Children, Families and Education**
 Title of project or proposed change: **SEND Strategy**
 Officer responsible for assessment: **Alison Farmer**
 Date assessment completed: **15th February 2019**

1.1.1 Information about the proposed change

Brief outline of proposed change (see above for examples of proposed changes). Please provide a brief outline of the proposed change, why it is being considered. Please also state if it is an existing, new/proposed or revised change.

SEND Strategy

The London Borough of Croydon Special Educational Needs and Disabilities Strategy 2018 to 2021 (SEND Strategy) sets out to improve the outcomes and life chances for children and young people with Special Educational Needs and Disabilities. It is a new Strategy.

The SEND strategy sets out the Council's approach to meeting the needs of children and young people with SEND, with a focus on developing ways of working together with families, early years settings, schools, FE colleges and health providers over the next three years to support positive outcomes for young people. The strategy addresses Croydon's need for long-term provision for children with SEND ensuring an efficient use of public resources, sustainable and effective.

The Send Strategy provides an umbrella document that sets the direction of travel for all policies and criteria that link underneath it. This includes specifically, the following two new documents:

Eligibility Criteria

Local authorities are required to ensure that there is an offer for children and young people with SEND, including a graduated response in schools and other education settings; that they undertake EHC needs assessment and issue and maintain an EHC Plan for those children who have the most complex learning difficulties and need additional and different provision and provide or co-ordinate and jointly commission the provision of services to meet the assessed needs of children and young people with disabilities where it is deemed necessary to so. (Children and Families Act 2014)

The overall aim of the SEND strategy and the supporting criteria and policies is to improve and make enhancements to the service for all children and young adults with SEND in Croydon through effective identification, assessment, planning and review of children and young people's progress. The goal is for children and young people and their families to be actively involved in planning a future independent life in Croydon. For children and young people to be safe, healthy, and happy and aspire to be the best they can be.

This strategy is for all children and young people with SEND and their families, this includes children and young people 0-25 who have a learning need or disability that is identified and met through SEN support, an EHC Plan and/or a Care Plan.

The only impact is related to age as the services are different for children and adults. This is dictated by the different legislation relating to children and adults (Children and Families Act 2014 and the Care Act 2014). The probability and impact is reflected below in the scoring.

1.2 Who could be affected by the change and how?

Scoring your adverse impact

You will need to score impact on service users, community groups and/or staff and record this in your Action Plan.

Deciding whether the impact could be positive or negative

You must gather evidence to help you decide how each of the protected groups could be affected. This evidence must be of two types:

- about people (quantitative) – for example, statistics, borough and ward profiles on the Croydon Observatory (<http://www.croydonobservatory.org/>), national research
- from people (qualitative) – for example, consultation results, complaints, surveys, information from relevant voluntary or community organisations

You will find it useful to discuss sources of information with the equalities manager. They may be able point you towards relevant information from another equality analysis or concerns about equality matters from inspections or audits.

However, you can make reasonable assumptions where impact is likely to be minimal. For example, changes to the school admissions policy are likely to have minimal impact on older people. Negative impacts can often be identified by the concerns that stakeholders raise about whether a change will work or not.

Ranking the potential impact

You have to act to eliminate any potential negative impact that, if it was to be realised, would breach the law (perhaps by abandoning your proposed change). However, you may not be able to take action to minimise all your potential negative impacts or maximise all your potential positive ones. You must be realistic and proportionate about how many actions you can resource.

When you act to reduce the negative impact or maximise the positive impact, you must be sure that this does not create a negative impact on another group. If this is unavoidable, it can only be justified if it is done to eliminate discrimination.

1.2.1 PROBABILITY

What is the likelihood of the service, policy or function having an impact on service users, community groups and/or staff?

Use table below to assign the proposed change a category code for each protected group.

IMPACT ON PROTECTED GROUP(S)									
Category Code	Race	Age	Gender	Disability	Religion or Belief	Sexual Orientation	Gender Reassignment	Pregnancy Or Maternity	Marriage or Civil Partnership
1 Rare	1		1	1	1	1	1	1	1
2 Unlikely		2							
3 Possible									
4 Likely									
5 Almost Certain									

1.2.2. SEVERITY OF IMPACT

Identify the highest possible impact on the service, policy or function.

Use this table as a general guide

Probability	Potential Impact on Protected Group(s)	The Potential for Complaint Litigation	Potential Impact on Organisation
1	No impact or adverse outcome	Unlikely to cause complaint/litigation	No risk at all to organisation
2	Short term impact	<ul style="list-style-type: none"> • Complaint possible • Litigation 	Minimal risk to organisation
3	Semi-Permanent Impact	<ul style="list-style-type: none"> • Litigation possible not certain • High potential for complaint 	<ul style="list-style-type: none"> • Need careful PR • Reportable to EHRC • External Investigation
4	Permanent Impact	<ul style="list-style-type: none"> • Litigation certain expected to be settled for <£1M 	<ul style="list-style-type: none"> • Service closure • Threat to Divisional/Directorate objectives/priorities • Local Publicity
5	Permanent and Severe Impact	<ul style="list-style-type: none"> • Litigation certain expected to be settled for >£1M 	<ul style="list-style-type: none"> • National adverse publicity • Threat to Trust objectives/priorities

1.2.3 Equality Impact Score

Use the table in 1.2.2 and matrix below to calculate the equality impact score by using the formula:

Impact x Likelihood = Equality Impact Score

I M P A C T	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5
		1	2	3	4	5
		LIKELIHOOD				



Risk index	Risk Magnitude
20-25	Maximum
15-19	High risk
10-14	Medium Risk
5-9	Low Risk
1-4	Minimum Risk

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the severity of the impact. You can do this by using the table in 1.2.2 as a guide, for the purpose of this example as 3 Semi-Permanent Impact
2. Estimate the Likelihood of this impact. You can use the category codes in the table in 1.2.1 to, for the purpose of this example as 5 Almost Certain

3. Calculate the equality impact score using the formula above and record it in the space provided below, for the purpose of this example - **Impact (3) x Likelihood (5) = 15 Red**

Calculate and enter the Equality Impact Score in the space provided (2)

A full Equality Analysis will be required if the proposed change has been graded as scoring 10 or above (orange or red in the above table) as this will help you detail how you are going to address any negative impact.

1.2.2. Please state if the proposed change will adversely impact the Council’s ability to meet one or more of the Public Sector Duties set out in the Equality Act 2010 below:

Please tick the relevant box(es) and provide a brief explanation

Advancing equality of opportunity between people who belong to protected groups

The strategy will have a positive effect on equality and opportunity for people with SEND

Eliminating unlawful discrimination, harassment and victimisation

The strategy will have a positive impact and therefore we do not envisage any unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

The aim of the strategy is to have a positive effect on the lives of people with SEND due to integration into the community and mainstream schools.

A full Equality Analysis will be required if the proposed change will adversely impact the Council’s ability to meet one or more of the Public Sector Duties set out above.



1.3 Decision on the Initial Equality Analysis

Officer responsible for assessment	Name: Alison Farmer	Position: Head of SEN Services	Date: 15.02.19
	Should a full equality analysis be carried out? No		
	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' without any supporting information or 'no information available' could leave the council vulnerable to legal challenge. There is no need to conduct a full equality analysis because the risk assessment has identified the proposed changes as being low risk. You must include this statement in any report used in decision making such as CCB or cabinet.		
Departmental Strategy Lead	Name: Yvonne Okiyo	Position: Equalities Manager	Date: 18.02.19
	Should a full Equality Analysis be carried out? (tick appropriate box) Yes No x		
	Please state why and outline the information that you used to make this decision. The proposed change will have a positive impact on protected groups and will improve and make enhancements to the service for all children and young adults with SEND through effective identification, assessment, planning and review of children and young people's progress.		
Director	Name: Shelley Davies	Position: Director for Education	Date: 05 February 2019

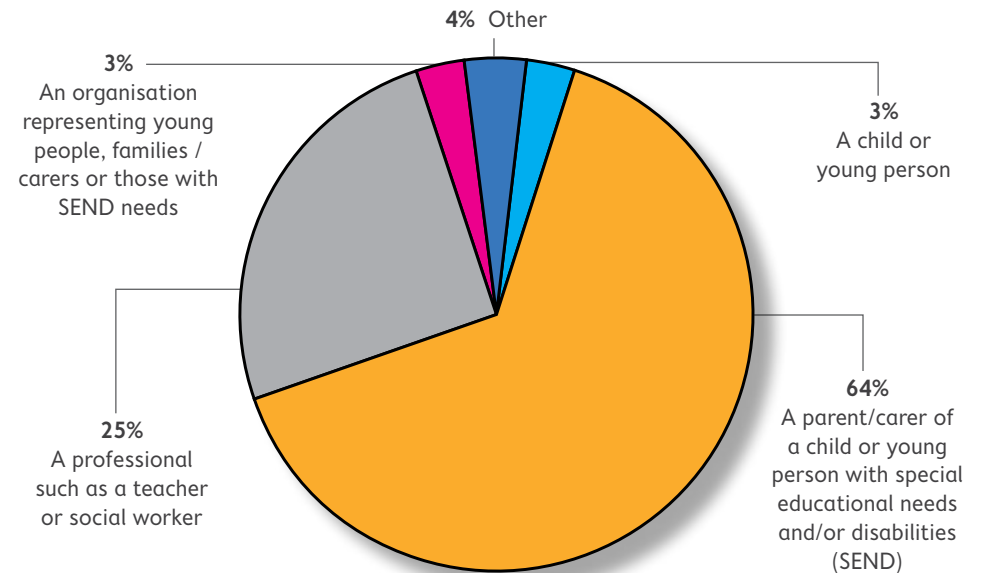
APPENDIX THREE – SURVEY RESULTS

SEND Strategy 2019-2022, Survey Consultation Results

Q1:

To help us get a good idea of who is completing the survey, please indicate in what capacity you are responding	Count of Completing the survey - 1 Who completion	%
A child or young person	3	3%
A parent/carer of a child or young person with special educational needs and/or disabilities (SEND)	61	64%
A professional such as a teacher or social worker	24	25%
An organisation representing young people, families / carers or those with SEND needs	3	3%
Other	4	4%
Grand Total	95	100%

Please indicate in what capacity you are responding (%)



Other:

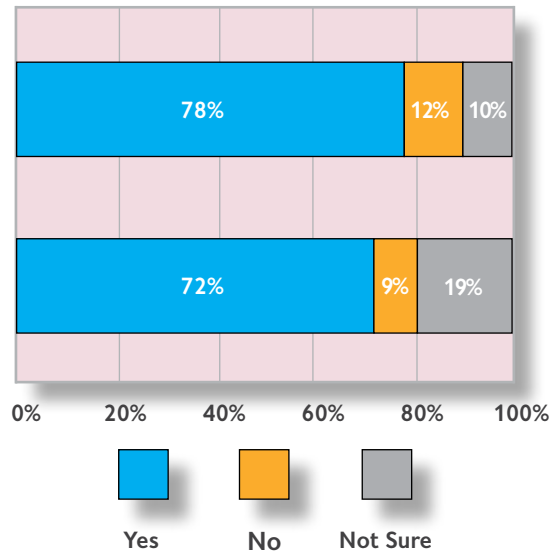
Resident
Disabled person, Professional disability practitioner and representative of professional organisation for staff working with disabled students.
Volunteer involvement with a college and Croydon Drop In
Someone who cares

Q2 & 3

Do you agree the strategy aim and principles? (%)

Do you agree with our aim: “Children with SEN and/or disabilities will achieve independence and employment, whenever possible, in our near their local community so that they can live fulfilled lives and be active contributors to Croydon’s future...”

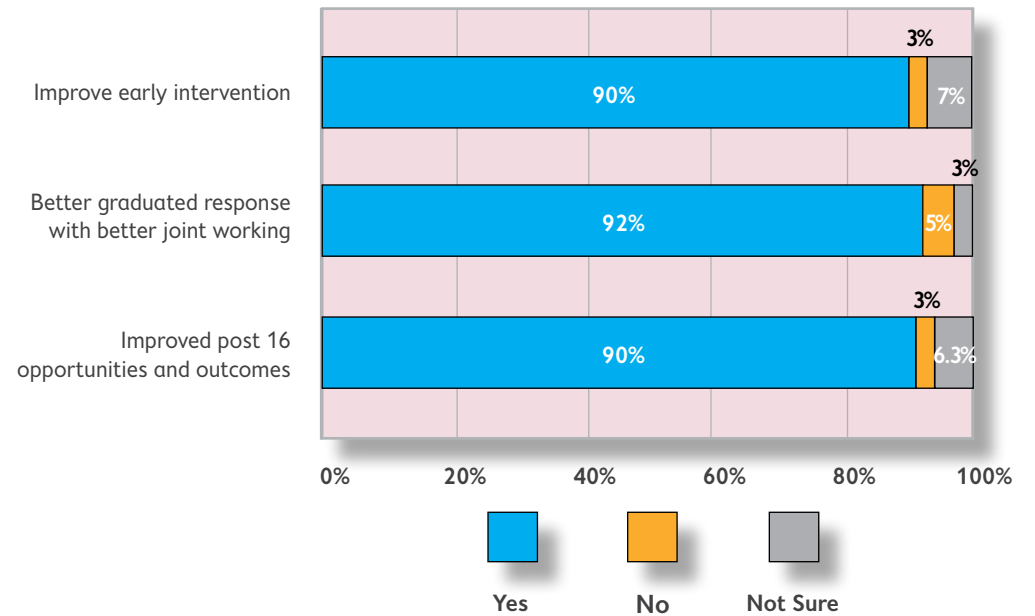
Do you support the principles that form the basis of the SEND strategy?



Q4 combined:

Do you support the area of development?		Yes	No	Not sure	Grand total
Improve early intervention	Count	57	3	4	63
	%	90%	3.2%	6.3%	100%
Better graduated response with better joint working	Count	57	3	2	62
	%	92%	5%	3%	100%
Improved post 16 opportunities and outcomes	Count	54	2	4	60
	%	90%	3%	7%	100%

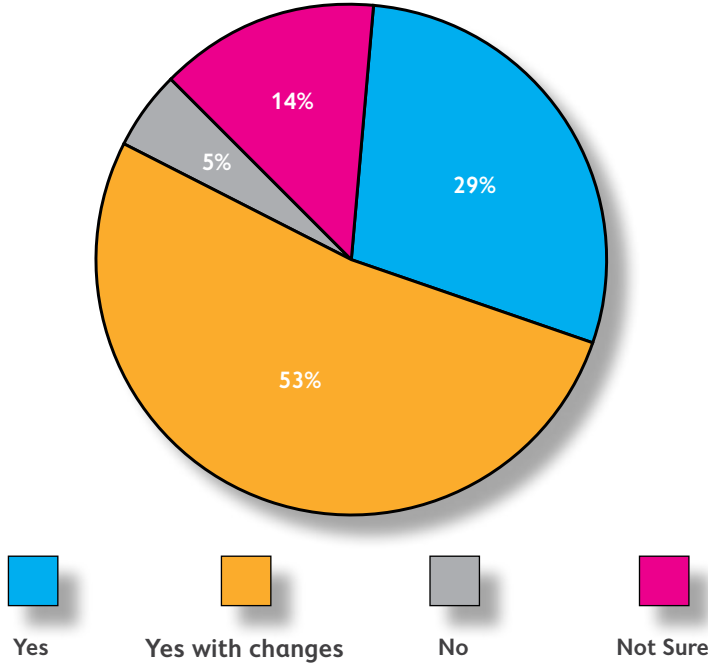
Do you support the following areas of development? (%)



Q5:

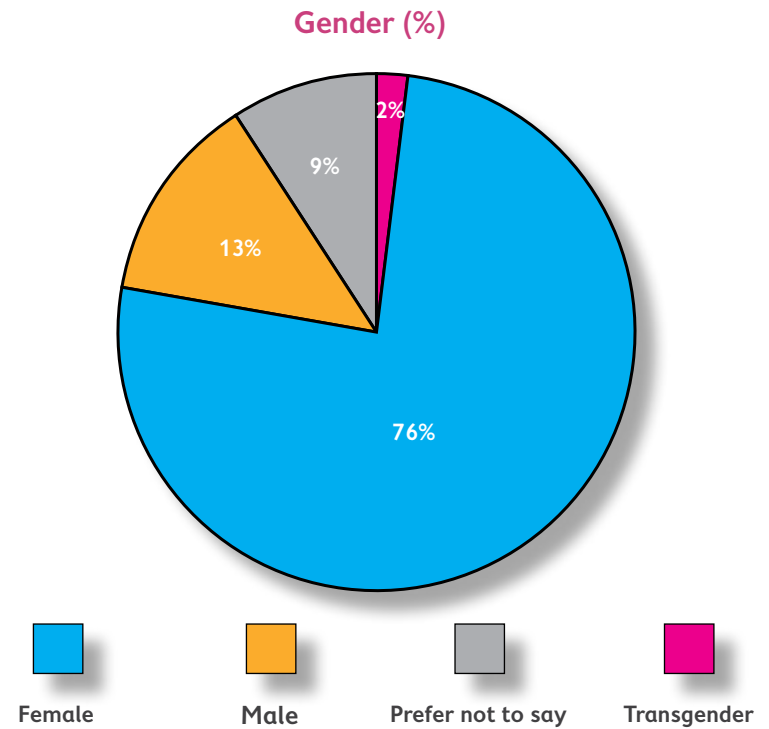
Do you think we should adopt the SEND Strategy?	Count	%
Yes	17	29%
Yes with changes	30	52%
No	3	5%
Not sure	8	14%
Grand total	58	100%

Do you think we should adopt the SEND Strategy?



Q6a:

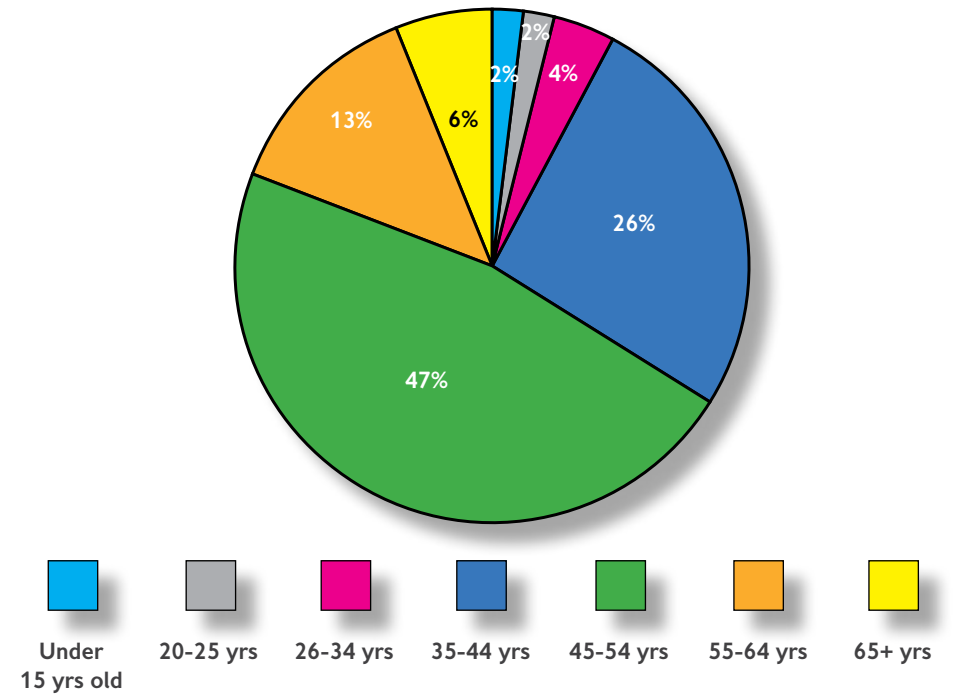
Gender	Count	%
Female	41	76%
Male	7	13%
Prefer not to say	5	9%
Transgender	1	2%
Grand total	54	100%



Q6b:

Please tell us how old you are	Count	%
Under 15 years old	1	2%
16-19 years	0	0%
20-25 years	1	2%
26-34 years	2	4%
35-44 years	14	26%
45-54 years	25	47%
55-64 years	7	13%
65+ years	3	6%
Grand Total	53	100%

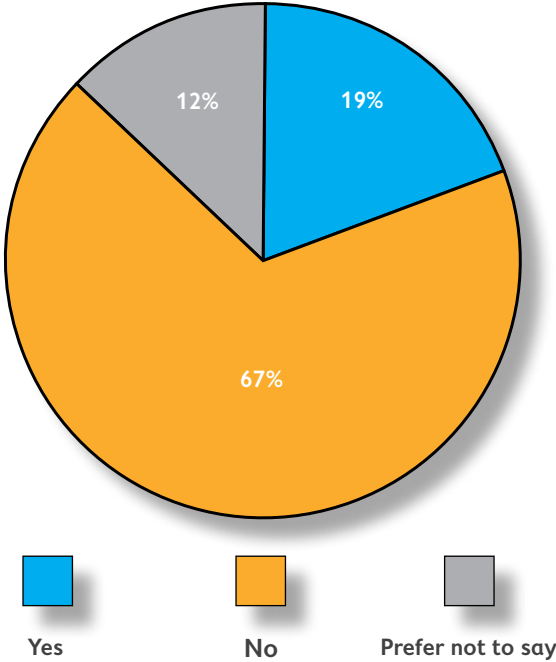
Please tell us how old you are (%)



Q6c:

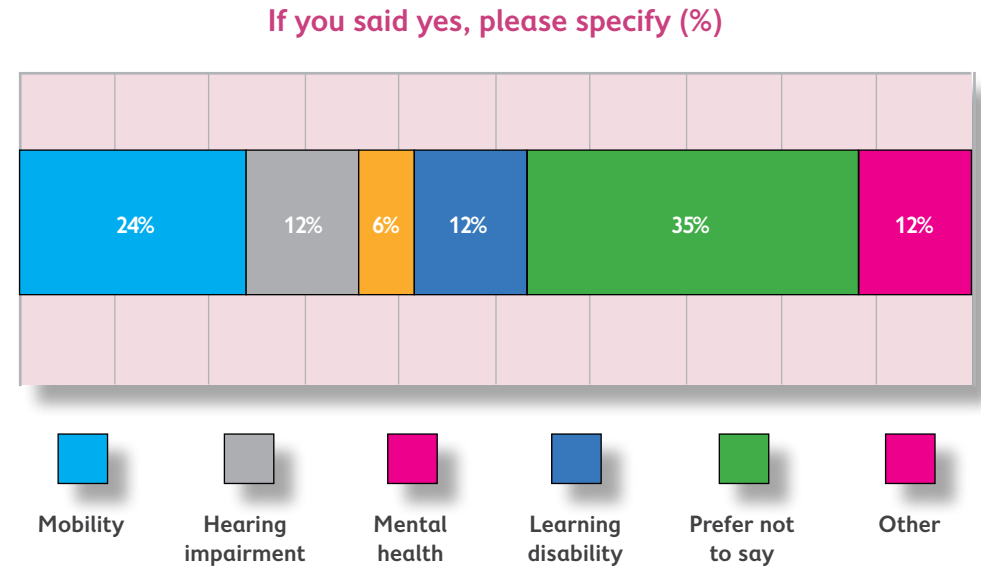
Do you consider yourself to have a disability	Count	%
Yes	10	19%
No	35	67%
Prefer not to say	7	13%
Grand total	52	100%

Do you consider yourself to have a disability (%)



Q6d:

If you said yes, please specify	Count	%
Mobility	4	24%
Visual impairment	0	0%
Hearing impairment	2	12%
Mental health	1	6%
Learning disability	2	12%
Prefer not to say	6	35%
Other	2	12%
Grand total	17	100%



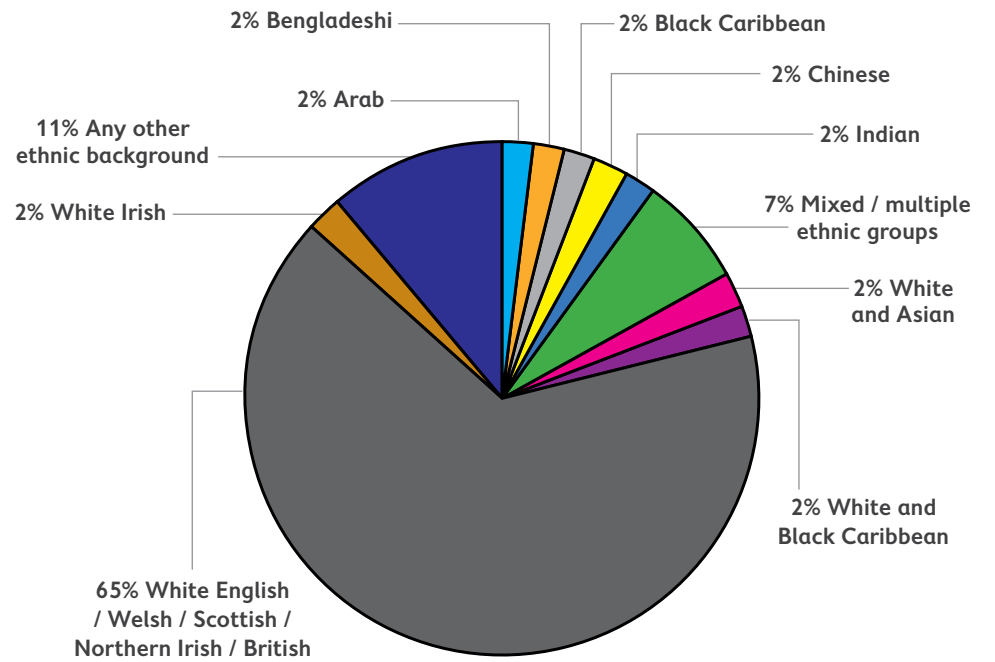
Q6e:

Other, please specify	Count
dyslexia and ASC	1
None	1
Grand total	2

Q6f:

What describes your ethnic group	Count	%
Arab	1	2%
Bangladeshi	1	2%
Black Caribbean	1	2%
Chinese	1	2%
Indian	1	2%
Mixed / multiple ethnic groups	3	7%
White and Asian	1	2%
White and Black Caribbean	1	2%
White English / Welsh / Scottish / Northern Irish / British	30	65%
White Irish	1	2%
Any other ethnic background	5	11%
Grand total	46	100%

What best describes your ethnic group? (%)



Q6g:

Any other background (Specify)	Total
British Asian	1
British Mauritian	1
Bulgariq	1
Mixed family with several ethnic groups	1
Prefer not to say	1
Grand total	5



APPENDIX FOUR – SURVEY RESPONSES

If you would like to read the full SEND Strategy Consultation Survey Responses, Dec 2018 to Jan 2019 you can view the findings by visiting: www.croydon.gov.uk/localoffer

or simply clicking [here](#):



SEND Strategy Consultation Survey Responses, Dec 18 to Jan 19	
Completing the survey - 1 Who completion	Completing the survey - 1 Please specify
A child or young person	
A parent/carer of a child or young person with special educational needs and/or disabilities (SEND)	
A professional such as a teacher or social worker	
A parent/carer of a child or young person with special educational needs and/or disabilities (SEND)	
A parent/carer of a child or young person with special educational needs and/or disabilities (SEND)	
A parent/carer of a child or young person with special educational needs and/or disabilities (SEND)	
An organisation representing young people, families/carers or those with SEND needs	
A professional such as a teacher or social worker	Resident
Other	
A professional such as a teacher or social worker	
A parent/carer of a child or young person with special educational needs and/or disabilities (SEND)	
A professional such as a teacher or social worker	
A professional such as a teacher or social worker	



NHS
Croydon Clinical Commissioning Group

CROYDON | Delivering
www.croydon.gov.uk | for Croydon

Stage 1: Initial Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

The Initial Equality Analysis helps to determine if the proposed change will have no impact, a positive or negative impact on groups that share a protected characteristic and ascertain if you will need to undertake a full equality analysis.

An Equality analysis enables us to target our services, and our budgets, more effectively as well as understand how they affect all our communities. It also helps us comply with the Equalities Act 2010.

Please note that an equality analysis must be completed as early as possible during the planning stages to ensure information gained from the process is incorporated in any decisions made. [If you are not at the beginning stage of your decision making process, you must inform your Director and the Equalities Manager that you have not yet completed an equality analysis.](#)

In practice, the term '**proposed change**' broadly covers the following:

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service Review;
- Budgets;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

Directorate:	Children, Families and Education
Title of project or proposed change:	SEND Strategy
Officer responsible for assessment:	Alison Farmer
Date assessment completed:	15 th February 2019

1.1 Information about the proposed change

1.1.1	<p>Brief outline of proposed change <i>(see above for examples of proposed changes)</i> <i>Please provide a brief outline of the proposed change, why it is being considered. Please also state if it is an existing, new/proposed or revised change</i></p> <p>SEND Strategy The London Borough of Croydon Special Educational Needs and Disabilities Strategy 2018 to 2021 (SEND Strategy) sets out to improve the outcomes and life chances for children and young people with Special Educational Needs and Disabilities. It is a new Strategy.</p> <p>The SEND strategy sets out the Council’s approach to meeting the needs of children and young people with SEND, with a focus on developing ways of working together with families, early years settings, schools, FE colleges and health providers over the next three years to support positive outcomes for young people. The strategy addresses Croydon’s need for long-term provision for children with SEND ensuring an efficient use of public resources, sustainable and effective.</p> <p>The Send Strategy provides an umbrella document that sets the direction of travel for all policies and criteria that link underneath it. This includes specifically, the following two new documents:</p> <p>Eligibility Criteria Local authorities are required to ensure that there is an offer for children and young people with SEND, including a graduated response in schools and other education settings; that they undertake EHC needs assessment and issue and maintain an EHC Plan for those children who have the most complex learning difficulties and need additional and different provision and provide or co-ordinate and jointly commission the provision of services to meet the assessed needs of children and young people with disabilities where it is deemed necessary to so. (Children and Families Act 2014)</p>
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The overall aim of the SEND strategy and the supporting criteria and policies is to improve and make enhancements to the service for all children and young adults with SEND in Croydon through effective identification, assessment, planning and review of children and young people's progress. The goal is for children and young people and their families to be actively involved in planning a future independent life in Croydon. For children and young people to be safe, healthy, and happy and aspire to be the best they can be.

This strategy is for all children and young people with SEND and their families, this includes children and young people 0-25 who have a learning need or disability that is identified and met through SEN support, an EHC Plan and/or a Care Plan.

The only impact is related to age as the services are different for children and adults. This is dictated by the different legislation relating to children and adults (Children and Families Act 2014 and the Care Act 2014). The probability and impact is reflected below in the scoring.

1.2 Who could be affected by the change and how?

Scoring your adverse impact

You will need to score impact on service users, community groups and/or staff and record this in your Action Plan.

Deciding whether the impact could be positive or negative

You must gather evidence to help you decide how each of the protected groups could be affected. This evidence must be of two types:

- about people (quantitative) – for example, statistics, borough and ward profiles on the Croydon Observatory (<http://www.croydonobservatory.org/>), national research
- from people (qualitative) – for example, consultation results, complaints, surveys, information from relevant voluntary or community organisations

You will find it useful to discuss sources of information with the equalities manager. They may be able point you towards relevant information from another equality analysis or concerns about equality matters from inspections or audits.

However, you can make reasonable assumptions where impact is likely to be minimal. For example, changes to the school admissions policy are likely to have minimal impact on older people. Negative impacts can often be identified by the concerns that stakeholders raise about whether a change will work or not.

Ranking the potential impact

You have to act to eliminate any potential negative impact that, if it was to be realised, would breach the law (perhaps by abandoning your proposed change). However, you may not be able to take action to minimise all your potential negative impacts or maximise all your potential positive ones. You must be realistic and proportionate about how many actions you can resource.

When you act to reduce the negative impact or maximise the positive impact, you must be sure that this does not create a negative impact on another group. If this is unavoidable, it can only be justified if it is done to eliminate discrimination.

1.2.1 PROBABILITY - What is the likelihood of the service, policy or function having an impact on service users, community groups and/or staff?

Use table below to assign the proposed change a category code for each protected group.

Category Code	IMPACT ON PROTECTED GROUP(S)								
	Race	Age	Gender	Disability	Religion or Belief	Sexual Orientation	Gender Reassignment	Pregnancy Or Maternity	Marriage or Civil Partnership
1 Rare	1		1	1	1	1	1	1	1
2 Unlikely		2							
3 Possible									
4 Likely									
5 Almost Certain									

1.2.2. SEVERITY OF IMPACT - Identify the highest possible impact on the service, policy or function.

Use this table as a general guide

Probability	Potential Impact on Protected Group(s)	The Potential for Complaint/Litigation	Potential Impact on Organisation
1	No impact or adverse outcome	Unlikely to cause complaint/litigation	No risk at all to organisation
2	Short term impact	<ul style="list-style-type: none"> Complaint possible Litigation 	Minimal risk to organisation
3	Semi-Permanent Impact	<ul style="list-style-type: none"> Litigation possible not certain High potential for complaint 	<ul style="list-style-type: none"> Need careful PR Reportable to EHRC External Investigation
4	Permanent Impact	<ul style="list-style-type: none"> Litigation certain expected to be settled for <£1M 	<ul style="list-style-type: none"> Service closure Threat to Divisional/Directorate objectives/priorities Local Publicity
5	Permanent and Severe Impact	Litigation certain expected to be settled for >£1M	<ul style="list-style-type: none"> National adverse publicity Threat to Trust objectives/priorities

1.2.3 Equality Impact Score

Use the table in 1.2.2 and matrix below to calculate the equality impact score by using the formula: **Impact x Likelihood = Equality Impact Score**

I M P A C T	5	5	10	15	20	25
	4	4	8	12	16	20
	3	3	6	9	12	15
	2	2	4	6	8	10
	1	1	2	3	4	5
	1	2	3	4	5	
	LIKELIHOOD					



Risk index	Risk Magnitude
20-25	Maximum
15-19	High risk
10-14	Medium Risk
5-9	Low Risk
1-4	Minimum Risk

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the severity of the impact. You can do this by using the table in 1.2.2 as a guide, for the purpose of this example as 3 Semi-Permanent Impact
2. Estimate the Likelihood of this impact. You can use the category codes in the table in 1.2.1 to, for the purpose of this example as 5 Almost Certain
3. Calculate the equality impact score using the formula above and record it in the space provided below, for the purpose of this example - **Impact (3) x Likelihood (5) = 15 Red**

Calculate and enter the Equality Impact Score in the space provided (2)

A full Equality Analysis will be required if the proposed change has been graded as scoring 10 or above (orange or red in the above table) as this will help you detail how you are going to address any negative impact.

1.2.4	<p>Please state if the proposed change will adversely impact the Council’s ability to meet one or more of the Public Sector Duties set out in the Equality Act 2010 below: Please tick the relevant box(es) and provide a brief explanation</p> <p>Advancing equality of opportunity between people who belong to protected groups <input type="checkbox"/> The strategy will have a positive effect on equality and opportunity for people with SEND</p> <p>Eliminating unlawful discrimination, harassment and victimisation <input type="checkbox"/> The strategy will have a positive impact and therefore we do not envisage any unlawful discrimination, harassment and victimisation</p> <p>Fostering good relations between people who belong to protected characteristic groups <input type="checkbox"/> The aim of the strategy is to have a positive effect on the lives of people with SEND due to integration into the community and mainstream schools.</p> <p>A full Equality Analysis will be required if the proposed change will adversely impact the Council’s ability to meet one or more of the Public Sector Duties set out above.</p>
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1.3 Decision on the Initial Equality Analysis

Officer responsible for assessment	Name: Alison Farmer			Position: Head of SEN Services		Date: 15.02.19
	Should a full equality analysis be carried out? No Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' without any supporting information or 'no information available' could leave the council vulnerable to legal challenge. There is no need to conduct a full equality analysis because the risk assessment has identified the proposed changes as being low risk. You must include this statement in any report used in decision making such as CCB or cabinet.					
Departmental Strategy Lead	Name: Yvonne Okiyo		Position: Equalities Manager		Date 18.02.19	
	Should a full Equality Analysis be carried out? (tick appropriate box) Yes No x					

	<p>Please state why and outline the information that you used to make this decision.</p> <p>The proposed change will have a positive impact on protected groups and will improve and make enhancements to the service for all children and young adults with SEND through effective identification, assessment, planning and review of children and young people's progress.</p>
Director	Name: Shelley Davies Position: Director for Education Date: 05 February 2019

REPORT TO:	CABINET 25th MARCH 2019
SUBJECT:	POST-16 TRAVEL ASSISTANCE POLICY CHANGES
LEAD OFFICER:	SHIFA MUSTAFA, EXECUTIVE DIRECTOR OF PLACE STEVE ILES DIRECTOR OF PUBLIC REALM
CABINET MEMBER:	COUNCILLOR ALISA FLEMMING CABINET MEMBER FOR CHILDREN, YOUNG PEOPLE AND LEARNING
WARDS:	All

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

This recommendation addresses the Council's Corporate Plan Priorities:

People live long, happy, healthy and independent lives.

Our Young People thrive and reach their full potential.

The proposed change to the Council's Post-16 Travel Assistance Policy is intended to permit Young People to make a choice of how they access education and training, following a public Consultation (Consultation report attached).

FINANCIAL IMPACT

Implementation of the recommended proposed change may result in reduced expenditure on 16-18 current travel costs.

This will not be a budget saving as the budget is currently overspending, but if adopted should result in a financial saving to the Council.

FORWARD PLAN KEY DECISION REFERENCE NO.: 0619CAB

This is a Key Decision as defined in the Council's Constitution. The decision may be implemented from 1300 hours on the expiry of 5 working days after it is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to:

- 1.1 Adopt the proposed change to the Post-16 Travel Assistance Policy, for the 2019/2020 academic year that where Independent Travel Training is not appropriate, the Council's default offer of support will be to provide a Personal Transport Budget (PTB) to learners aged 16 to 18 with special educational needs and/or disabilities.

2. EXECUTIVE SUMMARY

- 2.1 This report brings together the recommendation to adopt a change in the Council's post-16 travel policy based on the recent Consultation findings on the proposed change (to the Post-16 Travel Assistance policy).
- 2.2 The Consultation was on the proposed change to the policy which would make the Council's preferred option of Travel Assistance for students aged 16-18 to apply a Personal Travel Budget (PTB) to most eligible students who are not suitable for Independent Travel Training. The exception being for students with severe learning difficulties or complex physical/medical needs.
- 2.3 The proposed changes to the Post-16 Travel assistance policy are intended to:
- Promote the choice and independence of young people in relation to travel and transport.
 - Empower families to find their own lasting travel solutions.
 - Remove reliance on council provided transport and promote increased use of public transport.
- 2.4 The changes will be applied to students starting post-16 education or training from September 2019 or students starting a new course of study in the 2019/2020 academic year. All students carrying on their education post-16 must reapply for travel support. The final Post-16 Travel Assistance Policy will be published no later than 31 May 2019.

3. DETAIL – This is also available in Appendix 1

Local Authority Responsibility

- 3.1 The statutory responsibility for travel assistance for 16-19 year olds (who have started a course before their 19th birthday) rests with local authorities. Local authorities have a duty to prepare and publish an annual travel policy statement specifying the arrangements for the provision of transport, or otherwise that the authority considers necessary, to make to facilitate the attendance of all persons of sixth form age receiving education or training.

The sixth form age duty applies to young people of sixth form age and young people with Education, Health and Care Plans (EHC plans) up to the age of 25 where they are continuing on a course they started before their 19th birthday.

The overall intention of the sixth form age transport duty is to ensure that:

- Learners of sixth form age are able to access the education and training of their choice; and
 - If support for access is requested, this will be assessed and provided where necessary.
- 3.2 The local authority also has a duty under The Education Act 1996 section 508G to prepare a transport policy statement setting out any transport or other arrangements that it proposes to make for that academic year in respect of

adults aged under 25 with EHC plans. This must be published on or before the 31 May each year. The statement must include the details of transport arrangements and the details of financial support in respect of reasonable travelling expenses that the local authority consider it necessary to facilitate access to education or training for learners of sixth form age for the following academic year. These arrangements could include:

- The availability of a concessionary fares scheme
- A bus pass or cash equivalent
- A bus pass or cash equivalent plus a companion pass or cash equivalent
- Independent travel training
- A fixed mileage allowance
- Provision of actual transport

3.3 The Education Act 1996 section 509AA duty applies to all local authorities in England in respect of arrangements for young people (over compulsory school age) aged 16-18 and those continuing learners up to the age of 25 with EHC plans who started their programme of learning before their 19th birthday.

3.4 Legislation gives local authorities the discretion to determine what transport and financial support are necessary to facilitate young people's attendance. The local authority must exercise its power to provide transport or financial support reasonably, taking into account all relevant matters.

3.5 Currently, Croydon Council offers travel assistance to young people of sixth form age with an Education Health and Care Plan (EHCP) and/or disabilities who meet the eligibility criteria. This support can include:

- Travel Assistance to the nearest suitable provider offering a course or programme which is designed specifically to meet their special needs, or;
- A provider further away if the EHCP states that the course they wish to attend is specifically designed for them; is essential for their job aspirations or is the most suitable placement for their needs.

3.6 The consultation covered the discretionary criteria in the post 16 policy for those students aged 16 to 18 who have special education needs or a disability in education or training. The Council will continue to meet its statutory duty for children aged 5 to 16.

3.7 Croydon's current Post-16 Policy is underpinned by the following general principles in line with Department for Education guidance:

- Students who are able to travel independently or use public transport will always be supported in the first instance to do this. 'Independent travel' training is the first option for those students who have the potential to travel independently.
- Students who have specific special needs will be offered the most independent and personally enabling solution to their situation.
- Croydon council will ensure that transport for eligible students is arranged when needed; after other potential options have been explored.

- Travel needs are reviewed regularly at least annually to ensure the arrangements are still appropriate to assessed needs.
- 3.8 The Council's aim is to support young people in developing independence skills for life. Where suitable the Council's first offer of travel assistance will be Independent Travel Training.
- 3.9 Where Independent Travel Training is not appropriate, the option consulted on was to apply a personal transport budget to most learners aged 16 to 18 with special educational needs and/or disabilities.
- 3.10 As detailed elsewhere, transport will continue to be provided for young people with the very highest needs.
- 3.11 Both these approaches will provide young people with the opportunity to travel more independently and can be more cost effective for the local authority, as the increased demand may not be met with our current offer in the available budget.
- 3.12 If Independent Travel Training is not appropriate, the consultation asked people to consider that when a learner meets our eligibility criteria, they will be offered the default position of a personal transport budget to make private travel arrangements to the nearest educational provision offering their chosen course of study.

4. CONSULTATION

- 4.1 The Consultation ran from 3rd December 2018 until 31st January 2019.
- 4.2 The consultation was extensively promoted through a number of channels. This included direct contact with young people, families and stakeholders through focus groups. There was online availability of consultation documents including surveys available through the Local Offer on Get Involved. All documents were also available in Easy Read. All information about the consultation was circulated widely. This included education settings, Youth Clubs, neighbouring local authorities, Transport for London and parent support groups. Social media for example Twitter and Facebook was also used to promote the consultation.
- 4.3 The Consultation ran a public online consultation and held a number of focus groups. This involved a questionnaire (see Appendix 1 for questions) for individuals to answer.
- 4.4 Focus groups were held where questions around the consultation document were asked to those attending (see appendix 1 for questions, timetable, numbers, and details of consultees attending).
- 4.5 Full findings are detailed in Appendix 1.

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 5.1 Based on a detailed financial model that has been developed. It is anticipated that the introduction of this proposal will result in a reduction of costs. The table below shows the anticipated financial savings over a three year period. This will be reviewed annually, and revised accordingly based on performance. The table shows that cost savings of approximately £167k are forecast in the first year rising to £200k in the third year.

Input - SEN Post 16 Personal Travel Budgets (PTB)	2019/20	2020/21	2021/22
Total No. of Students receiving travel assistance	63	67	71
Estimated Annual increase in Demand		5.96%	5.98%
Cost uplift		3.48%	3.48%
Cost of providing Travel/ student/Year	£7,699	£7,967	£8,244
Cost of PTB /Student/Year	£2,800	£2,897	£2,998
Cost Avoidance/ Student	- £4,899	- £5,070	- £5,246
Targeted take up of PTB	34	36	38
Total annual cost avoidance	- £166,669	- £182,507	- £199,350

- 5.2 Modelling the existing student cohort, it has been identified that approximately 54% of the students to whom this change would apply (not retrospective) would be able to access education and training with access to a PTB. If the take up is not as high as 54%, then the cost mitigation identified above will not be as much as set out in the table above.
- 5.3 If these recommendations are not implemented, we will not be able to implement the findings of the consultation, and the cost reductions identified above will not be achieved.

Approved by: Lisa Taylor, Director of Finance, Investment & Risk and S151 Officer.

6. LEGAL CONSIDERATIONS

- 6.1 The Director of Law and Governance comments that under section 509AA of the Education Act 1996 the Council has a statutory responsibility to prepare and publish an annual travel policy statement specifying the arrangements for the provision of transport, or otherwise that the authority considers necessary, to make to facilitate the attendance of all persons of sixth form age receiving education or training.

Approved by: Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer.

7. HUMAN RESOURCES IMPACT

- 7.1 There are no HR resources impacts on this area, any change in policy will be accommodated by existing HR resources.

Approved by Jennifer Sankar, Head of HR, Place for and on behalf of Sue Moorman, Director of HR.

8. EQUALITIES IMPACT

- 8.1 An Equality Analysis has been undertaken to assess the actual or likely impact the recommendation mentioned in this report may have on groups that share protected characteristics and mitigating actions have been defined where appropriate.
- 8.2 The equality analysis for the policy recommendation in this report will enable the Council to ensure that it meets the statutory obligation in the exercise of its functions to address the Public Sector equality duty (PSED). This requires public bodies to ensure due regard to the need to advance equality of opportunity; foster good relations between people who share a “protected characteristic” and those who do not and take action to eliminate the potential of discrimination in the provision of services.
- 8.3 The survey response rate was low, particularly from the under 25 age group. This was mitigated by holding focus groups with this group of people (detailed in the Consultation Report, Appendix 1).
- 8.4 The proposed amendment to the Post 16 travel policy can have a positive impact on families, it is a more family centered approach giving more flexibility, freedom, independence and control for families.
- 8.5 The young people the change in policy will be applied to are more likely to find any changes difficult, there is potential for some negative impact. Therefore, if changes are made to current services, support will need to be provided to students and families affected.
- 8.6 A number of mitigating actions have been put in place to address this. A personal transport budget assists in the reduction of journey times. The council will also take into account individual circumstances and needs to ensure enablement of fair access to learning and training.

Approved by Yvonne Okiyo, Equalities Manager

9. ENVIRONMENTAL IMPACT

- 9.1 The change in policy has the potential to reduce the number of vehicles providing transport to students in the Borough, and if using the Personal Travel Budget to use Public Transport, could enable people to travel in a less-polluting form of transport.

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 There are not considered to be any impacts in this area.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

11.1 The majority of respondents (64%) to the questionnaire supported the idea of Young People making their own way to education and training where possible.

11.2 47% of respondents agreed that a Personal Travel Budget (PTB) would make post-16 students more independent (when Travel Training was not possible), as opposed to 44% who did not agree.

11.3 40% of respondents agreed that they supported our preferred option to apply PTBs to post-16 students aged 16-18 with Special Educational Needs and/or Disabilities (SEND) in education or training, as opposed to 33% who did not agree.

11.4 For full analysis see Appendix 1

12. OPTIONS CONSIDERED AND REJECTED

12.1 Charging for 16-18 transport was considered (and is undertaken by other Local Authorities) but was rejected as it was felt that this would be inequitable compared to those non-SEND students who are able to travel for free through the Transport for London Concessionary Fare scheme.

12.2 A blanket approach to making PTBs the default position for all 16-18 transport was also considered, but was rejected on the basis that would be an unsuitable approach.

12.3 A means-based approach was also considered making PTB the default option for all families except those of low incomes, but rejected due to the fact that this did not take into account the needs of the individual students.

Please see Appendix 1 for the Post 16 Consultation report, and associated appendices for options sought and received.

CONTACT OFFICER:

Name:	Daniel Shepherd
Post title:	Head of Independent Travel
Telephone no:	x63056

APPENDICES TO THIS REPORT:

1. Public Consultation Report – Post 16 Travel Assistance Policy
2. Proposed Post-16 Policy (draft)

BACKGROUND DOCUMENTS: None

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Proposed post 16 provision of travel assistance for students with an Education, Health and Care Plan and/or disabilities in education or training.

Draft consultation report: February 2019



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7. *Recommendations/Next Steps – Page 17-18*

1. EXECUTIVE SUMMARY

- 1.1 This report brings together Croydon council's consultation findings on the proposed changes to the Post-16 Travel Assistance Policy together with recommendations.

With grateful thanks to all involved in supporting the delivery of the consultation and to all those who actively took part in the process contributing valuable views.

The consultation process started on the 3rd December 2018 and ran live until the 31 January 2019. The consultation sought from parents/carers, young people and other agencies and stakeholders all of who offered important views and feedback.

The consultation was extensively promoted through a number of channels. This included direct contact with young people, families and stakeholders through focus groups. There was online availability of consultation documents including surveys available through the Local Offer on Get Involved. All documents were also available in Easy Read. All information about the consultation was circulated widely. This included education settings, Youth Clubs, neighbouring local authorities, Transport for London and parent support groups. Social media for example Twitter and Facebook was also used to promote the consultation.

The consultation was on the proposal to award a personal transport budget to most eligible students who are not suitable for Independent Travel Training. The exception being for students with severe learning difficulties or complex physical/medical needs.

The draft policy is attached in [Appendix 1](#)

2. INTRODUCTION

This report is a supplement to a report to Croydon Council's Informal Cabinet. It gives additional information about our consultation on proposals to change our Post-16 Travel Assistance Policy for students aged 16 to 18. The outcomes of the consultation and resulting recommendations are detailed in this report and in the appendices.

The proposed changes to the Post-16 Travel assistance policy are intended to:

- Promote the choice and independence of young people in relation to travel and transport.
- Empower families to find their own lasting travel solutions.
- Remove reliance on council provided transport and promote increased use of public transport.

There were many benefits to the consultation. Meeting with parents and carers gave a greater understanding of the issues and difficulties faced by families around travel and transport. It is important that the council continues to work closely with parents, carers and schools in the coming years to provide the best possible service and value for money to support young people in accessing education and training. Seeking the views of young people with Special Education Needs and/or Disabilities (SEND) in Croydon was invaluable. They told us how much they enjoyed travelling independently but also shared their views about what worries them. It was a pleasure to meet the students, parents and carers and their input into the consultation is greatly appreciated.

3.0 BACKGROUND - LOCAL AUTHORITY RESPONSIBILITY

The statutory responsibility for travel assistance for 16-19 year olds (who have started a course before their 19th birthday) rests with local authorities. Local authorities have a duty to prepare and publish an annual travel policy statement specifying the arrangements for the provision of transport, or otherwise that the authority considers necessary to facilitate the attendance of all persons of sixth form age receiving education or training.

The 'sixth form age' duty applies to young people of sixth form age and young people with Education, Health and Care Plans (EHC plans) up to the age of 25 where they are continuing on a course they started before their 19th birthday.

The overall intention of the sixth form age transport duty is to ensure that:

- Learners of sixth form age are able to access the education and training of their choice; and
- If support for access is requested, this will be assessed and provided where necessary.

The local authority also has a duty under section 508G of the Education Act 1996 to prepare a transport policy statement setting out any transport or other arrangements that it proposes to make for that academic year in respect of adults aged under 25 with EHC plans. This must be published on or before the 31 May each year. The statement must include the details of

transport arrangements and the details of financial support in respect of reasonable travelling expenses that the local authority consider it necessary to facilitate access to education or training for learners of sixth form age for the following academic year. These arrangements could include:

- The availability of a concessionary fares scheme
- A bus pass or cash equivalent
- A bus pass or cash equivalent plus a companion pass or cash equivalent
- Independent travel training
- A fixed mileage allowance
- Provision of transport

The Education Act 1996 section 509AA duty applies to all local authorities in England in respect of arrangements for young people (over compulsory school age) aged 16-18 and those continuing learners up to the age of 25 with EHC plans who started their programme of learning before their 19th birthday. Legislation gives local authorities the discretion to determine what transport and financial support are necessary to facilitate young people's attendance. The local authority must exercise its power to provide transport or financial support reasonably, taking into account all relevant matters.

Currently, Croydon Council offers travel assistance to young people of sixth form age with an Education Health and Care Plan (EHCP) and/or disabilities who meet the eligibility criteria. This support can include:

- Travel Assistance to the nearest suitable provider offering a course or programme which is designed specifically to meet their special needs, or;
- Travel to a provider further away if the EHCP states that the course they wish to attend is specifically designed for them; is essential for their job aspirations or is the most suitable placement for their needs.

The proposals in the consultation apply to the discretionary criteria and the post-16 policy for those students aged 16 to 18 who have special education needs or a disability in education or training. The Council will continue to meet its statutory duty for children aged 5 to 16.

Croydon's current Post-16 Policy is underpinned by the following general principles in line with Department for Education guidance:

- Students who are able to travel independently or use public transport will always be supported in the first instance to do this. 'Independent travel' training is the first option for those students who have the potential to travel independently.
- Students who have specific special needs will be offered the most independent and personally enabling solution to their situation.
- Croydon council will ensure that transport for eligible students is arranged when needed; after other potential options have been explored.
- Travel needs are reviewed regularly at least annually to ensure the arrangements are still appropriate to assessed needs.

The Council's aim is to support young people in developing independence skills for life. Where suitable the Council's first offer of travel assistance will be Independent Travel Training. Where Independent Travel Training is not appropriate, our preferred option will be to apply a personal transport budget to most learners aged 16 to 18 with special educational needs and/or disabilities. As detailed elsewhere, transport will continue to be provided for young people with the very highest needs.

Both these approaches will provide young people with the opportunity to travel more independently and can be more cost effective for the local authority, as the increased demand may not be met with our current offer in the available budget.

If Independent Travel Training is not appropriate, we are proposing that when a learner meets the criteria in the post-16 travel assistance policy, they will be offered the default position of a personal transport budget to make private travel arrangements to the nearest educational provision offering their chosen course of study.

4. METHODOLOGY:

We used a wide range of engagement methods to gather views on this consultation. We used a combination of both quantitative (questionnaire) and qualitative (discussion groups) with various stakeholders.

4.1 Questionnaires

The questionnaire was available mainly for completion online, with easy read and alternative versions available upon request. The questionnaire comprised of 16 questions as detailed below:

More about you:

Please tell what option below best represents you:

- A parent/carer of a young person with special educational needs and/or disabilities
- A school
- A social worker
- A student with special educational needs and/or disabilities who will enter post 16 education or training in the future
- A student with special educational needs and/or disabilities who is currently in post 16 education or training
- An organisation representing young people, families/carers or those with SEND needs (specify)
- Other

About our preferred option

Our aim is to support young people in developing independence skills for life. Where suitable we will support young people to travel independently to school/college through our personalised independent travel training programme. Where independent travel training is not appropriate our preferred option is to apply a personal transport budget to most learners aged 16 to 18 with special educational needs and/or disabilities. We recognise that there may be exceptional cases where a Personal Transport Budget is not appropriate, for example students with severe learning or physical difficulties.

Do you support our preferred option to apply personal transport budgets to post 16 students aged 16 to 18 with special educational in education/training?

Yes

No

Not sure

If you responded no/ not sure, tell us why?

To what extent do you agree/disagree that personal budgets will help to make Post-16 students more independent?

Strongly agree

Agree

Neither agree or disagree

Disagree

Strongly disagree

How the proposals may affect you? We are keen to find out more about how our proposals may impact you, please answer the questions below to tell us more.

How, if at all, will the proposed introduction of personal transport budgets for travel (for most 16-18 year old impact or affect you?

(open ended)

If you do think there will be an impact what can we do to reduce the impact of what we are proposing?

(open ended)

Other options

We currently provide personalised Independent Travel Training to students who have the potential to travel independently to and from school/college after receiving travel training. However, we are open to alternative suggestions. We're keen to hear how you think we could

help students travel more independently. Let us know whether you have any suggestions or alternatives to independent travel training or personal budgets?

Are there any other options you think we should consider? Do you have any alternative suggestions to what we are proposing?

About you gender? About you age? About you disability? About you type of disability? About you nationality?

4.2 FOCUS GROUPS

A number of focus groups were held at various times and locations across the borough. We sought the views of parents and carers and young people with special educational needs and / or disabilities. We also held focus groups with a number of practitioners. Please see table below.

We engaged with:

- 57 children and young people
- 45 parents
- 32 practitioners or professionals

A standard set of questions were used to form discussions:

1. Are the consultation documents/proposal clear?
2. What do you like about the proposed changes?
3. Is there anything about the proposal that worries/concerns you?
4. What impact do you think the proposed changed will have on you, your child/ren, family, school or wider community?
5. Is there anything missing from the draft policy that you feel should be included?

Date	Organisation	Audience	Number of attendees
5.12.18	CAMHS services SLAM	Professionals	15
7.12.18	Waddon Youth Centre	Parents	6
12.12.18	Bensham Manor	Parents	1
17.12.18	NHS Community Services Practitioners	Practitioners	13
20.12.18	Parents in Partnership	Parents	1
7.1.19	Waddon Youth Centre	Young People 18 +	18
9.1.19	Parents in Partnership	Parents inc. Advisor	4
10.1.19	Parents in Partnership	Parents	2
16.1.19	Autism Partnership Board	Parents, Councillors	9
16.1.19	Waddon Youth Club	Young People age 7-16	34
17.1.19	St Giles School	Parents	7

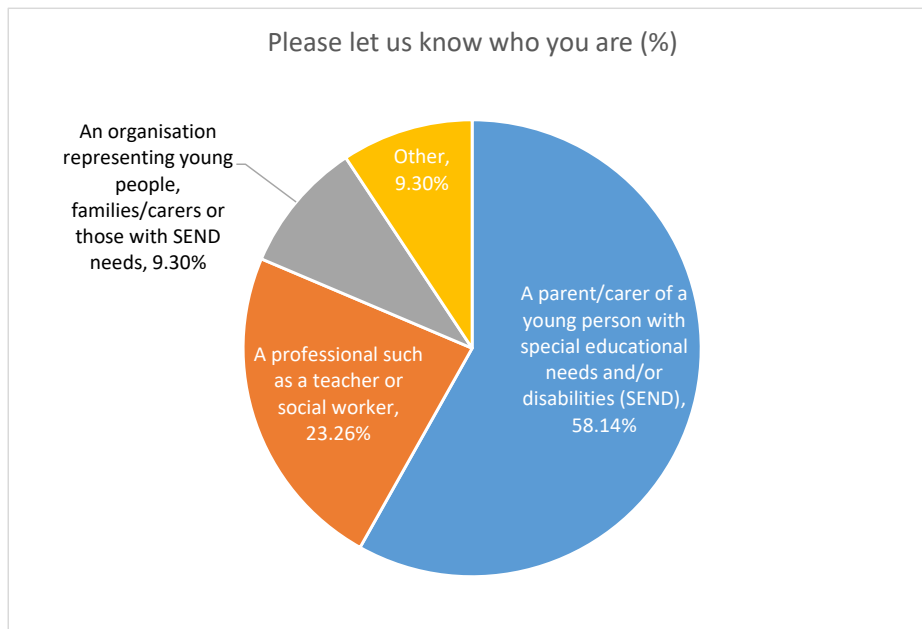
24.1.19	SENDIASS	parents	12
28.1.19	Beckmead School	Young People	5
	1 hr YP 1 hr parents	Parents	7
TOTAL			134

5 FINDINGS

42 surveys were completed in total. Although the number of respondents is low, the data received alongside findings from focus groups showed some themes had more direction of travel than others. We have provided numbers of respondents to the questions underneath each chart.

5.1 Presenting Questionnaire findings:

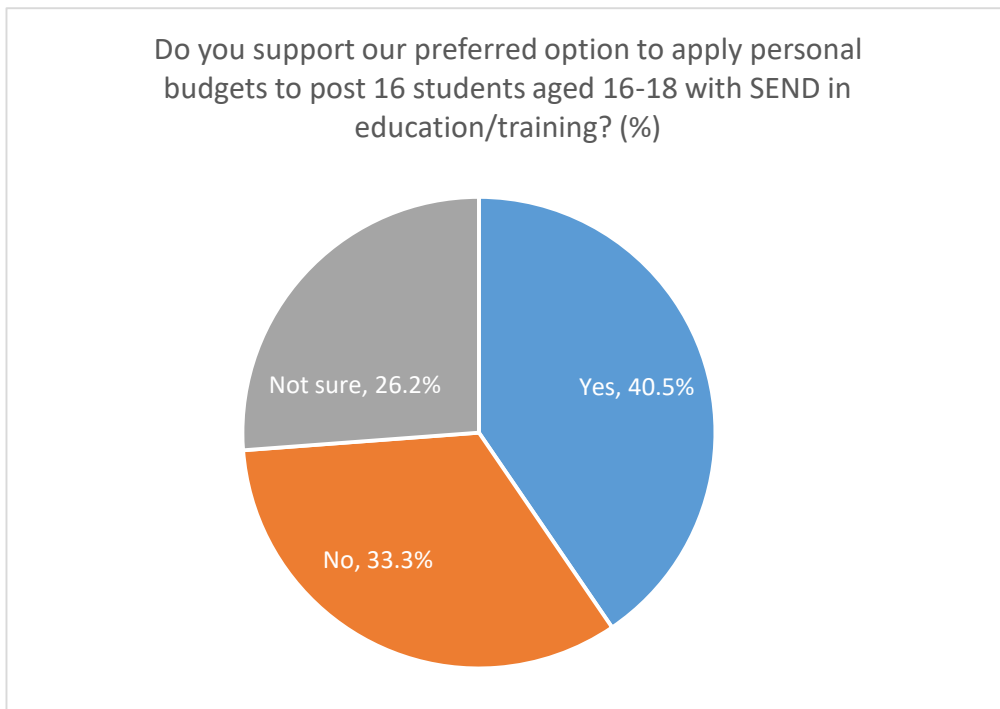
Over half of the respondents (58%) were parents/carers. 9% selected 'other as a response. This included a governor from a sixth form college with a large SEN population and a travel Assistance manager from a neighbouring authority.



Please let us know who you are to help us analyse	Count	%
A parent/carer of a young person with special educational needs and/or disabilities (SEND)	25	58.14%
A professional such as a teacher or social worker	10	23.26%
An organisation representing young people, families/carers or those with SEND needs	4	9.30%
Other	4	9.30%
Grand Total	43	100.00%

Other- Please specify
A travel assistance manager from a neighbouring LA
Croydon council employee
Governor of post-16 college with a large number of SEND students
KS4 Transition Support Advisor

Over one third of respondees supported the preferred option to apply a personal transport budget to most 16-18 year old students with SEND in education/training where independent travel training is not appropriate. Exactly a third of respondents did not support this proposal, whilst just over a quarter (26%) were not sure.



Do you support our preferred option to apply personal budgets to post 16 students aged 16-18 with SEND in education/training?	Count	%
Yes	17	40.5%
No	14	33.3%
Not sure	11	26.2%
Grand Total	42	100.0%

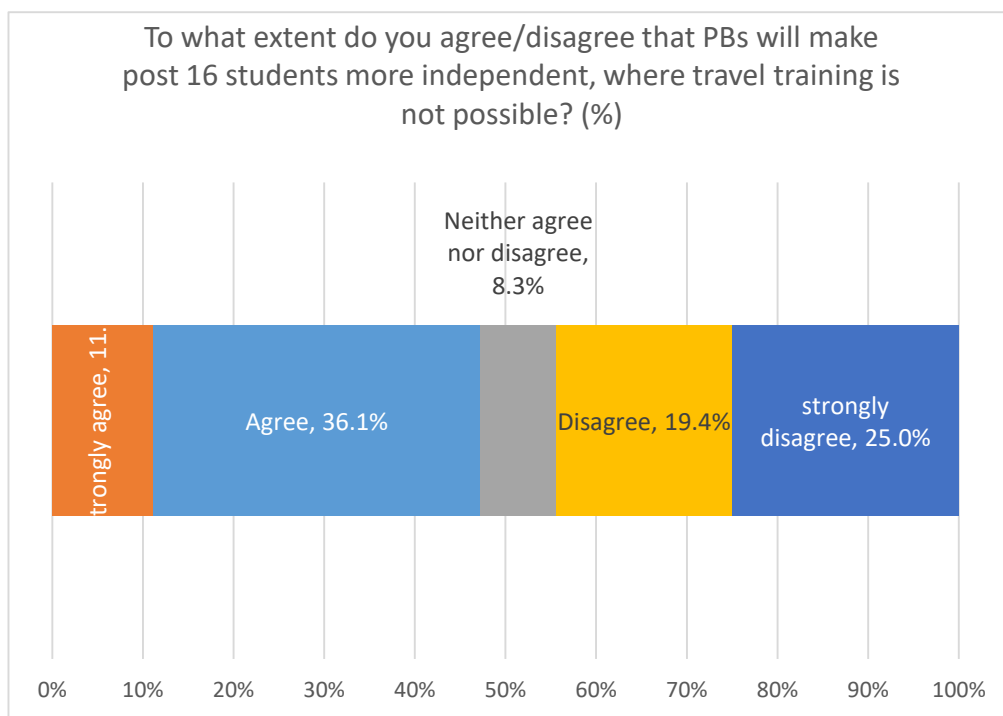
When we asked why respondents responded with ‘no’ or ‘unsure’ we found that some said:

“Parents of disabled children do not have the time to organise travel as well as care for their disabled child”

Others said:

“This depends highly on personal circumstances. I would want to see the amount suggested would suffice for this to be made an effective alternative option”

Nearly a half (47 %) of respondents agreed that a personal transport budget will make post-16 students more independent.



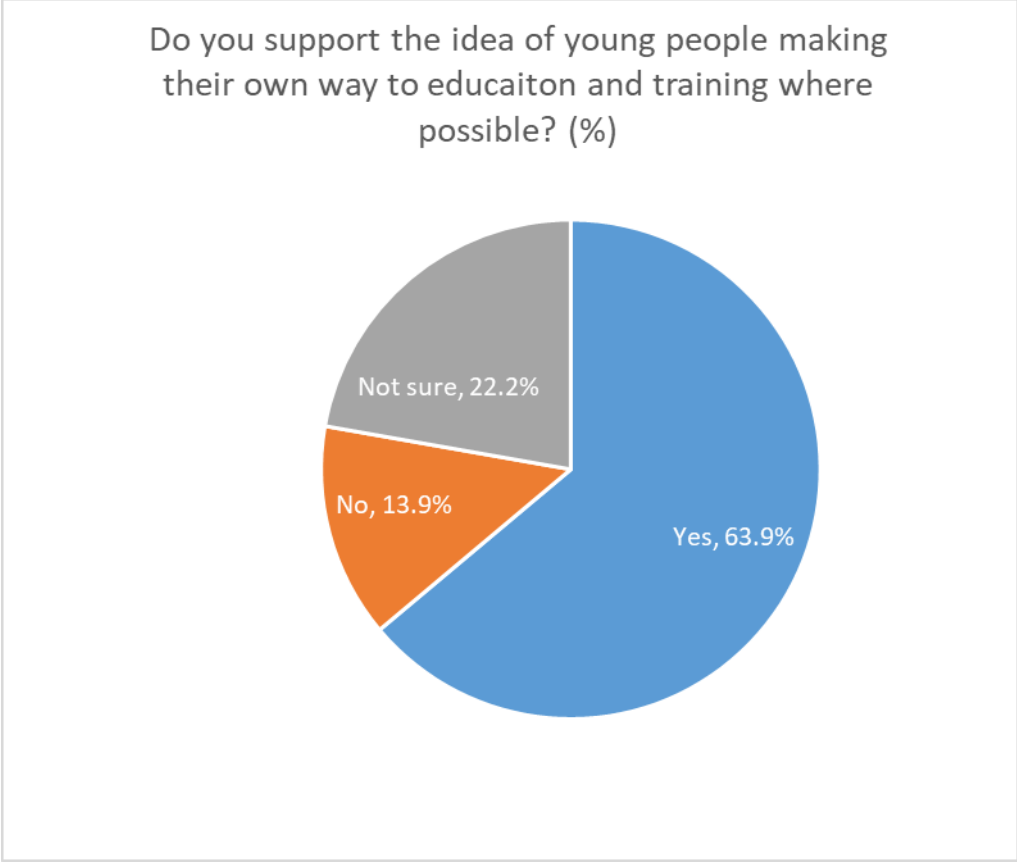
To what extent do you agree/disagree that personal budgets will make post 16 students more independent, where travel training is not possible?		
	Total	%
Strongly agree	4	11.1%
Agree	13	36.1%
Neither agree nor disagree	3	8.3%
Disagree	7	19.4%
Strongly disagree	9	25.0%
Grand Total	36	100.0%

Of those who either disagreed/strongly disagreed told us this was because:

“ Independence is only possible for those that can be travel trained”

“A personal budget is useless when it is so difficult to find a personal assistant, without that Burden to transport the child will fall upon the parents which would interfere with working etc,.....”

Nearly two thirds (64%) of the respondees supported the idea of young people making their own way to education and training where possible.



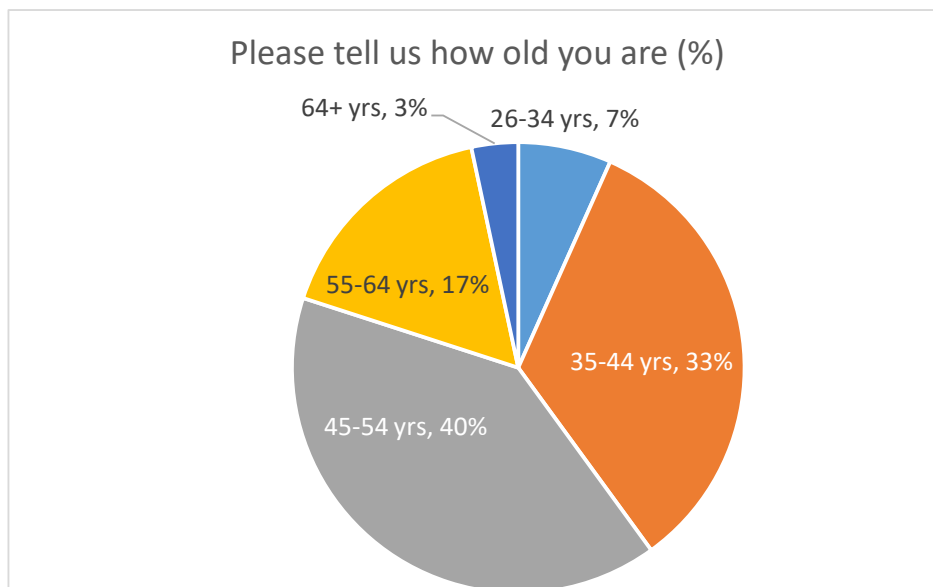
Those who disagreed with this said:

“I believe it will be difficult to 'judge' how an individual is able to travel independently. This will place additional stress and anxiety on individuals and their families. The Council needs to be clear on how this will be measured and implemented to ensure that all those who need support receive it.”

They also said:

“Our children are much more vulnerable to be travelling alone to school unless they are accompanied all the way”

We know that the majority of respondents were between 35 – 54 years old (73%) We understand that no one who answer this question was under the age of 25. However, the face to face engagement received a greater response to this consultation.



5.2 PRESENTING QUALITATIVE FINDINGS

Emerging themes from the qualitative section of the survey include, the impact on the environment, the need for specialist transport, cost, vulnerability and anxiety. This is detailed further below: Full survey results can be found in [appendix 2](#)

Questionnaire

Question: How, if at all, will the proposed introduction of personal transport budgets for travel (for most 16-18 year old impact or affect you?

Responses:

Environment – Responses highlighted the impact on the environment with the likelihood of more cars being used.

Bespoke travel – A response highlighted that the proposal would result in more tailored travel at greater cost.

‘Leave as it is because the situation will lead to a lot of families needing more tailored travel i.e. taxis which the council would have provide and pay for where you believe you are saving you will end up with a higher expense bill’

Cost - Some responses detailed that the proposal is a cost/budget cutting exercise.

'Transport is an integral part of most families with children with SEN lives. It allows us to function without as much stress and anxiety as possible in what is an incredibly stressful life. It would be cruel to go ahead with these proposals and would impact many families in a very bad way'

Vulnerability – Responses highlighted that the proposal would affect the most vulnerable.

'I don't understand why councils feel the best way to reduce their costs is to hit the most vulnerable. You can cut costs but the way you want to implement it will be catastrophic for these children, you need to go back to the drawing board and look at other ways to save money instead of making the vulnerable even more vulnerable.'

Anxiety – Anxiety was detailed as an issue in the survey results with one response detailing the 'immense anxiety' the proposal

Question: If you do think there will be an impact what can we do to reduce the impact of what we are proposing?

Response

Not changing the policy/keeping the policy as it is.

FOCUS GROUPS

A number of themes emerged from the focus groups and therefore the findings are presented in this report under the main themes. The views detailed will help shape the travel arrangements that we will help families to make. Further data can be found in [Appendix 3](#)

Theme 1 - Independence:

Independent travel training was seen as a positive provision for young people who are suitable to undertake travel training.

Children and young people told us that travelling independently gave them freedom, made them feel more grown up and was fun. Many young people enjoyed travelling in a group and some expressed that they were happy to travel on their own.

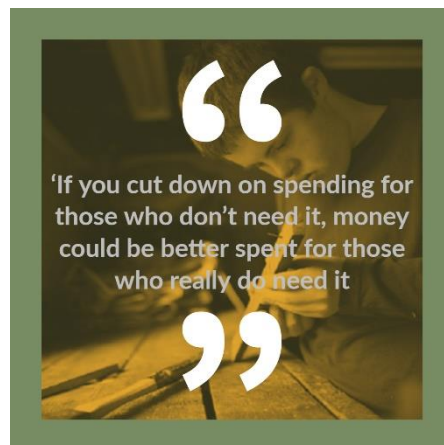
Some practitioners thought that linking young people to travel together was a brilliant idea.

All supported the idea of having apprentices with special needs and or disabilities as travel trainers.



Theme 2 - Cost:

Quote from young person:



There were a number of comments highlighting that the amount of personal transport budget would not be sufficient to meet transport costs. Parents/carers worried that transport would be taken away. Some parents/carers expressed the view that this was a financially driven decision.

Quote from parent: *'Is it a backdoor to take transport away?'*

Additional financial support is available to eligible learners through the provision of the 16-19 Bursary Funds. This support is available to help with additional costs incurred whilst learning, including transport costs.

Theme 3 - Anxiety: One parent expressed the view that the proposed change could reduce anxiety and stress, particularly in the morning, where not having to rush could make life easier.

Some parents/carers expressed their anxiety around their child travelling independently.

Apps linking parents/carers to their child might help to manage anxiety.

Theme 4 - Safety

Children, young people, parents and carers told us that they sometimes worry about safety when travelling independently. Bullying was also identified as an area of concern.

Parents/carers were worried about their children being unprepared to change.

Quote from young person: 'Sometimes it is not safe and I'm worried, it is about staying safe.'

Quote from parent: 'My daughter is only 14 and is scared of travelling by herself, it could be positive but she will need support'

Young people worried about travelling in the dark and had concerns about crossing busy roads.

Parents/carers supported the idea of students travelling with peers and/or buddies.

Parents/carers identified the need for support in the community, for example having safe places in shops, buildings etc.

Theme 5 – Needs-based assessments

Feedback was received to the effect that assistance should be based on need rather than on the funding available.



A number of parents/carers expressed concern around the assessment process, for example who would be undertaking the assessment for suitability for travel training and who would decide whether a young person has severe learning difficulties?

Theme 6 - Communication

Feedback was received around the need for better communication. Parents/carers thought that the Post-16 travel assistance policy should be easy to read and stress free, they thought that the policy should have clearer headings.

Theme 7 - Statutory school age

There were a number of comments concerning the view that as the statutory school age has been raised to 18 the provision of travel assistance should be similarly raised.

Practical arrangements

Parent/carers identified that sourcing passenger assistants would be very difficult. They also highlighted that personal transport budgets would be difficult for working parents. One parent identified that the proposed change may pose difficulties with attendance.

6 CONCLUSION:

Overall responses supported the Council's aim to support young people to travel independently where possible, with sixty-four per cent of survey respondents supporting the idea of young people making their own way to education and training where possible. Over one third of survey respondents supported the preferred option to apply a personal transport budget to most 16 to 18 year old students with SEND in education or training where independent travel training is not appropriate. However, over half of parent/carers of young people with SEND who completed the survey did not support this option.

Forty-seven per cent of survey respondents agreed that a personal transport budget will make students more independent. Forty four per cent of respondents did not agree.

7 RECOMMENDATIONS/NEXT STEPS:

We have gained considerable insight into the needs of young people, parents/carers and practitioners about what makes a good travel assistance policy. We were also able to identify some short and long term impacts from our proposals and what we could do to remedy/reduce some of these impacts. We've laid some some of these things out below:

Earlier conversations to manage concerns and expectations

By ensuring that transport conversations take place at a much earlier age and are part of the EHCP review process we will help families to establish realistic expectations of the likely travel assistance they will receive. Families will have more control over the transport solutions they put in place.

A travel plan will be developed in partnership with Croydon council, the young person, families and professionals to help identify how a personal transport budget can best be utilised. In doing this families will have support and increased flexibility to tailor their child's journey plans. Whilst the council has limited flexibility in the travel assistance we can offer families, every family in receipt of a personal transport budget has the opportunity to use it to develop new routines that best meets their child's needs.

The results of this consultation will be reported to Cabinet in March 2019, who will make a decision based on the consultation.

The short term recommendation is that the council adopts the proposed change to the Post-16 Travel Assistance Policy, for the 2019/2020 academic year and that the changes will be

applied to students starting post-16 education or training from September 2019 or students starting a new course of study in the 2019/2020 academic year. All students carrying on their education post 16 must reapply for travel support. The final Post-16 Travel Assistance Policy will be published no later than 31 May 2019.

Parents and carers identified that some details on the application form were misleading, we listened to this feedback and the application form has subsequently been updated.

Members will continue to be updated with regards to the outcome of the proposals through monthly travel governance board meetings.

In the long term, the council will continue to engage with parents, carers, young people and stakeholders and continue to monitor the progress of the implementation of the changes.

DRAFT

POST-16 TRAVEL ASSISTANCE TO EDUCATION & TRAINING

CROYDON ANNUAL POLICY STATEMENT 2018/19

GUIDANCE FOR YOUNG PEOPLE IN POST 16 EDUCATION & TRAINING

This policy statement is available on the Croydon Council website at www.croydon.gov.uk/education/adult/16-19-education-training-careers

Published: May 2018

**Croydon Post-16 Travel Assistance Policy to
Education and Training
Annual Policy Statement for 2018/19 Academic Year**

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1. PURPOSE

In accordance with section 509AA of the Education Act 1996, as amended by the sections 54-57 of the Apprenticeships, Skills, Children and Learning Act 2009, this policy statement describes the arrangements for the provision of transport for 16-18 year olds (sixth form age) to access appropriate education and training.

This document operates in parallel, and/or on similar principles to Croydon Local Authority's Home to School Travel Assistance Policy which covers support for children up to 16 years old. The intention of this document is to provide relevant information for students aged 16-18 and those continuing learners who started their programme of learning before their 19th birthday (or in some cases up to the age of 25 if the young person has complex learning difficulties and/or disabilities) in relation to access to appropriate education and training.

Any available funds held by Croydon Council will be used solely to support learners with Learning Difficulties or Disabilities (LDD) in accordance with criteria described in section 4.

Any available support to help other learners with transport costs can be accessed via application to your school, college, training provider or the relevant funding agency.

All young people in full-time education up to the age 18 are entitled to free transport on buses and trams, plus concessionary rates on other public transport, within London. In the light of this, Croydon Authority considers that this is sufficient to meet the transport needs of most of our students. It is therefore generally expected that learners study at the nearest reasonable and appropriate centre using fare concessions and the most cost effective mode of transport.

Learners should therefore carefully consider transport cost and travel time implications when selecting their venue of study, particularly if the learning venue is outside of the London transport boundaries (e.g. Surrey or Kent Council areas) for concessionary fares.

The Council will not provide financial support for travel other than described in section 4.

2. SCOPE

2.1 Academic year

This policy covers the period 1 August 2018 to 31 July 2019

2.2 Learner residency

This policy applies to anyone who is resident in the London Borough of Croydon. Learners not resident in Croydon or who are looked after by another Council, but live in Croydon, should refer to the transport policy statement issued by their home local authority or go to www.gov.uk/subsidised-college-transport-16-19

2.3 Learner age

This policy applies to young people aged over 16 but under 19 as at 31st August 2018 (or in some cases up to age 25 if they have complex learning difficulties and/or disabilities (LDD)), and those continuing learners who started their programme of learning before their 19th birthday.

2.4 Learning venue

This policy provides for learners who are engaged in education or training at:

- a school (including academies);
- a further education institution;
- a sixth form college;
- a local authority maintained or assisted institution providing higher or further education; ▪ an establishment funded directly by the Education Skills Funding Agency (ESFA) e.g. independent specialist providers for learners with learning difficulties and/or disabilities;
- a learning provider that is funded by the LA to deliver accredited programmes of learning which lead to a positive outcome (this could include colleges, charities and private learning providers).

3. PUBLIC TRANSPORT AND CYCLING

3.1 Transport for London – free and discounted travel

3.1.1 16+ Zip Oyster Cards

Young people aged 16-17 years that live in a London borough are entitled to a 16+ Zip Oyster Card that gives:

- free bus and tram travel
- child rate 7 day, monthly or longer period travel card and bus & tram passes
- pay as you go at half the adult rate on bus, Tube, tram, DLR, London Overground and most National Rail services in London

If you are aged 18 on 31 August you may also be eligible for a 16+ Zip Oyster Card to get free bus and tram travel if you can evidence that you are still in full time education, defined as:

- At least 12 hours of guided learning per week, between 09:00-17:00, Mon to Fri
- At least 10 weeks on a further education course at Level 3
- In a sixth form college, academy, further education college or other training provider

It can also include apprenticeships and training courses funded by the Education Skills Funding Agency (ESFA), provided the student is 18 or under on 31 August. Your school, college or training provider will be able to confirm if the course qualifies.

How to apply

Applications are usually made online. For further details visit <https://tfl.gov.uk/fares-and-payments/travel-for-under-18s/zip-oyster-photocards> or telephone the helpline on **0343 222 1234**

3.1.2 Apprentice Oyster Photocards

If you are aged 18 or over, a London resident and enrolled on an apprenticeship, you may be eligible for an Apprentice Oyster Photocard. You can save 30% off adult-rate travelcards and bus & tram pass season tickets.

How to apply

Applications are usually made online. For further details visit <https://tfl.gov.uk/fares-andpayments/adult-discounts-and-concessions/apprentice-oyster-photocard> or telephone the helpline on **0343 222 1234**

3.2 Young Person Rail Card

If you're between 16 and 25 years old, you're eligible. With the Railcard you'll enjoy 1/3 off rail fares when you go by train. An annual fee of £30 (or £70 for 3-years) applies.

How to apply

For more details refer to www.16-25railcard.co.uk/ or telephone **0345 3000 250**

3.3 Cycling

Cycling is an efficient, cheap, quiet, healthy and non-polluting sustainable form of transport. We seek to provide safe, convenient and clearly identified cycle facilities to make cycling easier and more fun, and also as part of our traffic management measures.

How to apply

Cycle Training

Can be booked for individuals, groups or by your school or college through www.cyclinginstructor.com/, or by the school calling **0845 652 0421**.

Cycle Guides

Free cycle route guides are available from Transport for London at:

www.tfl.gov.uk/modes/cycling/routes-and-maps

Cycle Rides

Cycling events and safe, accompanied rides for everyone from new cyclists to experienced riders are a sociable way to gain cycling confidence. See: www.croydon.gov.uk/leisure/sports/a-z-ofactivities/cyclingevents and especially our programme of local Sky rides, see: goskyride.com

Cycle Storage

Most schools and colleges have secure cycle storage areas, or can apply to TfL for a grant. Students should contact their school, college or training provider for information.

Inclusive Cycling

Wheels for Wellbeing is an award-winning charity supporting disabled people of all ages and abilities to enjoy the benefits of cycling. Cycling can be easier than walking, a way to keep independent, fit and healthy, a mobility aid, and a useful form of everyday transport. Inclusive cycling means EVERYONE can cycle regardless of age, health condition or impairment.” See: www.wheelsforwellbeing.org.uk/ for information, including regular off-road sessions at Croydon Arena Albert Road, South Norwood SE25 4QL.

4. SUPPORT FOR LEARNERS WITH LEARNING DIFFICULTIES AND/OR DISABILITIES (LDD)

4.1 Context

The Local Authority expects and encourages most learners of this age to use public transport and travel independently because of the beneficial effects this will have on the young person's development. However, we recognise that in some circumstances additional assistance with travel may be required.

Where a student has an Education Health and Care Plan, decisions will be based on parental or student application and assessment.

Croydon local authority will develop personalised travel plans for all students who are eligible for travel assistance. The personalised travel plan will be a living document that evolves as initiatives and activities are implemented and as students' travel needs change. We will be working very closely with families, young people and schools and colleges to enable alternative travel options resulting in greater service satisfaction and more positive outcomes for the young people and their families.

In most cases qualifying learners will be offered the default position of a personal transport budget to make private travel arrangements to the nearest education establishment offering their chosen course of study. The local authority will work with families to assess the most appropriate transport solution so that learners can continue to attend their training or education. However, in certain circumstances it may be more cost effective to offer travel assistance through other means, for example, where a vehicle has an available seat that could be offered at no incremental cost. There may also be exceptional cases where a Personal Transport Budget is not appropriate.

What is a Personal Transport Budget?

A personal transport budget is an amount of money that will help you to get a learner to college.

How does a Personal Transport Budget work?

- Each month we will transfer the young person's agreed Personal Transport Budget into your chosen bank account.
- Each year we'll review the plan with you and the college - to make sure it is the most appropriate arrangement.
- You must spend the money in a way that ensures the young person can get to college.

How can you use a personal transport budget?

- Arrange for a friend or relative to walk to college with the young person
- Drive the young person to college or share with another parent
- Get a bus pass for a friend or relative to travel with the young person
- Pay for childcare for a younger child so that you can take the young person to college
- Work with the parents to join up with the college to make suitable transport arrangements.

How much Personal Transport Budget is on offer?

This will depend on the young person's age, support needs, timetable, and the distance from home to college.

The benefits of a personal budget

- It allows you the freedom to make your own arrangements – to suit your family
- It gives you control over how the money is spent
- You can share the cost and save money by joining up with other parents
- You could use the money to help the young person to become more independent

Transport needs will be also be re evaluated in the light of the desire to establish travel independence for students wherever possible.

Croydon Council is committed to promoting independence for children and young people with special educational needs so that their experiences can be similar to those of their peers. The local authority recognises the importance of extending the range of travelling options available so that the most suitable arrangements can be made to support individual needs. It recognises that travelling to the place of learning as independently as possible is a valuable experience for young people as they grow up. In order to do this some young people with special educational needs may need extra training to help them learn the skills for greater independence.

4.2 Independent Travel Training

Independent Travel Training (ITT) helps young people with special educational needs and/or disabilities to travel to school or college by walking or on public transport.

Croydon's aim is to promote a happy and healthy lifestyle through alternative means of travel where possible and appropriate, including, walking, cycling and the use of public transport. We value independence and resilience and understand that the ability to travel without the need for support is a crucial life skill that helps give a young person the freedom to fulfil their potential and live a full life.

The training will help build the young person's confidence in other areas of their life such as:

- Future job and training opportunities
- Accessing new hobbies, leisure activities and social clubs
- Social Skills

Who is eligible?

To be considered for ITT a young person must have the potential, once trained to travel to and from school/college independently. Before any training takes place we will first assess whether the young person is suitable for ITT on an individual basis.

You may be offered ITT for free as part of travel assistance provided by Croydon Council. If you are not eligible for free ITT, you may still benefit from the programme by paying for the training yourself or through other sources of funding.

What are the benefits?

Young people who successfully complete the travel training will benefit from increased confidence, independence, freedom and better opportunities to access education, training, employment and other day to day activities, whilst helping them maintain better relationships with their peers. It will also help families find time to do things independently, as well as enabling them to do more things together. This all contributes to leading a more fulfilled life for the young person and those around them.

How is the training delivered?

Parents/Carers will be involved from the outset, starting with a meeting with the travel assessor who will work with the family and student to tailor the programme to the student's needs.

The training is delivered one to one from a trained professional. Until the young person is considered capable of completing the route on their own confidently they will be accompanied at all times. There will be regular assessments of progress which will be shared with the family. The young person will be taught the basic principles of travelling alone including the green cross code, how to get on and off transport and what to do in an emergency.

The training process consists of 4 key stages:

- Learning the route
- Travelling at peak times
- Confirming the young person is safe
- Recognising their achievement

All eligible Post-16 learners will be assessed for suitability for independent travel training. Special transport will not be provided by the local authority for pupils who are able but choose not to participate in the travel training programme.

How to apply

Please contact the SEN Travel Commissioner on **020 8760 5454** for further information or visit: <https://www.croydon.gov.uk/education/special-educational-needs/transport-and-travel-assistance/transport-and-travel-assistance-for-home-to-school-travel/independent-travel-training>

Applications for travel assistance will be considered against the following criteria:

- The learner has a disability or learning difficulty that would make it impracticable or dangerous for them to try to undertake a journey to school or college of less than 3 miles. Applications will be assessed on their own merits
- The learner has an Education, Health and Care Plan.
- The learner is aged between 16 and 19 (and in some cases up to the age of 25) and is on a course of further education at a school, college or training provider.
- The learner is attending a course that is not available at a school/college closer to the student's home address. Where a similar course is available at a closer school/college, the student will be expected to demonstrate how their chosen course meets their needs above this other similar course in order to qualify for travel assistance.
- The course is deemed to be suitable and will provide an educational benefit to the learner – as assessed by the SEN Service.
- The need for specific travel assistance has been identified in the learner's statement of special educational needs/transition or Education, Health and Care Plan.
- The learner lives more than 3 miles from school or college and is unable to undertake the journey by free public transport.
- If a learner is in receipt of a 16-19 Bursary this will be taken into account in any decision about the amount of travel assistance that may be provided.

Evidence and Information

Any relevant evidence may be considered as part of the assessment of eligibility and may include:

- Education Health and Care Plan
- Annual Review reports
- Information about the nature and reasonableness of the route, i.e. journey times, changes, safety, nature of roads and pavements, congestion, other passengers etc.
- Information from Social Care (initial or core assessment/CAF if appropriate)
- An existing travel training plan (or assessment being undertaken)
- Reports from other relevant professionals relating to the request for travel assistance.

Please note that the type of travel assistance offered for Post-16 learners is discretionary and could be changed in the future subject to consultation.

How to apply

Please contact the **SEN Travel Commissioner on 020 8760 5454** for further information relating to the application process. If deemed eligible a learner will be considered for a range of travel assistance solutions such as independent travel training or a personal transport budget as well as vehicle transport.

All applications will be considered individually and provision will be agreed on an annual basis.

4.4 Appeals

In line with statutory guidance, local authorities are required to operate an appeals process.

If an application for travel assistance is not approved by the Council, or the parent/carer disagrees with the type of assistance being offered, parent/carers have a right of appeal. The appeal should be made in writing within 20 days of the decision letter being received by the parents/carers.

Appeals are administered in 2 stages:

- Stage 1: Review by Head of Independent Travel SCC

Within 5 working days of the appeal form being received, the parent/carer will be sent confirmation that their appeal has been received and that their appeal is under review.

Further evidence may be requested to support the appeal and consultation with case workers and professional bodies may be required. Parents should receive their decision letter within 20 days of their appeal form being received.

- Stage 2: Independent Panel - Independent review of evidence

If the parent/carer remains dissatisfied with the outcome, they should notify the Council in writing within 20 days of receiving their Stage 1 appeal decision. The appeal will then be considered independently of the service and will involve consideration of all evidence gathered and the reasons for the decision being made. This will be undertaken by the "Independent Panel" constituted by a mix of panel members independent of the process to date and suitably experienced, this may include head teachers from primary and secondary schools.

Parents should receive their decision letter within 40 days of their appeal being received.

This decision is the final stage of the Council's appeal procedure in relation to travel assistance. If parents/carers remain dissatisfied they can complain to the Local Government Ombudsman. Details can be provided by the Council if necessary.

During the appeals process no new travel assistance will be provided or, in the case of existing arrangements, no change will be implemented.

If after the appeal, transport is agreed, it will commence from the date of the letter sent to the parent / carer. No backdated payments will be made nor will the Council accept any claims by parents/carers for costs incurred (e.g. for making alternative transport arrangements) during the process of appeal.

4.5 Complaints

Once travel assistance has been agreed any concerns regarding the provision of the service should be made in the first instance to the Travel Assistance Commissioner or in the case of vehicle transport to Croydon Transport Services on **0208 8686 2215**.

All complaints on the process for assessing eligibility for transport provision will be handled through the Council's formal complaints process. Full details are available on the Council's website. Any complaints regarding the outcome of the assessment process will be addressed as part of the appeals process.

DRAFT

5. SUPPORT AVAILABLE FOR POST 16 LEARNERS

5.1 16-19 Bursary Fund

You could get a bursary to help with education-related costs if you're aged 16 to 19 and: studying at publicly funded school or college (not university) in England or on a training course, including unpaid work experience. A publicly funded school is one that does not charge you for attending it.

A bursary is money that can be used to pay for things like clothing, books and other equipment for your course, transport and lunch on days you study or train.

There are two types of 16 to 19 bursary:

Vulnerable student bursary

You could get up to £1,200 if at least one of the following applies:

- you're in or recently left local authority care
- you get Income Support or Universal Credit because you're financially supporting yourself □
you get Disability Living Allowance (DLA) in your name and either Employment and Support Allowance (ESA) or Universal Credit
- you get Personal Independence Payment (PIP) in your name and either ESA or Universal Credit

You may get the full amount if you have expenses and on a full-time course of at least 30 weeks.

You'll usually get less than the full amount, or no bursary, if one of the following apply:

- your course is shorter than 30 weeks
- you study part time
- you have few expenses

You'll be told what evidence you need, for example benefit letters.

Discretionary bursary

You could get a discretionary bursary if you need financial help but don't qualify for a vulnerable student bursary.

Education and training providers set their own criteria for discretionary bursaries, e.g. they might look at family income, and how much you get and what it's used for.

How to apply

Apply to your school, college or training provider. Ask student services or your tutor to explain what you need to do.

For more information go to www.gov.uk/1619-bursary-fund/overview

5.2 Care to Learn

Care to Learn provides financial support to young parents (aged under 20 at the start of your course) who want to continue their education and need help with the cost of childcare and any associated travel.

Care to Learn is only available for publicly-funded courses in England. This includes courses that take place in:

- schools
- sixth-forms in schools
- sixth-form colleges
- other colleges and learning providers, including Foundation Learning
- your community at Children's Centres

Your learning provider can tell you if your course is eligible.

It pays up to £175 per week (if you live in London) for each child to help with the cost of:

- your childcare, including deposit and registration fees
- a childcare taster session for up to 5 days
- keeping your childcare place over the summer holidays
- taking your child to their childcare provider

Childcare payments go directly to your childcare provider and travel payments go direct to your school or college - they'll either pay you or arrange travel for you.

How to apply

Learners can obtain more information and request a Care to Learn application form online from www.gov.uk/care-to-learn/overview

Alternatively, you can contact the Student Bursary Support Service Helpline Mon-Fri 9am to 5pm on **0800 121 8989** or e-mail: c2l@studentbursarysupport.co.uk

5.3 16-18 Residential Bursary Fund (RBF)

The Residential Bursary Fund provides financial support towards the costs of accommodation for young people attending one of the designated providers delivering specialist provision, where their course requires the young person to be resident in order to participate because it is not available locally and/or because it requires students to be available at unsociable hours on a regular basis.

Institutions may determine their own eligibility criteria and process for considering applications for RBF support. Priority must be given to young people who are unable to access relevant learning within daily travel from their home or where the costs of such travel are prohibitive.

How to apply

Learners can find out more information at www.gov.uk/residential-support-scheme/residentialbursary-fund

You should apply directly to your institution for support and/or for further information.

5.4 Residential Support Scheme (RSS)

The Residential Support Scheme provides financial support with accommodation costs for learners aged between 16 and 18, who need to live away from home to study because their course is not available locally.

Learners must meet the eligibility criteria (which includes an income assessment) in order to receive support from the Residential Support Scheme. If you are assessed as eligible, the amount of award you receive will be based on your actual accommodation costs up to a maximum award level.

How to apply

Learners can find out more information at www.gov.uk/residential-support-scheme

You can request an application pack from your school/college or contact the Student Bursary Support Service Helpline Mon-Fri 9am to 5pm on 0800 121 8989 or e-mail: c2l@studentbursarysupport.co.uk

5.5 Dance and Drama Award

The Dance and Drama Award (DaDA) scheme supports talented individuals to access high-quality training at some of England's leading private dance and drama schools. Awards are granted to those students who are assessed by the school at audition as being the most talented and likely to succeed in the industry. The amount of support an individual receives depends on their household income.

To be eligible to receive DaDA funding in the 2018/2019 academic year, students must be aged between 16 and 23 at the start of the academic year (for a dance course) and aged between 18 and 23 at the start of the academic year (for an acting course).

Only students enrolled on the Trinity College London (TCL) Level 5 and 6 Professional Diplomas in Dance, Acting and Musical Theatre at one of the institutions that are part of the DaDA scheme are eligible to apply for funding.

If offered an award, the amount of support for fees and living costs will be based on an assessment of the family's household income. The income assessment will be undertaken by the appropriate DaDA school, according to national scales.

How to apply

For help and advice you should contact your DaDA school.

5.6 Discretionary Learner Support (DLS)

If you are aged 19 or over, on a further education course and facing financial hardship, you could get DLS. The money can help pay for things like:

- accommodation and travel
- course materials and equipment
- childcare - if you qualify

How to apply

You should apply directly to your institution for support or for further information, or go to www.gov.uk/discretionary-learner-support

5.7 Church Tenements Charity

The aim of the Church Tenements Charity is to provide "one off" small grants for educational purpose to young people under the age of 25 years either resident within, or studying at an establishment within, the London Borough of Croydon. In addition to the grants for educational purposes, the Trustees will consider application for recreational, social and physical training or equipment.

How to apply

Entitlement is not automatic. All applications will be considered by a committee who will decide whether to make an award of a part or full grant.

For more information contact June Haynes **0208 726 6000 extension 62317**

6. USEFUL CONTACTS

- **Church Tenements Charity:** T 0208 726 6000 ext 62317
- **Citizens Advice:**
www.adviceguide.org.uk/england/education_e/education_further_and_higher_education_ew/financial_help_for_students_aged_16-19
- **Croydon Council SEN Travel Assistance Commissioner :**T 020 8760 5454
- **Croydon Transport Services:** T 0208 8686 2215
- **Gov.UK:** www.gov.uk/16-to-19-education-financial-support-for-students
- **National Careers Service:**
nationalcareersservice.direct.gov.uk/tools/funding/Pages/default.aspx
- **National Rail:** www.16-25railcard.co.uk T 0345 3000 250 or railcardhelp@railcardsonline.co.uk
- **Student Bursary Support Service:** T 0800 121 8989 or c2l@efalearnersupport.co.uk
- **Transport for London:** www.tfl.gov.uk T 0343 222 1234 Textphone 0800 1123456

7. COMMENTS

Any comments relating to this policy should be sent to:

Julie Ralphs

Head of Service Education Commissioning & Youth Engagement

People Department 4th Floor Zone E Bernard Weatherill House 8 Mint Walk Croydon CR0 1EA

or

julie.ralphs@croydon.gov.uk

Agenda Item 8

REPORT TO:	CABINET 25 MARCH 2019
SUBJECT:	Parking Policy 2019-22
LEAD OFFICER:	Shifa Mustafa, Executive Director, Place
CABINET MEMBER:	Councillor Paul Scott Cabinet Member for Environment, Transport & Regeneration (job-share)
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT:	
<p>The Parking Policy (the “policy”) is intended to effectively manage parking provision across the borough in line with the borough’s growth objectives, and to contribute towards achieving the clean and sustainable objectives set out in Our Corporate Plan for Croydon 2018-2022.</p> <p>The policy sets out our aims and objectives and a supporting action plan sets out how these will be achieved.</p> <p>The policy also contributes towards the following aims of the Corporate Plan:</p> <ul style="list-style-type: none">• An excellent transport network that is safe, reliable and accessible to all• A cleaner and more sustainable environment• Happy, healthy and independent lives	
FINANCIAL IMPACT:	
<p>The Parking Policy will, together with other policies and plans, help deliver key commitments to our residents.</p> <p>The financial implications of implementing a parking policy as detailed in this report can not be fully developed at this stage due to the draft policy being subject to engagement & the proposals in relation to Emission-Based Parking Charges being subject to consultation and the outcomes unknown.</p> <p>Once the engagement and the consultation outcomes are known, the financial implications will be fully developed.</p> <p>It is anticipated that there will be additional income streams as a result of the draft proposals and the need for investment to ensure the proposals can be fully implemented.</p>	
KEY DECISION REFERENCE NO.:	
<p>NOT a key decision at this stage. Once the consultation has been undertaken in respect of the Emission-Based Parking Charges and engagement has been undertaken in respect of the Parking Policy and Action Plan, any approvals will be key decisions and will be advertised accordingly.</p>	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:

1 RECOMMENDATIONS

The Cabinet is recommended to:

- 1.1 Note the core principles of a Parking Policy as detailed in this report, and note the draft Parking Policy and the action plan proposals at appendix A for engagement purposes.
- 1.2 Note the proposals in relation to Emission-Based Parking Charges as detailed in section 6 for consultation purposes.
- 1.3 Delegate authority to the Executive Director, Place, in consultation with the acting Cabinet Member for Environment, Transport and Regeneration (Job Share), to:
 - a. To undertake appropriate engagement with relevant stakeholders and members of the public on the draft Parking Policy and action plan as at appendix A;
 - b. Consider the outcome of the engagement; and
 - c. Subject to there being no significant changes, finalise, agree and publish the Parking Policy and action plan. Any proposals requiring significant changes will be brought back to Cabinet for consideration. Note that delegation is already in place for the Executive Director Place to consider and implement Traffic Management Orders subject to specified parameters.
- 1.4 Delegate authority to the Executive Director, Place, in consultation with the acting Cabinet Member for Environment, Transport and Regeneration (Job Share), to:
 - a. To undertake appropriate consultation on the proposals in relation to Emission-Based Parking Charges as detailed in section 6;
 - b. Consider the outcome of the consultation regarding Emission-Based Parking Charges; and
 - c. Subject to there being no significant changes which would necessitate further consultation, finalise, agree and implement the Emission-Based Parking Charges proposals. Note that any proposals requiring significant changes or further consultation will be brought back to Cabinet for consideration.

2 EXECUTIVE SUMMARY

2.1 This report:

- sets out the context of key strategic drivers (local, regional & national) and the need for a Croydon Parking policy that will help address public health priorities, the impact of vehicle emissions and congestion on air quality, the need for a shift to more active and sustainable transport modes, and the growing demand for kerbside space;
- summarises the core principles of the draft Parking Policy and sets out the key work areas we will focus on to take parking forward over the next 3 years;
- sets out the proposal for the introduction of Emission-Based Parking Charges for resident permits.

3 DRAFT PARKING POLICY CORE PRINCIPLES

3.1 Parking affects almost everyone that lives, works or visits Croydon to some extent. Whilst our road networks have grown, so too have the competing demands for this space for use by pedestrians, cyclists, vehicles, parking and public realm. With the pace of growth in homes and developments that Croydon is set to undergo, this Parking Policy, and its emerging action plan, respond to the challenges posed and deliver effective and safe parking infrastructure and management in the borough.

3.2 The policy sets out the aims and objectives over the period 2019 to 2022 for managing on- and off-street parking infrastructure, parking demand management, traffic and parking compliance, school streets safety and related customer services.

3.3 The Policy is formed on six core principles:

3.3.1 Collaborative working

The aim is for Parking management to be a collaborative process distributed across planning, strategic transport, engineering and operational functions, and to embed a coherent approach that aligns and coordinates the individual sub-unit goals to the over-reaching common purpose. This will assure the coherent planning, development and operational management of traffic and parking.

3.3.2 Parking management

The aim is to provide suitable and adequate parking facilities on and off the highway, without detracting from the quality of public realm, and to contribute to securing the expeditious, convenient and safe movement of vehicular and other traffic. This includes contributing to the over-reaching policy aim of reducing car use and increasing walking, cycling and the use of public transport. This will ensure: that parking capacity & provision are balanced & optimized to meet the diverse needs of all road users; that on- and off-street infrastructure enables effective and efficient use of parking provision; a civil enforcement system in compliance with legislative framework and approved code of practice.

3.3.3 Controlled Parking Zones (CPZs)

The aim is to manage parking where demand exceeds supply and/or unsafe conditions exist, through the design of permitted and restricted kerb space that fairly balances parking capacity, parking times and bay types (residential, P&D, business and shared use) in accordance with the locations and appropriate to the needs of local communities and businesses.

3.3.4 School streets

The aim is to contribute to securing a healthy and safe environment near to schools, and to help children and parents use cars less and to walk, cycle and use public transport more.

3.3.5 Parking charges

The aim is to operate the charges defined in local Traffic Management Orders for on- and off-street parking places. In conformance to the Road Traffic Regulations Act 1984, the level of charges will have regard to securing the expeditious, convenient and safe movement of vehicles and other traffic (including pedestrians) having regard to the amenity, the national air quality strategy and any other relevant traffic management matters, and the requirement to self-finance the operational costs of providing and managing parking facilities.

3.3.6 Innovation and technology

The aim is to end the use of closed data systems and instead promote the use of open data platforms and devices, to facilitate a digital Smart City transformation in the way people travel and to support innovation in transport information systems, at a rate dictated by the natural replacement cycle or as reasonable investment costs permit.

This is reflected in Section 6 of the action plan at appendix A, where the objective of embracing new technology will play a crucial role for delivering the proposed actions for Emission-Based Parking Charges (as per Section 5 of the appended action plan), which, we are bringing before this Cabinet for consideration and approval to proceed as set out within recommendation 1.4.

4 PUBLIC HEALTH AND EMISSIONS

- 4.1 Air pollution is an important and increasingly more high profile public health issue, contributing to illness and shortened life expectancy. It disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly. Those at higher risk include those with existing respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease. People who live or work near busy roads are at particularly high risk of exposure to the health harms of air pollution.

4.2 An online public survey of views on the future of transport, for the Draft third Local Implementation Plan (LIP3) in September 2018 found, for example, that 74% of respondents are concerned about air quality in Croydon and 72% agreed that traffic levels should be lowered. Every car journey starts and ends with a parking space and parking management is therefore an important lever in supporting the LIP3 objectives.

Also, an online public survey of views on air quality, for the Air Quality Actions Plan in July 2017 found, for example, that 88% of respondents agreed that the AQAP healthy streets initiatives are important and 84% agreed it is important to improve air quality awareness at schools.

4.3 In Croydon, 19,226 residents registered with a Croydon GP suffer from asthma (2016/17). This is 4.73% of the GP register. Croydon has the 12th highest rate in London. Croydon has high rates of asthma among children and in 2016/17 there were 342 hospital admissions (under 19) per 100,000, which represented the highest rate in London.

4.4 Car occupants are typically exposed to higher levels of air pollution than cyclists or pedestrians. Air pollution is strongly associated with congestion, with pollutant levels generally higher inside vehicles than in ambient air.

4.5 The Public Health Outcomes Framework includes an indicator for air quality which local authorities are expected to show progress on. The indicator for estimated deaths attributable to particulate air pollution shows Croydon is in the worst 25% of local authorities nationally, although performance is better than the London average with the highest levels of air pollution in central London boroughs. The trend over time for this indicator does not consistently show improvement or deterioration.

4.6 The two pollutants which give most cause for concern are the toxic gas nitrogen dioxide (NO₂) and particulate matter (PM) - particles so small they can be ingested deep into the lungs. Particulate matter (PM₁₀ and PM_{2.5}) is a complex mixture of non-gaseous particle of varied physical and chemical composition. Most PM emissions in London are caused by road traffic (as much as 80% in central London) with exhaust emission being one of the main sources.¹

4.7 Across London, road transport and heating systems are the main sources of nitrogen dioxide (NO₂). 90% of road transport NO₂ emissions in central London now come from diesel vehicles. At high concentrations NO₂ causes inflammation of the airways and long term exposure can affect lung function and respiratory symptoms, including exacerbating asthma.

4.8 A quarter of the total health costs of outdoor air pollution is estimated to be a result of emissions from cars and vans, corresponding to more than 10,000 premature deaths in the UK each year.²

4.9 It has been estimated that 205 deaths a year in Croydon are attributable to air pollution.³

¹ [Greater London Authority. Air quality in Croydon a guide for public health professionals. London: September 2013](#)

² Health costs of air pollution from cars and vans, Brand & Hunt (2018)

³ Greater London Authority. Air quality in Croydon a guide for public health professionals. London: September 2013

5 NATIONAL, REGIONAL AND LOCAL DRIVERS

5.1 National Drivers

There are many strategies that have been introduced to improve air pollution and reduce emissions over recent years and months:

- The Industrial Strategy is based around Five Foundations of Productivity and Four Grand Challenges that invite innovation. One of the foundations is a major upgrade to the UK's infrastructure including a supporting support for electric vehicles through investment in the charging infrastructure. And amongst the Grand Challenges are: the Future of Mobility - in the way people, goods and services move, including innovation in electric and autonomous vehicles which could dramatically reduce carbon emissions and congestion through their use; and Clean Growth – maximising growth by development & use of low carbon technologies, by which reductions in emissions will be achieved.
- the national *Road to Zero Strategy* aims for 50-70% new car sales to be Ultra Low Emission Vehicles (ULEVs) by 2030 and to enable the rollout of supporting Electric Vehicle (EV) infrastructure & reduce emissions already on the roads.
- The Clean Air Strategy 2019, which aims to clean up the UK's air and reduce the damaging impact air pollution has on public health, including the harmful emissions from vehicles amongst other sources.

5.2 Regional Drivers

As one of 33 London boroughs, Croydon has an obligation to align & work with a number of regional London strategies, policies and plans, such as:

- The Mayor's Transport Strategy 2018, which applies a Healthy Streets Approach to transport that prioritises public health and amongst many objectives aims to reduce car dependency.
- The Mayor's new London Plan (draft), which is the statutory Spatial Development Strategy for Greater London. This includes policies to improve air quality within Sustainable Infrastructure & help ensure appropriate infrastructure is in place to meet needs such as increasing electric vehicles.

5.3 Local Drivers

5.3.1 Our Corporate Plan for Croydon 2018-2022 sets out a number of priorities that are aimed at improving the environment we live in, and aim to make it more sustainable, to encourage and support health live. The key priorities linked to this Parking Policy include:

- An excellent transport network that is safe, reliable and accessible to all – by recognising the important link between transport and a sustainable environment and working collaboratively and undertaking informed decisions that are innovative based on the needs of a neighbourhood, for example, to encourage fewer short car journeys and reduce traffic congestion.
- A cleaner and more sustainable environment – by addressing air quality with the work we do, such as introducing pedestrian zones around schools to help improve air quality and reduce congestion.

- Happy, healthy and independent lives – by preventing issues from becoming a problem and having an environment that encourages and supports healthy living.

5.3.2 There are many facets to improving the environment and it is recognised that genuine collaborative working across all our service areas will be necessary to secure positive outcomes. A variety of local policies, plans and pilots are already underway from different Council services perspectives that also work towards these and other outcomes such as:

- Air Quality Action Plan 2017-2022 – which is a five year plan to improve air quality within Croydon. It's key priorities are:
 - Controlling pollution from new developments,
 - Tackling emissions from servicing and freight vehicles – which also includes tackling our own fleet by working towards having 75% of the council fleet/hired fleet to be ultra low emission capable vehicles by 2025, and
 - Reducing exposure to air pollution & raising awareness for those you live and work in Croydon.
- Draft third Local Implementation Plan (LIP3) – which is under development and consultation to deliver outcomes against the three themes of the Mayor's Transport Strategy 2018, which are: Healthy streets and healthy people; A good public transport experience; New homes and jobs. Amongst the proposed objectives some will indirectly support the lowering of emissions such as:
 - by reducing traffic volumes,
 - supporting the shift to zero emission vehicles,
 - introducing new green infrastructure, specifically the *Electric Mobility* project will support the Council's ambition to install 400 electric vehicle charging points by 2022 & enable a shift to zero tailpipe emission vehicles, and
 - supporting the expansion of Car Clubs in the borough including electric vehicle charging provision and the introduction of flexible Car Clubs in the north of the borough.

5.3.3 Sustainable Croydon

A sustainable place is a key priority for Croydon. We are supporting significant growth in coming years which must provide benefit to our residents and existing businesses. Enabling this growth in a sustainable, healthy way will be crucial. A sustainable Croydon summit will take place in June, with the outcomes informing wider strategy development for the Council.

5.3.4 The Role a Parking Policy can play in tackling Air Quality in Croydon

In the context of the above, it is clear that the introduction of a Parking Policy for Croydon can play an important role in helping to achieve Croydon's Corporate outcomes by enabling a collaborative approach to managing parking provision across Croydon. As the borough grows in population and density the policy aims to improve the environment by delivering actions that will encourage and enable a lesser reliance on cars, a change to lower emitting vehicles and better management of the demand on the kerbside and that will secure a healthy and safe environment near to schools.

Parking management is a significant lever in influencing car ownership and use. It therefore has a role to play in addressing the borough's air quality and public health challenges. Many elements of car ownership and use costs are already being used to influence behaviours, including road tax, diesel fuel duty and differential congestion charges, but these are national or regional schemes.

There are currently insufficient borough level measures and tools in place to address specific areas of localised matters in air quality, to support active travel, to reduce external traffic and to accommodate planned and future Growth Zone and suburban intensification.

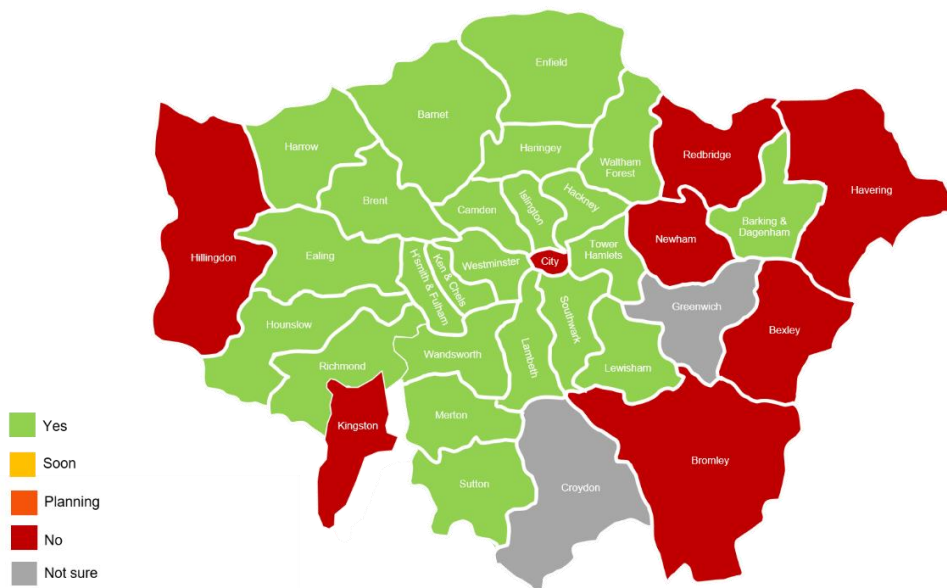
6 PROPOSAL FOR EMISSION-BASED PARKING CHARGES

6.1 In accordance with the core principles set out above, the council proposes to consult on the introduction of Emission-Based Parking Charges that are intended to encourage motorists to consider more active and sustainable forms of transport, or to switch to zero or low emission vehicles instead. Such behaviour change would reduce the overall demand pressure as well as help to drive improvements in our public health and air quality objectives.

6.2 Emission-Based Parking Charges for residents parking permits:

6.2.1 The map below clearly shows that the majority of London Councils are already applying emissions based parking charges in some form, with some having introduced these almost a decade ago. It is recommended that Croydon consult upon the introduction of emission-based charging for residents parking permits.

London: Emission based parking surcharge



Source: London Councils (2017/18)

6.2.2 The borough's current standard charge for a first resident permit per household is £80. A £46 surcharge (£126 total) is applied to a second permit and a £225 surcharge (total £305) to a third permit. In July 2018, the Traffic Management Advisory Committee recommended to the acting Cabinet Member for Environment, Transport and Regeneration (job share) the proposal to remove the option of a 3rd residents' permit at a household except in cases of permit renewals. Subsequently the third permit was discontinued in July 2018 and is now only available for renewal permit applications for the existing 34 third permits that remain in circulation.

6.2.3 Instead of a single rate which takes no account of the nature or type of vehicle that is attached to the permit, it is proposed to introduce a series of bandings with the price linked to the vehicle's emissions. Residents driving zero and low emission cars will experience a significant reduction in the parking permit charge.

6.2.4 Prices for resident permits have remained unchanged since 2013 and represent 4.9% of total parking income. Had the £80 permit fee increased in line with inflation it would now cost £91.30 (per the ONS retail price index).

Table 1 – Proposed Emission-Based Parking Charges structure for parking permits.

Vehicle registration from March 2001	CO ₂ emission (g/km)	Proposed new charge
Band 1	< 1	£6.50
Band 2	1 – 75	£65
Band 3	76 – 165	£104
Band 4	166 – 225	£146
Band 5	> 225	£300
Before March 2001	n/a	£300

- 6.2.5 It is proposed that second and third permits will also be based on the above emissions bandings plus surcharges. It is proposed to increase the surcharge for the second permit issued to a household from £46 to £50 in line with inflation. The second permit represents 21% of all permits issued. It is proposed to reduce the surcharge on the third permit to £150, while it is being naturally phased out.
- 6.2.6 The rationale for the differential charges is to incentivise car owners in the decision they take about their next car. There is a trade-off between moderating the complexity from too many changing bands and the sufficiency in bands to offer realistic step changes that car owners can make. Too few bands could also be perceived as unfair by owners of cars near the boundary of a more significant step in the band charges. A significant number of London boroughs have now introduced emission-based permit charges, and there is a broad level of support for the principle of “polluter pays”. There is little consistency in the bandings, ranging from 3 to 13 bands plus various surcharge mechanisms. However, the largest number of boroughs have settled for 5 bands, which is what is proposed in this report. The discount offered, relative to the highest charge band 5, must be sufficient to create a real incentive for a car owner to switch to a lower emission car – i.e. if the charging differential is too low then it would not, in itself, encourage a switch to a lower emission car.
- 6.2.7 The proposed resident permit charges compare to emission-based schemes already implemented in neighbouring boroughs.

Table 2 – Benchmarking against neighbouring permit schemes.

Vehicle registration from March 2001	Proposed new charge	Sutton	Merton	Lambeth
Band 1	£6.50	£40	£65	£35.84
Band 2	£65	£40	£90	£35.84
Band 3	£104	£55	£90	£160.76
Band 4	£146	£80	£90	£188.41
Band 5	£300	£110	£90	£306.17
Before March 2001	£300	£150	£90	£160-£306*

* L.B.Lambeth has 3 charge bands for pre-2001 vehicles, based on engine size.

NB: L.B.Merton have introduced a £25 permit discount on zero emission vehicles and a diesel levy phased-in over 3 years: £90 in 2017/18, £115 in 2018/19 and £150 in 2019/20, applied in addition to the £90 permit charge..

NB: L.B.Bromley do not operate emission-based charging. It operates a 2-tier location based differential of £40 and £80 for resident permits.

- 6.2.8 The purpose of seeking to introduce Emission-Based Parking charges to resident permits is aimed at incentivising the use of more environmentally friendly vehicles, as well as covering costs of administration, not simply to generate income. The proposed new charges will potentially increase parking revenue by £124k p/a, representing 0.64% of overall annual parking income budget. Under Section 122 of the Road Traffic Regulations Act 1984 the Council has the authority to set charges at a level that achieves the traffic management objectives, including the National Air Quality strategy prepared under Section 80 of the Environment Act 1995 – i.e. to realistically influence a reduction in vehicle emissions. Introducing emission-based charges solely to

raise income would be inconsistent with the 1984 Act, and is not the purpose of the proposed measures.

6.3 Emission-Based Parking Charges for business and visitor parking permits:

It is recommended that Croydon consult upon the introduction of Emission-Based Parking Charges for business and visitor parking permits.

Presently, 285 business permits are in circulation, within designated Inner and Outer Croydon zones. In the Inner zone, businesses are limited to maximum 2 permits. The permit charge is £382 p.a. and a 50% discount is currently in place for alternative fuel vehicles (electric and hybrids). Businesses in the Outer zones are limited to maximum 4 permits, where the first and second permits are £382, but the third and fourth are £560 and £910 respectively. The 50% alternative fuel discount is not currently available in the Outer zones. The proposed supporting action plan to this policy recommends the investigation of an alternative emission-based charging approach for business permits.

Presently, 1540 visitors' permits are issued per annum. Visitor permits currently operate whereby a residents either pre-purchases day permits or registers with a mobile app, to enable the resident paying for a visitor's parking time. The current system does not lend itself to introducing an emission-based charging structure. The proposed supporting action plan to this Policy recommends the investigation of an alternative emission-based charging approach for visitor permits. This requires the enabling technology becoming available, as per section 6.6 below.

6.4 Emission-Based Parking Charges for Pay and Display parking spaces:

It is recommended that Croydon consult upon the introduction of Emission-Based Parking Charges for Pay and Display parking spaces.

Whereas residents permit charges influences car ownership choices, the charges at destination pay and display places will further influence car use – for example, whether the multi-car family choose to make a trip using the smaller or the bigger family car. It is also an influencer on the emission-levels from commuter vehicles travelling into Croydon from outside the borough.

The proposed supporting action plan to this policy recommends the phasing-in of technology for eventually enabling Emission-Based Parking Charges in on- and off-street pay and display places. Presently, only City of London have managed to implement such a scheme within London and this has involved removing the vast majority of pay and display machines, in favour of drivers paying by an emission enabled mobile app instead. Such an abrupt switch is presently considered inappropriate in Croydon, while mobile payments represents just 32% of parking payments. It is preferable to encourage a further uptake in mobile app payments and to mirror this with the gradual phase-out of a portion of pay machines, before an emission-based scheme can be introduced in pay and display places.

Current parking charges vary widely between the many on- and off-street parking places in Croydon. The average on-street parking payment is £1.90. In

the present phase of the policy development, it is proposed to consult on the principles of significantly reducing (-90%, to £0.19 average) parking charges for zero emission vehicles and moderately increasing (+30%, to £2.47 average) charges for high emission vehicles. As a moderate increase, +30% is recommended, subject to consultation, as a reasonable balance between creating a sufficient incentive whilst not penalising unprepared occasional visitors to borough. The charge for parking a mid-range emission vehicle will remain unchanged (provided the driver registers for payment by a mobile app). There is little space on signs and machines for communicating the new charging structure to drivers in the street. To necessarily reduce complexity, without over-simplifying and losing the incentive, it is proposed to establish just 3 charging bands. Various types of vehicles will fall into one of the 3 bands.

Table 3 – Proposed Emission-Based Parking Charges structure on-/off-street parking.

Vehicle registration from March 2001	CO ₂ emission (g/km)	Proposed Change	Average Charge
Band 1	< 1	-90%	£0.19
Band 2	1 – 185	0%	£1.90
Band 3	> 185	+30%	£2.47
Pre-September 2015 diesel	n/a		
Pre-March 2001 petrol			
Payment at machine			

There are currently 574 off-street season tickets in circulation. It is proposed to align the season ticket charges to Table 3.

6.5 Diesel surcharge:

It is recommended that Croydon consult upon the introduction of diesel surcharging.

The health hazards from nitrogen oxide (NOx) and particulate matter (PM) emissions from private diesel cars and small vans relate primarily to vehicles registered before September 2015. Diesel vehicles conforming to the Euro6 and later standards in fact now emit less CO₂ than the average petrol engine and emit equivalent NOx and PM. The diesel ‘problem’ is to an extent resolving itself. The differential in fuel tax has made diesel fuel relatively more expensive at the pump; the VED (Road Tax) now higher for pre-September 2015 diesels; and the diesel supplement on company car benefits tax are increasing by 25% (from 3% to 4% of vehicle value) in April 2019. The sale of new diesel cars reportedly fell by 30% in 2018. This has, however, created an aftermarket of low cost pre-2015 diesel cars, which is not being fully addressed at a local level.

As an example, Westminster Council has implemented an on-street parking zone with a 50% diesel surcharge. Due to the necessity of identifying and classifying the vehicle at the time of purchasing parking time, the surcharge requires that all drivers pre-register and pay for parking via a mobile app. Pay and display machines have been phased out in the diesel surcharge zone.

It is proposed, as a first stage, subject to consultation, to introduce a 30% surcharge on pre-September 2015 diesel vehicles, in the resident parking permit charges from 2020.

It is further proposed, as a second stage, subject consultation, to introduce the 30% surcharge on pre-September 2015 diesel vehicles, in the pay and display parking places from 2021. This requires the enabling technology becoming available as per section 6.6 below.

- 6.6 As enabling technologies emerge in the marketplace, this will enable a phased implementation of Emission-Based Parking Charges across all types of parking provision across Croydon (i.e. permits and on-/off-street):

October 2019

- Emission-Based Parking Charges for Residents permits – see above section 6.2, to be phased in over a 12-month period on the existing permits renewal basis, subject to consultation.

April 2020

- Emission-based Parking Charges for all other permit types (business & visitor) – to be developed.
- Diesel surcharging for permits – to be developed.

April 2021

- Emission-based Parking Charges for on- and off-street parking – to be developed.
- Diesel surcharging for on- and off-street parking – to be developed.

Future reviews will be conducted at appropriate intervals following each phase of implementation to assess the effects and also consider any future measures to further drive improvements in our public health and air quality objectives.

7 CONSULTATION

- 7.1 It is recommended to undertake appropriate consultation in relation to Emissions-Based Parking Charges as detailed in section 6, and to undertake appropriate engagement in relation to the draft Parking Policy and action plan as appended.

- 7.2 We will follow any statutory prescribed guidance on consultation that this policy may be subject to. This may include timescales for consultation, and possible statutory consultees. We are currently in discussion with our legal services to determine how we will proceed with the statutory nature of this consultation. At Croydon, we adhere to the Gunning Principles, confirmed by the Court of Appeal in 2001 (Coughlan case) and are now applicable to all public consultations that take place in the UK. These are that:

- We must consult when proposals are still at a formative stage;
- We must give sufficient reasons for proposals to permit 'intelligent consideration'- that is, people involved in the consultation need to have enough information to make an intelligent choice and input in the process;

- We must allow for adequate time for consideration and response; and
- We (decision-makers) conscientiously take findings taken into account.

8 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

8.1 Revenue and Capital consequences of report recommendations

- 8.1.1 The financial implications of this policy are currently not fully developed and are pending the outcome of the engagement and consultation.

A full financial model will be developed following the engagement and consultation and reported as part of the findings report.

It is anticipated that there will be an additional income stream for the Council as a result of the proposed policy.

There will also be the need to invest in additional signs and equipment to ensure the policy can be implemented, following the completion of the consultation.

8.2 The effect of the decision

As detailed above it is likely that there will be an additional income stream along with the need to undertake additional investment. In order to secure such investment, business cases will be prepared as necessary for the appropriate funding regime.

8.3 Risks

- Legally challenged on the proposed charges and levels of income not being commensurate with traffic management objectives.
- Legally challenged on insufficiency in measures resulting in air pollution (public health) and traffic management duties not being met.
- Car ownership and car use behaviour changes having an excessively adverse economic impact on residents, enterprises and businesses.
- Car ownership and car use behaviour changes beyond the model assumptions, resulting in income projections and the duty to self-finance parking schemes not being met.
- Concerns that the proposed charges will disadvantage those who rely on the motor vehicle.
- Penalising residents in areas where CPZs are more extensive.
- There are technical challenges in systems software and devices for implementing Emission-Based Parking Charges, virtual loading bay and open data systems. Such challenges have been resolved in other towns, but at cost implications that cannot yet be fully ascertained until consultation has confirmed the preferred methods and levels.

8.4 Future savings/efficiencies

Following the engagement and consultation periods the financial implications of implementing the proposed parking policy will be fully developed and reported as part of the engagement and consultation findings.

The main aim of the policy is to improve parking and its environmental impacts within the borough. These will be linked to Corporate Priorities e.g. Low Emissions, AQ & PH etc.

If the implementation of any proposed policy will result in a reduced income for the Council this will need to be carefully considered as this will impact the Council's budget.

Approved by: Lisa Taylor, Director of Finance, Investment and Risk - S151 Officer.

9. LEGAL CONSIDERATIONS

9.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that there are a variety of statutory functions engaged by the proposed parking policy and action plan. These include the following:

Sections 6, 45, 46, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.

9.2 In making such Orders, the Council must follow the procedures set out at Schedule 9, Part III of the Road Traffic Regulation Act 1984 and detailed in the Local Authorities Traffic Orders (Procedure)(England and Wales) Regulations 1996 (the 1996 Regulations). The said Regulations, prescribe inter alia, specific publication, consultation and notification requirements that must be strictly observed. It is incumbent on the Council to take account of any representations made during the consultation stage and any material objections received to the making of the Order, must be reported back to the decision maker before the Order is made.

9.3 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. These powers must be exercised so far as practicable having regard to the following matters:-

- the desirability of securing and maintaining reasonable access to premises.
- the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
- the national air quality strategy.
- the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use

- such vehicles.
 - any other matters appearing to the Council to be relevant.
- 9.4 The High Court has confirmed that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.
- 9.5 Finally it should be noted that the Courts have been clear that the Road Traffic Regulation Act 1984 is not a fiscal measure and does not authorise a local authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.
- 9.6 When designating and charging for parking places the authority should be governed solely by the section 122 purpose. There is in section 45 no statutory purpose specifically identified for charging. Charging may be justified provided it is aimed at the fulfilment of the statutory purposes which are identified in section 122 (broadly referred to as “traffic management purposes”). Such purposes may include but are not limited to, the cost of provision of on-street and off-street parking, the cost of enforcement, the need to “restrain” competition for on-street parking, encouraging vehicles off-street, securing an appropriate balance between different classes of vehicles and users, and selecting charges which reflect periods of high demand. What the authority may not do is introduce charging and charging levels for the purpose, primary or secondary, of raising section 55(4) revenue.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance and Deputy Monitoring Officer

10. HUMAN RESOURCES IMPACT

- 10.1 There are no immediate HR issues and if any arise these will be managed under the Council’s policies and procedures.

Approved by: Jennifer Sankar, Head of HR, Place on behalf of Sue Moorman, Director of Human Resources.

11. EQUALITIES IMPACT

- 11.1 An Equity Analysis (EA) has been undertaken, to ascertain if the impact will be positive or negative for groups that share a protected characteristic. We will revisit EA at next stage. Engagement and consultation will ensure any equality and inclusion issues are incorporated and mitigating actions put in place.

Approved by: Yvonne Okiyo, Equalities Officer

12. ENVIRONMENTAL IMPACT

- 12.1 The environmental impacts associated with this policy will be positive by improving air quality, reducing congestion and improvements to the public realm.

13. CRIME AND DISORDER REDUCTION IMPACT

- 13.1 Gradually phasing out cash payments at pay and display machines will reduce the frequency of thefts, damage and vandalism.

14. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 14.1 A Parking Policy for Croydon can and must play an important role in helping to achieve Croydon's Corporate outcomes by enabling a collaborative approach to managing parking provision across Croydon. As the borough grows in population and density the policy aims to improve the environment by delivering actions that will encourage and enable a lesser reliance on cars, a change to lower emitting vehicles and better management of the demand on the kerbside and that will secure a healthy and safe environment near to schools.
- 14.2 There are currently insufficient borough level measures and tools in place to address specific areas of localised matters in air quality, to support active travel, to reduce external traffic and to accommodate planned and future Growth Zone and suburban intensification.

15. OPTIONS CONSIDERED AND REJECTED

- 15.1 Without this policy, the Council would be making decisions about Parking arrangements in the absence of any cohesive framework which is aligned to our corporate priorities. The making of any changes to parking arrangements in the absence of such a framework would be exposed to the risk of challenges.

Also, without this policy the Council would not be doing everything possible in its power to address the priorities within our Corporate Plan as detailed in section 4.3.1.

- 15.2 An option could be to wait and see what new technologies and technical solutions emerges as de facto standard from the marketplace or from work delivered in other boroughs, before committing to setting the policy objectives. However, this would introduce a lag in addressing our air pollution and public health priorities whilst parking pressures increase across the borough.

CONTACT OFFICER: Steve Iles, Director of Public Realm
Anupa Patel, Head of Strategic Projects

APPENDICES TO THIS REPORT: Appendix A – draft Parking Policy and action plan

BACKGROUND PAPERS: None

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CROYDON'S
**PARKING
 POLICY**
 2019 - 2022



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Draft

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APPENDIX 1
Action Plan 2019-2022



Policy Statement

► Parking affects almost everyone that lives in, works in or visits Croydon to some extent. Whilst our road networks have grown, so too have the competing demands for this space for use by pedestrians, cyclists, vehicles and parking. With the pace of growth in homes and developments that Croydon is set to undergo, this Parking Policy, and its emerging action plan, respond to the challenges posed and will deliver effective and safe parking infrastructure and management in the borough. It also complements and supports other local strategies and policies including our Corporate Plan 2018-2022 the Air Quality Action Plan, the Local Plan, the draft third Local Implementation Plan and further, it supports the London Mayor's Transport Strategy.

This policy sets out the aims and objectives for managing on- and off-street parking infrastructure, parking demand management, traffic and parking compliance, school streets safety and related customer services over the period 2019 to 2022. The policy and its objectives are largely cascaded down from national, regional and local policies.

The urban traffic infrastructure in Croydon was largely laid out in times when current levels of car use were not anticipated and the harmful effects of air pollution were not recognised. Car use has increased 10-fold over the past 50 years. Road traffic is projected to grow faster than car ownership, by 25% over the next 20 years¹. The UK has 30.6 million cars and 4.4 million light vans, transporting some 670 billion passenger kilometres (2017 data²), in some 47 billion journeys per annum. A parking space is required at the beginning and the end of each car journey. Parking management is thereby a key factor in managing congestion, sustainability, liveability and economy.

Parking management is a significant lever in influencing car ownership and use. It therefore has a role to play in addressing the borough's air quality and public health challenges. Many elements of car ownership and use costs are already being used to influence behaviours, including road tax, diesel fuel duty and differential congestion charges. These are national or regional schemes, which tend to be moderated for the general denominator. The national Clean Air Strategy 2019 devolves responsibility for further reducing emissions mainly to a local level. The national targets, such as the aim of 50-70% of new car sales being ULEV by 2030, require local authorities to develop the enabling support infrastructure. The London Mayor's regional proposal to extend the ULEZ emission requirements from central London the North and South Circulars by 2021 will also demand local considerations. There are currently insufficient borough level measures and tools in place to address specific areas of localised matters in air quality, to support active travel, to reduce external traffic and

to accommodate planned and future Growth Zone and suburban intensification.

Air pollution is directly associated with car and vehicle traffic, with pollutant levels being generally higher inside cars than on the pavement. It is a serious public health issue, which impacts most on our vulnerable young and elders. Croydon currently has the unenviable record for the highest rate of hospital admissions for childhood (0-9 year) asthma and the third highest number of asthma deaths in London. 7.5% of premature deaths in Croydon are linked to air pollution³. In the AQAP online public engagement survey 76% of 356 respondents rated their views on air pollution as 'very important' and a further 14% rated their views as 'important'. 88% agreed that the AQAP healthy streets initiatives are important. 84% agreed it is important to improve air quality awareness at schools. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents. The traffic chaos that often occurs outside schools at the beginning and end of the day is an unsafe environment for young children.

Each London Local Authority is required to produce a plan (a 'Local Implementation Plan') to implement the Mayor of London's Transport Strategy (MTS) within its area. The MTS aims for 'Good Growth' and sets outcomes including:

- 'Healthy Streets',
- Londoners to do at least 20 minutes of active travel each day to stay healthy (currently 26% of Croydon residents achieve this)
- 80% of journeys to be made by sustainable modes, namely walking, cycling, public transport (currently Croydon is at 49%)
- Reduce car ownership in London (the required Croydon reduction is 10,500 less cars owned by 2041)
- Reduce the volume of traffic in London (the required Croydon reduction is 5% by 2021 and 10% by 2041)

1. DfT Road Traffic Forecasts, <http://maps.dft.gov.uk/rtf18-vis/#/>

2. DfT, Transport Statistics Great Britain 2018

3. <https://www.croydon.gov.uk/democracy/dande/policies/health/annual-public-health-report>

These are translated into the emerging third Croydon LIP (LIP3) with associated targets. The MTS also states that Traffic Reduction Strategies should be developed at a borough level as part of LIPs, with the aim of reducing car and freight traffic levels across London. Management of the supply of parking is a key means of restraining car use and ensuring space for the alternatives.

In the LIP3 online public engagement survey with 1,000 responses in September 2018, 86% agreed that traffic levels are too high in Croydon and 72% agreed traffic levels should be lowered. 74% agreed they are concerned about air quality. 62% agreed to use the car less if the alternatives were better. 70% agreed that public transport is convenient (11% are unsure and 19% disagree). By comparison, a lesser 58% agreed that travel by car is convenient. 57% agreed they would walk more if conditions were right. 77% disagreed that the present Croydon street environment encourages them to cycle, although a lesser, but still significant, 39% agreed they would cycle more if conditions were right. Many Croydon streets are perceived as hostile to cyclists and pedestrians, largely as result of congestion and air pollution. Legacy unresolved footway parking exemptions cause localised difficulties for the partially sighted, wheel- and push-chair users.

The level of Croydon residents who regularly travel by active methods (walking and cycling) is lower than in each of our neighbouring 6 boroughs. Only 26% of Croydon residents undertake the minimum 20 minutes of active travel each day needed to stay healthy³. One in three of our children are now overweight and two in three adults are overweight⁵. Just 0.7% of easy to cycle journeys are made by bike, which is currently the lowest cycling mode share of all London boroughs⁶. Fortunately, the analysis undertaken by Transport for London in 2016 reveals the areas of Croydon that have the greatest potential for active travel in London.

Croydon's Growth Zone programme and wider developments throughout the borough are forecast to add 23,500 jobs and 30,000 new homes in the next decade⁷, adding to the existing challenges. In areas of higher population density, there tends to be a shorter travel distance between home, work, shopping and leisure. At least a third of new homes planned for the borough will be in the Croydon Growth Zone, situated a walking distance to the major public transport links that a majority of the residents will use to commute to work. This reduces the average reliance on the car and parking. However, currently 45% of people working in Croydon live outside the borough, and 50% of them commute by car⁸. The new jobs have the potential therefore to generate an increase in peak hour congestion and air pollution.

The average car is parked at home for about 80% of the time, parked elsewhere for about 16.5% of the time, and is actually only used for the remaining 3.5%⁹. Parking management measures typically operate by designating or moderating the provided space and through the parking time and charges structure. Motorists can respond to the measures by:

- Parking in a place that best suits personal needs,
- Parking in a different location with more space or lower charges, maybe further to walk,
- Parking for a different length of time,
- Making use of parking discounts, such as off-peak or emission-based pricing,
- Changing the mode of travel,
- Changing the destination, or
- Abandoning the journey.

Currently, 81% of all parking fee payments to the Croydon Council are made through the pay and display concept. The remainder 19% are parking permits and season tickets. The pay and display concept involves paying directly to a machine (29% cash, 20% card) or through a mobile phone app that mimics a machine (32%). The concept is based on drivers paying up-front for a pre-defined time. Such technology can raise driver anxiety. For example, it is difficult to fully enjoy dining or shopping in town while continually clock-watching the parking time. There is a perceived degree of unfairness in the Council retaining the income from unintended over-payments and from penalty-payments resulting from unintended overstays. The pre-payment concept is in fact not ensuring higher incomes. Emerging new technology is providing drivers with more convenient and efficient ways of paying for parking.



4. Draft LIP3 online engagement survey of 1,000 people in September 2018

5. <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Healthy%20Weight%20Action%20Plan%202017-2020.pdf>

6. <http://content.tfl.gov.uk/analysis-of-cycling-potential-2016.pdf>

7. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/download-draft-london-plan-0>

8. TfL LIP3 Borough Indicators & DVLA ownership by local authority

9. RAC Foundation, Spaced Out: Perspectives on parking policy, July 2012

Although parking management is an important lever, its limitations must be recognised:

- The local authority can only influence policies in publicly controlled parking spaces,
- Parking cannot take into account the origin of the journey and therefore distance travelled,
- Parking fees are dependent upon the length of the parking period, which can be inversely proportional to the total amount of parking related travel, and
- Studies indicate that the readiness to pay parking charges is greater than the readiness to pay road toll – i.e. parking charges are under certain conditions the weaker influencer.

Parking controls will contribute to the control of congestion and emissions. The reciprocal – that emission-controls contribute to parking controls – does not automatically hold true. While transport policy in general is concerned with unreliability of journey times caused by unanticipated congestion, journey times can also become uncertain because of the failure to find vacant destination parking, with further consequences to local congestion arising from the searching and idling for parking spaces. All cars in fact take up parking space, cause congestion and show hostility towards cyclists and pedestrians, regardless of emission levels and fuel type. Emission-based parking charges are not the full solution to reducing congestion and making road space more attractive to cycling. General parking times and charges structure are more effective in achieving this.

‘Home parking’ and ‘destination parking’ should be considered separately. Resident permits are generally associated with home parking. Business and season ticket permits are generally associated with destination parking. Destination parking conditions are a significant influencer on travel mode decisions. Destination parking therefore influences most on congestion, air pollution, public realm, health and safety.

Key terms & definitions:

- ANPR, Automatic Number Plate Recognition.
- AQAP, Air Quality Action Plan.
- CPZ, Controlled Parking Zone.
- DfT, Department for Transport.
- EVCP, Electric Vehicle Charging Point.
- LIP3, Local Implementation Plan (third revision 2019-2021).
- MTS, London Mayor’s Transport Strategy.
- P&D, Pay and Display.
- School Street, in present context, is a street with a school entrance, which during the start and end of the school day is restricted to all vehicles with the exemption of the following: pedestrians, cyclists, residents of an address within the zone, emergency vehicles, care services, people with special access needs, registered disabled persons with grounds for accessing amenities within the zone, school vehicles, public transport, business employees and school staff with allocated parking on their workplace premises within the zone..
- SEN, Special Educational Needs.
- TfL, Transport for London.
- ULEV, Ultra Low Emission Vehicle.
- ULEZ, Ultra Low Emission Zone.



▶ Section 1 Collaborative working

Aim

Parking management is a collaborative process distributed across planning, strategic transport, engineering and operational functions. The aim is a coherent approach that aligns and coordinates the individual sub-unit goals to the over-reaching common purpose.



Objectives:

- To work collaboratively, to assure the coherent planning, development and operational management of traffic and parking, including to:
 - ▶ Engage with corporate strategic and other local authority functions.
 - ▶ Establish and maintain a catalogue of policy objectives, which can be shared and applied by all for common purpose functions.
 - ▶ Establish and maintain a catalogue of planning decisions, which can be consulted on and applied by the engineering and operational functions. The catalogue will include a feedback feature to which monitoring and impact information is attached.
 - ▶ Ensure that planning and parking policy continually meets evolving needs, including with regards to the delivery of cycle parking, cycle lanes, Car Club, EVCPs, highway safety, business deliveries and managing parking stress (e.g. car free or permit free developments). Where there is a cumulative effect from multiple smaller developments in proximity to one another in a CPZ and where good public transport alternatives exist then we will seek to restrict occupiers from eligibility for on-street residential permits.
 - ▶ Coordinate resources to enable the effects of cumulative pressures and displacement from new developments in areas of growth to be identified, monitored and managed so that impacts on current residents can be reduced.
- ▶ Coordinate the introduction of Traffic Management Orders in public parking places within parks and on housing estates.
- ▶ Continue to respond to operational service action requests for road safety or highway management reasons.
- ▶ Refer non-operational matters to town planners or traffic engineers as appropriate for review, to help address the impacts of schemes & /or developments that will attract & generate more parking demand by proactively considering the introduction of new restrictions or new permitted controlled parking.
- ▶ Liaise and consult with emergency services to ensure that new and existing parking arrangements continually facilitate their duties.
- ▶ Review the future parking management of powered 2-wheel, small freight/delivery and passenger transport vehicles (inc: black cabs and minicabs), which have a growing and evolving function in substituting for private car ownership and use.
- ▶ Temporarily suspend parking on request of utility companies, residents and developers, to facilitate access for works in accordance with statutory processes and associated licensing/permission regime.

▶ Section 2 Parking Management

Aim

To provide suitable and adequate parking facilities on and off the highway, without detracting from the quality of public realm, and to contribute to securing the expeditious, convenient and safe movement of vehicular and other traffic. This includes contributing to the over-reaching policy aim of reducing car use and increasing walking, cycling and the use of public transport.



Objectives:

- To fairly balance parking capacity, parking times and bay types (residential, P&D, business and shared use) and to optimise these to meet the diverse needs of all road users, while affording a degree of priority as follows :
 - ▶ On main roads: efficient, congestion-free and safe flow of people and goods (including public transport, cycles and pedestrians).
 - ▶ In residential streets: needs of local residents for parking near to home as permitted by planning policy and planning law.
 - ▶ In streets near to commercial, retail, healthcare and leisure locations: all motorists, public transport users, cyclists and pedestrians, as necessary to optimise opportunity and equality for access to and the vitality of a locality.
 - ▶ Near schools: children and parents that walk and cycle to school.
 - ▶ In all places, overriding all of the above: Priority to emergency services, vulnerable road users, disabled people, people with special access needs and sufficiency for Car Clubs and EVCP users.
- To install and operate the on- and off-street infrastructure necessary to enable the effective and efficient use of the parking provision. This includes to:
 - ▶ Operate a reactive and preventative maintenance regime for ensuring infrastructure, including signs and lines, continually conforms to requirements and is visually presentable.
 - ▶ Maintain around 1,500 parking spaces in 17 off-street car parks in a clean, safe and orderly state.
 - ▶ New, amended or revoked on-street parking places are implemented by Traffic Management Orders, which are subject to advanced formal consultation through a Public Notice and approval by the relevant decision maker.
- To maintain and deploy sufficient and competent resources and devices to operate a civil enforcement system in compliance with the legislative framework and approved code of practice. This includes to:
 - ▶ Ensure a satisfactory level of compliance with the traffic and parking conditions established by road traffic laws (Highway Code) and/or by local Traffic Management Orders.
 - ▶ Maximise compliance with regulations in places used by vulnerable road users, such as cyclists, school children and disabled people.
 - ▶ Ensure enforcement on places where non-compliant parking would result in congestion, impact on highway safety and potentially result in delays to emergency service vehicles and public transport.
 - ▶ Implement and manage the compliance with conditions of use for parking spaces provided with Electric Vehicle Charging Points (EVCP).
 - ▶ Receive and expeditiously process representation against any enforcement action in accordance with the approved code of practice.
 - ▶ Operate a continual improvement quality management approach to the Council's compliance enforcement system, to minimise the number of penalty charge appeals and service specific complaints.

▶ Section 3 Controlled Parking Zones (CPZ)

Aim

Parking management is a collaborative process distributed across planning, strategic transport, engineering and operational functions. The aim is a coherent approach that aligns and coordinates the individual sub-unit goals to the over-reaching common purpose.



Objectives:

- To work collaboratively, to assure the coherent planning, development and operational management of traffic and parking, including to:
- Engage with corporate strategic and other local authority functions.
- Establish and maintain a catalogue of policy objectives, which can be shared and applied by all for common purpose functions.
- Establish and maintain a catalogue of planning decisions, which can be consulted on and applied by the engineering and operational functions. The catalogue will include a feedback feature to which monitoring and impact information is attached.
- Ensure that planning and parking policy continually meets evolving needs, including with regards to the delivery of cycle parking, cycle lanes, Car Club, EVCPs, highway safety, business deliveries and managing parking stress (e.g. car free or permit free developments). Where there is a cumulative effect from multiple smaller developments in proximity to one another in a CPZ and where good public transport alternatives exist then we will seek to restrict occupiers from eligibility for on-street residential permits.
- Coordinate resources to enable the effects of cumulative pressures and displacement from new developments in areas of growth to be identified, monitored and managed so that impacts on current residents can be reduced.
- Coordinate the introduction of Traffic Management Orders in public parking places within parks and on housing estates.
- Continue to respond to operational service action requests for road safety or highway management reasons.
- Refer non-operational matters to town planners or traffic engineers as appropriate for review, to help address the impacts of schemes & /or developments that will attract & generate more parking demand by proactively considering the introduction of new restrictions or new permitted controlled parking.
- Liaise and consult with emergency services to ensure that new and existing parking arrangements continually facilitate their duties.
- Review the future parking management of powered 2-wheel, small freight/delivery and passenger transport vehicles (inc: black cabs and minicabs), which have a growing and evolving function in substituting for private car ownership and use.
- Temporarily suspend parking on request of utility companies, residents and developers, to facilitate access for works in accordance with statutory processes and associated licensing/permission regime.

▶ Section 4 School Streets

Aim

To contribute to securing a healthy and safe environment near to schools, and to help children and parents use cars less and to walk, cycle and use public transport more.

Objectives:

- To implement and operate school streets, using ANPR technology, in all places where in agreement with the school, local residents and other public service authorities it will benefit children's health and safety, whilst being appropriate for local traffic conditions. New, amended or revoked school streets are implemented by Traffic Management Orders, which are subject to advanced formal consultation through a Public Notice and approval by the relevant decision maker.
- To operate an elevated peak-time compliance enforcement presence and/or school crossing patrols in locations where traffic conditions are assessed to adversely impact on safety and general order near schools, but where the implementation of a school street is assessed to be inappropriate.



▶ Section 5 Parking charges

Aim

To operate the charges defined in local Traffic Management Orders for on- and off-street parking places. In accordance with the Road Traffic Regulations Act 1984, the level of charges will have regard to securing the expeditious, convenient and safe movement of vehicles and other traffic (including pedestrians) having regard to the amenity, the national air quality strategy and any other relevant traffic management matters, and the requirement to self-finance the operational costs of providing and managing parking facilities. Any fees set are required to be reasonable and proportionate. Statutory guidance confirms that raising revenue should not be an objective of civil parking enforcement, nor should authorities set targets for revenue or the number of penalty charge notices (PCNs) they issue.

Objectives:

- To develop, implement and operate a differential parking and permit administration charges mechanism that will encourage the ownership, take-up and use of zero and low emission vehicles, while discouraging the ownership and use of noxious and high emission vehicles. The emission-based charging is proposed to be consulted on in accordance with the emergence of the enabling technologies to assess its applicability and impact on residents and road users within the borough with a view to promoting the use of low or zero emission vehicles.
- New and amended parking charges are implemented by new or amended Traffic Management Orders, which are subject to advanced formal consultation through a Public Notice and approval by the relevant decision maker.



▶ Section 6 Innovation and technology

Aim

Parking services will at a rate which the natural replacement cycle or reasonable investment costs permit, and subject to compliance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), end the use of closed data systems and instead promote the use of open data platforms and devices, to facilitate a digital Smart City transformation in the way people travel and to support innovation in transport information systems. The councils developing Digital Strategy will support the delivery of innovative systems to transform our platforms and devices.

Objectives:

- To embrace technology which helps customers to better access services and aids the efficiency of parking operations. This includes the expansion of cashless and mobile payment apps, with a resulting reduction in cash payments at machines. To gradually substitute Pay & Display machines for more user-convenient mobile apps and/or equivalent digital systems, which further enables the introduction of emission-based destination parking and unlocks valuable data in support of Smart City transportation objectives.
- To review and consider the introduction of virtual loading bays – i.e. using technology to enable a loading bay in any suitable place, for the time required.
- To open up existing parking places geographical information, on- and off-street parking definitions, restricted/unrestricted, the type of vehicle or permit accepted, yellow line restriction, parking spaces in a place and occupancy, times of operation, CPZs, duration (length of stay), tariff, payment methods and real-time space availability.



► Related laws or legislation

- Traffic Management Act 2004.
- London Local Authorities Act and Transport for London Act 2003, as amended by The Deregulation Act 2015.
- Greater London Authority Act 1999.
- Road Traffic Reduction Act 1997.
- Road Traffic Act 1991.
- Road Traffic Regulation Act 1984, impacted by Environment Act 1995.
- The Blue Badge (Disabled Persons Parking) Scheme, as amended, introduced 1971 under Section 21 of the Chronically Sick and Disabled Persons Act 1970.
- Equality Act 2010.
- Greater London Council (General Powers) Act 1974 on footway and verge parking ban.
- Parking (Code of Practice) Bill 2017-19 (completing its second reading in Jan 2019).
- Town and Country Planning Act 1990 (as amended).

National strategy and policy:

- Road to zero strategy
- Industrial strategy
- National Clean Air Strategy 2019 (launched 14th Jan 2019)
- The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions.

Regional strategy and policy:

- London Mayor's Transport Strategy 2018.
- London Mayor's new London Plan (draft).
- DfT Operational Guidance to Local Authorities: Parking Policy and Enforcement TMA 2004.

Adopted independent best practice standards:

- Disabled Motoring UK: Disabled Parking Accreditation, an industry standard for demonstrating conformity to the Equality Act 2010.
- British Parking Association (BPA): Park Mark, an industry standard for demonstrating conformity to recognised requirements for managing safety and security in a parking place.

► Related LB Croydon Strategies and Policies

- Our Corporate Plan for Croydon 2018 – 2022
- Air Quality Action Plan 2017-2022
- Croydon Local Plan
- Health and Wellbeing Strategy
- Local Implementation Plan (LIP3) (draft)
- Croydon Cycling Strategy 2018-23

The following strategies are also under development and will take the principles of this Parking Policy into consideration:

- Digital Strategy
- Community Strategy
- Sustainable City Strategy



This policy will be reviewed annually, to ensure that its principles and actions comply with any changes to legislation and reflect the changing needs of our communities.

Appendix – Action Plan 2019-2022

► Core Principles

Section 1: Collaborative working

The aim is for Parking management to be a collaborative process distributed across planning, strategic transport, engineering and operational functions, and to embed a coherent approach that aligns and coordinates the individual sub-unit goals to the over-reaching common purpose. This will assure the coherent planning, development and operational management of traffic and parking.

Our objective	Our action	Implementation
To work collaboratively	Joined up discussion and consensus definitions for: <ul style="list-style-type: none"> • Impacts of developments and public transport provisions upon parking. • the conditions of use and compliance for: <ul style="list-style-type: none"> • loading and unloading, • EVCP infrastructure, • Car Clubs. 	2019 - 2022
	Catalogue development sites with permit restrictions and land owner agreements.	2019 - 2022
	Digitise TMO information to be shareable for public domain.	2019 - 2022

Appendix – Action Plan 2019-2022

► Core Principles continued...

Section 2: Parking management

The aim is to provide suitable and adequate parking facilities on and off the highway, without detracting from the quality of public realm, and to contribute to securing the expeditious, convenient and safe movement of vehicular and other traffic. This includes contributing to the over-reaching policy aim of reducing car use and increasing walking, cycling and the use of public transport. This will ensure: that parking capacity & provision are balanced & optimized to meet the diverse needs of all road users; that on- and off-street infrastructure enables effective and efficient use of parking provision; a civil enforcement system in compliance with legislative framework and approved code of practice.

Our objective	Our action	Implementation
To fairly balance parking capacity to diverse needs	Review and resolve legacy temporary exemptions for footway and verge parking.	2019 - 2022
	Ensure sufficient disabled parking provision as per the Disabled Parking Accreditation (DPA) or London Plan, whichever is of the higher standard.	2019 - 2020
To install and operate on- and off-street parking infrastructure	To maintain parking infrastructure, including signs and lines, across the borough to maintain satisfactory compliance.	2019 - 2022
To assure compliance with Traffic Management Orders	Implement and operate the compliance criteria of the future EVCP infrastructure.	2019 - 2022

Section 3: Controlled Parking Zones (CPZ)

The aim is to manage parking where demand exceeds supply and/or unsafe conditions exist, through the design of permitted and restricted kerb space that fairly balances parking capacity, parking times and bay types (residential, P&D, business and shared use) in accordance with the locations and appropriate to the local communities and businesses.

Our objective	Our action	Implementation
Establish a consistent methodology for the assessment &/or development of CPZs.	Define methodology for new & existing CPZs to also include considerations for intensification areas, Car Clubs, EVPC infrastructure and shared bays.	2019 – 2020, Central Croydon. 2020 -2021, rest of borough.

► Core Principles continued...

Section 4: School Streets

The aim is to contribute to securing a healthy and safe environment near to schools, and to help children and parents use cars less and to walk, cycle and use public transport more.

Our objective	Our action	Implementation
Implement and operate School Streets of CPZs.	Extend School Streets on an annual basis subject to it being appropriate for the area in question. At least 3 School Streets in Sep 2019 and 10 (indicative) Schools Streets in Sep 2020.	2019 - 2021

Section 5: Parking charges

The aim is to operate the charges defined in local Traffic Management Orders for on- and off-street parking places. In conformance to the Road Traffic Regulations Act 1984, the level of charges will have regard to securing the expeditious, convenient and safe movement of vehicles and other traffic (including pedestrians) having regard to the amenity, the national air quality strategy and any other relevant traffic management matters, and the requirement to self-finance the operational costs of providing and managing parking facilities.

Our objective	Our action	Implementation
Introduce emission-based parking charges	Introduce emission-based charging for residents parking permits, on a permit renewal basis.	2019 - 2021
	Introduce emission-based charging for business permits.	2019
	Introduce emission-based charging for visitor permits.	2020
	Introduce diesel surcharge, initially for permits.	2020
	Introduce emission-based and diesel surcharging for on- and off-street parking places, including per event and season ticket charges.	2021

Appendix – Action Plan 2019-2022

► Core Principles continued...

Section 6: Innovation and technology

The aim is to end the use of closed data systems and instead promote the use of open data platforms and devices, to facilitate a digital Smart City transformation in the way people travel and to support innovation in transport information systems, at a rate dictated by the natural replacement cycle or reasonable investment costs permit.

Our objective	Our action	Implementation
Embrace new technology	Creating an online reporting portal for customers to report & receive feedback on parking issues.	2019 - 2022
	Expand alternative payment technologies for parking charges whilst reducing P&D machine numbers by 80%.	2019 - 2022
	Investigate new technologies and open data sources to provide guidance to drivers through apps or devices for nearest available parking spaces.	2019 - 2022
Consider introduction virtual loading bays	Review and evaluate technology options for virtual loading bays.	2019 - 2021
Open up parking data	Adopt emerging open data standards and collaborate with app developers and share data, within parameters of GDPR and Data Protection Act 2018 requirements.	2019 - 2022
	Ensure future procurement enable open data platform access in accordance with GDPR and Data Protection Act 2018 requirements.	2019 - 2022

CROYDON'S
PARKING POLICY
2019 - 2022

For General Release

REPORT TO:	CABINET 25th March 2019
SUBJECT:	Equality Annual Report
LEAD OFFICER:	Hazel Simmonds Executive Director Gateway Strategy & Engagement
CABINET MEMBER:	Councillor Hamida Ali Cabinet Member for Safer Croydon & Communities
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:	
<p>The Council's Equality and Inclusion Annual Report 2018 provides an update on the progress made in implementing the statutory equality objectives that are set out in the Equality and Inclusion Policy 2016-20 to reduce inequality and promote opportunity and fairness for all communities in the borough. It is aligned with the Community Strategy and the Corporate Plan. The Equality and Inclusion Annual Report sets out the progress made in line with the statutory duty to publish information each year.</p>	
FINANCIAL IMPACT	
<p>There are no direct financial implications arising from this report.</p> <p>There were minimal costs incurred in publishing the Annual Report and these were contained within the existing service budgets.</p>	
KEY DECISION REFERENCE NO.: This is not a key decision	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to;

- 1.1 Note the Equality and Inclusion Annual Report 2018 and that arrangements are in place to publish the Annual report. .

2. EXECUTIVE SUMMARY

2.1 The Equality and Inclusion Annual Report 2018 provides an update on the progress made in implementing the statutory equality and inclusion priorities as set out in the Equality and Inclusion Policy 2016-20 agreed by Cabinet in April 2016.

2.2 The Equality and Inclusion Annual Report 2018 supports the Council to demonstrate compliance with the Public Sector Equality Duty (PSED) set out in the Equality Act 2010. The PSED is made up of a general equality duty which is

supported by specific duties. The general equality duty requires the Council, in the exercise of functions, to have “due regard” to the need to:

- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it
- Foster good relations between people who share a relevant protected characteristic and those who do not share
- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.

The **specific duty** requires the council to:

- Annually publish information to demonstrate how it is complying with the Public Sector Equality Duty. This information must relate to people who are affected by the Councils policies and practices such as service users as well as its employees
- Prepare and publish equality objectives at least every four years

2.3 The information included in this report is drawn from a range of sources from across the Council.

2.4 It has also involved identifying activities that demonstrate good practice on equality and working with activity leads to gather more detailed information on how these initiatives have delivered positive outcomes for local people, particularly those that are most vulnerable and may experience exclusion. This information has been used to produce some good practice stories that describe the positive impact of some of the equality and inclusion initiatives that the Council implemented during the previous year.

2.5 The Equality and Inclusion Annual Report 2018 is structured around the Council's equality objectives:

- To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.
- To reduce the rate of child poverty especially in the six most deprived wards.
- To improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked after Children, particularly at Key Stage 2 including those living in six most deprived wards.
- To increase the percentage of domestic violence sanctions.
- To increase the reporting and detection of the child sexual offences monitored.
- To reduce the number of young people who enter the youth justice system.
- To reduce social isolation amongst disabled people and older people.
- To improve the proportion of people from different backgrounds who get on well together.
- To reduce differences in life expectancy between communities.

2.6 Each section of the report sets out the current equality and inclusion policy priorities (listed above) and a summary of the key activities and projects that the Council has focused on over the last year to deliver them.

- 2.7 It also contains good practice stories that aim to provide an overview of how the Council has worked in partnership with our statutory, voluntary and community partners and engaged with our customers to deliver equality initiatives that support work on improving service outcomes for diverse communities in the borough.
- 2.8 The Council used the Opportunity and Fairness Commission's (OFC) final report recommendations and research and the information on issues of deprivation and disadvantage that are highlighted in the Indices of Multiple Deprivation (2015) to set its statutory equality and objectives for 2016-20. These define the boroughs longer term vision for fairness and set out the outcomes and performance measures that the Council will focus on to address inequality.

3. DETAIL

- 3.1 The Equality Act 2010 (the Act), contains the Public Sector Equality Duty (PSED) in section 149 of the Act that came into force on 5 April 2011. The duty applies to public bodies and others carrying out public functions. Nine characteristics are protected in law and these include age, gender, disability, race, religion and/or belief, sexual orientation, pregnancy and maternity, marriage and civil partnership, and gender reassignment
- 3.2 The Act and PSED support good decision-making by ensuring public bodies consider how different people will be affected by their activities, helping them to deliver policies and services which are efficient and effective; accessible to all; and which meet different people's needs.
- 3.3 The PSED is made up of a general equality duty which is supported by specific duties. The 'public sector equality duty' is the formal title of the duty , the 'general equality duty' is the overarching requirement or substance of the duty, and the 'specific duties' are intended to enable better performance of the general equality duty.
- 3.4 The general equality duty requires the Council, in the exercise of functions, to have due regard to the need to:
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
 - Foster good relations between people who share a relevant protected characteristic and those who do not share it.
 - Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- 3.5 The Council is also required to publish information to demonstrate their compliance with the general equality duty. In addition:
- All listed bodies (except schools and pupil referral units) must do this at least annually by 31 January.
 - Schools and pupil referral units must do this, at least annually by 6 April.

3.6 This information must relate to people who share a protected characteristic and who are:

- The Council's employees
- Affected by its policies and practices (for example, service users).

3.4 The Council, like most public sector organisations is required to publish an annual report setting out the progress it makes implementing the equality objectives and its arrangements for publishing information. At appendix one is the Council's Equality and Inclusion Annual Report 2018 (minor updates to the draft report will be completed by the date of final publication 31 March 2019.)

4. CONSULTATION

4.1 The information included in this report is drawn from a range of sources from across the Council.

- It has also involved identifying activities that demonstrate good practice on equality and working with activity leads to gather more detailed information on how these initiatives have delivered positive outcomes for local people, particularly those that are most vulnerable and may experience exclusion

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 There are minimal direct financial implications arising from the publication of the Council's Equality and Inclusion Annual Report 2018 and these are contained within existing revenue budgets. The Annual report must be accessible and therefore made available in different formats, in summary and electronically - on the Council's website and intranet.

5.2 Failure to implement and annually report on the Council's Equality and Inclusion priorities and actions will expose the Council to risk of claims for breach of statutory duty. Failing to implement actions identified in the equality analysis conducted to support decision-making or compliance with the public sector equality duties will also expose the Council to risk.

Approved by Lisa Taylor, Director of Finance, Investment and Risk, S151 Officer

6. LEGAL CONSIDERATIONS

6.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the Equality Act 2010 (Specific Duties) Regulations 2011 sets out that the Council must publish information to demonstrate its compliance with the duty imposed by section 149(1) of the Equality Act 2010, not later than 31st January 2012; and subsequently at intervals of not greater than one year beginning with the date of last publication. The information which the Council publishes must include, in particular, information relating to persons who share a relevant protected characteristic

who are—

- (a) its employees;
- (b) other persons affected by its policies and practices.

- 6.2 Section 149(1) (a) to (c) sets out the public sector equality duty with which the Council is required to comply. A public authority must, in the exercise of its functions, have due regard to the need to—
- (a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 6.3 In addition, the Council is required to publish one or more objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of subsection (1) of section 149 of the Act referenced above.
- 6.4 The objectives must be published—not later than 6th April 2012; and subsequently at intervals of not greater than four years beginning with the date of last publication.
- 6.5 An objective published by a public authority in compliance with paragraph (1) must be specific and measurable and must be published in such a manner that the information is accessible to the public.

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance and Deputy Monitoring Officer

7. HUMAN RESOURCES IMPACT

- 7.1 Equality is integral to our workforce processes, policies and practices, including becoming an employer of choice. We continue to make positive progress towards having a workforce that reflects its community and where inclusivity is embedded in our practice, though it is recognised that there is more to do.

Approved by: Sue Moorman, Director of Human Resources

8. EQUALITIES IMPACT

- 8.1 Consultation was carried out when drafting the Equality and Inclusion Policy. Please see Cabinet Reports, 25 April 2016, Item A44/16 for further details.
- The Opportunity and Fairness Plan 2016-2020 aims to make Croydon ‘a stronger, fairer borough where no community is held back.
 - The Opportunity and Fairness Plan sets out the Council’s Equality objectives 2016-2020. This information is from the Borough Profile, Index of Multiple Deprivation, as well as the views of 3000 people including staff, residents, local businesses, community and voluntary organisations all of whom contributed to

the Opportunity and Fairness Commission's final report published in January 2016.

- The work of the Opportunity and Fairness Commission is essentially an extensive analysis of equality and inclusion issues in the borough.
- 8.2 Further information about thematic inequalities will be found in borough-wide documents such as the annual health report, crime analysis or workforce profile that can be accessed through that can be accessed through <http://www.croydonobservatory.org/>

Approved by: Yvonne Okiyo, Equalities Officer

9. ENVIRONMENTAL IMPACT

9.1 None

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 None

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

11.1 To support the Council to demonstrate its transparency and fairness in its operations as well as compliance with its public sector equality general duty and specific duties as defined by the Equality Act 2010.

12. OPTIONS CONSIDERED AND REJECTED

12.1 None

CONTACT OFFICER: Yvonne Okiyo, Equalities Manager ext 63265

APPENDICES TO THIS REPORT: Appendix 1 – Equality annual report 2018

BACKGROUND PAPERS: None

CROYDON COUNCIL

EQUALITY ANNUAL REPORT 2018

“A stronger, fairer borough where no community is held back”

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Foreword – Cabinet Member for Safer Croydon and Communities

As the portfolio holder for the Safer Croydon and Communities agenda, I am pleased to introduce the progress report on the Council's Opportunity and Fairness Plan 2016-2020, which sets out the Council's equality objectives and latest analysis and action on the Council's workforce profile and gender pay gap.

Equality and inclusion is integral to everything we do as a Council, whether it is the services we provide, the money we spend, or the people we employ. It is a fundamental tenet of our pledge to achieve the highest standards of excellence in equality and inclusion practice, working closely with our partners in the public, business, and voluntary sectors.

This administration wants Croydon to be a stronger, fairer borough where no community is held back. We want the Council to reflect the diversity of the Borough, and focus on embedding equality and inclusion in all that we do as well as providing community leadership to encourage and support our partners in Croydon to share this ambition.

Croydon's Corporate Plan 2018-2022 outlines the Borough's key priorities for the next four years, and how we will continue to eradicate inequalities and ensure that Croydon is a place where all have the opportunity to live, work and flourish. One of the Corporate Plan's outcomes is to abolish inequality in Croydon and work towards a place where all have an equal opportunity to prosper.

This progress report sets out some significant steps the Council has taken over the past year to embed equality and inclusion throughout the organisation. It highlights the Council's achievements in relation to our equalities performance indicators, and sets out examples through a series of case studies that describe the different ways the council is seeking to ensure that our services are fair, inclusive and accessible to our residents. The majority of the case studies support achievements across the range of the equality objectives we set for 2016/20.

Although many challenges remain locally and nationally to achieve our ambitions there are significant achievements including:

- ✓ Continued support to the independent Opportunity and Fairness Commission towards the delivery of its recommendations and objectives.
- ✓ Promoting equality of access to education and jobs through the development of programmes tailored to the needs of under-represented communities.
- ✓ Ensure employment opportunities for disabled people transitioning into employment, or who may need more supportive work environments.
- ✓ Continuing to work with young people to tackle the issues that matter most to them, raising aspiration and opportunities through the Choose Your Future campaign and the Youth Congress.
- ✓ Establishing the Young Mayor to increase young people's participation within the borough.
- ✓ Developing more apprenticeship programmes dedicated to meeting the needs of Croydon's young people.
- ✓ Work with schools to help them support students with additional needs and keep those students in mainstream education.
- ✓ Increasing the availability of parenting training and support services for single parent families.
- ✓ Work to reduce digital exclusion in the borough.

- ✓ Establishment of the One Croydon Alliance in order to integrate provision of hospital, primary care, mental health and social services for those aged 65+ and extending that to all ages.
- ✓ Tackling isolation through better access to services and facilities for all parts of the borough, particularly the most disadvantaged areas.
- ✓ Continuing to work to reduce ill-health, including promoting mental health and reducing inequalities in health care.
- ✓ Ensuring that prevention services are delivered in locations around the borough, where those who need them most can have easy access.
- ✓ Celebrating Croydon's diversity and heritage through supporting annual events such as Croydon Mela and PrideFest.

The performance in key areas and good practice stories provide evidence that we have made progress in our journey towards achieving excellence for our equality and inclusion practices. This progress has also been recognised through the Council winning three awards at the *Employers Network for Equality and Inclusion (enei)* in 2018. These included Overall winner – Public Sector, Apprenticeships Award, Mental Health and Wellbeing and being Highly Commended for the Employee Network Group of the Year.

We are not complacent and recognise that there are still many inequality and fairness challenges in the borough that we need to focus on by working in collaboration with our partners.

Over the next year, we are preparing for the Equalities Framework for Local Government (EFLG) accreditation. Undertaking the assessment will help us review and improve our performance for people with protected characteristics, make improvements to and deliver better equality outcomes for staff, residents and service users, and meet our Public Sector Equality Duty under the Equality Act 2010.

I look forward to sharing the improvements that we make in 2019/20 with you in our next progress report.

Introduction

The Equality Policy and supporting Opportunity and Fairness Plan 2016/20 set out the Council's statutory equality objectives in line with the regulatory duties under the Equality Act 2010.

In setting the equality objectives for 2016/20 an evidence base was drawn upon from the Croydon Opportunity and Fairness Commission final report, the Borough profile 2015 and Index of Multiple deprivation which highlighted the following objectives:

- ✓ To increase the rate of employment for disabled people, young people, over 50s and lone parents, who are furthest away from the job market.
- ✓ To reduce the rate of child poverty especially in the six most deprived wards.
- ✓ To improve attainment levels for White working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked after Children, particularly at Key Stage 2 including those living in six most deprived wards.
- ✓ To increase the percentage of domestic violence sanctions.
- ✓ To increase the reporting and detection of child sexual offences monitored.
- ✓ To reduce the number of young people who enter the youth justice system.
- ✓ To reduce social isolation amongst disabled and older people.
- ✓ To improve the proportion of people from different backgrounds who get on well together.
- ✓ To reduce differences in life expectancy between communities.

Key performance indicators to measure the progress were developed for each objective and embedded within the Council's Corporate performance framework, these have been reported on a bi-annual basis to Cabinet since September 2016.

Each section of the report sets out the current equality and inclusion priorities (listed above) and a summary of the performance key activities and projects that the Council has focused on over the last year to deliver them.

It also contains good practice stories that provide an overview of how the Council has worked in partnership with our statutory, voluntary and community partners, and engaged with our residents to deliver equality initiatives that support work on improving service outcomes for diverse communities in the borough.

Next Steps

The Council will continue to monitor progress against the Equality Objectives set out in the Opportunity and Fairness Plan 2016/20 through the Council's Corporate Performance Framework and will report annually on overall progress.

THEME 1

EMPLOYMENT

A TOWN CENTRE THAT LIFTS THE WHOLE BOROUGH

EQUALITY OBJECTIVE

To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.

Why we chose this equality objective?

Despite falling unemployment the Index of Multiple Deprivation (IMD) showed there were still challenges around the proportion of working age population excluded from the labour market, especially those aged 18 – 24, over 50, and those who would like to work but are unable to do so due to sickness, disability and/or caring responsibilities. The Opportunity and Fairness Commission found that many disabled people, those who had long-term health conditions, or with mental health concerns, want to work but struggle to gain employment.

Residents told the Opportunity and Fairness Commission that they would like to see local employers doing more to recruit disabled people, and those from BME backgrounds. The Commission also found that female workers wanted better support with childcare and caring responsibilities to access the job market. In addition the Commission highlighted that workers needed to be paid the London Living Wage (LLW).

What has happened?

The percentage of people employed within the borough and the percentage of 18-24 years not in employment, education and training the Borough continues to perform better than London and England. The numbers of Job Seekers Allowance claimants aged between 60-64 years within the Borough continues to see reductions in the six most deprived wards. The performance demonstrates the focus on getting people into jobs and the continuing success of the Croydon Works programme.

There are still challenges in relation the level of skills and qualification in the borough to maximise the opportunities within the job market. Through the Croydon Works programme and Good Employer Charter the Council continues to focus on ensuring that all Croydon residents have access to good quality employment opportunities whether that is through education, training or support for job readiness. This includes making our Council a London Living Wage Council, with payment of the LLW as a basic requirement in new council contracts and working towards ensuring the town centre is developed as a London Living Wage commercial and shopping zone, promoting the payment of the London Living Wage. In addition there is a focus on extending the Croydon Good Employer Charter with business champions and asking our business community to: Pay Fair, Employ Croydon, Buy Croydon and Be Better for Croydon.

The key actions that the Council has taken to deliver this outcome include:

- ✓ **Promoting equality of access to education and jobs through the development of programmes tailored to the needs of under-represented communities.**
- ✓ **Ensure employment opportunities for disabled people transitioning into employment or who may need more supportive work environments.**

- ✓ **Developing more apprenticeship programmes dedicated to meeting the needs of Croydon's young people.**
- ✓ **Increasing the availability of parenting training and support services for single parent families.**

The case studies below highlight the work supporting this theme.

Employer of Choice Programme

As an apprenticeship levy paying employer, the Council recognised the need to design meaningful progression pathways into Croydon Council, and creating jobs that attract and provide jobs for local people.

Through the Employer of Choice Programme, the Council aims to;

- Become an employer of choice for local residents.
- Upskill and take on new staff.
- Develop progression pathways.
- Respond to the workforce challenges in relation to an ageing local government workforce, and particular professions it is hard to recruit and retain, for example procurement, planning, health and social care

The programme provides a range of employment pathways into the Council, including apprenticeships, work experience, traineeships and internships. Some of its ambitions include;

- Targeting certain groups within the Croydon population who would benefit from apprenticeships within the local authority, for example young people, individuals from BME backgrounds, people with disabilities.
- Blended learning, with development of skills and pastoral care.
- Providing buddies and mentors.

The programme is made up of activities, events and training to help our apprentices grow. It offers a range of opportunities and qualifications to help participants gain skills and knowledge they need. Participants can earn while they learn and get paid a competitive salary. All training provided is free. Find some examples of these below;

Cultural Internships

Apprentices are given the opportunity to gain paid work experience with both internationally acclaimed and local arts organisations. Placements are available with UK's leading black theatre company, Talawa; Croydon's world-class chamber orchestra, the London Mozart Players (LMP); the world-famous BRIT school; fashion company FMM Pop Up who have just moved to Croydon from Camden; and our very own Croydon Music and Arts.

The cultural internships project has been developed by the council and supported by Croydon Partnership, the joint venture between Unibail-Rodamco-Westfield and Hammerson.

The programme was named 'Apprenticeship Employer of the Year' at the Personnel Today Awards - a ceremony that celebrates the success of the best of HR in both the private and public sector. This achievement follows on from previous success at the enei (Employers Network for Equality and Inclusion) Awards earlier in 2018.

The scheme is in its second year and third wave - having successfully increased employment opportunities for people across the borough - welcoming young people from underrepresented groups with little or no work experience.

It's the result of innovative recruitment practices such as utilising social media platforms, simplifying the application process, and providing group assessment days to allow candidates, who may struggle with a formal interview, to demonstrate their strengths. Staff tasked with recruiting were also told to look at the potential of those applying as opposed to experience, which is recognised as an example of good practice by the Learning and Work Institute.

Our apprentices, who are ambassadors for the council, speak in schools to students and young people to further break down socio-economic barriers. They are the face of our Choose Your Future campaign - supporting young people to make positive choices and give them access to opportunities.

More young Croydon residents and school leavers have had an opportunity to develop experience and gain a relevant qualification that they would not have had without the scheme.

Since its launch in 2017, the scheme has recruited 36 new apprentices. In addition to the work experience opportunities, Croydon also created more than 20 short work placement opportunities, and are in the process of pulling together and streamlining internships available at the council. Four externally recruited apprentices have moved up to the next level of their apprenticeship within the council. Two more have been offered opportunities to progress to the next level and four more have achieved employment within the council after or before their apprenticeship was completed, including a 17 year old.

"Before working in the council I was a manager in a milkshake shop. There was no way I would have been able to make the transition into local government that quickly without doing an apprenticeship. It allowed me to change my skill-set, get a foot in the door and figure out what direction I wanted to go in."

I secured a role as a full-time housing officer after my apprenticeship and after that I applied for a role in the SNAP (Supported Needs Assessment and Placement) team working in supported housing. I now specialise in working with offenders and am based at the probation offices twice a week. Looking back, I am proud of my career progression. I have recently completed a leadership programme and in the future I will be looking at managerial roles."

Leonie Thomas - former apprentice

"Young people want the opportunity to learn, work and get paid. Employers want to take on young people, but they also expect them to have the relevant experience, by being the organisation to take on apprentices you give them the ability to gain the experience that they need to progress."

I have been working with the 14-19 team for approximately 3 months, during which I have had an active part in the production of the post 16 prospectus. I was once a student receiving the prospectus and I am now helping to create something that will be beneficial to current students."

Supported Employment for Disabled residents

The Council's Supported Employment Team won a BASE (British Association for Supported Employment) Innovation Award for the work they have undertaken to support residents with disabilities into employment. This is illustrated by a number of projects that have produced employment outcomes or provided the necessary training, to enable disabled residents to be more job ready and follow their aspirations. You can find further information about some of the projects below;

All About Me Shop

All About Me is a boutique shop staffed by Croydon residents' with disabilities working towards a career in retail. Residents are given the opportunity to participate in a four-week employability programme to help local residents with disabilities gain experience of working in a shop and gain a City & Guilds level 1 retail qualification at the same time.

The Gateway service works to support and train both people at risk of homelessness and adults with disabilities so they have greater confidence in the workplace, financial stability and independence. Disabled residents are also given the opportunity to volunteer in the shop, thereby also gaining retail experience for their CVs.

Shop stock is produced by local artisans, local residents with disabilities and pupils from Bensham School (a school for pupils with moderate learning difficulties and autism). This helps them showcase their talents and gives them opportunities and the confidence to take their talents forward. Support came from the community - The BRIT School, local colleges, special schools who provided items, and Social Enterprises such as Solid Wood who provided their support and furniture.

The All About Me Shop is a proof of concept pilot, with the aim to make this a full time project that provides residents with opportunities to gain valuable work experience underpinned with a qualification, and engage with employers to turn the work experience into paid work. This can be further extended to include care leavers, long term unemployed, homeless residents and work experience students. The project also aims to support residents that make clothing, furniture, bags and other products to sell their stock in the All About Me shop.

One of the people on the course is Chris Meliniotis, aged 58 from Kenley, whose past jobs have ranged from sweet shop assistant to warehouse foreman and dry cleaner. He has been unemployed for 12 years after being turned down for hundreds of jobs.

Chris said: "I have had interviews and it all goes well but once I've mentioned my disability they never phone me back to say whether I've got the job, and it is upsetting. The only retail experience I haven't got is with modern tills where people pay with cards. I hope I get the qualification because that brings me closer to getting a job."

Reverse Job Fairs

An innovative approach was taken to the format of a Jobs Fair for people with disabilities. Instead of potential candidates approaching employers to look for work, the process was turned on its head with employers, seeking to recruit and approaching candidates. The event was deliberately kept informal and a relaxed atmosphere maintained.

60 residents with disabilities showcased their skills by running stalls where local employers were given the opportunity to approach them to discuss vacancies currently available. The event was targeting 40 residents but due to popularity 60 residents attended. Three reverse job fairs have taken place to date. This has led to 10 disabled residents gaining employment and 15 starting work placements/work courses.

Supported internship programme

The Council hosted a supported internship programme in 2017/18, which gave eight talented residents a work opportunity. These eight interns have grown in confidence, developed new skills and made new friends and work colleagues. A second cohort was run from September 2018. Five out of the eight interns have secured paid job opportunities, one is taking part in the second cohort, and two will secure volunteering opportunities.

Croydon Council

Croydon Council has worked with the Department for Work and Pensions, local partners and employers over the past three years to encourage employers to become more confident in recruiting and retaining someone with a disability.

Croydon Council were awarded Disability Confident Employer status in October 2016 (Level 2) and is working towards becoming a Leader Employer. (Level 3).

Delivering Employability Skills and Parent Aspirations

Croydon's Best Start model brings together key services including health visiting, children's centres, early years and the voluntary sector into an integrated service model to ensure young children get the best start in life.

The service supports parents/carers with children aged under five years to overcome barriers to employment, with a particular focus on those parents/carers who are out of work or lack confidence and, the skills needed to look and apply for work. It delivers a package of services which ensure overall progression and pathways to work and concentrate on:

- supporting parents/carers to understand and maximise their family budgets and benefits take up;
- delivering an innovative program that helps parents/carers to break down main barriers to employment and,
- providing support and brokerage services for parents/carers to access volunteering and work experience opportunities.

Employability skills for parents have been delivered in collaboration with Croydon Children's centres and Croydon libraries. Children's centres provide the crèche facilities in order for parents to attend the employability sessions/workshops, thereby reducing the barrier to learning for many parents of young children. The training is tailored to the needs of individual parents and includes beauty and jewellery workshops, budgeting skills and CV/interview skills, working closely with several partners under the Best Start contract for both delivering and signposting services, this includes working with local charities/voluntary/community sector. Through strong relationships developed with the library services in the borough, the contractor has secured space to deliver computer skills workshops to local parents, through a digital zone, enhancing the original contract and supporting parents further.

Below are quotes from participants who attended the digital skills course;

"The tutor is the most fantastic lady I ever met. Great information about everything I want to know regarding digital skills."

"Very interesting course. I gained a lot of knowledge on job searching and employment. I have become more confident using the web."

"This course was very relevant and helpful. Actually, was more than what I expected from the course. Lots of information about services and support for parents in Croydon. And wise advice about how to search and work on career path and job search. Thank you, this course is very helpful and enlightening as to what is available."

THEME 2 CHILD POVERTY
LEAVING NO CHILD BEHIND

EQUALITY OBJECTIVE

To reduce the rate of child poverty especially in the six most deprived wards.

Why did we chose this equality objective?

Child poverty varies significantly across the Borough. Although the overall proportion of children in poverty had fallen, the areas with the highest rates of child poverty had remained the same namely: New Addington, Fieldway, Broad Green, Selhurst and Thornton Heath. Almost four times as many children live in poverty in Fieldway (30%) than Sanderstead (8%). Welfare reforms had further compounded the situation for many of those who already find it difficult to make ends meet. The Opportunity and Fairness Commission found food banks around the borough were struggling to cope with the increase in demand from people who were in need. At a time when money is tight many people got into debt and turned to payday loans or hire purchase. Citizen Advice in Croydon told the Commission that after benefits, tax credit and housing issues, debt represented their third biggest case load.

Tackling the socio-economic determinants of health such as jobs, homes, social cohesion, education and income are key to reducing the inequalities in early years that become the inequalities in health and life chances.

What has happened?

Nationally there has been an upward trend in child poverty over the last three years with the impact of welfare reform and benefit freezes challenging the ability to combat child poverty locally. Families on the margins of poverty are often dependent on in-work and out-of-work benefits. Changes in the benefits system have a significant impact on child poverty rates which can hide the impact of local initiatives.

The Council has collaborated with a range of partners to undertake a number of initiatives and approaches which have contributed towards combating the impact of child poverty. The key actions include:

- ✓ **Working towards becoming a flexible working borough, and increasing the number and range of flexible working opportunities.**
- ✓ **Continued delivery of the Best Start Programme, a multi-agency model for improving universal and early intervention services from pregnancy until the child reaches five years old.**
- ✓ **Exploring new models of childcare that offer parents and carers appropriate affordable places.**
- ✓ **Supported Community Connect Alliance, a community hub that helps residents achieve financial stability by balancing their income, budget and housing costs.**

The case study below highlights the work supporting this theme.



Community Connect

Community Connect was set up and co-designed with partners from across the voluntary, community, faith, private and statutory sectors.

The Council recognised the need to change the way it supports residents in order to respond to wider vulnerabilities and issues in particular localities; it needed to go above and beyond to effectively prevent residents from experiencing crisis and homelessness and launched Community Connect in January 2017.

Based at the Family Centre in Fieldway, Community Connect is a multi-agency ('Alliance'), community hub model that is based in the community. Membership conditions are prioritised to residents who may be at a time of crisis, in need of budget management, training, employment and housing support. This element of 'need' is assessed and typical members are families with children who are affected by the welfare reform changes, those unemployed or at risk of homelessness, food and fuel poverty. There have been a number of positive outcomes whereby tenancies have been sustained, employment has been secured and incomes have been maximised therefore alleviating the risk of child poverty within these families.

We identify households most at risk of homelessness and help residents gain clarity of their circumstances and what they can realistically do to improve their situations. As one resident explained "It's the choice between paying the rent and buying food". It is not acceptable that any of our residents have to make these kind of choices.

By working in an innovative way with residents in their own community we are identifying opportunities to make an impact earlier and tackling the issues more quickly to prevent escalation as well as reducing the demand for more costly statutory services in the future.

Community Connect outcomes:

- 21 long-term unemployed residents into work,
- 22 residents supported into education,
- 5.27 tonnes of surplus food provided, helping families save a combined £37,042.50 on their food shopping bills
- Addressing poverty – the Food Stop reached its target number of members (100) within just weeks of its launch
- Encouraging social value e.g. Food Stop shop fit-out (Mulalley); food donations (Tesco); volunteers (Croydon Council)

In addition, Community Connect is providing inspiration for others in the sector who are using this approach as best practice in their own schemes.

Community Connect/Food Stop Film

https://www.youtube.com/watch?v=CA-W90H1m_4&feature=youtu.be

Due to its success we are rolling out Community Connect/Food Stop to other parts of the borough so even more residents can benefit. Community Connect/Food Stop Thornton Heath will be launching in early 2019.

Case Study – Resident - <https://youtu.be/abpVXQDTInU>

THEME 3 ATTAINMENT

LEAVING NO CHILD BEHIND

EQUALITY OBJECTIVE

To improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked after Children, particularly at Key Stage 2 including those living in the six most deprived wards.

Why did we chose this equality objective?

Croydon's borough profile (2015/16) highlighted that the proportion of children achieving a good level of development by age 5 was lower than the national average across England and significantly lower for children from poorer backgrounds. Poor levels of literacy and language among a family can have a detrimental impact on early learning and development that result in greater exclusion later on in life.

Despite improved attainment among children and young people in Croydon, gaps remained difficult to close for BME (Black Minority Ethnic) children, disabled children with special educational needs and those receiving free school meals, especially those who were carers and living in the most deprived wards in the north and in New Addington and Fieldway. In addition, children who are looked after in care, especially unaccompanied asylum seeking children, of which Croydon has the largest number of any London Borough, experienced significant difficulties including trauma and mental health issues. For unaccompanied asylum seeking children there are also often cultural and language barriers.

What has happened?

In 2016/17 the Borough schools continued to perform at or above the national and London average in key attainment areas, including the early years, key stage 1 and key stage 2. At Key Stage 4 pupils in Croydon secondary schools continue to make better than average progress. These achievements have been mirrored in performance above the national average in educational attainment for children with SEND (Special Educational Needs), Black Caribbean children, White Working class children and children in receipt of free school meals.

Although outcomes for Croydon Looked After Children who have been in continuous care for 12 months or more are lower than for all pupils, data for 2016/17 shows that they attain in line with their peers nationally. This is an improved picture from the previous academic year we are starting to close the attainment gap for Looked After Children and are working hard to improve this further. At the end of key stage 4, 48% of Looked After Children achieved a combined English and mathematics GCSE pass at Grade 4 or above. A large percentage of this cohort are UASC (Unaccompanied Asylum Seeker Children), many of whom have little previous education experience or provision in place when they enter the care system. These learners go on to make considerable progress, achieving at a level appropriate to their starting point and are successfully supported into suitable courses post 16. The successes enjoyed by our post 16 learners are testament to this and a result of the heavy investment made into this area of work.

The key actions that the Council has taken to deliver this outcome are:

- ✓ **Continuing to ensure there are school places for all our children and young people**
- ✓ **Work with schools to help them support students with additional needs and keep those students in mainstream education**
- ✓ **Working with schools to avoid permanent exclusions**
- ✓ **Supported the creation of a new school in New Addington, which will provide places for children with special needs between the ages of 4 and 16**
- ✓ **Provided 56 additional places for children with special educational needs**

The case study below highlights the work supporting this theme.

Virtual School

The virtual school service provides advice and support to children and young people aged 3-19 years who are Looked After. From the time a child comes in to the care system, we actively work to put strategies in place and start the support process of the child.

The Virtual School (previously the Looked after Children Education Service) is a core service within the Council's Children and Young People's Service.

It has a tiered delivery model for Children Looked After:

Level 1 - monitoring individual attainment, attendance, Special Educational Needs (SEN), exclusions and leading on Personal Education Plans (PEPs).

Level 2 - individual casework including negotiation and advocacy, attendance at multi-agency meetings, assessments.

Level 3 - individual direct work with young people through interventions in school and off site for learning (underachievement), behaviour and attendance issues.

This is particularly beneficial for Unaccompanied Asylum Seeker Children (UASC) as they can be taken into the provision whilst a school is found for them.

Children from Years 7 to Year 11 can attend the provision from any local authority however the priority would be for our Croydon Looked After Children.

Virtual School offers a range of subjects, namely; English, Maths, Music, Art, Cookery, Geography and Independent Skills.

The Virtual Schools' main objective is to empower, inspire and celebrate success. As part of this process, it also;

- Prepares students for mainstream school;
- identifies any behaviours or concerns, and
- supports cultural differences.

THEME 4

COMMUNITY SAFETY

EQUALITY OBJECTIVE

- To increase the percentage of domestic violence sanctions
- To increase the reporting and detection of the child sexual offences monitored
- To reduce the number of young people who enter the youth justice system.

Why did we chose this equality objective?

Crime and safety is a key priority within the current Croydon Corporate Plan. Under the theme “*Everyone feels safe in their street, their neighbourhood, and their home*”, the current Council Corporate Plan includes the following actions:

- Work in partnership to develop a public health approach to tackling serious youth violence & knife crime
- Further develop services that support survivors of domestic & sexual violence, and disrupt the most prolific offenders
- Work with communities, businesses, police and other agencies to tackle crime and anti-social behaviour across the borough
- Deliver our Prevent Strategy to reduce radicalisation, extremism & hate crime
- Upgrade our CCTV infrastructure and ensure the control room is operating effectively to reduce crime and protect the public

The Safer Croydon Partnership (SCP) is a key element in the delivery of these objectives with our partners. The Safer Croydon Partnership is part of the overarching Croydon Strategic Partnership, which includes other partnership structures such as the Local Children Safeguarding, Adult Safeguarding and Health and Wellbeing Boards.

The requirement to have a Community Safety Partnership has existed for every locality since the 1998 Crime and Disorder Act. The responsibilities and requirements have been amended numerous times by legislation since 1998, including the statutory partners that constitute the partnership

Through the SCP Plan and DASV (Domestic Abuse and Sexual Violence) Strategy (2018-2021) the partnership has the following priorities:

- To reduce the overall crime rate in the borough; focus on violent crime and domestic abuse.
- To improve the safety of children and young people.
- To tackle anti-social behaviour and environmental crime.
- To improve public confidence and community engagement.

What has happened?

Family Justice Centre (FJC)

The FJC is the Council's internal service that supports survivors of Domestic Abuse and Sexual Violence (DASV). The team provides independent advocacy support and delivers its services at a new dedicated centre as well as at police stations, hospitals and numerous community based locations. The work of the service is aligned with the partnerships Domestic Abuse and Sexual Violence strategy 2018-21.

Training and Increasing Referrals

Increasing Children's Social Care referrals to the FJC is an area which the DASV Programme Board focused delivering improvements. Through identifying this and delivering DASV training to Children's Social Care professionals at the start of the financial year we have seen an increase by 45% in the referrals made to the FJC by Children's Social Care. This is a positive outcome and will continue to be regularly monitored to help identify risks more efficiently. FJC regularly delivers training sessions to Council staff, schools and nurseries to help raise awareness of domestic violence and introduction to FJC services. The service also run the DASV Forum in conjunction with Croydon Voluntary Action. The Forum is open to anyone working with residents and families within the borough and is well attended (70 at the last event).

Reducing the number of young people that enter the youth justice system

The Council measures first time entrants (young people who have been convicted of an offence for the first time) and overall there has been a 30% reduction from 232 young people aged 10 to 17 during the period Oct 2016 to Sep 2017, compared 162 young people in Oct 2017 to Sept 2018.

Supporting this work is the joint decision making partnership with the police to divert young people who commit low level offences from the youth justice system. This improves outcomes and life chances for such young people not to be pulled into the youth justice system. During this period around 190 young people were diverted from prosecution.

We still have some challenges as compared to the rest of London we have the fifth highest number of first time entrants and we need to plug the gap with a wider, targeted, youth crime prevention offer to vulnerable children and young people.

The key actions that the Council has taken to deliver this outcome are:

- ✓ **Continuing to prioritise tackling all forms of domestic and sexual abuse and ensure there is a co-ordinated response across the borough.**
- ✓ **Ensuring the safety of our borough is at the very heart of Council services, with a co-ordinated and strategic approach at both the most senior levels of the council and on the front line, to ensure a prevention and early intervention are key priorities.**
- ✓ **Prioritising tackling serious youth violence and knife crime, and working towards making ours the safest borough for young people in London.**

The case study on the next page highlights the work supporting this theme.

Choose Your Future Campaign

The Choose Your Future campaign was developed in response to the top concerns raised by young people in the borough. As an umbrella campaign it builds on existing work and signposts to key services across the council, the police and other Local Strategic Partnership and community partners.

It aims to tackle serious youth violence and support young people to make positive choices, as well as the work with those directly affected by youth violence, and in particular, knife crime.

The campaign has been delivered in phases, with each developed and adjusted based on the needs and concerns of young people at the time.

Phase 1: My Future / My Voice (Oct 2017 to March 2018)

This raised awareness of the campaign across the borough. It showcased and successfully engaged with a range of young people, organisations and partners, with the young people sharing their views and concerns for their futures. Activities included a number of borough firsts including, the recruitment of a large cohort of council apprentices, taking part in the National Takeover Challenge and the election of Croydon's first Young Mayor and Deputy Young Mayor. This saw the campaign expand into phase two - young people having a voice.

Phase 2: My Choice (April 2018 to September 2018)

The campaign was delivered through digital and advertising opportunities, including outdoor poster sites, buses and tram advertising. These led the public to a series of 'My Choice' case studies – videos and written blogs developed by young people and hosted on the Choose Your Future website. A youth summit organised by the Croydon BME Forum focused on knife crime and gave young people an opportunity to ask questions directly to a panel of decision makers including the police, local councillors and MPs.

Working with specialist youth engagement teams, schools and the police the campaign delivered a 'Back to School' event to share anti-knife crime messages, ensure safety advice was given and encourage young people to share their views.

Phase 3: My Support (October 2018 to March 2019)

This phase of the campaign focused on:

- Signposting to advice and guidance to young people
- Helping them to staying safe
- 1-2-1 counselling
- Mental health support
- Jobs and opportunities.

It highlighted the specialist support being offered to vulnerable young people and adults, such as young women ex-prisoners, young people not in education or training (NEETS) including those at risk of exclusion. Partners include BME organisations, specialist mental health and well-being organisations. A second youth-led congress further gauged the views of young people.

Young people remain at the centre of the campaign and its content in terms of its messaging and themes.

We are using high profile local young people to embrace the power of role models and act as ambassadors to support the campaign. They are reflecting on their own stories and what they have achieved and are asking other young people to think about the choices they can make and encouraging them to get involved with the campaign.

By signposting to jobs and opportunities, the campaign has raised awareness amongst young people which has led to an increased number of young people taking up apprenticeships and participating in work placement and experiences such as the Takeover Challenge.

The campaign has supported better engagement with harder to reach young people not in education or training (NEETS) including those at risk of exclusion.

Croydon's BME Forum now has a well-established Serious Youth Violence Forum which helps coordinate and inform the activities of the local voluntary sector and public services.

The campaign is in line with Croydon's plans to establish a violence reduction network, which will also take a public health approach to help stop serious violence.

<http://news.croydon.gov.uk/londons-deputy-mayor-for-crime-and-policing-backs-croydons-plans-to-prevent-violence/>

The council and police have worked with the BRIT school to produce a performance and workshop for young people in schools, to give them a voice for their concerns around a range of issues including gangs and knife crime. <http://news.croydon.gov.uk/putting-knife-crime-spotlight/>

The majority of apprentices have been BME, female, and all the externally recruited apprentices who have progressed within the council are young people under the age of 25. Approximately 150 young people took part in the Takeover Challenge. <http://news.croydon.gov.uk/young-people-take-over-croydon/>

The Council funded two youth engagement workers to help support vulnerable young people in schools. The specialist youth workers facilitate six weekly, one-hour workshops to help nine to 14-year-olds keep themselves safe, and support their transition between primary and secondary education. <http://news.croydon.gov.uk/helping-young-people-make-positive-choices/>

In just one year, the campaign has:

- Facilitated engagement with over 3,000 young people.
- Supported Croydon's first Young Mayor election, engaging with 28 candidates and over 12,000 young voters.
- Brought together 40 young ambassadors who have directly supported the campaign.
- Gained the support of over 100 organisations, that promote the campaign and often partner on joint projects.
- Supported the creation of 30 new apprenticeships in Croydon Council.
- Supported Croydon's first Takeover Challenge day, engaging with 60 young participants.
- Launched 'You Choose', a play commissioned by the Council and police and taken to six schools in the borough.

- Been involved in several anti-knife crime events with Croydon Business Improvement District, the police and the Council's Youth Engagement Team.
- Amassed more than 1,000 followers on Instagram, a Facebook reach of over 120,000, and almost 500,000 impressions on twitter using #ChooseYourFuture.
- The campaign has been shortlisted for an LGA award and is seen as an example of good practice.

“What stands out about the Choose Your Future campaign is you helping us choose how our future should be”

A. Sultan, College Student.

Croydon Safe and Well Programme

Hundreds of Croydon pupils as young as nine are to benefit from a unique preventative programme, offering early targeted support to help them avoid becoming involved in crime and/or exploited.

Following a successful pilot, Safe and Well – a six-week programme designed by Croydon youth workers for vulnerable pupils aged nine-thirteen – is now being offered to primary and secondary schools across the borough.

Around 300 young people will benefit over one year, based on around 30 group work programmes and 60 being offered one-to-one support.

Delivered in schools by the council's youth engagement team, Safe and Well involves them working with small groups of pupils who are felt to be at risk of becoming victims or perpetrators of crime, antisocial behaviour or exploitation.

It was developed by youth workers after the local gang's team identified a gang whose members attended different secondary schools, but the majority had attended the same primary – highlighting the need for earlier intervention.

It is also based on exclusions data, which shows that the peak age for exclusions is Year 8 - just two years into secondary school. Primary schools reported that they often knew as early as Year 5 which pupils would struggle with the transition to secondary school, and could benefit from extra support.

Schools refer young people based on the following criteria:

- Pupils who have had at least one fixed-term exclusion or are approaching this.
- Pupils who are displaying antisocial behaviour in their local community and/or school.
- Pupils whose families have been affected by knife crime.

Safe and Well focuses on helping young people to spot and understand risky situations in their communities through group work, activities, discussions and games. It helps them understand peer pressure, the risk and ripple effect of violence; and crucially, to develop resilience to harmful influence, and resist difficult situations.

In line with the Choose Your Future campaign, it aims to provide young people with new opportunities, increase their confidence, encourage them to make positive choices – and understand consequences.

Safe and Well was initially launched as a pilot project - a six-week programme for two groups of 10 pupils in Years 5 and 6 at Forest Academy and South Norwood Academy, after Croydon Council successfully bid for MOPAC funding.

The success has been measured based on young people's feedback, and referring professionals' and parents' observations on development.

To date pupils in eight schools have received Safe and Well programme.

In every school:

- 100% said they had enjoyed the activities
- 100% said they had developed their skills
- 100% said they had strengthened friendships
- 100% said they felt happy and well
- 100% said they felt supported by staff

Below are quotes from some young people who have received the programme:

- *“I love that I can share things that’s on my mind freely.”*
- *“I learnt that gangs can have a bad effect on my life”*
- *“I feel safe to talk to an adult if something was on my mind”*
- *“I learnt grooming can come from all different types of people.”*
- *“I used what you taught me in a risky circumstance and it defused the situation.”*
- *“Saying no can save my life”*

The project also offers one-to-one support and ongoing specialist support where needed.

THEME 5

SOCIAL ISOLATION

EQUALITY OBJECTIVE

To reduce social isolation amongst disabled people and older people.

Why did we chose this equality objective?

Being socially isolated is different to loneliness but they are closely related and nationally 1 in 10 of people aged over 65 said they were lonely most or all of the time. Social isolation and loneliness affects all people across the life-course and not just older people. The Campaign to end Loneliness found 3 in 5 people who report poor health say that they are lonely some of the time or often, compared with 1 in 5 who report excellent health

The Opportunity and Fairness Commission highlighted that not only does social isolation have a significant personal cost but also has an implication for public services as it can lead to people needing more social and medical support. For example GPs and hospital accident and emergency departments had visits from people who were simply seeking someone to talk to or because their isolation has resulted in depression or another preventable illness. In addition, people often have prolonged stays in hospital because there is no one to care for them upon discharge.

What has happened?

In June 2016 a wide range of stakeholders came together to consider the issues in relation to social isolation and loneliness. The themes and issues raised were used by the Health and Wellbeing Board to develop a strategic response and social isolation action plan. The reduction of social isolation has been a key area of the Council's support for community capacity building including the approach to the Community Fund and Grants programme- £1.8m was allocated over three years to community groups working within the "A connected borough where no one is isolated" theme. It has been a central bank of the development of the One Croydon Alliance Programme.

The key actions that the Council has taken to deliver this outcome are:

- ✓ **Continue to work to reduce digital exclusion in the borough**
- ✓ **Tackling isolation through better access to services and facilities for all parts of the borough, particularly the most disadvantaged areas**
- ✓ **Work to improve the provision of affordable places to meet, socialise and learn.**

The case study on the next page highlights the work supporting this theme.

Living Independently for Everyone (LIFE)

The One Croydon Alliance is a partnership of six organisations; Croydon Council, Croydon CCG, Croydon Heath Services NHS Trust, South London and Maudsley Mental Health Trust, Age UK Croydon and Croydon GP Collaborative. The aim of the Alliance is ‘to support the people in Croydon to be independent and live longer, live healthier and fulfilling lives and be able to access high quality care, in the right place and at the right time’.

One Croydon have developed an integrated service called Living Independently for Everyone (LIFE) that helps older people to retain or regain their independence at times of change and transition, which promotes the health, well-being, independence, dignity and social inclusion of the individuals who are referred to the service.

The service provides intensive, proactive and goal-focused support for up to six weeks at times of high levels of need, when individuals require more clinical and social care interventions focussed on enabling individuals back to the optimum state of wellbeing, functioning and independence.

The service cares for individuals in their usual place of residence or an intermediate care setting. Providing intense, short medical, nursing, therapy and social care interventions helps prevent unnecessary hospital admissions and facilitates early supported discharge from a hospital ward.

The LIFE service operates 7 days a week, 365 days a year.

A total of 1333 individuals have been supported by the service to date.

Roberts Story:

<https://www.youtube.com/watch?v=UJnSPgnmj7g>

Case Study

Q) Best thing about the care received?

“Being treated as a human being. Information I was given me has been very very good, they could not have done more for me”

Local Resident in Receipt of LIFE service

THEME 6

COMMUNITY COHESION

EQUALITY OBJECTIVE

To improve the proportion of people from different backgrounds who get on well together.

Why did we chose this equality objective?

In Croydon, communities are changing fast with the borough has one of the fastest growing BME populations in London. More than 50% of children and young people are from a BME background and approximately 47% of adults. More than 100 languages are spoken across the borough. Croydon also has the largest number of unaccompanied asylum seeking children. Croydon has a great sense of community pride but social cohesion is challenged when there are poor community relations and people from different backgrounds do get on and live isolated from each other. In addition, high levels of poverty lead to people feeling that a place is unfair, and they cannot influence change or trust organisations.

The Opportunity and Fairness Commission said that residents told them that too often there was a lack of respect amongst people living in their area and insufficient shared ownership of problems. Many residents mentioned people from different backgrounds moving into their local area and their struggle to create strong integrated communities especially at times when national or international activity can cause concern locally. In addition, the Commission highlighted that while migration had brought new energy and perspectives, there was recognition that communities were isolated from each other rather than working together to tackle shared challenges. However, many people told the Commission that they would be willing to do more in their local community including volunteering and wanted to participate and influence what was going on locally and across the borough.

What has happened?

Recent national events have provided a challenging environment for community cohesion. Croydon has come together as a community to support each other with partners across the borough and faiths showing solidarity and providing community assurance. This has included community events such as We Stand Together to provide a forum to support communities impacted by hate crime and explore issues that face different communities within Croydon. The Council has continued to support community development, capacity building and events to strengthen cohesion.

The key actions that the Council has taken to deliver this outcome are:

- ✓ **Community Fund and Community Grants programme with £2.1M committed to vibrant responsible and connected communities over three years.**
- ✓ **Celebrating Croydon's diversity and heritage, highlighting the positive contribution of its refugee communities and those who have chosen Croydon as their home.**
- ✓ **Increasing investment in Community Ward Budgets.**
- ✓ **Delivered a programme of proactive walkabouts where the Cabinet Member for Safer Croydon and Communities, Borough Commander of Croydon Police and local councillors make visits to different parts of the borough throughout the year.**

The case studies below highlight the work supporting this theme.

Community Ward Budgets

The Community Ward Budget programme was agreed by Cabinet on 22 June 2015. The programme was built on the local democratic process that already existed to provide specific allocated resources to councillors to work in partnership with communities and support organisations and projects that benefit communities within their ward.

In Croydon there are numerous success stories demonstrating how local communities work together to solve problems or improve the places where they live. The results and achievement far outweigh the small investments required to achieve these successes. The programme seeks to harness that success and energy to deliver the things that matter to our residents in the wards that they call their home.

A diverse range of projects within the community were supported to play a full part in making decisions, and delivering Council priorities. Projects supported empowered communities to take a more active role in delivering a cleaner and safer environment. Projects enabled people to do more for themselves and rely less on public services such as delivering community events or local initiatives.

Below are some examples of projects that have been supported via ward budgets;

- PrideFest – event that celebrates the LGBT+ community in Croydon.
- Purley Youth Project - project that aims to keep young people off the streets and provide safe, fun and learning-based activities for young people to enjoy, including taking them on trips out, such as a four day residential to the Isle of Wight in June 2017.
- Achieving with Autism - raises awareness of autism amongst students in primary schools by equipping students with digestible information and providing a positive framework for them to discuss and explore neurodiversity. By shining a light on autism, the project aims to reduce bullying, anxiety and social isolation.
- Parade of Nations – funding towards the costs of hosting an annual celebration of the diverse communities who have chosen Croydon as their home
- Croydon mosque interfaith events - funding support for a series of four annual interfaith events aimed at promoting dialogue across Croydon's many faith communities.

Celebrating Diversity

The Council supports a programme of events to celebrate the Borough's diversity and promote community cohesion.

Below are details of two annual events hosted by the Council;

Croydon PrideFest

Croydon PrideFest 2018 represented a significant step change from 2017, in both scale and diversity. Prior to the event a number of Croydon Pride mix and mingle events were organised in partnership with Croydon Pride, the cross-organisational network and the local LGBT+ community. The events increased awareness of the LGBT+ community and Croydon PrideFest which resulted in the doubling of numbers attending the parade (approx. 1000 people) and the largest number ever attending Croydon PrideFest (approx. 5,000). There was notably a younger demographic attending, particularly young bi and/or trans people which visibly demonstrated how comfortable the event made young LGBT+ people feel.

The event had a larger parade and thereby a greater impact in the town centre. The route went down the town centre's two key retail streets with several retail shops showing their support by displaying rainbow visual merchandising on their shopfronts or shop windows. The organisation TransPALS were invited to lead the parade as a message of solidarity after the Trans exclusionary protest at London Pride, thus providing the local trans community a very visible presence in the parade route.

Croydon PrideFest was also widely promoted across the borough. Promotional posters were displayed on belly bins and sites across the borough. The event was also promoted on social media.

The event was also well attended by a significant numbers of councillors (22) with some providing further support by awarding funding from their ward budgets towards the event. All three of Croydon's MPs spoke at the event with the Leader of the Council reflecting his commitment to Pride and Croydon's LGBT+ community. The Croydon PrideFest 2018 video shows how great the event was:

<https://www.youtube.com/watch?v=C5DAgKwfwY&feature=youtu.be>.

We were impressed with the whole event and enjoyed having the time to really talk to people. It was fantastic to see so many young people there too, as they might often be excluded from bigger Prides because of cost and access.

Rob Pateman, Stonewall

Croydon International Mela

Free event that celebrates the culture of Croydon's Asian communities and showcases a combination of musical legends, international artists, local talent, extraordinary dance and spectacular street theatre.

Zee Croydon International Mela is a timely symbol of our diverse communities and dynamic Borough. It celebrates a rainbow of cultures and traditions through music, dance, food and culture at a time when community tensions may be higher, it is an important reminder that above all, love always wins.

<https://www.youtube.com/watch?v=6cncr-spAmRg&feature=youtu.be>

THEME 7 HEALTH

EQUALITY OBJECTIVE

To reduce differences in life expectancy between communities.

Why did we chose this equality objective?

The Annual Report of the Director of Public Health for 2018 identified a number of significant inequalities in health outcomes in the borough. It is well accepted that inequalities result in poor health, social, educational and economic outcomes across the whole of the life course and across generations.

The Indices of Deprivation 2015 showed that health deprivation and disability indicator is greatest in West Thornton, Broad Green, Selhurst and Thornton Heath as well as New Addington and Fieldway. West Thornton and Selhurst had become significantly more deprived in this domain since index of multiple deprivation data was last released in 2010. Finally there are higher levels of income poverty amongst older people in ethnically diverse wards in the north of the borough along with a lack of access to services such as a post office or community services.

Girls born in some areas of Croydon are expected to live six years more than their counterparts in other areas and for boys, the difference is over nine years. There is also a difference in how long people can expect to live in a healthy state. As an example, women in Old Coulsdon are expected to live at least nine years longer in a healthy state than women in Broad Green.

What has happened?

Croydon's current performance is similar or better than average on a range of health outcome indicators including alcohol related hospital admissions, preventable deaths from cardio vascular diseases and childhood obesity at reception year. Croydon's performance has improved for the several measures of perceived wellbeing, and is above the London average for all four of them (Life Satisfaction, Well-being, Happiness and Anxiety).

Improvements in life expectancy and reductions in preventable deaths partly reflect changes in lifestyle over time. Good overall performance however masks significant variation within the borough which continue to be an issue. Outcomes still tend to be poorer in areas of higher deprivation. Lifestyle advice and support is being brought together through the Live Well programme, an integrated lifestyle programme with the overarching aim of reducing health inequalities across the borough.

The key actions that the Council has taken to deliver this outcome are:

- ✓ **Improved health and social care for the residents of Croydon.**
- ✓ **Establishment of the One Croydon Alliance in order to integrate provision of hospital, primary care, mental health and social services for all ages.**
- ✓ **Investment into young persons' mental health services to support the help needed at an early stage.**
- ✓ **Working with the voluntary sector and communities to improve physical and mental health**

✓ **Continuing to work to reduce ill-health, including promoting mental health and reducing inequalities in health care**

The case study below highlights the work supporting this theme.

St Pauls 'Plug-In' initiative

The development of the St Pauls 'Plug-In' initiative has seen a range of community led activities aimed at improving the health and well-being of the local Thornton Heath community.

The programme is built on three basic principles engagement, opportunities and support. It focuses on finding the best ways of engaging with the patients and the wider Croydon community, developing an array of local based opportunities proven to assist in their health self-management and supporting them through the transition of long term behavioural change.

The project was developed through working in partnership with Croydon Social P Social Prescribing project. Activities that support people to improve their health and wellbeing were identified. These were endorsed by GPs and practitioners at the Parchmore GP practice.

The project continues to work with a range of partners including the Safer Neighbourhood Team, Parchmore Church and Community Centre, Age UK, Best Start Community Builder and the Croydon Voluntary Action Day Opportunity Community Builder. It also has direct contact with the NHS Croydon University Hospital who run a Falls Clinic. It also works in partnership with local councillors and the local MP and is part of a network of churches involved in Social Prescribing as a means to work in partnership with the community and make it a safe, enjoyable place to live or work.

The project has been reaching out to all communities young and old and is working on promoting more inter-generational activities. Activities are held in the church hall on a weekly basis at no or minimal cost for those attending. Activities include senior exercise classes, NHS falls exercise class, mindfulness classes, counselling , housing surgeries and coffee, cake and chat drop in to name but a few.

Feedback forms back from the exercise activities show that not only are individuals getting fitter, but they are reversing serious conditions such as Type two diabetes.

Participants in the initiative are much more aware of the importance of looking after their own health and their need to take control of that. They also believe it is helping socially, as many have made new friends and something that literally gets them out of the house. They report that they feel calmer, less stressed, having more energy, reducing medication.

Feedback from service user:

'It was at a Patient Participation Meeting at my doctors' practice where I first heard of social prescribing and, more specifically, of Janey's exercise classes, though I'll admit my initial reaction was rather dismissive. It instinctively sounded like the kind of structured activity ideal for people who are not very fit.

That was in November 2017. By February of the following year it had dawned on me that walking in my everyday life would not be enough to maintain my fitness and ensure I could fully enjoy my holidays tramping around the Lake District and Pembrokeshire's coastal path. I would be short of breath on steep climbs and, sometimes, have to stop for a while before carrying on. It was that realisation which prompted me to abandon feeling so self-conscious and try out the classes.

Fast forward 10 months and I have scarcely missed a session. Exercises which seemed strenuous in February now feel comfortable and invigorating. Janey encourages us to proceed at our own pace to allow everyone to participate on their own level.

Looking around the crammed Church Hall at St Paul's this morning, I saw rows of smiling faces, the positive energy in the room palpable.

Personally, I have made huge physical progress. I now march up hills without stopping or suffering breathlessness. My medication has been reduced and my back, which used to grind uncomfortably as I trudged along, is now much stronger. I feel I am taking ownership of my condition and doing something to help myself.

My husband, 77, now joins in once a week. Highly resistant to the idea of organised exercise initially, he, too, is now one of the class's most enthusiastic members. The whole experience has been revelatory'.

THEME 8 OUR WORKFORCE

EQUALITY OBJECTIVE

To create a modern and diverse workforce that is representative of the communities we serve and building and further developing a valued, engaged and motivated workforce

As a council we have committed to:

- Ensuring the council has a representative workforce.
- Providing staff with training and support to enable them to manage and/or work within a diverse workforce.
- Addressing any unfair treatment in the workplace particularly relating to any of the 'protected characteristics'.
- Recognising the contribution of the staff network groups and supporting their work.

Why do we monitor the workforce?

The workforce profile provides a valuable source of data about the Council's workforce, that:

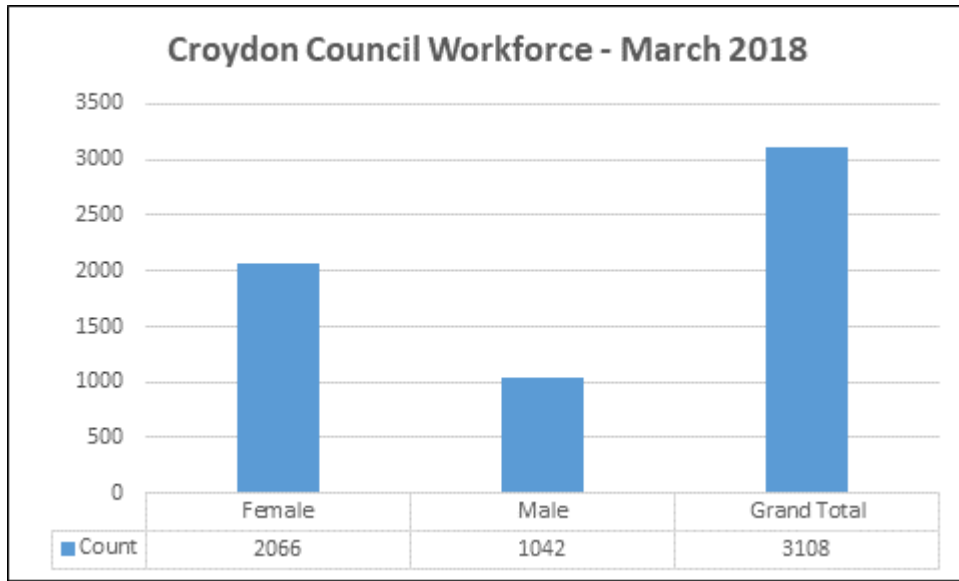
- Provides evidence the Council is meeting its general equalities duty to: eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity, and foster good relations.
- Supports delivery of some of the Council's key workforce objectives and values, most notably: a modern, diverse and inclusive workforce that is reflective of the borough's community, and the attraction, recruitment and retention of talented staff and leaders.
- Alongside other sources such as staff survey results and organisational health monitoring, informs and delivery of workforce planning priorities including the development of HR policies and procedures and learning and development and planning.
- Is a resource to help monitor workforce performance and provide benchmarking information to assist workforce planning and equality analysis.

Workforce representation by protected characteristics

Our breakdown of the workforce is mapped against Croydon residents' 2011 census statistics regarding gender, ethnicity, and disability and religion characteristics. Whilst Croydon has a positive gender mix, there is more to do on ethnicity and disability if we are to meet our aspiration of employing a workforce that is representative of our communities. We have made progress in increasing disclosure rates for ethnicity and disability, sexual orientation and religious belief within the last twelve months.

It is useful to highlight the levels of staff who have declared that they prefer not to say in respect of protected characteristics (as shown over leaf). We will be exploring why individual staff may be reticent to declare and stress the benefits of insight and understanding to inform initiatives to improve representation at all levels via the Council's Culture Board.

Croydon Council Workforce - March 2018

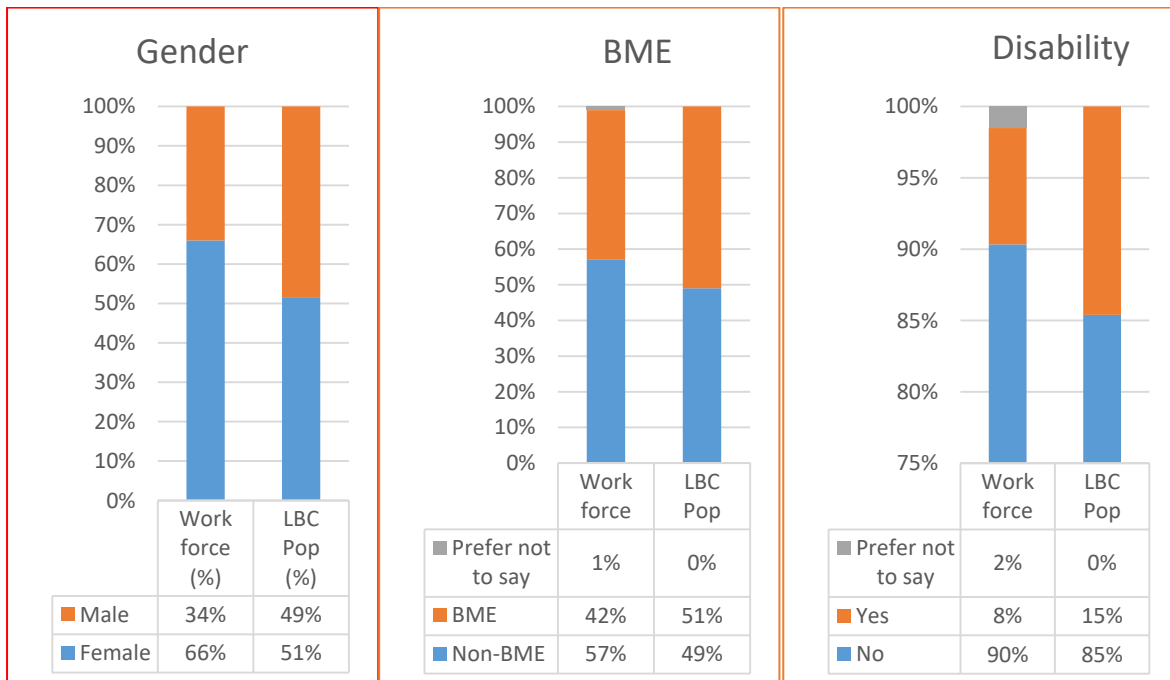


Our current non-disclosure rates for the protected characteristics below are as follows:

Ethnicity: 25%

Disability: 30%

Religious Belief: 31%



The 2011 census did not collect information from respondents on sexual orientation or sexual identity, therefore the council does not have a community comparator to map against. However the council undertakes workforce monitoring on sexuality and has collated data over the last five years (see chart below).

During this monitoring period we have seen a small but positive increase in LGBT representation and a decrease in those electing to prefer not to say. The council also achieved a positive outcome in the stonewall index, placing it 101st out of 445 employers, its highest rating so far.

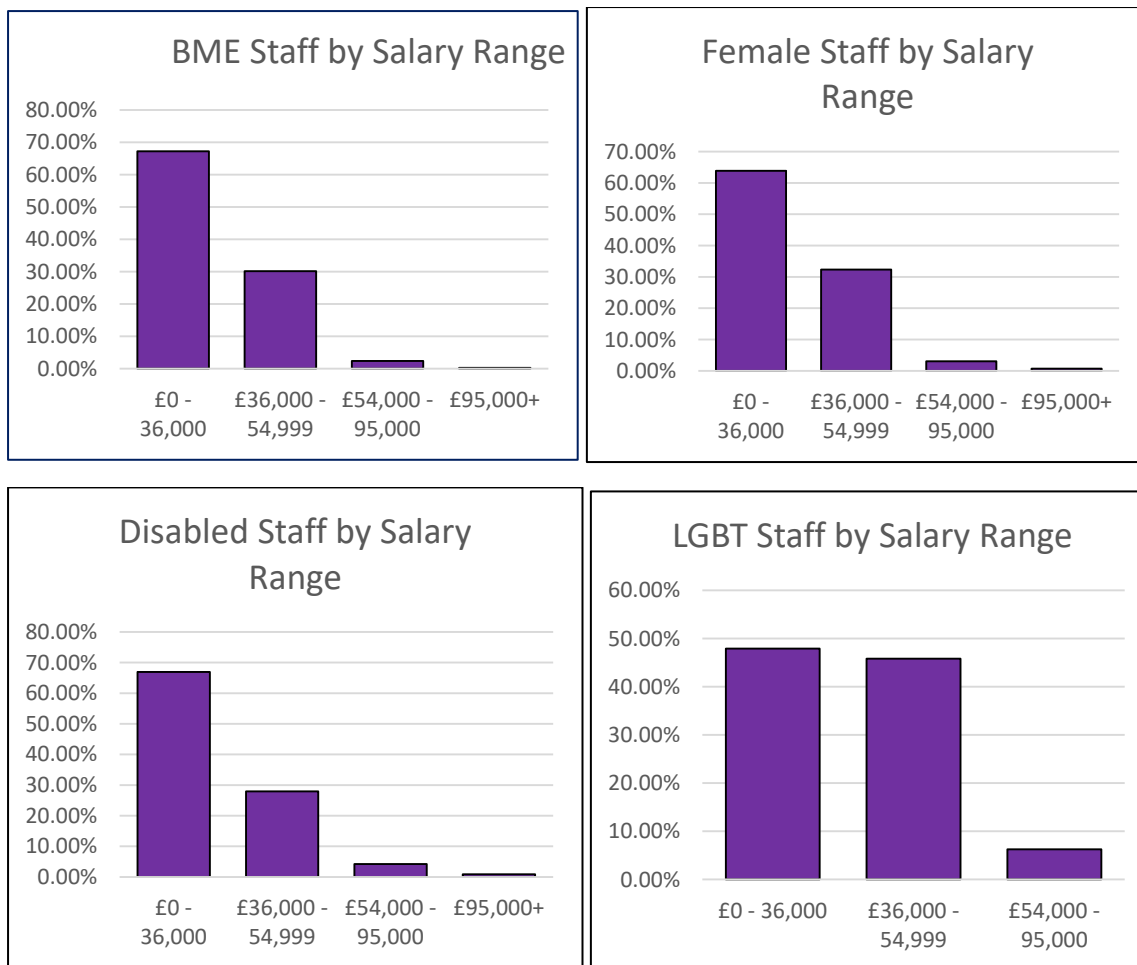
	LBC 2013		LBC 2014		LBC 2015/16	
Bisexual	8	0.30%	9	0.30%	4	0.15%
Heterosexual	2,270	71.50%	2,117	71.40%	1,714	63.36%
Homosexual	45	1.40%	38	1.30%	28	1.04%
Other	0	0.00%	0	0.00%	85	3.14%
Prefer Not To Say	854	26.90%	803	27.00%	874	32.31%

	LBC 2016/17		LBC 2017/18	
Bisexual	8	0.38%	10	0.49%
Heterosexual	1606	76.19%	1572	76.72%
*categories recorded were 'Gay Man or Lesbian Woman'	37	1.76%	38	1.85%
Other	66	3.13%	59	2.88%
Prefer Not To Say	391	18.55%	370	18.06%

The Council is continuing to review and update terminology to describe sexual orientation categories referencing the latest Stonewall guidance and advice.

Equalities profile by earnings

It has already been highlighted that the workforce at Croydon is not yet representative of its community in respect of ethnicity and disability. The equalities monitoring of our workforce further indicates that there is also an under-representation within the workforce across salary ranges, with a negative funnelling of representation for BME staff at senior level. It is interesting to note a more positive distribution for staff declaring a disability. From 2018-19 several senior staff were appointed which may positively influence diversity at this level but it is recognised underrepresentation still exists.



NOTE: data shows positive declarations on protected characteristics

Gender Pay Gap Reporting:

From 2018 it is a legal requirement for the Council to publish its gender pay gap workforce data. A gender pay gap compares the difference between how much people from one gender are paid on average compared with people from another gender. It is the average difference between the remuneration for men and women who are working. It is not a comparison of pay between people doing the same work.

In 2018 the Council reported a mean gender pay gap of 1.6% and a median gender pay gap of 2.4% which compare favourably in comparison with other local authorities and regional statistics. In 2019 the Council will report a mean gender pay gap of 1.6% and a median gender pay gap of 2.6 % which is comparable to last year's statistics. These figures will be reported to on the government portal and the council's website by 30th March 2019.

The Council intend to publish pay gap for disability and ethnicity characteristics. Further details will be published on the Council's website by 30th March 2019.

What are the key successes?

Our workforce profile illustrates that although our workforce is not yet fully reflective of the population we serve, we are seeing changes in our workforce as a result of a variety of initiatives.

These include:

- Staff diversity network groups: we have six staff diversity network groups within the council who have supported change to our workforce profile by their visibility of staff diversity through awareness raising events, communications campaigns and role modelling. They have also worked actively with the community in activities such as volunteering and event promotions.
- All staff diversity group network chairs sit on our culture board which is held monthly and chaired by the Chief Executive. The Board includes staff ambassadors and senior management representatives. The Culture Board aims to set the direction for improving culture and oversee all the changes within the council to ensure that we “create an organisation where talent can flourish”.
- Staff Survey: in 2018 over 755 of staff completed the staff survey which was the highest ever level of response. The results indicated that over 80% of staff indicates satisfaction with their role and over 90% were proud to work for Croydon. The council is working via Culture Board to address challenges that have been raised including improving information and communications technology (ICT) and increasing consistent management practice.
- To address inequalities in diversity at middle and senior management levels, leadership programmes have been implemented specifically for employees who are women or of BME ethnicity.
- In 2018 we started a campaign within the council to increase levels of disclosure of equality characteristics by employees. As at February 2019 we have seen levels of disclosure significantly increase since June 2018 for these characteristics: disability (8% increase); sexual orientation (4% increase), religious belief (5% increase).
- Timewise Accreditation: we are now accredited (since December 2016) as a Flexible Working borough and are continuing to advocated and promote flexible and agile working for our existing workforce and potential employees.
- Disability Confident Employer: we are accredited as a Disability Confident Employer (since 2017) and have worked with our Disability Network Group internally and with the community in promoting good practice and training managers.
- ENEI awards: we achieved the Employers Network for Equality and Inclusion award for ‘Overall Public Sector Winner’ in 2018. This award recognised the strengths of the submissions we made to ENEI. We also won an award for our Apprenticeships work and the Mental Health and Wellbeing Networks Group was highly commended.
- Stonewall Workplace Equality Index: 2019 marked our highest placing for Stonewall. We achieved a placing of 101 out of 445 employers entered, placing us in the top 25% of employers.
- REBA (Reward and Employer Benefits Association) Health and Wellbeing Awards: in 2019 we achieved the award for ‘Innovation’ from the REBA in recognition of the

ground breaking work the Menopause Steering Group (a sub-group of the Women's Staff Network) has undertaken to spread awareness and provide resources and support to women in the workforce who have been impacted.

The key actions that the Council have taken to deliver these outcomes are:

- ✓ **Supporting and developing our staff network groups.**
- ✓ **Becoming a 'default' agile working employer since 2016 and enabling new employees to request formal flexible working patterns from the start date of employment.**
- ✓ **Improving and promoting our policies around family friendly leave, unpaid leave and offering up to ten days purchased leave.**
- ✓ **Assisting employees with leave for family issues including caring, premature birth and parental bereavement.**

What Next

Based on the data on pages 33-35 there will be focus in the following areas in the future:

- Develop a workforce strategy that will lay out our commitment to our staff, and provide the framework by which we will ensure we have the right people with the right skills, doing the right jobs at the right time. This will be key to creating an agile and capable workforce that can partner with residents to deliver better outcomes for local people and create the dynamic, fair and inclusive workplace that we aspire to.
- To ensure the strategy can take us to where we want to be and be open and honest about where we are now, we are working with an industry professional who is examining our data, headline themes from last year's staff survey and engaging with a selection of staff. The output from this work will highlight where we need to concentrate our efforts.
- We will involve staff in the development of the strategy as we want to hear about the sort of place they want Croydon Council to be.
- Examining gender segregation of some roles, particularly where there is a high gap between male and female
- Understanding and tackling the issues regarding low numbers of BAME in senior management roles
- Encouraging higher disclosure declarations, particularly around disability and sexual orientation

Our good practice case studies below further highlight the work that has been ongoing:

Flexible Working

In early 2014 a survey of lone parents in Croydon was carried out by the Council in partnership with Jobcentre Plus and children's centres. The parents, all of whom used children's centre services, reported that barriers to finding sustainable work were high costs of childcare, and a lack of part-time and flexible jobs which allow parents to combine caring responsibilities with work.

Around half of responses recognised that beyond the additional income, being in work would increase their independence and provide a positive role model to their children. In addition a sense of purpose (by one in four) and social contact (by one in five) were identified as factors.

What were the key areas for improvement and main drivers for the council in championing flexible working?

- Encouraging residents, especially lone parents and those living in poverty, into work (in the context of above).
- Reducing council office costs through remote working.
- Attraction and retention of staff through flexible working.
- Increasing number of Council staff working flexibly particularly men and those at higher grades.
- Influencing other Croydon employers to actively promote and encourage flexible working.

What were the key deliverables?

- Development of a Flexible Working Implementation Plan across the Council – this included working as a cross council team from 2014 – 2016.
- Achieve Timewise accreditation as a flexible working Council – this was achieved in December 2016 and has been renewed annually.
- Agree an engagement plan to promote flexible working – the internal flexible working policy was reviewed and re-issued in 2016 alongside a campaign to encourage agile working principles.
- Inclusive and accessible recruitment processes. This includes ensuring that potential new recruits are aware of our commitment to enabling our workforce to work in an agile way; being an inclusive employer; having discussions with prospective employees' about flexible working options; and encouraging applications from under-represented groups (where this exists). All job advertisements from the council include this phrase: "we will be pleased to consider applications from candidates seeking flexible working arrangements."
- Improving our understanding as a Council of current flexible working arrangements through better management information better performance assessment and tracking; All formal flexible working arrangements are logged on the HR system
- Introducing an Employment Charter for Croydon which includes a commitment to flexible working and timewise accreditation. Flexible working is mentioned as part of the 'Good Employer' framework.

Outcome

- The Flexible Working Implementation Plan was developed with ownership across elected members and Council senior management;
- Accreditation from Timewise as a Flexible Working Council was achieved in December 2016;
- The 'Good Employer Charter' launched in January, 2017 with 10 employers achieving Good Employer accreditation and 38 Good Employer Charter pledges includes a reference to flexible working as a criteria for applicants.
- All council jobs are advertised to encourage applicants who are seeking flexible working arrangements.
- In September 2017 a snap poll confirmed that over 70% of respondents worked flexibly and were supported in doing so.
- The staff survey in March 2018 also stated that 78% of respondents had flexibility in how and where they worked. Also 80% of respondents felt they had a good work life balance within the council.

Cultural change around some elements of flexible working is still challenging – for example 19% of the workforce are part-time workers and of this group the overwhelming majority comprises female employees 71% against 29% male employees.

This work had helped the council achieve the equality objectives below:

- Employment (aiming to get lone parents/carers into the workforce)
- Child Poverty (by assisting lone parents)
- Community cohesion (by encouraging applications from the diverse local community)
- Social isolation (by encouraging applications from disabled and older individuals)

In looking at the figures relating to protected groups the key beneficiaries may be:

- Gender (female) staff
- Disabled staff
- Pregnancy and Maternity

Currently staff identifying as female staff comprise 67% of the Croydon Council workforce and within formal flexible working arrangements their representation is 70%.

Disabled staff comprise 8% of the Croydon Council workforce, but within formal flexible working arrangements their representation is 2.5% part-time and 6% full-time flexible. However as stated previously due to the large numbers of staff working in informal agile and flexible working arrangements no necessary negative conclusions can be drawn from this.

Women on maternity leave during 2017 -18 comprised 5% of the workforce. We have no figures for any impact on this staff group returning to flexible or agile working but as the numbers of women in formal arrangements exceeds their workforce representation, it may be surmised that a large number of women returning from maternity leave may be using flexible/agile working opportunities.

Increasing Staff Disclosure of Protected Characteristics

The council has been committed to improving the rates of disclosure by employees of their protected characteristics over a number of years. By improving disclosure the council will be able to:

- Build an accurate picture of the workforce.
- Ensure that all members of the workforce are treated fairly (by monitoring equality of opportunities).
- Ensure that staff can be themselves at work.
- Make sure the workforce strives to reflect the community we serve.
- Ensure that our policies are not indirectly discriminatory.

As a council we also strive to be accurate in our reporting of the diversity of our workforce as this will help us plan new initiatives and campaigns.

We were aware that there were several obstacles to staff completing their equality data which included:

- Lack of awareness by staff that their data was incomplete.
- Lack of knowledge (of the self-service system) by staff regarding how to complete their data online.
- Lack of insight by staff into why completing this data was important.
- Suspicion regarding the confidentiality of the data.

We were aware that our disclosure levels were particularly disappointing (as at June 2018) for areas such as;

- Disability (approx. 38 % non-disclosure)
- Religious belief (approx. 36% non-disclosure)
- Sexual orientation (approx. 34% non-disclosure)
- Ethnicity (approx. 25% non-disclosure)

A campaign to increase levels of disclosure was crafted to address this issue. The campaign focused on specific areas. This resulted in a rise in disclosure rates, bringing disability, religious belief and sexual orientation disclosure levels up to around 75 - 80% and ethnicity up to 85%.

In September 2018 an intranet and plasma screen campaign was launched with the collaboration of Internal Communications, Human Resources and Staff Network Groups.

Information was clearly presented to staff detailing:

- How to check and update equality information
- Why it was important to do so
- Who would be able to see this information
- Asking staff to check their data and personal contact information
- How the data would be used

Also included were screen shots detailing how data could be updated and an frequently asked questions (FAQs) document with answers to questions about disclosing equalities data.

Staff diversity network groups (who comprise approximately 30% of the council) also sent out communications to staff reminding them of the importance of disclosure.

During Black History Month in October, several 'drop in' sessions were held to encourage staff to update their equality records.

Additionally, from September onwards all diversity events included a reference to disclosure in all their communications to staff.

In November 2018, the Chair of the Mental Health Staff Network also drafted a piece about her working life and the interaction with her physical and mental health entitled 'Why updating your One Oracle equality data helps everyone'.

In December 2018 – January 2019, the HR Equalities and Policy Manager sent out personal emails to all staff who had joined the council from 2014 – 2016 encouraging them to check and update their equalities data.

From October onwards reports were produced every two weeks to measure the levels of disclosure and non-disclosure rates for specific categories (ethnicity, religion, sexual orientation and disability). Increases have been observed from June 2018 – January 2019.

Non-Disclosure Rates: June 2018 – February 2019

	June 2018	February 2019	% change
Ethnicity	25%	25%	No change
Disability	38%	30%	+ 8%
Religious Belief	36%	31%	+ 5%
Sexual Orientation	34%	30%	+ 4%

Croydon's Culture Board's vision is to "create a collaborative, inclusive and creative environment which allows talent to flourish"

Ultimately we aim to create an environment where staff are able to 'be themselves' so if they are willing to communicate openly and disclose protected characteristics this shows increasing levels of engagement and confidence in the Council which will be reflected in performance levels and satisfaction surveys.

We will continue to promote the benefits of disclosure to our workforce during 2019 and link this to our promotions regarding the change to self-service on-line systems, it is anticipated that further increases in disclosure rates will be observed.

Appendix 1**Additional sources for information on equality and inclusion in Croydon****Croydon Opportunity and Fairness Commission Report**

The Croydon Opportunity and Fairness Commission was an independent Commission set up by Croydon Council in 2015. It sought to understand the challenges faced by the people of Croydon and put forward recommendations that would help create a fairer and better place to live. You can obtain a copy of the report by clicking the link below

https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon_Opportunity_%26_fairness%20Commission_final_report.pdf

Croydon Observatory

The Croydon Observatory provides access to data and information about Croydon. It is an information sharing, mapping and reporting website that can be used by anyone. The observatory contains links to key strategies, information on the Borough's demographic profile which can be broken down easily into ward profiles. The site also includes data broken down by protected characteristics as outlined in the Equality Act 2010. Please click link below to access the observatory.

<https://www.croydonobservatory.org/>

Equality and Inclusion Policy 2016-20

The council's ambition is to make Croydon a stronger, fairer place where no community is held back. It acknowledges its statutory equality duty as a Public Sector employer under section 149 of the Equality Act 2010.

It recognises it has an important community leadership role and will use this opportunity to advance equality, fairness and community cohesion as well as to improve the social and economic environment in the borough

Please click link below for a copy of the Council's equality and inclusion policy

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Equality%20Policy%20Statement.pdf>

Workforce Profile 2016-2017

The workforce profile provides a valuable source of data about the Croydon Council workforce that provides evidence the Council is meeting its general equalities duty to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity; and foster good relations.

Please click link below for a copy of the Councils workforce profile

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Workforce%20Profile%20-%202017%20-%202018.pdf>

REPORT TO:	CABINET 25 MARCH 2019
SUBJECT:	Suburban Design Guide - Supplementary Planning Document (SPD2) - Adoption
LEAD OFFICER:	Shifa Mustafa, Executive Director of Place Heather Cheesbrough, Director of Planning and Strategic Transport
CABINET MEMBER:	Councillor Paul Scott, Cabinet Member for Environment, Transport & Regeneration (Job Share)
WARDS:	All
<p>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON:</p> <p>The Croydon Local Plan 2018 sets the growth and development vision and planning policies for the borough from 2016 – 2036. The Croydon Local Plan provides the planning policy basis for the borough to plan for and deliver the borough’s housing need, deliver necessary affordable housing, accommodate sustainable growth, regenerate the district centres, strengthen neighbourhood and local centres, safeguard and provide employment floor space and deliver a renewed Croydon Opportunity Area, with a residential population of up to 20,000 people, a redeveloped retail core and provision of public realm and infrastructure.</p> <p>The Suburban Design Guide - Supplementary Planning Document (SPD2) relates particularly to the following Ambitious for Croydon and Corporate Plan (2018 – 2022) outcomes:</p> <p><i>Our new Croydon Local Plan has a strong emphasis on building sustainable communities and delivering affordable homes. We will actively work to see that both are delivered</i></p> <p><i>Corporate Plan (2018 – 22) - Good, decent homes, affordable to all.</i></p>	
<p>FINANCIAL IMPACT</p> <p>SPD2 and the associated officers’ resource, including the evidence base assembly has been delivered through the Spatial Planning Service budget, supported by the Government’s Planning Delivery Fund: Design Quality bid, which allocated £24,300 to the project in 2017/18 and £25,700 in 2018/19.</p>	
<p>KEY DECISION REFERENCE NO.: 0419CAB</p> <p>This is a Key Decision as defined in the Council’s Constitution. The decision may be implemented from 13.00 hours on the expiry of 5 working days after it is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors.</p>	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below.

1. RECOMMENDATION

- 1.1 Consider the comments received and the Council's responses at Appendix A to the statutory public consultation on the draft Suburban Design Guide - Supplementary Planning Document (SPD2) (Appendix B).

And:

- 1.2 Agree the Consultation Statement, including the list of comments, responses and (where applicable) amendments at Appendix A.
- 1.3 Note that the Council has undertaken a screening exercise with the statutory bodies to confirm the Suburban Design Guide - Supplementary Planning Document (SPD2) is not required to be supported by a Strategic Environmental Assessment.

Recommend Cabinet recommend to Council:

- 1.4 Adoption of the Suburban Design Guide - Supplementary Planning Document (SPD2) in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012;
- 1.5 Delegate to the Director of Planning and Strategic Transport, in consultation with the Cabinet Member for Environment, Transport & Regeneration (Job Share), the making of minor factual, editorial and image changes to the Suburban Design Guide - Supplementary Planning Document (SPD2) prior to adoption publication.

2. EXECUTIVE SUMMARY

- 2.1. Croydon is a growing borough. It is already the most populous borough in London and planning is critical to ensuring that Croydon meets its housing need over the next 20 years. The Croydon Local Plan 2018, adopted in February 2018, sets out the strategy, sites and planning policies necessary to meet these needs up to 2036.
- 2.2. Increasing the supply of homes through sustainable growth, including affordable homes, is a key element of Ambitious for Croydon, which is enshrined throughout the Croydon Local Plan 2018. In part, the sustainable growth of the suburbs will deliver this growth as encouraged and enabled by the Croydon Local Plan 2018. This will be achieved whilst protecting the borough's open space and the distinctive heritage and character, alongside the necessary infrastructure to mitigate the impact of growth.
- 2.3. With a growing population there is a necessity to build more homes. This is reflected in the current housing target set in the Croydon Local Plan 2018;

32,890 new homes are expected to be delivered in the borough by 2036 (1,645 per annum). As further context the emerging London Plan proposes to increase Croydon's housing target to 2,949 per annum.

- 2.4. In order to deliver a wide choice of high quality homes through good design, the National Planning Policy Framework (NPPF) (July 2018) states that 'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this'.
- 2.5. In the Croydon Local Plan 2018, Policy DM10 outlines the expected modes of suburban development on windfall sites including conversion, additions, infill and plot subdivision, rear garden development and regeneration. Furthermore, Table 6.3 designates four areas of focussed intensification; areas with established infrastructure, but relatively low density and the potential to accommodate a significant increase in residential development.
- 2.6. The evolution of the suburbs is underpinned by the strategic objectives of the Croydon Local Plan 2018, which are required to fulfil Croydon's spatial vision and deliver the Local Plan's policies.
- 2.7. On adoption, SPD2 will supersede the current SPD2, providing revised guidance for residential extensions and alterations, as well as new guidance for suburban residential developments and development in areas of focussed intensification.
- 2.8. SPD2 will help steer, guide and provide the parameters and certainty for the evolution of the suburbs to the benefit of communities, stakeholders, developers and planning officers.

3. SUBURBAN DESIGN GUIDE SPD2

- 3.1. The purpose of SPD2 is not purely driven by growth and meeting housing need, but to provide guidance on how development of homes for Croydon should occur. Policy DM10.11 of the Croydon Local Plan 2018 also provides the policy that development in areas of focused intensification should be assessed against.
- 3.2. While development in the borough is managed by the policies set out in the Croydon Local Plan 2018 and London Plan, regard should be given to the SPD2 when preparing designs and planning applications, including those which are Permitted Development.
- 3.3. Once adopted, SPD2 will supersede the existing Residential Extensions and Alterations SPD2 which was produced in 2006. Since the existing SPD2 was produced, demand for housing has increased and National, London and borough planning policy has changed. With significant changes to Permitted

Development rights since 2006, which give homeowners rights to extend their homes without the need for planning permission, the old SPD2 is outdated.

- 3.4. SPD2 provides guidance for suburban residential developments and extensions and alterations to existing homes across the borough. It is a Supplementary Planning Document which should be used by residents, developers, builders and agents including architects and planning consultants in shaping development proposals and will assist in making decisions on planning applications and inform the Council's pre-planning application service.
- 3.5. Beyond providing technical design guidance, SPD2 sets out how residential development, including extensions and alterations, in the Places across the Borough is part of a holistic strategy being driven by the Council to deliver tangible public benefits to suburban communities.
- 3.6. The guidance contained in SPD2 is broken down into three sections:
 - Suburban Residential Development
 - Areas of Focussed Intensification; and
 - Residential extensions and alterations.
- 3.7. The Croydon Local Plan states that 'Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed'.
- 3.8. The delivery of approximately 10,000 homes in the suburbs of Croydon will result in an evolution of the existing character of suburban streets. Increased density of homes can impact on the amenity of existing residents if not properly managed through the planning process.
- 3.9. SPD2 provides technical design guidance that seeks to both limit any negative impact on the Places, including the amenity of existing residents, and frame opportunities where increased densities can present significant opportunities to enhance places and bring benefits to communities.
- 3.10. SPD2 is anticipated to assist planning officers in making decisions on planning applications and will be a material consideration in assessing planning applications.

4. CONSULTATION

- 4.1 Before the formal consultation process began, the draft SPD2 underwent a process of extensive internal consultation. During the initial preparation of the draft SPD2, further broader consultation was also been undertaken with local developers and architects, Croydon's Resident Associations' (North and South), Planning Committee, Scrutiny Committee and the Greater London Authority.
- 4.2 As per the requirements for public participation of Regulation 12 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the

Council undertook a formal consultation period of six weeks, from 3 September 2018 to 12 October 2018. During this period, officers held seven (7) consultation events with the community across the borough to engage residents, businesses, developers and interested parties on the draft SPD2.

- 4.3 Consultation on the draft SPD2 was compliant with the Local Planning Regulations and Council's Statement of Community Involvement (SCI). The consultation was publicised via the following methods:
- Emails/letters were sent to persons on the LDF database (in line the with General Data Protection Regulations update), including Statutory consultees, to inform stakeholders about the consultation.
 - Croydon Council's SPD website page and *Your Croydon* website were updated to reflect the consultation period and inform persons about the consultation events and how to make a representations.
 - Copies of the draft Suburban Design Guide SPD2 were available to view at Access Croydon and at each of the Borough's libraries.
 - An advertisement in The Croydon Guardian.
 - Postcards providing the Council website address, details of the consultation events and methods for submitting representations online were available at Access Croydon, Borough libraries and consultation events.
 - Tweets from the Croydon Council Twitter feed were posted to inform readers of deadlines and events.
 - Councillors and Croydon's Resident Associations' (where in line the with General Data Protection Regulations update) were informed of the consultation period.
- 4.4 Further detail about the consultation process is available in the Consultation Statement (Attachment X).
- 4.5 As per Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council sought representations on the draft SPD2. A total of 623 representations were received during the consultation period, covering a number of topics and issues. Detail regarding the responses received, including those that have resulted in amendments to the final SPD2 are detailed in the Consultation Statement (Attachment X).

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2018/19 £'000	2019/2020 £'000	2020/21 £'000	2021/22 £'000
Revenue Budget available				
Expenditure	25.7	0	0	0
Income	(25.7)			
Effect of decision from report				
Expenditure	25.7	0	0	0
Income	(25.7)			
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>
Capital Budget available	0	0	0	0
Expenditure	0	0	0	0
Effect of decision from report	0	0	0	0
Expenditure	0	0	0	0
Remaining budget	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>

5.2 The effect of the decision

SPD2 and the associated officers' resource, evidence base assembly and consultation undertaken was delivered through the Spatial Planning Service budget, supported by the Government's Planning Delivery Fund: Design Quality bid, which allocated £24,300 to the project in 2017/18 and £25,700 in 2018/19.

Risks

There are no significant risks arising directly from this report.

5.3 Future savings/efficiencies

- 5.3.1 Officer time required to advise applicants is likely to be reduced due to the provision of better guidance, and create a more efficient pre-planning application and planning application determination service.
- 5.3.2 SPD2 will contribute indirect financial savings by assisting the regeneration of the borough and the delivery of the housing targets set out in the Croydon local Plan 2018 through the setting of design guidance that will provide certainty to the community and developers and mitigate costs associated with planning appeals.

Approved by: Lisa Taylor Director of Finance Investment & Risk

6. LEGAL CONSIDERATIONS

- 6.1 The Director of Law and Governance comments that there needs to be public participation before a local planning authority can adopt a Supplementary Planning Document. Council Officers are satisfied that the Consultation undertaken in September-October 2018 was in accordance with the requirements for public participation detailed in the Town and Country Planning (Local Planning) (England) Regulations 2012, particularly regulations 12 and 35. Adoption of the Suburban Design Guide - Supplementary Planning Document (SPD2) will be in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012

Approved by: Sean Murphy, Director of Law and Governance & Deputy Monitoring Officer

7. HUMAN RESOURCES IMPACT

- 7.1 There are no human resources implications arising from this report.

Approved by: Jennifer Sankar, Head of HR Place on behalf of Sue Moorman Director of HR

8. EQUALITIES IMPACT

- 8.1 The Croydon Local Plan: Strategic Policies – Partial Review and the Croydon Local Plan: Detailed Policies and Proposals (The Croydon Local Plan 2018) was subject to an Equality Analysis to ascertain the Plans' potential impact on groups that share a protected characteristic and identified that a full Equality Analysis was necessary for the Proposed Submission stage. The full Equality Analysis established that there was no potential for discrimination, harassment or victimisation and that the Croydon Local Plan includes all appropriate actions to advance equality and foster good relations between all groups. The appropriate actions to address potential impacts on groups with a protected characteristic include:
- The Croydon Monitoring Report, which is published annually, to assess the effectiveness of the Croydon Local Plan 2018.
 - Monitoring of supply and demand for sheltered, residential care, and extra care housing.
- 8.2 The Equality Analysis undertaken for the Croydon Local Plan: Strategic Policies – Partial Review and the Croydon Local Plan: Detailed Policies and Proposal sufficiently and appropriately covers the content and implications of SPD2.
- 8.3 The Equality Analysis for the Croydon Local Plan: Strategic Policies – Partial Review and the Croydon Local Plan: Detailed Policies and Proposal is a background document.
- 8.4 The proposed change will help the council meet its equality objective 'To increase the support offered to people who find themselves in a position where

they are accepted as homeless especially those from BME backgrounds and women’.

Approved by Yvonne Okiyo, Equalities Manager

9. ENVIRONMENTAL IMPACT

- 9.1 A Sustainability Appraisal (SA) was prepared for the Croydon Local Plan 2018. Given that SPD2 will provide supplementary guidance to the policies within the Local Plan, it is determined that the Local Plans’ SA provides relevant assessment and therefore negates the need for a SA/Strategic Environmental Assessment (SEA).
- 9.2 The Environmental Agency, Natural England and Historic England were consulted on the need for a SA / SEA of the SPD2. All three statutory consultees confirmed that the production and adoption of SPD2 is unlikely to have any significant environmental impacts and therefore a full SA/SEA is not required.

10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 There are no crime and disorder reduction impacts arising from the recommendations of this report.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 11.1 To provide design guidance for suburban residential developments and extensions and alterations to existing homes across the borough, while assisting in the delivery of the borough’s housing targets and providing clarity to communities, stakeholders, developers and planning officers.

12. OPTIONS CONSIDERED AND REJECTED

- 12.1 The other option would be to not adopt SPD2. This would mean that there would be no up to date design guidance for the borough, which would lead to planning applications being determined on the basis of existing planning policy and guidance that is not considered to be sufficiently detailed or area-specific and would create a tension with the Council’s obligation to meet the housing targets in the Croydon Local Plan in a sustainable and managed way. Such an approach could also lead to additional planning appeals.

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APPENDICES: Appendix A: SPD2 Consultation Statement

BACKGROUND DOCUMENTS: Equality Analysis

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Consultation Statement: Suburban Design Guide Supplementary Planning Document

Consultation statement prepared in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.

1. Name of Supplementary Planning Document

Suburban Design Guide (SPD2)

2. Purpose of SPD

2.1 The Suburban Design Guide Supplementary Planning Document (SPD2) provides guidance for suburban residential developments, development in Areas of Focused Intensification and extensions and alterations to existing homes across the borough. It is a Supplementary Planning Document to the Croydon Local Plan 2018 and is intended to assist in the delivery of around 10,000 homes in these locations of the boroughs housing target of 32,890 new homes by 2036 as set out in Policy SP2.2 of the Local Plan. The document relates to Policy DM10: Design and Character of the Local Plan, along with other relevant policies, and provides technical design guidance that seeks to both limit any negative impact on places, including the amenity of existing residents, and frame opportunities where increased densities can enhance places and bring benefits to communities.

3. Persons/groups/bodies consulted in connection with preparation of SPD

3.1 Public consultation has occurred on the draft SPD in line with the Council's Statement of Community Involvement (SCI). Croydon Council went beyond the requirements of the SCI as detailed below and has worked closely with the local community and local stakeholders in the area to produce the draft Suburban Design Guide.

4. How were people consulted?

4.1 Prior to formal public consultation, engagement events including meetings and workshops were held with identified stakeholders from across the Borough, internally within the Council and external bodies including:

- Residents Associations, during their regular forums with the Planning Department.
- A local developer/agent meeting was run to discuss issues and options, followed by a second meeting where developers/agents presented relevant development schemes that had been granted permission or recently built.
- Informal workshop with local agents, London-wide professionals and representatives from the Greater London Authority to test how such guidance may be applied.
- Informal Place Review Panel workshop considering issues and options, and to test how such guidance may be applied.
- Recurring Local Development Framework Board meetings throughout the drafting, consultation, amendment and adoption process.

- Scrutiny Committee in January 2018.

4.2 In addition, before the formal consultation process, the Suburban Design Guide SPD2 went through a process of internal consultation and testing with the Spatial Planning, Development Management, Transport and Regeneration Services.

4.3 The formal consultation process for the draft Suburban Design Guide SPD2 adhered to the Council's adopted Statement of Community Involvement (2012) and also the statutory requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012. Formal Consultation took place between 3 September and 15 October 2018. Those consulted (as detailed in Paragraph 4.4) were informed of how they may access the document, the date and location of consultation events, along with the date by which representations must be made and where they should be sent.

Consultation overview

4.4 Publicity for consultation was undertaken via the following activities:

- Emails/letters were sent to persons on the Local Development Framework database (in line with General Data Protection Regulations¹), including Statutory Consultees, to inform stakeholders about the consultation process.
- Croydon Council's SPD website page and *Your Croydon* website were updated to reflect the consultation period and inform persons about the consultation events and how to make a representation.
- Physical copies of the draft Suburban Design Guide SPD2 were available to view at Access Croydon and at each of the Borough's libraries.
- An advertisement in The Croydon Guardian as a statutory notice.
- Postcards providing the Council website address, details of the consultation events and methods for submitting representations online were available at Access Croydon, Borough libraries and consultation events.
- Tweets from the Croydon Council Twitter feed were posted to inform readers of deadlines and events.
- Councillors and local Residents Associations (where in line with the General Data Protection Regulation) were informed of the consultation period.

4.5 Consultation comprised of the following:

- Hosted on the SPD web page, an electronic version of the draft Suburban Design Guide SPD2 was made available for download from the Council's website.
- Hard copies of the draft Suburban Design Guide SPD2 were available in Access Croydon and all libraries across the Borough.
- A narrated animation depicting the growth of Croydon and the guidance outlined in the document.
- Seven public consultation events on the draft Suburban Design Guide SPD2 were held across the borough during the consultation period and staffed by the SPD2 team and members of the Council's Planning Department. Consultation material at events included:
 - hard copies of the document;
 - poster boards with components of the document displayed including the development of typical streets and plots, as well as key guidance;
 - the animation screened on loop

¹ General Data Protection Regulation (GDPR) came into force on 25th May 2018, ahead of formal consultation on SPD2. Contacts on the LDF database prior to the GDPR were contacted and required to respond to confirm they wish to stay on the database, following which those who did not respond were removed from the LDF database.

- an interactive website for the public to test navigation and display of the draft SPD2 in an online format;
 - table drawing boards with typical street patterns/housing typologies for attendees to demonstrate typical issues, concerns or suggestions for suburban development;
 - 3D wooden models of development patterns (detached homes, semi-detached homes and terraced homes) with removable and interchangeable houses which, when repositioned, provided examples of how development and evolution may occur;
 - Two ‘windows on wheels’ to portray overlooking distance dimensions as mentioned in the document; and
 - Council project staff on hand to answer questions regarding the document or development linked to the guidance in the draft SPD2.
- Representation forms were provided at events for consultees to leave their comments and were also available in Access Croydon, each of the Borough’s libraries and for download from the website. Representations were also recorded if they were provided via email to the LDF inbox, mailed to Croydon Council’s Spatial Planning team or asked to be recorded at consultation events.

4.6 Consultation Event Attendees

Total number of attendees: 242 people

Tuesday 18 September, 4pm – 8pm, Addington Community Centre: 17 people

Thursday 20 September, 4pm – 8pm, Upper Norwood Library Hub: 5 people

Tuesday 25 September, 4pm – 8pm, Kenley Hall: 110 people

Saturday 29 September, 10am – 2pm, Purley Library: 23 people

Tuesday 2 October, 4pm – 8pm, Christchurch Methodist Hall Addiscombe: 14 people

Thursday 4 October, 4pm – 8pm, Selsdon Community Centre for the retired: 37 people

Tuesday 9 October, 4pm – 8pm, Shirley Community Centre: 36 people

4.7 Animation Views

Online: 885

Offline: At consultation events, approximately 100 views

4.8 Representations received

623

4.9 Statutory Consultees

As part of the consultation, Statutory consultees and key stakeholders were invited to make a representation on the draft SPD2. These included:

- Environment Agency
- Highways England
- Historic Buildings and Monuments Commission for England (Historic England)
- Natural England
- Sport England
- Greater London Authority (GLA)
- Mayor of London
- Transport for London (TfL)

Comments received from Statutory Consultees have been detailed in Section 6 of this statement, along with Council’s response

Other local authorities, as listed below, were also consulted:

- Surrey County Council
- Lambeth

- Wandsworth
- Southwark
- Bromley
- Tandridge
- Reigate and Banstead
- Sutton
- Merton

5. Comments of support

5.1 A number of representations were received expressing support for the draft Suburban Design Guide SPD. These included:

- Support for the Council in recognising that the burden of regeneration and the requirement for housing needs to be shared across the borough;
- Praise for the documents guidance on managing evolution, thereby limiting negative impacts on existing residents and bringing benefits to the community by enhancing character through good quality design;
- Welcoming the guidance that does not support overbearing development that would negatively impact neighbouring properties and the streetscene;
- Welcoming the intent to make more efficient use of existing infrastructure and improve public spaces and community facilities in the Forestdale Intensification Area;
- Support for the guidance that seeks to avoid the use of materials that weather poorly;
- Support for the use of bicycles throughout the borough where additional cycle routes are provided;
- Support for the guidance on car parking including permit-free developments through the use of S106 agreements to restrict residents from applying for on-street parking permits and the provision of disabled persons parking spaces, car club spaces and active vehicle charging facilities;
- Praise for the quality of the written document and accompanying visuals;
- Commendation for the progressive improvement in the quality of consultation, including the assistance provided by staff and quality of material on display.

6. Comments received from Statutory Consultees and stakeholders

6.1 Environment Agency

The Environment Agency (EA) provided the following comments:

- *Noted no specific or detailed comments relating to land contamination or flood risk in light of the text in the SPD.*
- *Recommended that any future site allocations on land with previous use will need to address potential contamination issues by adequate investigation and risk assessment.*
- *Where relevant, they would provide comments on any specific site at application stage.*

- *Noted Section 2.36 refers to the use of SuDS and that any new proposals should ensure that any sustainable drainage design will achieve appropriate protection of groundwater.*
- *Noted that Brighton Road and Kenley AFIs are in Flood Zone 3 and have been subject to historic flooding emphasising the need to steer all new development away from these locations, and any areas at high risk of Surface Water Flooding.*

LBC notes the recommendation with regards to site allocation and potential contamination. This will be considered in any future site allocations (nb. this is not within the scope of an SPD). LBC appreciate comments from EA on any specific site at application stage.

LBC recognise the comment with regards to SuDS and protection of groundwater. This is a detailed technical design issue and would be addressed by consultants working on a development application.

In relation to flooding in the Brighton Road and Kenley Areas of Focused Intensification (adopted in the Croydon Local Plan 2018), the guidance has been revised to provide reference to Policy DM25 and Table 8.1 of the Croydon Local Plan 2018 which require sequential and exception tests that enables flood risk to be mitigated and balanced against overall development need.

6.2 Historic England (HE)

Historic England (HE) provided the following comments:

- *Welcomes the Council's intention to produce design guidance for suburban areas and considers the guidance timely and well detailed.*
- *Supports the principal of planning for increased densities through sustainable development methodologies which reflect and demonstrate the positive aspects of local character.*
- *Supports the guidance on heritage and the proportionate approach to significance where heritage assets are affected in paragraphs 1.4.12 to 1.4.17.*
- *Suggests that the guidance could provide a stronger framework for successful design, suggesting that a number of illustrative examples in the document appear at odds with the guidance and may result in uncharacteristic and unpopular development (such as 2.4 and 2.11). HE suggests that these would benefit from better illustration and qualification or revision.*
- *Provided useful built examples for consideration in developing the proposed guidance.*
- *Supports the case study illustrations in the document as innovative ways to increase density.*
- *Suggests that it may be helpful to state that where proposals affect heritage assets that the additional policies set out in the National Planning Policy Framework, Local Plan and associated national and local guidance documents will be applied.*
- *Recommends clarifying where the illustrative examples are likely to be unsuitable for historic suburbs or, alternatively, consider including a section illustrating schemes in historic areas which have been successfully delivered.*
- *Recommends setting out the design process that underpinned those successful case studies through a flow chart/process map which shows the steps for design development. This may assist in developing a design tool-kit to help potential developers test designs and bring forward successful schemes.*
- *Noted the need to provide usable green spaces where people feel they have ownership and help to maintain.*

LBC appreciates the positive and supportive feedback from Historic England.

With regards to the comment on Section 2.4, it has been important to incorporate this so that smaller sites can achieve a scale that provides higher densities and affordable housing. This section has now been linked to Section 2.15 and the other relevant sections within the guide are written to limit uncharacteristic development (Refer to Paragraph 7.4.5 of this statement). With regards to the comment on Section 2.11, the 45° rule is commonly applied by the Local Planning Authority and is largely accepted as an industry standard. Figures 2.11d-2.11s demonstrate how an approach to form can limit impact.

LBC has reviewed the examples provided and subsequently included Worland Gardens within the guide.

In response to HE's recommendation that it should be clarified where examples are unlikely to be suitable for historic suburbs, or include a separate section for historic areas, LBC would like to note that the Council has a Conservation Area General Guidance (CAGG) document and specific Conservations Area Appraisal and Management Plans (CAAMP) for each Conservation Area. SPD2 makes reference to these and notes these take priority over the SPD2; as such it was deemed this would be an unreasonable addition that might compromise the authority of the CAGG or CAAMPs.

In response to setting out the design process in a flow chart, this risks constraining architects/designers and would fail to recognise that a good design process is not linear and should be iterative. The design guide is in itself a toolkit providing a series of rules to help shape designs as they progress.

LBC have strengthened the guidance on landscaping, particularly shared amenity space, to facilitate ownership and maintenance of green spaces.

6.3 Natural England

Natural England (NE) provided the following comments:

- *Noted that the SPD is unlikely to have major impacts on the natural environment and therefore did not provide specific comments.*
- *Advised incorporating features which are beneficial to wildlife within the guidance for suburban development.*
- *Noted the opportunity that landscaping presents to enhance the character, sustainability, amenity and local distinctiveness of the surrounding natural and built environment. NE recommended this could be considered to ensure new development makes a positive to the local area.*
- *Noted that SPDs only require a Strategic Environmental Assessment in exceptional circumstances and did not note this to be the case.*

LBC have now incorporated guidance on a 'wildlife area' within landscaping proposals associated with development to provide wildlife corridors (refer to Paragraph 7.4.46 of this statement). LBC have strengthened the wording in relation to landscaping to emphasise its importance and how new development should contribute to this (refer to Paragraphs 7.4.45-7.4.48 of this statement).

LBC notes that NE were consulted at an earlier stage to confirm whether a Strategic Environmental Assessment (SEA) would be required. The response from NE was that an SEA was not necessary.

6.4 Mayor of London / Greater London Authority (GLA)

The Mayor of London / GLA provided the following comments:

- *Noted that the SPD is an innovative planning document to encourage the delivery of small housing sites.*
- *Strongly welcomes the aims and objectives of the SPD, being broadly in line with the emerging London Plan as set out in following comments.*
- *Noted the housing targets for LBC within the draft new London Plan and that a significant number (1,511 per annum) should be delivered from small sites in line with draft new London Plan policy H2 Small Sites.*
- *Noted that policy H2 in the draft new London Plan sets out a presumption in favour of sustainable development for certain types of small residential developments and that boroughs should prepare area-wide design codes to proactively encourage increased housing provision, good design and higher residential densities. SPD2 broadly performs this function.*
- *Noted the areas SPD2 applies to could be extended to reflect those outlined in draft London Plan policy H2D.*
- *Noted that policy H2 in the draft new London Plan applies to residential developments between 1 and 25 homes and Croydon should increase its threshold to 25 units to be consistent.*

LBC appreciate the comments of support from the GLA. LBC have increased the threshold to 25 homes and notes that the guidance applies across the borough (and includes additional guidance for the Areas of Focussed Intensification) with the exception of the Metropolitan Centre and District Centres. These centres are excluded as they are subject to place specific policies within the Croydon Local Plan and are expected to accommodate development of a scale greater than allowed for in the Suburban Design Guide SPD, including on small sites.

6.5 Transport for London

Transport for London (TfL) provided the following comments:

- *Noted that the document puts forward proposals that align well with the Healthy Streets approach, the Mayor's Transport Strategy (MTS) and Policies D7 (Public Realm), GG3 (Creating a Healthy City) and T2 (Healthy Streets) of the draft London Plan (2017).*
- *Support for the principles in the sustainable transport section.*
- *Strongly supported the guidance providing on parking.*
- *Suggested the guide should explicitly refer to the Healthy Streets principles.*
- *Suggested the guide should emphasise requirement of the draft new London Plan for new development to be car free in metropolitan and major town centres and all areas of PTAL 5-6.*
- *Support for parking spaces being leased rather than sold, but recommended leases should be short enough to allow sufficient flexibility in parking allocation to reflect changing circumstances.*
- *Support for the use of permit-free developments.*

- *Potential to provide a stronger commitment to introducing new CPZs.*
- *Generally supported the guidance on parking requirements, including the provision of charging facilities, noting the need for 20% of parking spaces to have active charging facilities, with passive provision for all remaining spaces.*
- *Noted that the text reading 'Car Park Design & Management Plan' should be amended to 'Parking Design and Management Plan'.*
- *Suggested the need to emphasise the flexible use of parking depending on changes in demand and behaviour and local context.*
- *Suggested strengthening of guidance on landscaping to screen parking.*
- *Suggested a separate section on cycle parking to emphasise the importance of active travel.*
- *Noted clarification is needed to state cycle storage will need to be in addition to general storage area and not in a combined bike and general storage area. Additionally, all access routes to cycle storage should be accessible and easily fit a bicycle that does not need to be folded. Reference should also be made for the need to accommodate visitor cycle parking that should be considered within public realm design.*
- *Noted that all new driveways to developments on the TLRN should be consulted and made in agreement with TfL. Likewise for those that access onto a tram route, with particular consideration to glare and vegetation.*
- *Support for creating connections through suburban blocks, but noted the need to prioritise pedestrians and minimise vehicular access.*
- *Noted the need to better emphasise the benefits for Areas of Focussed Intensification, including better facilities for walking, cycling and public transport access, safer roads and public realm improvements.*
- *Support the use of parking surveys and where necessary/relevant the requirement for the developer to enter into a legal agreement restricting future occupiers from applying for an on street parking permit.*

LBC appreciate the comments of support that recognise the guide reflects the current London policies, strategies and guidance; LBC have now included specific reference to the Healthy Streets principles within the guide (refer to paragraph 7.4.11 of this statement); the guide refers to the London Plan standards on charging facilities associated with parking spaces rather than setting out the specific requirements in the guide itself. This ensures the guide has longevity as London Plan standards may evolve on this subject.

In response to TfL's comments on areas of the highest PTALs, LBC notes that the guidance does not refer to metropolitan or major town centres.

LBC noted the comment on parking space leases being short, however considered this to be inappropriate to quantify in an SPD focussed on residential design. A stronger commitment to future CPZs has been made, dependent on consultation with communities (refer to paragraphs 7.4.12 and 7.4.40 of this statement). An amendment has also been made to 'Parking Design and Management Plan' (refer to paragraph 7.4.7 of this statement).

The guidance on parking in Paragraph 2.30.10 has been amended to emphasise the importance of flexible use of parking spaces to accommodate alternative uses in light of potential future change in demands (refer to paragraph 7.4.42 of this statement). Further

detail on screening to parking areas has been provided in Paragraph 2.30.10 (refer to paragraph 7.4.43 of this statement).

LBC recognise the importance of cycling as part of the MTS, however in the context of the SPD are of the opinion that proportionate guidance on cycle storage has been provided. However the guidance provided has been strengthened based on the recommendations from TfL (refer to paragraphs 2.31.2 and 2.31.3 of the SPD).

Additional guidance for developments that would access onto TLRN or Tram Route has been provided in Paragraph 2.29.9 which notes the need to consult TfL in these instances (refer to paragraph 7.4.38 of this statement). Additional guidance and amendments have also been made to 2.29.1 and 2.29.13 to strengthen the prioritisation of pedestrians over vehicular movement (refer to paragraph 7.4.39 of this statement).

Revisions to Chapter 3 have been made to highlight the potential benefits and opportunities for the Areas of Focussed Intensification in terms of better facilities in relation to walking, cycling and public realm improvements (refer to paragraph 7.5.2 of this statement).

6.6 Highways England

Highways England responded to consultation noting they had no comments on the document.

6.7 Sport England

No response was received from Sport England.

7. Issues Raised & Responses

7.1 The following paragraphs provide a summary of the main issues raised and how these have been addressed in the SPD. The comments received have been separated into sections to reflect the chapters of the SPD, and those that have resulted in amendments and those that have not. Where representations made comments that were similar or identical to others received these have been grouped to allow a consolidated response. Alongside comments received, the tables below list how these have been addressed in the SPD, and where relevant additional commentary from the council to respond to these issues. Where an amendment to the document has been made this is denoted by red italics.

7.2 General SPD2 comments

Comments and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

<u>General Comments: Responses that result in amendments</u>		
	Comments received	Council response
7.2.1	Representations requested further clarification regarding the provision of physical and social infrastructure to support suburban evolution as advocated within the SPD. These representations noted the need to plan for the needed infrastructure alongside the planned increase of housing delivery.	<p>It should be noted that SPD2 is a residential design guide for the suburbs concerned primarily with the design of buildings and their surrounding sites, rather than an infrastructure plan. Notwithstanding this, the Council has planned for the increased number of housing across all parts of the borough within Local Plan policies and the Infrastructure Delivery Plan. This is reflected in the following amendment.</p> <p><i>Amendment to Paragraph 1.1.3: 'Infrastructure policies and site allocations within the Croydon Local Plan (including, for example, sites for schools and health facilities) and the Council's Infrastructure Delivery Plan provide for the increased demand forecast as a result of the borough wide development growth.'</i></p>
7.2.2	Representations requested further clarification on the areas in the borough and the types of schemes to which the guidance applies, particularly as the draft new London Plan identifies 'small sites' as being any site which delivers under 25 homes.	<p>The table within Section 1.2 clearly identifies which chapters of the SPD are relevant. The SPD is applicable to suburban residential developments on smaller sites within Croydon and does not apply to larger development.</p> <p><i>Amendment to Section 1.2 Table: Updated to '25 homes', reflecting the draft London Plan.</i></p>
7.2.3	Representations suggested that it should be made clear that a supplementary planning document	<i>Amendment to include Additional Paragraph 1.2.6:</i>

	<p>does not undergo an independent examination and therefore it does not carry the same weight in determining planning applications as policies in the Local Plan.</p>	<p><i>'1.2.6 The Croydon Local Plan provides the planning policy context for this guide. The policies within the Local Plan have greater weight in determining planning applications as part of the Council's development plan, but it is expected that applicants shall adhere to this guide as a significant material consideration to the determination of planning applications. When determining applications, the Croydon Local Plan and its policies, along with relevant guidance, are taken as a whole to reach a balanced decision.'</i></p>
7.2.4	<p>Representations suggested that development on windfall sites is contradictory to the NPPF which states that development in rear gardens should be resisted.</p>	<p>The Local Plan makes provision for delivery of homes on windfall sites and underwent examination by the Planning Inspector to ensure it is sound and in line with the NPPF. Further clarification has been provided in the following amendment.</p> <p><i>Amendment to Paragraph 1.2.7: 'This reliance on windfall sites is supported by the NPPF and the Croydon Local Plan provides the evidence base to support this position, having been found sound at the Croydon Local Plan examination.'</i></p>
7.2.5	<p>Representations suggested that the character of an area is determined by the setting (suburban/urban/central), the density and PTAL rating. These representations raised concerns that these parameters are not specified in the document and it ignores guidance in the London Plan Density Matrix and Paragraph 122 of the NPPF.</p>	<p>Table 6.4 of the Croydon Local Plan sets out the policy position in relation to character of the Places of Croydon, in reference to the Borough Character Appraisal. This was examined and found sound by the Planning Inspector as part of the Local Plan process. Further clarification within SPD2 has been provided with the amendment below.</p> <p><i>Amendment to Paragraph 1.2.8: 'Further detail in relation to the expected evolution or change in character of different areas is set out in Table 6.4 of the Local Plan (see Figure 1.2d below).'</i></p>
7.2.6	<p>Representations noted that the document fails to provide a mechanism for measuring the cumulative impacts of development, which is currently not assessed in the decision making process of applications.</p>	<p>The Council recognise that this is of concern to many residents. It is noted that measuring the cumulative impact of development remains challenging as the Council have limited control over if and when an approved development will be built out. To provide some control over potential cumulative impacts, an amendment is proposed to the document.</p>

		<p><i>Amendment to include additional Paragraph 1.4.12: ‘Applicants should consider both the existing constraints on a site and future constraints, such as where planning permission has been granted on neighbouring land but has not yet been built. Wherever possible it is helpful to include both existing and approved neighbouring developments on submitted drawings to help illustrate the cumulative impact of development along a street and how this may affect the streetscene.’</i></p>
7.2.7	<p>Representations suggested the document fails to adequately address environmental impacts, including flooding and biodiversity, as a result of the development advocated within the guidance. This is particularly in light of the replacement of unsurfaced land with hard surfacing, and the resulting water run-off.</p>	<p><i>Amendment to include additional paragraph 1.4.25: ‘1.4.25 An environmentally responsive proposal will consider the local environmental impacts of the development, such as biodiversity and flooding. Developments within Flood Zones 2 and 3 will not usually be supported and would require sequential and exception tests as outlined in Policy DM25 and Table 8.1 of the Croydon Local Plan. Development should seek to protect and enhance biodiversity and should refer to Section 2.33 for guidance.’</i></p> <p><i>Amendment to include additional Bullet 5 in Paragraph 2.20.4: ‘Not located in an area of groundwater flooding.’</i></p> <p>The Council recognise the increase of water run-off as a result of development and have included a section on Sustainable Urban Drainage Systems (Section 2.36). Similarly the guidance on Biodiversity (Section 2.33) has been strengthened in response to consultation - refer to paragraph 7.4.46 of this statement for further amendments relating to biodiversity.</p>
7.2.8	<p>Representations noted limited guidance regarding road safety when numerous planning applications are approved without demonstration of road safety.</p>	<p>It should be note that SPD2 is a residential design guide for the suburbs concerned primarily with the design of buildings and their surrounding sites, rather than a road safety or transport improvement document. There are a number of existing references to road safety within the document (refer to paragraphs 2.29.10, 2.29.11, 2.29.12, 3.2.6, 3.4.4 and 4.29 within the SPD).</p>

		<p><i>Amendment to include additional paragraph 2.29.1: '2.29.1 Driveways, entrances and new routes should be designed to prioritise pedestrian flow and safety. This will generally mean limiting the number of vehicular access points to control vehicle flow and prioritising pedestrian and cyclist focussed designs.'</i></p> <p>Further amendments have been made in relation to the Areas of Focussed Intensification, please refer to paragraphs 7.5.3 and 7.5.7 of this statement.</p>
<u>General Comments: Responses that do not result in amendments</u>		
	Comments received	Council response
7.2.9	Representations expressed concerns that the document is subjective, rather than providing clarity on policies in the Croydon Local Plan 2018, which allows various interpretations by different users.	The Suburban Design Guide SPD2 is supplementary planning guidance, enlarging on planning policy but it cannot be overly prescriptive as it seeks to guide development applications, whilst allowing flexibility for applicants to respond to the particularities of a development site. It will be used to help determine applications as part of a balanced decision when assessing proposals against the Local Plan and other relevant policy & guidance as a whole.
7.2.10	Representations noted that the document does not provide an overall vision or plan of what development may be acceptable overall in a given area.	The borough wide vision is provided in the Local Plan and, as it required, the SPD provides borough-wide design guidance for suburban residential development, it is not possible or practicable to provide visions or plans for all areas across the borough. It does however provide further detail for the Areas of Focussed Intensification.
7.2.11	Representations noted that a number of examples and case studies are not built which makes it difficult to determine whether they are positive examples; they suggested it would be helpful to identify how the examples meet the guidance provided.	It is recognised that built schemes provide better references, however it should be noted that development applications are made based on drawn and written information, and as such drawn schemes can inform future schemes. The schemes selected present a range of positive attributes; a lengthy appraisal of each case study would make the guide unreasonably cumbersome and where possible the planning application number has been provided so readers can acquire further information if desired.

7.2.12	Representations suggest that the document should contain a list of requirements for applicants and information relating to making a planning application.	SPD2 is a design guidance document for suburban residential development and is not written to contain information about processes and procedures relating to planning applications which are subject to different regulations and may change. For this reason the SPD refers the reader to information about the requirements for making a planning application which can be found on the Council's website (https://www.croydon.gov.uk/planningandregeneration/make-application/validation-checklist).
7.2.13	Representations noted that the document doesn't recognise how design standards can affect the viability of a scheme.	SPD2 provides guidance that seeks to enable the delivery of good value through effective building design. It generally seeks to afford development opportunity, but this must go hand-in-hand with high quality design as required by planning policy.
7.2.14	Representations noted concerns that the type of development advocated by SPD2 would impact the visual appearance of an area.	The type of development guided by SPD2 is supported by policies within the Local Plan. The guidance within SPD2 seeks to ensure that where change to the appearance of an area is managed and positive. This underpins the design guidance throughout SPD2.
7.2.15	Representations noted concerns that the type of development advocated by SPD2 would have impact on neighbouring properties.	The type of development guided by SPD2 is supported by policies within the Local Plan. The guidance within SPD2 seeks to ensure any impact on neighbouring properties is mitigated wherever reasonable. This underpins the design guidance throughout the SPD.
7.2.16	Representations expressed concern over the deliverability of proposals in the document, particularly in Areas of Focused Intensification, and whether they represent the Council's intentions for compulsory purchase orders.	SPD2 provides design guidance only to help shape future residential development but is not in itself a development proposal. None of the proposals within SPD2 represent an intent for compulsory purchase by the Council.
7.2.17	Representations noted concerns the Council has failed to demonstrate how increased housing densities will enhance places and bring benefits to communities.	It should be noted the SPD is a design guide focussed on housing, and it sets out the potential benefits that increased densities may bring to communities. Local Plan policies make provision for delivering these benefits, such as infrastructure (refer to paragraph 7.2.1 of this statement). The Council's Spatial Planning Service work closely with the Council's Regeneration Service to deliver community-focussed projects that help to realise these benefits, such as the South

		Norwood Community Plan and Kenley Community Plan.
7.2.18	Representations expressed concerns that development of small sites is only economically beneficial to developers. These developments negatively impact neighbouring property values and are often too costly for local residents to purchase.	The private economic outcomes of a development are not a planning matter, except where concerning the provision of affordable homes. Where a development is a major scheme they are required to provide affordable housing in line with Local Plan policy SP2.
7.2.19	Representations expressed concerns that the redevelopment and replacement of single dwelling houses and family homes with blocks of flats significantly affects the character of an area.	The principle of the development addressed by SPD2 is supported by the Croydon Local Plan. SPD2 provides a definition for character in Section 2.7 and elaborates this is not tied to type of dwelling, and provides guidance for how character should be responded to. It should however be noted that the Local Plan Policy DM1.2 prevents the loss of 3 bedroom homes and provides strategic policies (SP2.7) and detailed policies (DM1) to ensure sufficient provision of family sized homes within new developments. This includes flats where they provide 3 or more bedrooms.
7.2.20	Representations noted concerns that the form of development advocated by SPD2 will result in piecemeal development.	The principle of the development addressed by SPD2 is supported by the Croydon Local Plan. The guidance within SPD2 has been written to ensure the suburbs evolve positively and collectively through individual developments as they come forward.
7.2.21	A number of representations raised concerns that there is limited protection for heritage assets, including those in a poor condition, and that conservation areas will have little protection.	Section 1.4 of SPD2 provides guidance on how to approach suburban residential development in the context of heritage assets. This section clearly refers to and prioritises the guidance documents the Council provides for Conservation Areas. The Council has an internal Heritage at Risk register to monitor buildings at risk and where possible to work with land owners to develop plans for their repair and safeguarding as necessary. Any heritage assets in serious disrepair can be reported to the Council's Conservation Officer.

7.2.22	<p>Representations expressed concern about the cumulative impacts on the road network, particularly from small, incremental changes, including that the SPD:</p> <ul style="list-style-type: none"> • does not reflect the strain additional developments will have on the road network; • should include methods to ensure that the road network is expanded and improved to provide the capacity needed; • fails to identify how pollution, as a result of increased traffic, will be managed to limit impacts on health. 	<p>The SPD is primarily design guidance for residential development and is not an infrastructure or transport document.</p> <p>The Croydon Local Plan and Infrastructure Delivery Plan, along with the London Plan, provide policies and proposals to ensure new development is sustainable and seeks to promote reduced private vehicle use, reducing congestions and pollution, in line with the London-wide Mayor’s Transport Strategy. These plans account for increased transport demands as a result of development.</p> <p>Additionally each development application is assessed both individually and cumulatively - often through a transport statement or assessment and the Council’s Strategic Transport team consider the impacts of the development on the highways network, local public transport network and where appropriate require contributions, mitigation or changes from the developer.</p>
7.2.23	<p>Representations suggested there should be greater recognition of the value of and the need to preserve and improve green, open space and private gardens.</p>	<p>SPD2 provides detail for the design of private amenity spaces, including gardens. It does recognise the importance of landscaping and biodiversity in the guidance contained in Sections 2.32-2.36. These sections have been strengthened following consultation, please refer to paragraphs 7.4.45 – 7.4.48 in this statement.</p> <p>In broader terms, the provision of homes on windfall sites allows for the protection of green, open spaces, such as Metropolitan Green Belt and local green spaces (including parks), from residential developments which may be put at risk if the Council were to fail to demonstrate a 5-year housing supply.</p> <p>Furthermore, Metropolitan Green Belt and Metropolitan Open Land are afforded the highest policy protection to protect and safeguard the Borough’s green space.</p>
7.2.24	<p>Representations noted that environmental issues such as noise and dust from development are not addressed in the document.</p>	<p>SPD2 provides detail on design policies in the Local Plan for suburban development. There are specific environmental policies in the Local Plan and where relevant guidance supporting guidance that would be considered for these issues so this is not in SPD2.</p>

7.3 Chapter 1

Comments received and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

Chapter 1: Responses that result in amendments		
	Comments received	Council response
7.3.1	Representations expressed concern that paragraph 1.2.6 conflicts with 1.2.7 and that gradual change cannot be achieved whilst meeting housing targets, and that the deliverability of housing targets in line with managed change does not account for market forces. There is a need to be clearer on the rate of change and this could include the understood figure to equate to 1 new home for every 5 that exist.	<p>The expected modes of suburban intensification outlined in Paragraph 1.2.7 (as per Policy DM10 of the Local Plan) indicate how the housing targets can be met in a managed way through the high-quality design of proposals, this is expanded upon throughout the guide. The Local Plan evidence base accounts for changes in the market to assess the deliverability of housing, whereas SPD2 is a design guide that ensures the design of individual developments support the creation of sustainable communities and manages change on individual sites that collectively contributes to a wider area; this is relevant regardless of market forces. The rate of change and impact of market forces has been clarified in the following amendments.</p> <p><i>Amendment to paragraph 1.2.7: 'it is expected that these homes will be provided through approximately: 11,000 new homes in the Croydon Metropolitan Centre; 7,000 on allocated sites across the borough; 10,000 on windfall sites; and a further 5,000 being either completed or under construction already. This equates to approximately 1,600 new homes per year by 2036 amounting to roughly 1 new home for every 5 that currently exist.'</i></p> <p><i>Amendment to guidance paragraph 1.3.1: 'The process of suburban evolution indicated here is expected over a period of 10 – 15 years, however it is recognised that market conditions may bring about change in a shorter period of time. The guidance is written so that it is relevant to creating sustainable neighbourhoods regardless of the rate of development to ensure that the benefits of such growth are optimised.'</i></p>
7.3.2	Representations suggested greater emphasis is needed to encourage	SPD2 cannot require publication of consultation with neighbours as this is a

	<p>developers to engage with neighbours. Suggests that there should be a requirement for applicants to publish the consultation had with neighbouring properties/landowners.</p>	<p>matter for the validation checklist that can be found on the Council's website (https://www.croydon.gov.uk/planningandregeneration/make-application/validation-checklist). The amendment below has been made to the SPD.</p> <p><i>Amendment to paragraph 1.4.28: 'to properly consider how neighbouring amenity may be affected... Responding to neighbours' concerns in a meaningful manner can help to develop an acceptable proposal.'</i></p>
7.3.3	<p>Representations noted that the intent of this guide should be clear, and noted that Figure 1.3d advocated the creation of new suburban streets.</p>	<p>The scope and applicability of the guide is set out in Section 1.2. As the guide covers developments of up to 25 homes, the developments on larger sites delivering close to this maximum, may result in the creation of new streets, as illustrated in Figure 1.3d.</p> <p><i>Amendment to caption for Figure 1.3d: 'Larger suburban developments, of up to 25 homes as covered by this guide, may result in the creation of a new suburban street with a mixture of flats and houses.'</i></p>

Chapter 1: Responses that do not result in amendments

	Comments received	Council response
7.3.4	<p>Representations noted concerns that Figures 1.3a, 1.3b and 1.3c detail the evolution of the different suburban scenarios but are subjective and open to interpretation. It was commented they may be more helpful if they were 3D.</p>	<p>The figures and illustrations in SPD2 are indicative only and cannot capture all development scenarios. The detailed guidance throughout the document elaborates on the specific issues that relate to suburban intensification and design in a number of common contexts, including 3D visuals. The document is also supported by the animation which describes the process of evolution in a more visually accessible manner.</p>
7.3.5	<p>Representations notes that the design objectives underpinning the draft guidance (Paragraph 1.3.2) are admirable, however suggestions were raised that the guide should explicitly demonstrate how each of these objectives are to be achieved.</p>	<p>The SPD elaborates on and explains in further detail throughout the document how these objectives can be achieved in different circumstances. For ease of use, the document is established in chapters and sections that reflect the built environment contexts where suburban development may occur. The detailed guidance contained throughout SPD2 is referable to a single/multiple overarching objectives within Paragraph 1.3.2.</p>

7.4 Chapter 2: Suburban Residential Development

Comments received and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

Chapter 2: Responses that result in amendments		
	Comments received	Council response
7.4.1	Representations commented that replacing 2 storey homes with 3 or 4 storey development (as per Figure 2.10c) will result in significant change to the character of an area, and therefore the statement of 'without significant change' is inaccurate.	As per the Local Plan Figure 6.4, it is expected that more and bigger buildings can be accommodated without significant change to the character of an area. <i>Amendment to Paragraph 1.3.1: 'and will result in more and larger buildings.'</i>
7.4.2	Representations suggested that Paragraph 2.2.1 needs to be backed by stronger policy applying to smaller developments to provide them with credibility.	<i>Amendment to Paragraph 2.2.1: 'and Strategic Policies SP2 and SP4'</i>
7.4.3	Representations noted concern that SPD2 fails to encourage family sized homes and preferences the delivery of 1 or 2 bedroom units.	<i>Amendment to Paragraph 2.3.2: 'Policy SP2.7 sets a strategic target of 30% of new homes to have three or more bedrooms with Policy DM1 establishing how this will be achieved on specific sites of 10 or more units. Developments on sites under 10 units are also encouraged to deliver homes with three or more bedrooms. In some cases this is potentially at the expense of delivering a larger quantity of smaller 1 or 2 bedroom units if the site specifics are such.'</i>
7.4.4	Representations noted the need for clarity on the suitable provision of outdoor amenity space	SPD2 provides a section on the design of outdoor amenity space (refer to Section 2.34 within the SPD). <i>Amendment to Paragraph 2.34.1: 'include outdoor amenity space as set out in policy DM10.4 of the Croydon Local Plan and... Where this is not possible, applicants will need to demonstrate this and provide shared outdoor amenity space in lieu.'</i>
7.4.5	Representations questioned whether the comprehensive development advocated in Section 2.4 would enhance an area and whether it aligned with the guidance within Section 2.15.	The guidance within SPD2 is devised to ensure development enhances, or where appropriate positively changes, an area. This can include bigger buildings. It is however recognised that Figure 2.4a needs to reflect the guidance within Section 2.15 as per the amendments below.

		<p><i>Amendment to Figure 2.4a to better reflect the guidance within Section 2.15.</i></p> <p><i>Amendment to include additional Paragraph 2.4.3: '2.4.3 Where combining sites would result in building across existing street-facing plot boundaries applicants should refer to Section 2.15 to avoid creating over-bearing developments that disrupt the rhythm of a street.'</i></p>
7.4.6	Responses noted that paragraph 2.6.8 bullet 1 on electric charging requirements should reflect London Plan standards.	<i>Amendment to Paragraph 2.6.8 bullet 1: 'in accordance with London Plan standards;'</i>
7.4.7	Responses commented that the text reading 'Car Park Design & Management Plan' should be amended to 'Parking Design and Management Plan'.	<i>Amendment to Paragraph 2.6.8 bullet 2: 'A Parking Design & Management Plan'</i>
7.4.8	Responses noted that, in relation to 2.6.8 Bullet 3, the NPPF requires a Travel Plan for developments that will generate a "significant amount of movements". It was suggested the wording should be amended to 50+ dwellings, not 10+.	<p>As per Paragraph 111 of the National Planning Policy Framework all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed. The Council will make a judgement as to whether a proposed development would generate significant amounts of movement on a case by case basis, and where relevant this will include smaller schemes.</p> <p><i>Amendment to Paragraph 2.6.8 bullet 3: 'A Travel Plan Statement will be required for all developments that the Council considers would generate significant amounts of movements in relation to the existing context. This will be judged on a case by case basis considered factors such as existing parking stress, PTAL, adjacent site uses and cumulative impact of development in an area. The statement should respond to the particular concerns highlighted by the Council, outlining how the residents will be informed about the sustainable travel options in their area and how and why there are restrictions on their parking provision.'</i></p>
7.4.9	Representations questioned whether Bullet 4 of paragraph 2.6.4 was	<i>Amendment - removal of Bullet 4.</i>

	contradictory to the purpose of the paragraph.	
	Responses noted the need for clarity on Paragraph 2.6.8 bullet 6 as to what the definition of 'larger developments' is. It was noted that free car club membership for a large number of residents will result in significant cost and impact viability. What happens if there is not a car club nearby or car club operators don't want to operate in that area? The wording needs to provide greater flexibility as there are still many unknowns around car clubs.	<i>Amendment to Paragraph 2.6.8 bullet 6: 'Car Club parking space provision should be in line with the requirements in Table 10.1 of the Croydon Local Plan. Where suburban residential developments present an opportunity to provide additional car club spaces or membership to nearby schemes, the Council will encourage this.'</i>
7.4.10	In the context of transport provision, representations noted that the document should be clearer that intensification would result in a need to improve public services, rather than an opportunity, and that there was a need for clarity on how this would be achieved.	It should be noted that it is not within the scope of SPD2 to set out infrastructure proposals, however the Council does plan for infrastructure as reflected in the amendments below and it is recognised this will be needed as our suburbs continue to accommodate more housing. <i>Amendment to Paragraph 2.6.1: 'resulting in a need to deliver increased public transport capacity and provision.'</i> <i>Amendment to Paragraph 2.6.2: 'The Croydon Local Plan, Infrastructure Delivery Plan and the London Plan provide detail on this.'</i>
7.4.11	Representations noted a need to refer to the Healthy Streets approach advocated by TfL.	<i>Amendment to Paragraph 2.6.2: 'This should put people, and their health, at the centre of the design of our neighbourhoods, in line with TfL's Healthy Street Approach.'</i>
7.4.12	Representations noted some support for permit-free developments, but recommended an amendment to the text to reflect a commitment to modifying or introducing new Controlled Parking Zones (CPZs) to help alleviate existing or potential parking stress and help manage the use of scarce public highway space.	<i>Amendment to include additional Paragraph 2.30.9: 'In locations where there are significant additional demands on kerbside space and parking pressure the Council may introduce or amend parking controls on roads within the area. Where this is proposed this can be taken into account when considering a development proposal to encourage more sustainable travel choices and reducing car ownership. In these locations the Council can restrict the occupants of new developments from applying for on street permits and in appropriate locations with good PTALs make the development completely car free.'</i>

7.4.13	<p>Representations commented that the SPD is unclear what specific character parameter(s) identifies the difference between accommodating growth without significant change to its character and that for the Areas of Focussed Intensification. This included a concern that allowing for change in scale & type of dwelling was not necessarily compatible with assuming a suburban character, and not cognisant of the Borough Character Appraisal (BCA).</p>	<p>SPD2 expands upon the Local Plan policies for design & character that are relevant across the borough in Chapter 2 and those that are specific for the Areas of Focussed Intensification in Chapter 3. It should also be noted that with high quality design it is possible to accommodate larger buildings with different types of dwelling whilst still assuming a suburban character. It should be noted that BCA provides an assessment of the current character, but as per the direction of the NPPF planning policies should allow for innovation & change, including increased building densities. This is reflected in the Local Plan policies and expanded in the guidance within SPD2 that has been written to enable this. This has been reflected in the amendment below.</p> <p><i>Amendment to Paragraph 2.7.2: 'This does not exclude increased building sizes.'</i></p> <p><i>Amendment to Paragraph 2.7.5: 'as outlined in Policies DM10.1 – DM10.10 of the Croydon Local Plan. For the Areas of Focussed Intensification, greater flexibility in responding to existing character will be allowed to achieve higher densities across the areas as per Policy DM10.11. However, it is expected that developments should still demonstrate a clear approach to character in line with the guidance in Section 2.8 and that collectively developments in these area will contribute to the gradual change in character.'</i></p>
7.4.14	<p>Representations noted a general need for further clarity on what character is and considered the local demographic to be considered an aspect of character.</p>	<p>In planning terms, character is not defined by the local demographic, but by built physical characteristics. This is described in Section 2.7. The definition of these physical aspects has been enhanced in the following amendment.</p> <p><i>Amendment to the Intro Paragraph of Section 2.7: 'This may include street layouts, building forms and positioning, landscaping, materials and architectural details.'</i></p>
7.4.15	<p>Representations raised concerns that Sections 2.7 & 2.8 provided a map of typologies to help describe</p>	<p>The inclusion of the map of predominant housing typologies map (Figure 2.7a) within the draft was not intended to</p>

	<p>the character of the 16 places and is then followed by the three types of approaches to character advocated in the SPD. The map (Figure 2.7a) itself is very high level and it is unclear whether any/all of the three approaches are accepted anywhere, or whether some neighbourhoods should only see one of these types of development? If the former, this does not reflect the individual and specific character of the places and does not demonstrate how an applicant would meaningfully respond to character. Representations raised concerns that this may not provide a sound interpretation of policy DM10.</p>	<p>prescribe certain development typologies in any given area as this would be contradictory to policy. It is recognised there is greater need to visually describe how character can be interpreted, this is provided in the following amendment.</p> <p><i>Amendment - replacement of Figure 2.7a and replacement with contextual analysis figure.</i></p> <p>The guidance expands upon Local Plan policy DM10 by providing 3 distinct approaches that encourage high-quality design. It should be noted that an approach to character must be informed by the local context and it is not possible to prescribe an approach for each area across the borough within the SPD. This responds directly to the NPPF that prescribes that planning policies ‘should ensure that developments... are sympathetic to local character and history... while not preventing or discouraging appropriate innovation or change (such as increased densities)’. However, it is recognised that there is need to strengthen the guidance to ensure the ‘Approaches to Character’ are not meaningless and are clearly demonstrated within an application:</p> <p><i>Amendment to include additional Paragraph 2.7.4: ‘2.7.4 Applicants should undertake contextual analysis that identifies the positive physical characteristics of an area and informs the approach to character as set out in Section 2.8. An example of contextual analysis is provided in Figure 2.7a’</i></p> <p><i>Amendment to Paragraph 2.8.1: ‘In developing an approach to character, applicants should refer to Section 2.7 of this guide to help identify the existing character.’</i></p>
7.4.16	<p>Representations questioned how the Council will ensure new development ‘enhances’ the character of an area and what criteria there are to ensure this?</p>	<p>SPD2 provides the 3 approaches to character set out in Section 2.8 and has strengthened how character is responded to as per the amendments above. Further guidance is provided in the amendments below.</p> <p><i>Amendment to Paragraph 2.7.2: ‘This can be achieved through pursuing development that references and</i></p>

		<p><i>reinforces existing architectural styles or introduces new, well-designed architectural styles that add interest to the area.'</i></p> <p><i>Amendment to Paragraph 2.8.3: 'and will only be acceptable where there is a demonstration of high-quality design in the proposal.'</i></p>
7.4.17	Representations noted that the guidance allows for bigger buildings but Section 2.8 advocates being of a similar density and massing.	<p>SPD2 does support larger developments where they are well designed. In line with the NPPF this does not exclude increased densities. This has been reflected in the following amendment which refers to form, rather than density and massing.</p> <p><i>Amendment to Paragraph 2.8.5: 'Schemes should closely relate to the existing surrounding typologies by pursuing a similar form, style, materials and detailing.'</i></p>
7.4.18	Representations questioned whether schemes are required to provide daylight and sunlight testing.	<p>The Council do not normally require schemes of the scale covered by SPD2 to provide daylight and sunlight testing but do however consider that BRE guidance should be referred to as good practice.</p> <p><i>Amendment to Paragraph 2.9.2: 'The scale of development covered by this guide will not usually require daylight and sunlight testing, however applicants are advised to consult the BRE guidance on good practice for access to natural light.'</i></p>
7.4.19	Representations requested clarification on the guidance within Paragraph 2.9.17 on what is meant by 'where acceptable separation distances cannot be achieved'.	<p>This is where site constraints limit the placement of windows. It is noted that schemes that are considered to be over development or result in an overbearing appearance are not supported, and this is provided for throughout the guidance within Chapter 2.</p> <p><i>Amendment to Paragraph 2.9.17 to include 'due to site constraints'.</i> <i>Amendment to Paragraph 2.9.18 to include: 'quality of design'</i></p>
7.4.20	Representations commented that Paragraph 2.9.8 is difficult to understand.	<p><i>Amendment to include additional diagram – Figure 2.9e</i></p>
7.4.21	Representations questioned the guidance and rationale behind the approach in Paragraph 2.9.3 on unneighbourly windows which gives less protection to neighbouring outlook.	<p>The inclusion of Paragraph 2.9.3 which refers to unneighbourly windows does not undermine the protection awarded to most windows in neighbouring buildings. It is only those that exist that are considered to face onto a development site in an</p>

		<p>unreasonable manner as per the definition added to the glossary (see below) that would not usually be permitted.</p> <p><i>‘Un-neighbourly windows: Where such a window already exists on any type of development (including windows within extensions), it is a window that faces onto a potential development site in a way that would not be permitted if the window did not currently exist as it would unreasonably preclude development on the neighbouring site. Where such a window does not currently exist, it is a window proposed within any type of development application (including extensions) that would unduly preclude development on the neighbouring site.’</i></p>
7.4.22	<p>Representations requested that Paragraph 2.9.9 needs expanding to cover how and when a development would appear overbearing and/or create a poorly designed streetscene. This paragraph should set-out key criteria and link back to CLP policy.</p>	<p>The key criteria are provided within in paragraph 2.9.6 to ensure a development does not appear overbearing. It is however expected that this would be judged on a case by case basis as per the amendment below.</p> <p><i>Amendment to Paragraph 2.9.9: ‘Where there is a concern that a development would appear overbearing to a neighbouring property across the street and/or create a poorly designed streetscene, they will not be supported. This will be judged on a case by case basis in light of this guidance and Policy DM10 of the Croydon Local Plan.’</i></p>
7.4.23	<p>Representations expressed the belief that where surrounded by 2 storey houses, new development should be limited to 2 storeys plus mansard (rather than 3 storeys + roof accommodation). This included the understanding that any additional floor space beyond 3 floors would be contradictory to the Local Plan.</p>	<p>The guidance within SPD2 has been justified with the following amendment, cognisant of the Local Plan.</p> <p><i>Amendment to include Additional Paragraph 2.10.2: ‘DM10.1 of the Croydon Local Plan recommends a minimum of 3 storeys, as such where suburban contexts allow for additional accommodation in a roof space or basement these should be afforded as follows.</i></p> <ul style="list-style-type: none"> <i>• Where a design includes a roof space in addition to three full floors, it is then possible that this space is used for accommodation; this may be within the eaves or in set-back roof form.</i> <i>• Where a basement is partially concealed and not fully visible from the street, there is scope for</i>

		<i>accommodation on an additional lower level as this will not be read as full storey in the streetscene.'</i>
7.4.24	Representations noted that the appearance of the development diagrammed in Figure 2.10c appeared out of character due to its height and roof form.	The issue of height is covered in the amendment above. Whilst SPD2 advocates a range of roof forms as per Section 2.19, it is recognised a mansard roof to Figure 2.10c could diagrammatically respond to the neighbouring character more effectively. <i>Amendment to Figure 2.10c to include a mansard style roof.</i>
7.4.25	Representations noted that Figure 2.10a was not accurate to all conditions due to the mature tree between the properties.	<i>Amendment to replace Figure 2.10a with figure showing development without a mature tree between developments of different heights.</i>
7.4.26	Representations expressed concerns that the development shown within Figures 2.11j, n and r would be overbearing on the neighbouring garden.	The 45° rule established in Section 2.11 is an accepted industry standard to minimise loss of light to neighbouring properties. The diagrams within 2.11j, n and r meet this standard and are included to demonstrate how different built form can be achieved within 45°. Guidance within 2.11.3 is provided to help ensure that the form of a development is coherent to achieve high quality design and in turn help minimise an overbearing appearance. <i>Amendment to Paragraph 2.11.3: 'as demonstrated in Proposal 3 on pages 44 – 45'</i> <i>Captions to Figures 2.11d-2.11s amended to refer more clearly to form, architectural coherence and relationship to 45° rule.</i> <i>Figures amended to provide more realistic representation of planting between neighbouring properties.</i>
7.4.27	Representations noted concerns that the wording in Section 2.12 is quite restrictive (i.e. that proposals in rear garden should be one storey lower than host dwelling) and does not accord with the separation distances provided in guidance paragraph 2.9.10. Representations suggested 2.12 should be amended to reflect 2.9.10 and to provide greater flexibility on how subservience may be achieved.	<i>Amendment to 2.12.1 to clarify how subservience may be achieved and to correlate with separation distances provided in Paragraph 2.9.10: 'Where a development is proposed within a rear garden, including redevelopment of a garage to the rear of a property, it should be subservient to accord with Policy DM10.1 of the Croydon Local Plan. Subservience can be achieved through proposals of either a lower height or articulated massing dependant on the context and as follows:</i>

		<p><i>i. If any part of the proposed development would be within 18m of the rear wall of any neighbouring dwelling, the proposal should be of a lower height. This may be best achieved by being 1 storey lower than the neighbouring dwelling, however accommodation may be provided within roofspace (Refer to Figure 2.12a).</i></p> <p><i>ii. Where no part of the proposed development would be within 18m of the rear wall of the host or any neighbouring dwelling, the proposal may be of the same number of storeys of the predominant building height in the area (Refer to Figure 2.12b) provided the footprint and/or articulated form helps achieve a massing that appears subservient to the existing dwellings.</i></p> <p><i>Figure 2.12a: Height of rear garden development is lower than the neighbouring dwelling where any part of the development is within 18m of the rear wall of the neighbouring property, however accommodation is provided in the roof space.</i></p> <p><i>Figure 2.12b: Height of rear garden development may be equivalent to that of the neighbouring property where no part of the development is within 18m of the rear wall of the neighbouring property.</i></p> <p><i>Figure 2.12c: A rear garden development that is within 18m of another dwelling that has a height that is subservient to the surrounding dwellings.'</i></p>
7.4.28	<p>Representations noted that Paragraph 2.12.1 ii states that 'the proposal may be of the same number of storeys of the predominant building height in the area' which contradicts policy DM10.1c which states that 'in the case of development in the grounds of an existing building which is retained, development shall be subservient to that building'.</p>	<p><i>Amendment as above to give greater clarity to how subservience can be achieved through design.</i></p>
7.4.29	<p>Representations recommended that Section 2.12 should refer to Local Plan Policy DM10.4e.</p>	<p>Local Plan Policy DM10.4e is primarily concerned with the footprint and positioning of development within the grounds of an existing buildings, rather</p>

		than height (as per Section 2.12 of SPD2). Amendments have been made to section 2.18 to account for Policy DM10.4e. Refer to 7.4.32 of this statement.
7.4.30	Representations questioned whether the guidance within Section 2.13 was contradictory to the Local Plan Policy of seeking to achieve a minimum of 3 storeys and suggested rethinking use of phrase 'predominant' building height in this section.	<i>Amendment to 2.13.1: 'If the development introduces a bigger built form to achieve 3 storeys as per Policy DM10.1 of the Croydon Local Plan, it can be advisable to step the height and/or footprint such that the proposal respects the scale, height, massing and density of the context in line with Policy DM10.1c.'</i>
7.4.31	Representations commented that it is unclear why larger development is acceptable on corner plots as per Section 2.14, and that this guidance could result in unreasonably large buildings with unacceptable overlooking and limited outdoor amenity space.	<p>Corner plots provide a marker point within the townscape and therefore can accommodate more prominent buildings with a dual frontage, this does not however negate the need to avoid overlooking and provide adequate outdoor amenity space. This is reflected in Section 2.14 and strengthened in the amendments below.</p> <p><i>Amendment to Paragraph 2.14.1: 'accommodate additional height and depth as marker points within the townscape.'</i></p> <p><i>Amendment to Paragraph 2.14.2 & 2.14.3: 'This will be judged on a case by case basis and balanced against any unreasonable impact on neighbouring amenity... Whilst this allows for larger development, such proposals would still need to conform with relevant policy and guidance with regards to the amenity of neighbours and future residents, such as overlooking and provision of outdoor amenity spaces.'</i></p>
7.4.32	Representations requested further clarity on DM10.4e in Section 2.17 of the SPD.	<i>Section 2.17 is renumbered Section 2.18. Amendment to Paragraph 2.18.1: 'Due to varying plot sizes across the borough, it will often be desirable for developments in rear gardens and back land sites to build along or in close proximity to boundaries and existing buildings to maximise development opportunity. However, it is important that new developments are sited so as to minimise their impacts on the residential amenities of neighbouring properties... If within a rear garden, the footprint of the proposal conforms with Policy DM10.4(e) of the Croydon Local Plan. The policy seeks a minimum</i>

		<p><i>retention of 10m length and no less than half or 200m² (whichever is the smaller) of the existing garden area to be retained for the host property. This is primarily to provide sufficient outlook and amenity to existing dwellings, but also provides additional benefits of maintaining a sense of openness within gardens.'</i></p> <p><i>Section 2.17 retitled to '2.18 Positioning of development in rear garden and back land sites'</i></p>
7.4.33	Representations questioned whether balconies are acceptable to the front and rear of a property.	<p><i>Amendment to Paragraph 2.26.2: 'and may be acceptable to the front, as well as the rear of a property, where they are successfully integrated into the design of the proposal.'</i></p>
7.4.34	Representations suggested that Section 2.27 should include wiring for external lighting, broadband and satellite services, and how these may be located discreetly.	<p><i>Amendment to Paragraph 2.27.1: 'With the exception of rainwater goods, no servicing items, such as vents, flues, pipes, wiring, telecommunication boxes or satellite dishes, should be located on the front elevation or prominent side elevation of a development... Servicing items should be located to be as discreet as possible, at the end of an elevation or at the corner of a recess or, where possible, within the building envelope... Applicants should illustrate external servicing item locations on drawings submitted with planning applications.'</i></p>
7.4.35	Representations noted that Section 2.28 does not provide clarity on policy to DM10.4e.	<p>Section 2.28 has been strengthened to provide clarity to Local Plan Policy DM10.4e as per the amendment below.</p> <p><i>Amendment to 2.28.1: 'Proposals that seek to subdivide and/or infill must conform to Policy DM10.4(e) of the Croydon Local Plan and should refer to Section 2.16 or 2.18 of this guide (as relevant) in relation to building positioning. They should also consider the existing pattern of development along the street, and the associated visual amenity that breaks in built form provide.'</i></p>
7.4.36	Representations noted there was no discussion on subdividing existing properties and the resulting quality of accommodation, including the need to meet planning policies internal spatial requirements of London plan.	<p><i>Amendment to Paragraph 2.5.2: 'Where existing houses or spaces above shops are converted to provide new dwellings, consideration must be given to the design and layout to ensure awkward layouts and limited access to natural light is avoided. All new dwellings as a result of conversions must meet minimum space standards.'</i></p>

7.4.37	Representations noted that many sites covered by SPD2 may have existing entrances that cannot be widened due to land ownership and as such the guidance within Paragraph 2.29.7 should be amended so as not to unreasonably preclude development in these instances.	<i>Amendment to Paragraph 2.29.7: 'Entrances should generally be of a width that meet the criteria set out in Figure 2.29e... Where an existing entrance is narrower, the acceptability of this will be judged on a case by case basis and, where necessary, development applications will need to demonstrate that a modern vehicle can safely and easily access and exit from the site.'</i>
7.4.38	Representations noted that all new driveways to developments that are on the TLRN or a tram route should be consulted and made in agreement with TfL. This included a particular comment relating to vegetation and glare in close proximity to trams.	<p><i>Amendment to include additional Paragraph 2.29.9: 'Where a new driveway accesses onto a road within the Transport for London Road Network, applicants should consult and come to an agreement with TfL. TfL should also be consulted where a development accesses onto or is in close proximity to a tram route.'</i></p> <p>It is noted that the issue of vegetation and glare in close proximity to a tram route would be captured during the consultation process with TfL.</p>
7.4.39	Representations were supportive of providing new routes through suburban blocks but noted the need to control vehicle movements and allow for people focussed design.	<p><i>Amendment to include additional Paragraph 2.29.1: 'Driveways, entrances and new routes should be designed to prioritise pedestrian flow and safety. This will generally mean limiting the number of vehicular access points to control vehicle flow and prioritising pedestrian and cyclist focussed designs.'</i></p> <p><i>Amendment to Paragraph 2.29.13: 'to create pedestrian connections through suburban blocks... and will be secured through planning agreements.'</i></p>
7.4.40	Representations raised concerns that SPD2 allows for inadequate parking provision. These representations considered the parking provision allowed for in the London Plan to be low and more suited to inner cities and as such did not find it appropriate to reduce this further in areas where there is little public transport. These also noted a lack of provision of parking for delivery/visitor vehicles within SPD2. These representations also considered that more parking may be required to support the sustainable development of our communities.	<p>SPD2 refers to the parking provision requirements set out in the Local Plan, which refer to the London Plan standards. The London Plan requirements account for delivery/visitor vehicle and servicing requirements of development. Policy states that where possible parking should be reduced, recognising that: Strategically there is the ambition to reduce reliance on private vehicular use due to current issues facing public health, congestion and pollution. This is set out in the Mayor's Transport Strategy. Parking is at the expense of green space and therefore should be minimised to protect biodiversity; where space and traffic management permits, as assessed in parking stress assessments, parking</p>

		<p>may be accommodated on streets where there is already tarmacked surfaces and therefore minimising loss of green space and allowing for greater development potential. Higher parking requirements would result in less developable areas.</p> <p>On balance promoting reduced parking provision is therefore considered by the Council to support the sustainable development of our communities. However it is recognised that in the areas of lowest PTAL there will be greater car reliance and that where parking would place significant demands on kerbside parking there may be need to introduce Controlled Parking Zones as per the amendments below.</p> <p><i>Amendment to include additional Paragraph 2.30.8: 'In areas of very low transport accessibility such as PTAL 0-1, it will be harder to access sustainable transport and therefore may be more difficult to reduce reliance on private cars. In these areas The Council will seek to accommodate all parking within the site (off street) and any anticipated need for on-street parking will be judged on a case by case basis.'</i></p> <p><i>Amendment to include additional Paragraph 2.30.9: 'In locations where there are significant additional demands on kerbside space and parking pressure, the Council may introduce or amend parking controls on roads within the area. Where this is proposed, this can be taken into account when considering a development proposal to encourage more sustainable travel choices and reducing car ownership. In these locations the Council can restrict the occupants of new developments from applying for on street permits and in appropriate locations with good PTALs make the development completely car free.'</i></p>
7.4.41	<p>Representations noted that reliance on on-street parking failed to account for cumulative impact of existing permission not yet implemented and that more on-street parking will result in a reduction of</p>	<p><i>Amendment to Paragraph 2.30.7: 'In some locations, as a result of a development additional parking may occur on the street. In these cases, assessed on a case by case basis, this may be acceptable where it is deemed safe by the Council's Strategic Transport officers and will not</i></p>

	road safety, and reduced space for pedestrians and cyclists.	<i>unreasonably impact on pedestrians or cyclists. This must be supported by a documented parking assessment demonstrating that there is kerbside capacity for car parking (using Lambeth Methodology). Parking on streets should not be through designated bays.'</i>
7.4.42	Representations noted the opportunity to emphasise the flexible use of parking to ensure that land is used as efficiently as possible over the life of a development, including allowing parking spaces to be easily converted to other valuable uses.	<i>Amendment to Paragraph 2.30.10: 'include within the design a flexible parking resource to accommodate motorbikes and microcars and smaller electric vehicles, or alternative future uses. Such flexible parking should recognise the changing sizes of and reducing demand for private vehicles.'</i>
7.4.43	Representations supported using screening to parking areas and noted the opportunity to strengthen this through advocating parking between bays.	<i>Amendment to Paragraph 2.30.10: 'be screened with planting between and around bays and be informed by a landscaping plan which minimises visual impact on the streetcene and neighbouring properties;'</i>
7.4.44	Representations noted the need for cycle storage to be in addition to general storage area and not in a combined bike and general storage area. Reference should also be made to need to accommodate visitor cycle parking.	<i>Amendment to Paragraph 2.31.2: 'Be in addition and separate to the general storage provision required for each new dwelling.'</i> <i>Amendment to Paragraph 2.31.3: 'Wherever possible, some provision for visitor cycle parking should be made. This is best provided with cycle racks or stands to the front of a property.'</i>
7.4.45	Representations noted a need to prioritise the protection of garden space within Section 2.32.	<i>Amendment to Paragraph 2.32.1: 'The provision of landscaping is particularly important to support Croydon's ecology and biodiversity, as well as providing important amenity to residents... Where proposals would result in the loss of existing garden space, they must be cognisant of Policy DM10.4e of the Croydon Local Plan that seeks to protect from the unreasonable loss of outdoor amenity space.'</i>
7.4.46	Representations noted the need to provide stronger guidance that protects biodiversity. This should promote habitats for existing wildlife and recognise the associated amenity benefits for the local community. This should include further guidance on replacing lost trees and shrubs.	Section 2.33 of the SPD provides guidance related to biodiversity and has been strengthened as per the following amendment. <i>Amendment to Paragraph 2.33.1: 'Natural and maintained landscaping within the suburbs provides important habitats that contribute to biodiversity and environmental health of our neighbourhoods. All proposals must be cognisant of Policy SP7.4, DM27 and DM28 of the Croydon Local Plan which</i>

		<p><i>seek to deliver ecological restoration across the borough. Suburban development proposals should seek to achieve this by supporting and enhancing the biodiversity on individual sites through: In the first instance retaining existing trees and planting.</i></p> <p><i>Only where the removal of existing landscaping is unavoidable, they are replaced with mature trees and planting. This will only be acceptable where the loss is outweighed by the benefits of a development. Replacement planting should be native species that will help enhance the natural biodiversity of the area. This applies to planting lost both within and outside of a site boundary as a result of development.</i></p> <p><i>Providing a wildlife area of natural landscaping within gardens. This may be ideally located to the rear of sites and should seek to be at least 3m deep to allow sufficient space to encourage natural habitats.'</i></p> <p><i>Amendment to include additional paragraph 2.33.2: 'Applicants are advised to refer the Urban Tree Manual which provides advice on selecting the right tree for the right location.'</i></p>
7.4.47	<p>Representations noted the need to provide for multiple uses of shared outdoor amenity spaces at the same time, such as families & activities and those seeking peace & quiet.</p>	<p><i>Amendment to Paragraph 2.34.1: 'Where a shared outdoor amenity space is provided in lieu of directly accessible private outdoor amenity space, provide a large area of shared space, along with a series of semi-private spaces allocated to each units, as shown in Figure 2.34c. These should be open to the shared areas and may be bordered by low hedges and shrubs but should not be divided from the other garden areas with fences or high hedges.</i></p> <p><i>Shared outdoor amenity space should be designed to accommodate a series of different uses, with quieter seating areas along with family orientated areas, and should seek to include a mixture of grassed and planted areas as a minimum, and a shared patio area... Play space need not be provided with off the shelf equipment, but can often be better accommodated with natural play as part of the landscape design.'</i></p>

7.4.48	Representations noted that the guidance within Paragraph 2.34.1 Bullet 7 & 8 is too onerous and not evidenced or justified.	<i>Amendment to Paragraph 2.34.1 Bullet 7/8: 'Shared access to a garden shed or similar, along with a garden tap, are encouraged and should be provided to facilitate maintenance and ownership over the space by residents.'</i>
<u>Chapter 2: Responses that do not result in amendments</u>		
7.4.49	Representations questioned who decides what is and isn't acceptable, and that SPD2 doesn't give weight to residents opinion. For example, who judges what the right mix of homes is and whether development contributes to local character in relation to the overarching principles in Paragraph 2.2 of the SPD2.	Policies within the Local Plan are evidenced based and the community were consulted in the development of the Plan. Similarly, SPD2 has been consulted on and amended to reflect comments received from the community where it would not contradict policy. Specifically, the right mix of homes is defined by strategic policies in the Croydon Local Plan. The guidance on character within SPD2, which expands upon Local Plan policy DM10, help to define how development may contribute to character. It should be noted that each case is judged against the relevant policies and guidance as a whole to reach a balanced decision that weighs the benefit of an approval against any negatives.
7.4.50	Representations raised concerns that SPD2 facilitates the destruction of good quality family homes, to be replaced by unaffordable flats for which there is no justifiable demand.	The Croydon Local Plan provides policies that seek to provide a high proportion of 3 bedroom homes in new development and protect form the loss of smaller family homes, supported by evidence that demonstrates the need for family homes of this particular size. There is also need for 1 and 2 bedroom homes. Where a larger family home can be redeveloped to provide this mix of homes it is therefore supported.
7.4.51	Representations requested that the requirement to supply a minimum ratio of 3-bed dwellings be more firmly applied to avoid developers providing solely 1 or 2 bed flats. Contrasting to this, some representations noted that the requirement to maximise 3 bed homes in minor applications has not been tested, justified or evidenced, and therefore should not be included in SPD2 as it is a policy matter and risks making smaller sites unviable.	Croydon Local Plan strategic policies are relevant to all schemes and therefore wherever possible minor developments should seek to deliver a high proportion of 3 bedroom homes. This is reflected in Section 2.3 of the SPD.

7.4.52	Representations noted that Croydon’s Local Plan policy for play space is only relevant for major schemes. The expectation within SPD2 for shared communal play on minors is above and beyond London Plan and Croydon Local Plan requirements and therefore it should be deleted.	The guidance within SPD2 is not a requirement for specific play equipment for minor schemes, but is guidance of best practice to ensure families who live within smaller developments are provided for with space for play. It represents a good design aspiration and can deliver value to developers in making more attractive developments for all types of residents.
7.4.53	Representations noted that Section 2.3 does not make provision for affordable housing in smaller schemes.	The provision of affordable homes is a policy matter and set out in the Croydon Local Plan.
7.4.54	Representations noted a lack of guidance for "assisted living" or dwellings appropriate for disabled persons. Similarly, representations noted a lack of transport provision for disabled persons.	<p>The London Plan policies set requirements for accessible, adaptable and wheelchair user dwellings in relation to Building Regulations standards. These policies are applicable to development within Croydon.</p> <p>SPD2 is not a transport document and provision is made for disabled persons within the Local Implementation Plan and other relevant transport planning documents.</p>
7.4.55	Representations noted that the aggregate impact of increased concentrations of flatted developments may disrupt the community ethos and kill-off neighbourly relations, such as "chatting over-the-garden-fence". The document should better discriminate between good & bad places to build flats and the appropriateness of their size.	The SPD cannot seek to designate areas as appropriate for development or protection as this is a matter for the Local Plan. The type of dwelling within a street is not considered to negatively impact an existing community ethos which may be added to through a greater number of residents in an area.
7.4.56	Representations noted a need for some form of protection is needed to safeguard areas with a special character.	It is noted that the Local Plan provides protection for areas of particular heritage & character value through Conservation Area and Local Heritage Area designations.
7.4.57	Representations noted that the offset distances in Fig 2.12a & 2.12b (25m rule) is at odds with Fig 2.9d (18m rule).	Where relevant Fig 2.9d can be applied in conjunction with Fig 2.12a & 2.12b. Fig 2.9d provides minimum separation distance between the rear of properties, whereas Fig 2.9d determines the relative heights of such development at different distances.
7.4.58	Representations noted that there are no recommended policies or methodologies to actually quantify the required “Sustainable Transport Facilities”, including a more	SPD2 is primarily concerned with the design of residential developments in suburban locations and is not a transport planning document. The Council’s ambitions and policies on delivering

	<p>comprehensive cycling strategy that prioritises safe cycling routes. Representations noted that policy should seek to balance increased densities with the need to improve patchy transport provision.</p>	<p>sustainable transport in order to accommodate the predicted levels of growth and development over the next twenty years are set out in the third Local Implementation Plan (LIP3) and the Croydon Local Plan.</p> <p>A Cycling Strategy for the borough was published in early 2018 and further details of the proposed cycling network are set out in the LIP3. Croydon is seeking to improve transport provision in lower PTAL areas through the delivery of electric cycle hire schemes, new demand responsive bus services, connected and autonomous bus services, and the delivery of new cycle routes.</p>
7.4.59	<p>In relation to Paragraph 2.6.7 representations commented that it should be up to the developer to decide where parking spaces within communal car park should be leased rather than sold and that this is not a planning issue.</p>	<p>The Council consider this to be a planning issue and note that it is included in the draft new London Plan policy T6.1 Residential Parking. This position was supported in representations received from TfL.</p>
7.4.60	<p>Representations questioned whether charging points for e-bikes is a policy requirement.</p>	<p>Table 10.1 in the Croydon Local Plan requires cycle parking for major residential development. Bullet 5 of Section 2.6.8 of SPD2 provides suitable guidance to advocate that developments need to consider this in their proposals.</p>
7.4.61	<p>Representations noted concerns that the Croydon Local Plan Table 6.5 and subsequently SPD2 deliberately target certain types of development. As a result, these representations consider SPD2 fails to safeguard the particular character of areas with certain types of existing development. These representations noted that the purpose of Borough Character Appraisal was stated to be to provide protection and preservation of character, rather than need designations such as the former LASCs.</p>	<p>The Croydon Local Plan was consulted on and examined prior to adoption. This facilitates development to ensure sufficient delivery of housing.</p> <p>SPD2 provides clarification on what is meant by character and how to interpret the Borough Character Appraisal, and importantly how development proposals may respond to character to enable evolution or gradual change, in line with the provisions in Table 6.4 of the Local Plan.</p>
7.4.62	<p>Representations noted that more weight needs to be given to density (as prescribed by the London Plan Density Matrix).</p>	<p>It is noted the draft new London Plan does no longer include a density matrix, instead advocates development on small sites within an 800m radius of town centre or station, or in areas with a PTAL 3 or more.</p>
7.4.63	<p>Representations questioned whether sufficient flexibility will be given by Council officers when applying the three approaches prescribed in</p>	<p>The 3 broad approaches have been defined to allow for architectural innovation and creativity whilst emphasising the importance of character and need to</p>

	Section 2.8. Otherwise actively prescribing three design approaches could stifle architectural innovation and creativity.	respond to it within proposals. They are broad enough not stifle innovation, but are included so that applicants must demonstrate an approach to character within applications. Each application is judged on a case by case basis.
7.4.64	Representations noted concerns that the guidance on character in Sections 2.7 & 2.8 is too general and needs to be more localised.	SPD2 requires developers to do contextual analysis to ensure a development proposal responds to the specifics of local character. SPD2 is supported by the Borough Character Appraisal that identified character of different places within the borough in detail and therefore SPD2 does not seek to reiterate it.
7.4.65	In relation to paragraph 2.9.8, representations questioned in what circumstances would these distances “be difficult to achieve” and how does this relate to Local Plan policy DM10.4e.	It should be noted that this guidance refers to where the fronts of development face each other, whereas DM10.4e refers specifically to the protection of garden space in the scenario of development within the garden of an existing dwelling to protection of garden space (this is covered in section 2.18 of SPD2, including reference to Policy DM10.4e). In some scenarios it is possible that development within the grounds of an existing dwelling may front each other and result in the loss of garden, in such circumstances, the policy would be read in conjunction with this guidance and officers would reach a balanced decision.
7.4.66	Representations questioned whether the 45° rule in Section 2.11 is appropriate. They noted a less acute angle would provide for a much better relationship for existing residents and communities.	The 45° rule is a widely applied standard across the country.
7.4.67	Representations noted that Paragraph 2.15.2 may not sufficiently reduce the sense of massing created by linked developments.	It is noted there are successful examples of where larger developments have successfully introduced linking elements to reduce the overall appearance of mass, this is demonstrated in Figure 2.13d.
7.4.68	Representations questions whether the guidance on parking provision correlated to GLA standards, noting that a Mayor of London paper requires reasonable parking to be provided in zones of low PTAL.	TfL were consulted on the SPD and noted that the guidance on parking accorded with their position. Refer to paragraph 6.5 of this statement.
7.4.69	Representations questioned whether paragraph 2.31 allows for the new waste collection services that have recently been launched across the borough?	Whilst the new waste collection services require a larger number of bins (depending on the property type), the guidance within the SPD2 does not dictate specific sizes of storage spaces, but that they must be

		designed to sufficiently accommodate waste receptacles and guidance on how they can be designed so as to integrate into the proposal. As such the guidance within SPD2 remains relevant.
7.4.70	Representations suggested including a separate section on cycle parking to emphasise its importance in light of mayoral priority of cycling.	During earlier drafting options separate sections on cycling parking was provided, however it proved that much of the content was repetitive and added to a lengthy document that risks being cumbersome for the end users.
7.4.71	Representation noted that SPD2 does not define quantities of outdoor private/shared amenity space required.	This is a policy matter and it set out in the Local Plan and London Plan.
7.4.72	Representations questioned whether the separation distances in this chapter meet requirements of the new Croydon Plan or London Plan.	The Croydon Local Plan refers to the London Housing Design Guide separation distances of 18m-21m and that that whilst these are useful yardsticks for visual privacy, they do not need to be adhered to rigidly as this may limit the variety of urban spaces and housing types. The Local Plan does not set these distances into a policy requirement and notes that they should be applied with some flexibility. There are many examples across London where there are smaller separation distances that do not result in a reasonable loss of privacy. This informed the minimum distance of 12m between two windows of habitable rooms in new properties set out in SPD2. It should be noted that existing amenity of a neighbouring property is protected in SPD2 by requiring a separation distance of 18m between windows of habitable rooms.
7.4.73	Representations questioned whether it is appropriate to have parking to the front and rear of a property considering the impacts to neighbouring privacy and amenity, as well as having an impact on the streetscene.	The parking designs set out within SPD2 are in line with the CLP Policy 10.1 – this is referenced within guidance Paragraph 2.30.2 and 2.30.3.
7.4.74	Representations commented that SPD2 doesn't appear to support any form of car parking for disabled persons.	SPD2 refers to the London Plan requirements in guidance Paragraph 2.6.6 in relation to disabled parking provision.
7.4.75	Representation supported the greater use of bicycles advocated in Section 2.6, but noted concerns that increased use of bicycles would be limited due to the topography of the	The Strategic Transport team is currently developing a scheme for the roll out of a borough wide cycle hire scheme that will include electric bikes and be located at hubs around the borough, including

	borough, lack of cycle lanes and inconvenience when transporting children. Several representations expressed concern that few people would use e-bikes.	locations in the south of the borough, for example at Kenley Rail Station. As part of the Local Plan and development process we seek to require charging infrastructure in new developments for electric bikes as well as electric vehicles.
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7.5 Chapter 3: Areas of Focussed Intensification

Comments received and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

<u>Chapter 3: Responses that result in amendments</u>		
General comments relevant to all Areas of Focussed Intensification (AFI)		
	Comments received	Council response
7.5.1	Representations raised concerns that it was unclear whether the rest of SPD2 also applies in AFIs or what sections within the other chapters are relevant to the AFIs.	<i>Amendments to include additional section '3.2 General guidance for Intensification Areas' has been added which addresses a number of concerns that apply in all the Areas of Focussed Intensification, including a paragraph on the application of guidance from other chapters as follows: '3.2.1 Developments within the Areas of Focussed Intensification should primarily refer to the guidance within this chapter and, where relevant, refer to guidance within the previous chapter, 'Chapter 2: Suburban Residential Development'. The guidance on materials & external appearance, site layout & servicing, and landscaping & outdoor amenity space within Chapter 2 remain relevant. Policy DM10.11 of the Croydon Local Plan provides greater flexibility on massing and character for the Areas of Focussed Intensification than set out in Chapter 2, however it is still important that proposals develop an approach to character (refer to Section 2.7 & 2.8) that contributes to positive change and are aware of how the massing of a proposal will inform the future appearance of the area. All applications for residential extensions and alterations within the Areas of Focussed Intensification should refer to Chapter 4 for guidance.'</i>
7.5.2	Representations noted that car parking design within AFIs will need to ensure that the movement of	<i>Amendment to include additional Paragraph 3.2.4: 'The provision of sustainable transport facilities will be</i>

	<p>pedestrians, cycles, public transport and emergency services is not impeded, and that developments should also promote alternatives to car use, and promote walking, cycling and public transport use.</p>	<p><i>facilitated through transport improvement schemes such as the South Croydon Bus Review. Developments must also contribute to this through ensuring they promote and support safer walking and cycling opportunities. This will need to take into account local road safety issues which the Council will also seek to work with local communities to address.</i></p>
<p>7.5.3</p>	<p>Representations agreed with the principles set out for AFIs but noted that communities would be more likely to view the illustrations for the evolution of the street more positively if the benefits of intensification are made clearer. It is important to understand the potential benefits and opportunities that development can bring to improve function and character of area for people in reality. This could include better facilities for walking, cycling and public transport access, safer roads, public realm improvements, better services, more street trees and better environment.</p>	<p><i>Amendment to include additional paragraphs 3.2.2-3.2.24: '3.2.2 As the number of residents increase in the areas, it provides the business case to improve and sustain services and facilities, providing tangible benefits that result from intensification. Whilst this guide is primarily a residential design guide and therefore cannot address all issues, the Council will seek opportunities to work with communities within the Intensification Areas to deliver this. 3.2.3 Beyond strengthening the provision of services, infrastructure and commercial offers in the areas, development should come forward in a manner that collectively promotes thriving, healthy and safe communities within the Intensification Areas. This includes contributing to biodiversity and recreational space through landscaping design both within private development sites and in the public realm in a manner that contributes to leafy suburban characteristics wherever possible. 3.2.4 The provision of sustainable transport facilities will be facilitated through transport improvement schemes such as the South Croydon Bus Review. Developments will be able to contribute to the development of sustainable transport options through promoting walking and cycling opportunities, for example in the design of access routes into a site and the provision of cycle storage as per the guidance in Chapter 2. 3.2.6 As demand on road infrastructure changes with reduced car ownership in line with national trends or where the need to address road safety issues emerges, the Council will seek to work with stakeholders and local communities to address these and wherever possible provide opportunities that will enhance the area.'</i></p>

Kenley		
7.5.4	Representations noted that TfL have developed proposals for improving the A22 which were consulted on in 2017 and that TfL are planning on progressing these proposals.	<p>The Council are seeking to work further with TfL on these proposals as they were developed prior to Kenley being designated as an AFI.</p> <p><i>Amendment to Paragraph 3.4.4: 'It is noted that the A22 is subject to a current TfL improvement proposal that seeks to address issues resulting from traffic, lack of pedestrian crossing, car parking aside the road and the junction with Hayes Lane.'</i></p>
7.5.5	Representations commented that SPD2 does not give sufficient protection the leafy character of Kenley, the Site of Nature Conservation at Oaklands and the setting of Riddlesdown.	<p><i>Amendment to Paragraph 3.6 Bullet 16: 'These plots currently provide significant landscape amenity and contribute to the biodiversity of the area. As such the significant loss of landscaping will not be accepted and must be balanced with re-provision of high quality mature planting of native species which will support the local ecology and should be demonstrated on plans provided as part of the development application. Applicants should refer to Sections 2.32-2.36 in Chapter 2.'</i></p> <p><i>Amendment to Paragraph 3.4.2: 'Part of Oaklands is designated as a Site of Nature Conservation Importance; any development on this site must take account of this.'</i></p> <p><i>Amendment to Paragraph 3.4.3: 'This is opposite the Riddlesdown greenbelt land, which provides significant recreational amenity to the area, including the Kenley Panorama. Any development proposal should seek to protect and enhance this panorama.'</i></p>
7.5.6	Representations noted that the railway is not considered to be the community heart as it is privately and commercially owned, and that there are a number of other publicly accessible spaces that serve the community.	<p><i>Amendment to 3.3.1: 'The shopping parade, train station, church, nursery, GP surgery and memorial hall should be supported and improved as necessary to continue to provide important community services.'</i></p>
7.5.7	Representation noted the need for increased train service on the Kenley line to cater for any increase in population and an improved bus service. Representations also raised concerns relating to road safety and congestion within the Kenley AFI.	<p>Road safety is an important issue and considered in all development applications, including review by the Council's Strategic Transport team to ensure road safety is not compromised. The following amendments have been made to recognise the communities</p>

	<p>The following factors contribute to this:</p> <ul style="list-style-type: none"> • Narrow roads, some of which containing blind bends and lack pavements. • Hump back bridge over the railway line provides limited visibility. It has narrow pavements and is the only crossing point for disabled access to cross to other platform at station • Limited on street parking available – being in high demand in certain areas. • Hazardous junction with A22. • Lack of pedestrian crossing over the A22 to bus stop. <p>These representations noted the need to deliver a walk-able and cycle-friendly community in Kenley, and that development should not be permitted where road safety is compromised (in accordance with the NPPF).</p>	<p>concerns regarding transport and road safety within the Kenley AFI.</p> <p><i>Amendment to Paragraph 3.4.4: ‘The area is reasonably well accessed by public transport, including buses, and is walkable from Kenley train station. Public transport in the area is expected to improve as a result of the South Croydon Bus Review and improvements to the Brighton Main Line in the East Croydon area. There are however a number of road safety issues that result from the local narrow lanes which lack pavements, along with gradients, blind corners and the humpback bridge over the railway. It is noted that the A22 is subject to a current TfL improvement proposal that seeks to address issues resulting from traffic, lack of pedestrian crossing, car parking aside the road and the junction with Hayes Lane. It is important that development seeks to reduce car reliance and there is the potential to introduce schemes, such as a Home Zone or Quiet Lane, that prioritise pedestrians. The safety of the lanes may also be improved by the provision of lighting.’</i></p> <p><i>Amendment to Paragraph 3.6 Bullet 17: ‘Developments accessing onto narrow lanes without pavements should provide a 1.5m buffer strip along the front of the site directly adjacent to the road, allowing greater space for pedestrians, cyclists and passing vehicles. This area should not be planted with shrubs or trees or enclosed from the road, and may function best as a grass verge or gravelled area. This may require a reworking of landscaping to the front of properties to bring the boundary treatment away from the road. Any lost planting should be reprovided within the scheme.’</i></p>
7.5.8	<p>Representations noted proposed development would put increased pressure on existing infrastructure requiring expenditure on services such as schools & medical facilities. Representations also noted the need to improve the retail offering in the area to support an increased population.</p>	<p>It is noted that Kenley is relatively well served by publicly accessible services, which partly underpinned its designation as an AFI within the Local Plan. Plans to improve social infrastructure are set out in the Council’s IDP and the Croydon Local Plan.</p> <p><i>Amendment to include additional Paragraph 3.4.5: ‘There is an existing GP surgery, local schools, the Kenley</i></p>

		<i>Memorial Hall and local church which all contribute to the community and character of the area. The existing parade of shops also provides focus to the community and development should seek to enhance this offering.'</i>
7.5.9	Representations commented that flooding in the Kenley AFI is an issue and there is a need to steer all new development away from Flood Zone 3, and any areas at high risk of Surface Water Flooding. There is a need to avoid exacerbating flooding that occurs around the station.	<i>Amendment to Paragraph 3.4.6: 'Development in Kenley should seek to reduce flood risk as the area is prone to flooding with Station Road and Godstone Road being within Flood Zone 3. Any development proposals within the flood zone should refer to Policy DM25 and Table 8.1 of the Croydon Local Plan which require sequential and exception tests.'</i>
7.5.10	Representations noted limited street lighting in the Kenley AFI which impacts safe walking at night.	<i>Amendment to Paragraph 3.4.4: 'The safety of the lanes may also be improved by the provision of lighting.'</i>
7.5.11	Representations commented that the implications of topography needs to be considered in terms of access to new developments.	<i>Amendment to remove bullet 12 and include additional bullet 15 in Paragraph 3.6: 'Development proposals must consider the topography carefully to ensure appropriate access and minimise the use of retaining walls (Refer to 2.3.5 for guidance).'</i>
7.5.12	Representations commented that the Figures 3.5b and 3.5c indicated development that may impact the heritage of listed railway station; remove the station car park where on street parking is limited; and see the removal of the doctors' surgery.	<p>These figures are for illustration purposes only to describe a potential development scenario. In detail, it is noted that the Croydon Local Plan provides policies to protect from the loss of community facilities and for the protection of heritage assets, and any application would be judged against these and the impact loss of parking would have on surrounding streets.</p> <p><i>Amendment to Figures 3.5b and c to show development set further away from the railway station.</i></p>
Forestdale		
7.5.13	Representations noted that the existing shopping parades and church are already the heart of the community. The diagrams illustrate the removal of some of these services.	<p><i>Amendment to Paragraph 3.7.1: 'there is an opportunity to enhance the suburban village heart to service greater development.'</i></p> <p>It should be noted that any development proposals that involve redeveloping sites with existing community and/or employment spaces will have to align with the Croydon Local Plan policies which seek to limit their loss.</p>
7.5.14	Representations commented that the SPD does not include any detail	<i>Amendment to include additional Paragraph 3.8.5:</i>

	about the provision of infrastructure within the Forestdale AFI.	<i>‘3.8.5 The area is served by a number of schools, along with a GP surgery, three bus routes and access to the tram from Gravel Hill. Improvements to infrastructure are set out in the Croydon Infrastructure Delivery Plan.’</i>
7.5.15	Representations considered it inaccurate to state that grounds associated with medium-rise blocks are typically underutilised. These grounds consist of communal gardens that are part of the landscaping and necessary to the wellbeing of residents, with the remainder of hard surface used for access to garages and car parking.	<i>Amendment to Paragraph 3.8.3: ‘These blocks of flats occupy large associated grounds providing potential for increased development in terms of density and intensity that could deliver greater definition to the main road.’</i> <i>Amendment to Bullet 15 of Paragraph 3.10: ‘Land associated with these blocks provide amenity space along with opportunities for intensified development to create a stronger frontage along Selsdon Park Road and a better connection into the neighbourhood centre. Any development should respond to the setting of the existing blocks and not significantly reduce the amount of existing amenity space.’</i>
7.5.16	Representations noted it would be beneficial to provide better connections between the neighbourhood centre and green belt.	<i>Amendment to Paragraph 3.8.4: ‘Accessed by a separate carriageway, this area provides an opportunity to allow connections into the Metropolitan Greenbelt for recreational use. It will be important to strengthen pedestrian links from the Neighbourhood Centre across Featherbed Lane to this location.’</i>
7.5.17	Representations questioned the reference to a need to improve safety and which part of the AFI was currently unsafe.	<i>Amendment to Bullet 14 of Paragraph 3.10: ‘Development should safeguard or re-provide pedestrian routes into the Neighbourhood Centre, ensuring they are well overlooked, with good surfaces and lighting, to ensure safety.’</i>
Brighton Road		
7.5.18	Representations commented that the SPD notes the proposals will create a sense of place, however it is considered there is already a sense of place.	<i>Amendment to Paragraph 3.11.1: ‘develop the sense of place where it is diminished by the busy nature of Brighton Road and under-utilised plots.’</i>
7.5.19	Representations commented that the draft did not accurately reflect existing development activity in the area.	<i>Amendment to include additional Paragraph 3.12.6: ‘There are a number of developments underway or subject to planning permissions in the area, providing a mix of uses that will deliver new homes along with commercial and retail offers.’</i>
7.5.20	Representations commented that there is a need to steer all new	<i>Amendment to include additional Paragraph 3.12.7: ‘Development should</i>

	development away from Flood Zone 3, and any areas at high risk of Surface Water Flooding.	<i>seek to reduce flood risk recognising the Flood Zone 3 designation running along the Brighton Road. Any development proposals within the flood zone should refer to Policy DM25 and Table 8.1 of the Croydon Local Plan.'</i>
7.5.21	Representations notes that 3.12.3 refers to South Croydon recreation ground being an outlook for new development. Lidl already has most of frontage and an HA most of the rest. This has already been delivered and should not be included for the future.	Developments underway have been referred to in the amendment listed above (refer to 7.5.19 of this statement). There are other potential windfall sites close to the recreation ground that could have an outlook onto the recreation ground, as such this statement remains. <i>Amendment of 'sports field' and 'playing fields' in 3.11.1 and 3.12.2: 'recreation ground.'</i>
7.5.22	Representations disagreed that car-parking areas are under-utilised as they provide for those visiting shops and commuters, and therefore should not be built on.	<i>Amendment to 3.12.4 removal of 'car parking'.</i>
7.5.23	Representations noted that Figures 3.13b & 3.13c incorrectly show the development of sites that are protected or already under construction. The document suggests that the Red Deer building should be at the heart of the area but the indicative illustrations show the redevelopment of this site. The former BMW garage is sited as possible for development, but this is already in the process of being developed by Lidl. The site behind the Red Deer is just in the process of completion.	It should be noted that the diagrams are illustrative. <i>Amendments to figures 3.13b & 3.13c have been made to reflect development already underway in 2018.</i>
7.5.24	Representations noted the need to protect from the loss of employment and community space.	<i>Amendment to include additional Paragraph 3.12.8: 'The area provides a good level of employment spaces, along with community facilities. Where proposals seek to redevelop these, they must conform to the Croydon Local Plan policies which seek the re-provision of such floorspace.'</i>
Shirley		
7.5.25	Representations commented that Shirley has no connection to tram or train and there are often standstills on the dual carriageway. Given this, it is unclear that there is sufficient established infrastructure and there	It should be noted that whilst the area is not served by Tram or Train it is well served by a number of bus routes. Planning for infrastructure is beyond the scope of the SPD, however further detail on future infrastructure provision is set out

	is a need to plan for additional transport infrastructure.	in the Croydon Infrastructure Delivery Plan. <i>Amendment to Paragraph 3.16.5 'There are 6 bus routes that serve the area and there is the potential for the area to provide an improved connection from the east of the borough, creating a gateway to the Croydon Metropolitan Centre.'</i>
7.5.26	Representations noted that the Shirley / Addiscombe road shopping area (defined as the Neighbourhood Centre in the Croydon Local Plan) provides a good offer of independent shops and is easily accessible by nearby parking in neighbouring street and good bus services.	<i>Amendment to 3.16.2: 'The roundabout at Shirley and Addiscombe Roads is bordered by the successful parade of independent shops that provide a useful service to the community at this key intersection.'</i>
7.5.27	Representations expressed that the Wickham Road/Hartland War/Orchard section of the AFI provides a vibrant library, retirement home and shop, and the need to protect these from being lost.	<i>Amendment of 3.16.3 to remove the Synagogue and adjacent open space as this is outside of the Intensification Area boundary and include Shirley Library, noting the importance of the existing community uses as follows: 'along with Shirley Library. The number of local community spaces will be important to the continued success of the area and development should seek to enhance these offers.'</i>
7.5.28	Representations questioned what is the meaning of the phrase "mending this separation" in paragraph 3.16.4.	<i>Amendment to Paragraph 3.16.4: 'Creating better pedestrian and cycle crossings is crucial to providing a people focussed link between the Shirley Road Neighbourhood Centre and Shirley Local Centre. Where possible, and as reliance on private car ownership reduces, in line with national trends there may be future opportunity to reduce the width of the road.'</i>
Chapter 3: Responses that do not result in amendments <i>(Note: the responses below have a prefix to define which section of Chapter 3 they refer to)</i>		
7.5.29	General : Representations requested clarity on the District, Local and Neighbourhood Centres referred to in the caption of Figure 3.1a, and the need to identify them on this map. Representations commented that highlighting these areas was misleading as it indicated they are intensification areas.	It should be noted that District, Local and Neighbourhood Centres are designated in the Croydon Local Plan and can be viewed in detail on the Croydon Local Plan interactive map: http://www.planvu.co.uk/croydon2018/ Metropolitan, District and Local Centres are shaded grey to indicate that they are also areas that are expected to accommodate significant growth as per Local Plan policies specific for those areas

		and that the Areas of Focused Intensification are in addition to these areas of grows.
7.5.30	General: Representations suggested the level of detail provided in the document for the Areas of Focused Intensification should have been included in the Local Plan and subject to the examination process.	The detail provided supplements and expands on the designations and overarching policies for the Intensification Areas provided for in the Local Plan. Given the areas are relatively small geographical areas, the extent of detail in the SPD and the need for flexibility as development progresses within them, as an SPD the guidance provides a suitable level of weight and detail for steering determination of forthcoming planning applications.
7.5.31	General: Representations considered the boundaries for the AFIs to be inappropriate and that they should be amended.	The boundaries were determined by evidence that supported their designation within the Croydon Local Plan 2018. The SPD cannot seek to amend the boundaries.
7.5.32	General: Representation questioned whether the proposals for the AFIs are deliverable given land ownership constraints.	Development on sites within the AFIs will be dependent on landowners, but there are sites within these areas already being developed or coming forward for planning permission.
7.5.33	General: Representations commented that the Council should review other areas in south of the Borough that might be appropriate to be designated as an AFI.	The designation of an AFI is a matter for the Local Plan. It is however noted that the draft new London Plan encourages intensification within an 800m circumference of a station or town centre boundary, or within a PTAL of 3-6.
7.5.34	Kenley: Representations raised concern that street parking impact assessments fail to recognise additional stress at peak times as a result of school runs and commuter drop-offs/pick-ups. They also noted that commuters are sometimes willing to walk considerable distance to access free on-street parking. These representations noted there was no suitable plan for restricting parking or how a CPZ would be managed.	The Council requires the use of the standard Lambeth Parking Survey Methodology where parking is monitored during the weekday and overnight, if the site is near a commercial centre or weekend parking is a problem then a survey over the weekend will also be required. This ensures that commuter parking is considered in any parking stress survey. It should be noted that the introduction of controlled parking zones are currently resident led and if a group of residents feel that there is a particular problem that can be resolved through parking controls then they may approach the Council to request the introduction of controls. School runs and commuter pick up and drop off will be a temporary time specific issue which can be relieved through the introduction of parking controls or restrictions such as double yellow lines, however the resolution will involve increased enforcement of parking and

		drop off activity and the introduction of measures such as school pedestrian zones to encourage mode shift to walking, cycling and public transport.
7.5.35	Kenley: Representations requested a template for development along Welcomes Road, in conjunction with the Council's Strategic Transport & Development Management services. This would seek to balance new housing with other factors specific to the road.	Officers from the Strategic Transport and Development Management services have been in dialogue with residents of Welcomes Road. It is noted that the Regeneration, Strategic Transport and Spatial Planning services are working with the community to develop a Kenley Community Plan that may begin to assess these issues in more detail.
7.5.36	Kenley: Representations noted that minimal parking provision within development sites in Kenley will not work due to the limited alternative transport provision available and that parking on roads would be dangerous in many places due to the nature of the steep and narrow lanes.	Road safety and transport provision in Kenley have been addressed in paragraph 7.5.7 of this statement.
7.5.37	Kenley: Representations noted that it is not possible to establish how many new properties are being proposed, and there was no indication how many would be affordable.	The designation as an AFI is to facilitate a greater amount of development; whilst there are no specific targets for this area, there are borough wide housing targets set within the Local Plan and London Plan. Where relevant, developments will need to provide affordable housing in accordance with Local Plan policy SP2.
7.5.38	Kenley: Representations suggested delaying the introduction of the AFI designation on the valley side of the railway until all parties are happy that infrastructure can cope with planned increase in traffic.	The boundaries for the AFIs were adopted as part of the Local Plan in February 2018. They underwent examination by the planning inspectorate and were found to be sound. The SPD cannot seek to amend them as this is a matter for the Local Plan.
7.5.39	Kenley: Representations questioned whether the proposals for Kenley in the SPD will meet the ambition of the document to 'both limit any negative impact on places, including the amenity of existing residents, and frame opportunities where increased densities can enhance places and bring benefits to communities.' These representations noted the opinion that it will result in profit orientated piecemeal development with no concerns for the wider impact on the environment or the community. If the Council wishes to achieve its objectives it will need to take a more active role than merely	The detailed technical guidance contained within Chapter 3 (and where relevant to the AFIs, in Chapter 2) of the SPD are designed to ensure individual proposals take due consideration to the wider context. The Council seek to work with applicants to ensure they are thinking comprehensively about their development and the wider opportunities and benefits it may present to the local area.

	responding to the planning applications of individual developers.	
7.5.40	Kenley: Representations questioned what the timescale for development is.	The Croydon Local Plan, where the AFIs are designated, runs from 2018-2036. Delivery of development is dependent on individual land owners coming forward with proposals and the Council has no control on if and when this will be.
7.5.41	Kenley: Representations questioned whether the pressure on the A22 as a result of nearby development in Whyteleafe and Tandridge have been considered?	It is noted that the A22 is subject to proposed improvements by TfL. Where relevant Croydon Council are consulted on developments in neighbouring boroughs.
7.5.42	Kenley: Representations noted that SPD2 refers to transport reviews but there is no indication that money is available to improve services or how they would benefit Kenley.	Please refer to paragraph 7.5.7 of this statement that refers to the relevant reviews and how they will benefit Kenley. The funding of transport related projects is identified within the Infrastructure Delivery Plan.
7.5.43	Kenley: Representations noted that there is no specific reference to an extended provision of medical services or how the shopping parade would be enhanced in light of the national decline of high street shopping.	It should be noted that the SPD is primarily a residential design guide for the suburbs. Provision to extend medical services is made through policies and site allocations within the Local Plan, along with the Infrastructure Delivery Plan. It is expected that shopping parade in Kenley will be a factor within the development of the Keenly Community Plan project being launched by the Council.
7.5.44	Kenley: Representations noted that there is a large unutilised site to rear of Old Police Station, and that issues of flooding have ruined applications for supermarket and hospital on the site. SPD2 is opportunity to define this area as a car parking for community - rail users, local shops and memorial hall. Provision of parking would revitalise business along Godstone Road as per section 3.3.	Site allocations are a matter for the Local Plan and cannot be made within the SPD.
7.5.45	Forestdale: Representations welcomed intent to improve public spaces but noted there were no specific plans.	Specific development plans are not provided within the SPD as it is a guidance document. It is the intention of the Council to facilitate such improvements where development opportunities afford them.
7.5.46	Shirley: Representations noted it would make sense to expand the tram route along Wickham road.	SPD2 is not a transport plan document. The Croydon Local Implementation Plan sets out proposed improvements to transport provision in the Borough.

7.6 Chapter 4: Residential Extensions & Alterations (REAs)

Comments received and responses are divided into two sections below. The first section covers those which result in amendments and the second section covers those that do not result in amendments.

Chapter 4: Responses that result in amendments		
	Comments received	Council response
7.6.1	<p>Representations noted that the SPD provides 3 approaches to character for REAs. There was concern that this was not reflective of Local Plan Policy DM10.1 which requires subservience for development within the grounds of an existing building which is retained. There were also concerns that the 3 approaches were not place specific and a general need to be clearer on how to approach character.</p>	<p>In response to these comments there has been significant rewording and re-ordering to Sections 4.2-4.5 as described in the amendments below. This includes guidance that requires subservience, and revises the previous ‘Subservience, Innovative or Seamless’ <i>character</i> approaches into two <i>design</i> approaches ‘Supplementary’ or ‘Innovative’. It should be noted that the wording within SPD2 reflects and expands upon the Croydon Local Plan policies which require character to be responded to and this allows for innovation and does not necessarily require replication of existing architectural styles.</p> <p><i>Amendment to Paragraph 4.2.1: ‘The built character of an area includes, but is not limited to the size, shape and positioning of buildings, the associated landscaping, materials and details. Extensions and alterations should seek to respond to the character of a dwelling and the existing appearance of the street.’</i></p> <p><i>Amendment to include additional Section 4.3 on Scale: ‘4.3.1 Extensions and alterations should generally be of a scale that is subservient to the existing dwelling in accordance with Policy DM10.1 of the Croydon Local Plan. Subservience is required to prevent terracing between and to the rear of existing properties, or to avoid uncharacteristically large additions to the front of a property that would detract from the appearance of the street. Through following the guidance in this chapter (Refer to 4.10 – 4.21) subservience will usually be achieved. However, this should not stifle or discourage high quality design in terms of form, fenestration, materials and detailing, as set out in Approaches to Design (Refer to 4.5).’</i></p>

		<p><i>Amendment to Section 4.5 (formerly 4.4):</i> <i>'4.5.1 Extensions and alterations to an existing dwelling should respond to character (Refer to 4.2) and be subservient in scale (Refer to 4.3), whilst developing a high quality approach to the design in terms of the form, fenestration, materials and detailing. The following two distinct approaches, Supplementary or Innovative, provide broad design direction to the development of a proposal, however there may be other successful approaches and those outlined here should not stifle creativity in achieving high quality design.</i></p> <p><i>Supplementary: 4.5.2 This is the approach that most proposed extensions and alterations are likely to take as it can be easiest to achieve successfully and affordably. A supplementary approach will typically have a form that does not distract from the appearance of the existing house, but may still introduce contemporary elements, such as increased proportions of glazing or new materials. The materials and details should complement the existing house, but do not necessarily need to replicate them and should allow the existing house to maintain its prominence.</i></p> <p><i>Figure 4.5a: A supplementary side extension designed by Selencky Parsons. The form clearly relates to the existing house, but successfully introduces larger windows and combines new materials with brickwork to complement the existing house. (Photo: Andy Matthews)</i></p> <p><i>Innovative: 4.5.3 This approach may be suitable for challenging sites that require a particular design response or where the context provides opportunity to depart from traditional domestic aesthetics. This might be through the use of contemporary materials, unique forms and/or new construction methods. An innovative approach should provide the highest quality design and allow an extension and alteration to be distinguished from, whilst enhancing, the existing dwelling. An innovative approach will require more</i></p>
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		<p><i>investment in the design and construction of a proposal due to its bespoke nature.</i></p> <p><i>Figure 4.5b: This innovative extension designed by Alison Brookes Architects enhances the existing dwelling through its contrasting form, use of the highest quality materials and contemporary detailing. (Photo: Paul Riddle).</i></p> <p><i>Figure 4.5c: A series of extensions designed by fourth_space that appear supplementary to the original house by clearly responding to its existing form and materials.'</i></p> <p>As a result of the above amendments, all references to the previous 'subservient, innovative or seamless' approaches have been removed in the subsequent guidance in Chapter 4.</p>
7.6.2	<p>Representations noted the need for less planning terminology and more appropriate language for the general public.</p>	<p><i>Throughout Chapter 4 phrases have been revised and words such as 'streetscene', 'development' and 'adjoining occupier' have been replaced with 'appearance of/from the street', 'buildings along a street' and 'neighbour' respectively or similar.</i></p>
7.6.3	<p>During consultation it was questioned whether side extensions should be allowed to extend to the same depth as rear extensions – this is currently permissible in most circumstances.</p>	<p><i>Amendment to Paragraph 4.12.1: 'They may be as deep as the existing house and extend beyond the rear elevation to the distances and in line with the design guidance prescribed in Section 4.10 Single Storey Rear Extensions.'</i></p> <p><i>Figure 4.12a amended to reflect amended text.</i></p>
7.6.4	<p>During consultation it was questioned whether allowing a 'seamless' approach was appropriate for two-storey side extensions.</p>	<p>Please refer to paragraph 7.6.1 of this statement which has removed the overarching reference to 'seamless'.</p> <p><i>Amendment to Paragraph 4.17: 'They do not result in an overly wide or poorly proportioned elevation facing the street. This can usually be avoided by setting the extension back from the exiting front elevation; this should be at least 1m at the first floor, while a ground floor setback of approximately 1 brick (215mm) could be provided. In some special circumstances a reduced setback may be allowable and would need to be justified in an application and considered on a case by case basis.'</i></p>

		<p><i>They do not exceed the eaves and roof ridge line of the existing house.'</i></p>
7.6.5	<p>During consultation it was questioned whether the guidance on roof extensions was too complex and should engage with matters such as party walls.</p>	<p>The guidance on roof extensions has been simplified, including using sections of the guidance in the existing SPD2.</p> <p><i>Amendment to paragraph 4.21.1: 'Extensions and alterations to roofs should follow the guidance below: Ideally be located on the rear elevation of a dwelling to minimise impact on the street. May be full-width for mid-terrace houses, but should be set in from the edge of a hipped roof or gable end on end of terrace houses (refer to Figures 4.21a and 4.21g). May be no more than two-thirds the width of the existing roof on a semi-detached or detached house, and should be set in from the edge of a hipped roof or gable end (refer to Figures 4.21b and 4.21g). Should be no higher than the existing ridge-line. Should not wrap around two-sides of a hipped roof unless in special circumstances where it can be justified; this will be judged on a case by case basis. Should include generously sized windows that are generally best if positioned to relate to the existing doors and windows on the floor below. Large blank facades on dormers can have an overbearing appearance and will not generally be acceptable. If proposing a hip to gable roof extension, should not interrupt the pattern of roof forms visible from the street. If proposing a side roof extensions, be no more than two thirds the width of the existing roof and should not interrupt the appearance of the roof when viewed from the street (refer to Figure 4.21e). Habitable room windows in the side elevation facing a neighbouring property would not normally be acceptable if it results in overlooking to habitable rooms or the first 10m of the rear garden of a neighbouring property.'</i></p> <p><i>Amendment to include additional figures 4.21a, 4.21b and 4.21g to illustrate above text.</i></p>

7.6.6	Representations commented on the need for guidance on extensions that result in subdividing a property.	<p>Section 4.9 of the SPD provides guidance on extensions that result in subdivisions. The amendment below provides additional signposting in relation to rooftop additions that may result in the creation of new dwellings.</p> <p><i>Amendment to include additional paragraph 4.22.2: 'Where additional storeys would result in the creation of new residential units, they should refer to the guidance provided in Chapter 2 with regards to Site Layout & Servicing and Landscaping & Provision of Outdoor Amenity Space.'</i></p>
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7.7 Consultation

The following comments were received in relation to the consultation process.

	Comments received	Council response
7.7.1	Representations expressed concerns that the consultation did not provide positive examples of how this approach to development had delivered benefits to a community and individual residents, address the rationale for this approach to development or provide indications of planning for health, education and environment.	<p>The SPD is primarily focused on residential design and this was reflected in the material presented at consultation. Built examples shown in SPD2 demonstrate the benefits of housing delivery, improving streetscapes and facilitating wider regeneration as the suburbs continue to grow. The Council plans for health, education and the environment through Local Plan policies, site allocations and the Infrastructure Delivery Plan. Please refer to 7.2.1 of this statement with regards to infrastructure related comments.</p>
7.7.2	Concerned that advertising of the consultation events had not reached a wide enough audience.	<p>The consultation period and events were advertised via:</p> <ul style="list-style-type: none"> • Croydon Council's SPD webpage; • the Your Croydon website; • emails and letters sent to persons on the LDF database (in line with the General Data Protection Regulations update); • an advertisement in The Croydon Guardian; • notices accompanying copies of the draft document at Access Croydon and at each of the Borough's libraries; • postcards providing the Council website address, details of the consultation events and methods for submitting representations at the above locations; • tweets from the Croydon Council Twitter feed; and

		<ul style="list-style-type: none"> • emails to local Residents Associations (where in line the with General Data Protection Regulations update).
7.7.3	<p>Expectation at consultation events that:</p> <ul style="list-style-type: none"> • the Head of Planning or Deputy would have been in attendance; • there was a speaker; • there would have been document copies to take away; and • the models were arranged to represent existing places. 	<p>The consultation events were designed to be informal sessions allowing the public to speak to officers about their concerns and engage in the project and evolution of the borough. The events were staffed in rotation between project and senior officers (including the Director for Planning & Strategic Transport and the Head of Spatial Planning).</p> <p>As the document is designed to be used electronically, limited hard copies were provided at the events to be used as an example and allow people to read the document if desired, to reduce printing costs and environmental waste.</p> <p>The wooden housing models used at the consultation events were indicative of housing and street typologies across the borough and were specifically designed so as not to represent an existing location in the borough so as not to single-out certain locations for possible development.</p>
7.7.4	<p>Concerns regarding funding of the project and whether it will achieve the desired results.</p>	<p>The Spatial Planning Suburban Design Guide Team were successful in a bid to the Ministry for Housing, Communities and Local Government (MHCLG) for the Planning Delivery Fund for design quality. The proposal to develop a Design Quality proposal for the borough was assessed against prospectus criteria and was successful in securing a funding allocation for the SPD to help change the quality of new development within the local area.</p> <p>The SPD not only establishes guidance on how to achieve an acceptable design, but aims to encourage the highest quality of design by promoting a well thought-through design process, balanced with the need to protect neighbouring amenity, leading to better quality developments that contribute positively to the Borough. Once adopted it will have weight in planning decisions and is therefore will have effect in achieving the desired results.</p>

7.8 Non-SPD2 Comments

A number of comments were received that related to planning, development, intensification, infrastructure or the Council generally. Whilst these comments will not result in amendments as they are not applicable to the content of the SPD, responses to the matters received have been provided below.

	Comments received	Council response
7.8.1	Representations suggested that there should be a limit to the rate of change to assist in controlling development. A number of these representations suggested that no more than up to 5% of homes as the number of suburban intensification developments in any given street or area.	Development strategy and the level an area can accommodate is a Local Plan matter and therefore not applicable for inclusion in the SPD2. Such a control would also be contradictory to the Local Plan housing targets and policies, London Plan and National Policy Planning Framework (NPPF), which seek to support development and boost housing delivery where they accord with the relevant policies.
7.8.2	Representations suggested that the Local Planning Authority should act as guardians of the borough and seek to protect the character of Croydon. Suggestions noted that the rate of change demonstrated in SDP2 does not represent evolution but a rapid change in the borough.	The SPD is guidance to help deliver the required growth in the borough whilst seeking a high quality of design. The development (or change demonstrated) reflects the required development as set out in the London Plan, Local Plan and the broader growth objectives set by the Council.
7.8.3	Concerns that recent planning approvals have been given in isolation and without consideration of residents' concerns or oppositions, preceding and anticipated approvals and the impact on neighbouring properties.	This is a comment about the determination of planning applications rather than the SPD.
7.8.4	Representations suggested that brownfield and other allocated sites throughout the borough should be prioritised for development delivering homes. Subsequent to these sites and only if there is still demonstrable need, should suburban intensification be considered. Some of these representations noted concerns that the SPD conflicts with National Planning Policy on this matter which requires windfall development to be pursued only when all brownfield sites have been allocated.	In accordance with the NPPF and the London Plan the Croydon Local Plan directs development to allocated brown field sites which make up a considerable proportion (circa 2/3) of the sites to meet the development requirements in the Croydon Local Plan over the 20 year period.

7.8.5	Concern that the small sites described in SPD2 typically fail to provide affordable housing.	Affordable housing is an important policy in the Croydon Local Plan and there is a recognised need to provide affordable housing across the borough. However, in line with current government policy that small sites (schemes of 1-9 units) are not required to deliver affordable housing. It is acknowledged that a large portion of the development that would apply to the SPD falls within this threshold. It is not the subject or possible against current government guidance for the SPD to seek that affordable housing is delivered on small sites.
7.8.6	Representations noted concerns that there is not applicable planning policy for 'minor applications', resulting in substandard development in comparison to a major development.	Minor applications, defined as those containing fewer than 10 residential units, are required to meet space standards as prescribed by the London Plan. They are also required to meet relevant design policies (DM10), along with policies regarding daylight and sunlight, the provision of outdoor amenity space and parking, therefore, the quality of these units is comparable to those of a major scheme. Typically, major schemes are required to provide Design & Access Statements to justify the proposed development, as well as the documentation which demonstrates the schemes adherence to relevant planning policies. This recognise that such requirements would be too onerous for minor applications and may impede development on smaller sites which are expected to make a significant contribution to delivering Croydon's housing targets over the next 20 years.
7.8.7	Representations expressed concern for the number of permissions granted for small sites and that many schemes presented to committee appear to be a foregone conclusion for approval.	This is a comment about the determination of planning applications rather than the SPD.
7.8.8	A number of representations noted that residents in certain areas of the borough are receiving letters and approaches from developers and parties interested in purchasing properties who are confident they will secure permission for development	Croydon Council, as the Local Planning Authority (LPA), provides the policy framework for development. All applications made to the LPA are assessed against this policy framework. The Local Planning Authority is in no way party to the business operations of private development companies.
7.8.9	Suggestions were made that the Council should: <ul style="list-style-type: none"> • allow similar access to the planning portal as other boroughs to enable residents to view comments 	This is a comment about the determination of planning applications rather than the SPD.

	<p>and objections made on planning applications;</p> <ul style="list-style-type: none"> publish pre-application advice given to applicants to allow residents to understand the Council’s involvement in schemes. 	
7.8.10	<p>A number of representations expressed concern about Croydon’s housing targets, including:</p> <ul style="list-style-type: none"> the housing supply targets in the New London Plan (Table 4.1) do not reflect a balance between the areas of a local authority and their population densities; they are too high for the suburbs as a result of pressure from the London Plan; the document lacks an explicit statement of the argument for the proposed housing volume required in the borough and how it will sustain Croydon and wider London. 	<p>The Croydon Local Plan 2018 sets a housing target of 32,890 new homes in the borough over the next 20 years. The draft New London Plan increases this target as a result of evidence based reports which support the draft plan and Greater London Authority (GLA) in determining the housing demand required across London boroughs and their capacity to deliver on these demands. These matters are currently being discussed at the Examination into the draft New London Plan.</p>
7.8.11	<p>A number of representations expressed concern that the provision of smaller flats should not count towards the delivery of the borough’s housing targets with equal weight as houses. These presentations expressed the following views to support this opinion:</p> <ul style="list-style-type: none"> The provision of flats impacts communities as their residents fail to integrate into existing communities. Provision of smaller homes will not lead to a satisfactory mix of homes, distorting the housing market and make it difficult for families to afford to live locally. 	<p>The Local Plan sets out the mix of homes required in Strategic Policy SP2.7 and Detailed Policy DM1. This reflects the evidence base that supports the Local Plan and forecasted demand for homes of a certain size. Flats can provide needed smaller homes for younger generations and downsizers; residents within flats are not necessarily transient and can provide as much long-term commitment to a local community as any other form of housing.</p> <p>SPD2 provides design guidance such that those living within flats may be well integrated into a community through the design of their residence that will allow neighbourly relation to develop (Refer to Section 2.29 Driveways, Entrances and New Routes, and Section 2.34 Design of Private & Shared Outdoor Amenity Space).</p>
7.8.12	<p>Representors requested that the Council develop a more collaborative working relationship between Council</p>	<p>The Council’s Spatial Planning service (responsible for producing the Croydon Local Plan 2018 and SPD2) recently consulted on the Statement of Community Involvement</p>

	<p>officers, ward Councillors, residents and developers to achieve positive solutions to the housing crisis.</p>	<p>which sets out how the Council will consult formally on such matters. In addition to this the Planning department has established forums for Residents' Associations and Developers to allow for more informal conversations and engagement.</p>
7.8.13	<p>Representations suggested that developments should be restricted to match planned increases in local infrastructure such as schools, health care, transport and utilities. These representations expressed concerns that the absence of a comprehensive approach towards a significant increase in population is a deficiency and without being identified at this stage and planned for could lead to significant problems amongst the local population and with service providers. It is unclear whether there is money for any needed infrastructure improvements and the requirements of developers to contribute toward infrastructure provision. Guidance should set out how infrastructure is calculated and what mechanism is in place.</p>	<p>Croydon provides a comprehensive framework for infrastructure through the Infrastructure Delivery Plan which informs the Local Plan and is updated on an annual basis in partnership with service providers. This outlines the scale of infrastructure and funding needed, funding available and timeline by which such infrastructure provision should be provided. The SPD is about design and not the suitability of infrastructure to support the development which would be considered against other policies and calculations as part of determining a planning application.</p>
7.8.14	<p>Representations question how residents will be persuaded to rely on public transport, rather than cars, when bus services in several areas have been reduced over recent years.</p>	<p>In the short term TfL have been reducing bus services in parts of Croydon however in the medium to long term TfL and the Mayor of London have committed to improving bus services in Outer London by shifting buses from Central and Inner London (as per Proposal 53 of the Mayor's Transport Strategy). Croydon's Strategic Transport team are also working with TfL Buses to review provision of services in both the north and south of the borough to identify shortfalls in service frequency and coverage and to accommodate expected increases in population and growth. As part of these service reviews we will be looking at what part demand responsive buses can play in serving lower density areas and feeding into higher frequency routes and corridors. Through the Growth Zone funding framework Croydon can secure circa £200 million in funding in improvements for transport which will be used to improve tram services and bus services through increased frequencies and dedicated</p>

		bus priority infrastructure to support faster routes.
7.8.15	Representations raised concerns trains, particularly during rush hour, are at capacity and run limited services to remote parts of the borough. These services will be unable to cope with increased demands.	Croydon is supporting the Network Rail improvements to East Croydon Station and the Brighton Mainline Bottleneck at the Selhurst Triangle which is the largest cause of delays and congestion on the rail routes through Croydon. Once this upgrade has been undertaken then there will be additional capacity available to enable the delivery of the Mayor’s metroisation proposals which will see a huge uplift and improvement in both frequency and journey times to suburban rail services in South London and particularly Croydon.
7.8.16	Representations suggested a need for a collaborative approach with TfL to create a pro-public transport initiative to discourage (where possible) the use of private vehicles and to plan for future public transport infrastructure to support additional development, before development commences.	Croydon has a strong partnership with TfL and works with them on a variety of transport projects including Fiveways Junction, Tramlink extensions, bus priority, Vision Zero and cycling. Croydon is required to work towards delivering the Mayor’s Transport Strategy to meet the objectives to reduce car use, create healthy streets and increase active travel. How we propose to deliver the outcomes and proposals is set out in our third Local Implementation Plan (LIP3).

8. Clarifications & Editorial Amendments

The following minor amendments have been made to address the following issues:

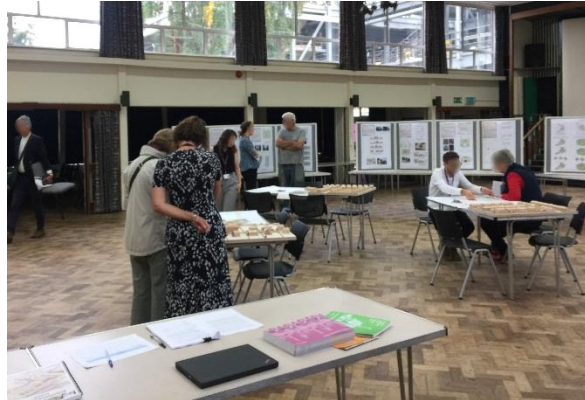
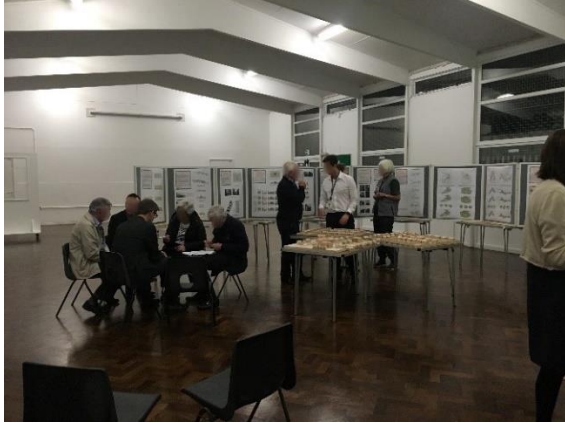
- Provide further clarification to the guidance where it has been deemed necessary
- Edits to phrasing, spelling & grammar
- Edits to images

Section / Paragraph	Clarification / Amendment
Entire document	Reordering of sections / paragraphs / bullets to improve readability where necessary.
Entire document	Spelling and grammar errors.
Entire document	'Material choice' replaced with 'Choice of material'
Chapter 1	Revised title.
1.1.2	Full quote from NPPF provided.
1.2	Footnote to table – clarification.
1.2.4	Clarification.
1.2.7	Clarification.
1.4.1	Rephrasing.
Figure 1.4a	Caption – clarification.
Figure 1.4b	Additional figure.
1.4.9	Clarification.
2.1.2	Reference to Figures 2.1a-e.
2.1.3	Clarification.
Figure 2.1b and 2.1d	Replacement figures.
2.6.3 - 2.6.6	Clarification.
Fig 2.8a	Caption - clarification.
Fig 2.8c & 2.8b	Replacement images & caption.
2.9.7	Clarification.
2.9.17	Clarification & reference to Figure 2.9g
2.9.18	Clarification.
2.9.19	Rephrasing.
2.9.20	Clarification.
Figure 2.9b, e & h	Additional figures.
Figure 2.9f, g & h	Removal of images.
Figure 2.11b & 2.11c	Caption – clarification.
2.11, 2.12, 2.13 & 2.16	Reworded titles.
2.11.1	Clarification.
2.13.1	Clarification & reference to Figure 2.13b.
Figure 2.13c	Removal of image.
2.15.2	Reference to Figure 2.13d.
2.16.1 – 2.16.4	Clarification.
Figure 2.16b	Additional figure.
Figure 2.18a	Additional figure.
Figures 2.18b-e	Captions – clarification.
2.17.1	Clarification.
2.19.2	Rephrasing.
Figure 2.20c	Adjustment.
2.23.4	Rephrasing.
Figure 2.24d	Replacement figure.
Figure 2.26c	Additional figure.
2.28.3	Clarification.
2.29.11	Clarification.
Figure 2.29e	Labelling – clarification.
2.31.2	Clarification.
Figure 2.31c	Removal of image.
2.38.1 & 2.38.2	Amalgamation and clarification.
2.39.2	Rephrasing.

2.41, 2.42, 2.43 & 2.46	Clarification
2.44	Removal of Case Study.
3.1	Reworded titles.
Figure 3.1a	Caption – clarification.
Figure 3.2f	Clarification.
3.6	Bullet 7 – clarification.
3.6	Bullet 14 – clarification to footnote
3.14	Bullet 2 – clarification.
Figure 4.1b	Replacement figure.
Figure 4.2a, 4.4a - 4.4f	Replacement figures 4.5a & 4.5b.
4.6.1 & 4.6.3	Clarification.
4.9.1	Clarification.
4.10.1	Clarification.
4.14.1	Bullet 3 & 4 – clarification.
4.15	Rephrasing.
Figure 4.16a	Caption – clarification.
4.16.1	Clarification and reference to Figure 4.15b.
Figure 4.16b	Additional figure.
4.17	Rephrasing.
4.21.1	Bullet 9 – clarification.
4.21.2	Rephrasing & clarification.
Figure 4.21c	Replacement image for 4.20a & 4.20b.
Figures 4.21e & 4.21f	Captions – clarification.
4.22.1	Rephrasing.
Figure 4.21a	Replacement figure.
4.25	Clarification.
4.29.2	Clarification.
4.31.2	Clarification
Figure 4.31b	Replacement figure.
Glossary	Addition/amendment to: ‘Conservation areas’ ‘Evolution without significant change’ ‘Flexible bus’ ‘Focussed intensification associated with change of area’s local character’ ‘Guided intensification’ ‘Habitable rooms’ ‘Hit and miss brickwork or stone’ ‘High quality design’ ‘Host dwelling’ ‘Incoherent form’ ‘Overbearing’ ‘Self-provided housing’ ‘Unneighbourly windows’

9. Appendix

Photos of the consultation event set-ups:



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SUBURBAN DESIGN GUIDE

SUPPLEMENTARY PLANNING DOCUMENT

CROYDON COUNCIL

ISSUE

Suburban Design Guide Supplementary Planning Document (SPD) adopted by Croydon Council in April 2019.

This document is available to view and download online at:
<https://www.croydon.gov.uk/planningandregeneration/framework/localplan/spdandoapf>

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CROYDON LOCAL PLAN

The Croydon Local Plan and other Supplementary Planning Documents are available online at:
<http://www.croydon.gov.uk/planningandregeneration/framework/localplan/>

IMAGES

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Delivering for Croydon

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CHAPTER 1: OVERVIEW

INTRODUCTION

1.1 OVERVIEW OF THIS DESIGN GUIDE

1.1.1 This design guide provides guidance for suburban residential developments and extensions and alterations to existing homes across the borough. It is a Supplementary Planning Document (SPD) which should be used by residents, developers, builders and agents including architects and planning consultants in shaping development proposals, and will assist in making decisions on planning applications and inform the Council's pre-planning application service. Beyond providing technical design guidance, this guide sets out how residential development, including extensions and alterations, in neighbourhoods across the borough is part of a holistic strategy being driven by the Council to deliver tangible public benefits to suburban communities.

1.1.2 With a growing population there is a necessity to build more homes. This is reflected in the current housing target set in the Croydon Local Plan 2018; 32,890 new homes are expected to be delivered in the borough by 2036. It is anticipated that meeting housing need will become more challenging with the adoption of the emerging London Plan¹. In order to achieve well-designed places, the National Planning Policy Framework (NPPF) states that *'To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places,*

with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified'. The places of Croydon (as defined in the Croydon Local Plan to *provide further design detail in the form of Place-specific development management policies aspiration to achieve good design while retaining and improving the distinctiveness of each place*), including the suburbs and neighbourhoods outside the main Metropolitan Centre of the borough, provide a great opportunity for delivering new homes and it is expected that one third of these, approximately 10,000, will be delivered through small scale suburban developments (windfall developments). In Croydon there are a number of low density and suburban locations which have been identified as having the capacity and ability to accommodate additional housing, benefiting new and existing residents. New homes will allow Croydon to provide truly lifetime communities, places where there are homes for people of all ages; first homes, homes for families and homes for down sizers. Similarly, residential extensions and alterations can allow homes to be adapted to suit the changing needs of residents. This allows people to stay in the communities they love through generations.

1.1.3 The evolution of the suburbs to provide homes that will meet the needs of a growing population has the potential to add new vitality to the places of Croydon. More people living in a place provides a better prospect of improved public services, such as transport and health care. This

is particularly important in the remotest of suburban locations which have suffered from a lack of infrastructure to support the local community. The Council and partners are planning for increased population and how services can be delivered to support them. For example, new transport initiatives are being invested in that will connect existing communities currently poorly served, benefiting existing residents as well as new residents. Infrastructure policies and site allocations within the Croydon Local Plan (including, for example, sites for schools and health facilities) and the Council's Infrastructure Delivery Plan provide for the increased demand forecast as a result of the borough wide development growth. Increased populations also provide the basis for local shops to remain open, allowing local businesses to thrive, and supporting local shopping parades as thriving centres of the community.

1.1.4 It must however be recognised that delivering approximately 10,000 homes in the suburban places of Croydon will result in an evolution of the existing character of suburban streets and that the increased density of homes can impact on the amenity of existing residents if not properly managed. This guide provides technical design guidance that seeks to both limit any negative impact on places, including the amenity of existing residents, and frame opportunities where increased densities can present significant opportunities to enhance places and bring benefits to communities.

¹ As amended from time to time.



Figure 1.1a: Higher density housing designed by Peter Barber Architects exemplifying high quality and enjoyable design that enhances the character of the local area without replicating the existing pattern, scale, form or materials of the context. (Photo: Morley von Sternberg)

1.2 WHAT IS COVERED BY THIS GUIDANCE?

THIS GUIDANCE IS BROKEN DOWN INTO THREE SECTIONS:

1. Suburban Residential Development
2. Areas of Focussed Intensification
3. Residential Extensions and Alterations.

The table below shows where the guidance is applicable.

	SUBURBAN RESIDENTIAL DEVELOPMENT	AREA OF FOCUSED INTENSIFICATION	RESIDENTIAL EXTENSIONS AND ALTERATIONS
Residential development proposals, generally under 25 homes	X	X	
Mixed-use proposals, including those that would deliver more than 25 homes		X	
Not generally located in the Croydon Metropolitan Centre and District Centres*	X	X	
Anywhere in the borough			X

*In these areas there is greater scope for development than allowed for in this guide.

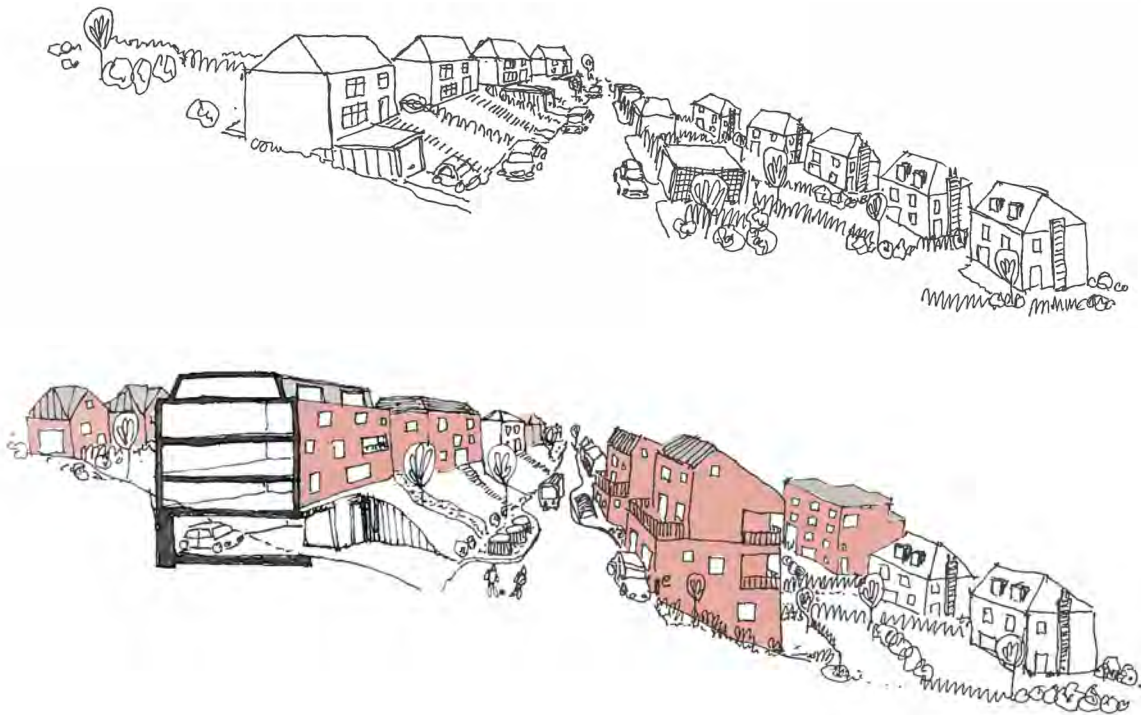


Figure 1.2a: Before and after - Possible development within an Area of Focussed Intensification



Figure 1.2b: Before and after - Suburban Residential Development

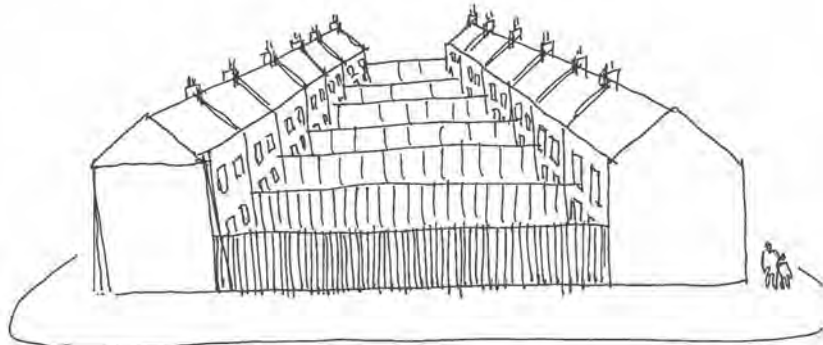


Figure 1.2c: Before and after - Residential Extensions & Alterations

WHO SHOULD USE THIS GUIDE?

1.2.1 This guide is intended for the use of any person involved in proposing or assessing development proposals as previously outlined. It provides guidance for residents, home owners, community groups, developers and associated agents in designing their proposals. It does not negate the need for a planning application.

1.2.2 While development in the borough is managed by the policies set out in the Croydon Local Plan and the London Plan², it is recommended that regard should be given to this supplementary guidance when preparing designs and planning applications, including those which are Permitted Development. It will assist Local Planning Authority officers in making decisions on planning applications and is a material consideration in assessing planning applications. In line with National, London and borough policies, poor design can be a reason for refusal, therefore the use of this guidance is important. Use of this guidance should lead to better quality developments that contribute positively to Croydon, benefit the people of Croydon and should add value for those who develop too.

1.2.3 This document not only establishes guidance on how to achieve an acceptable design, but aims to encourage the highest quality of design by promoting a well thought-through design process, balanced with the need to protect neighbouring amenity, so that the places we live in are both attractive and liveable and contribute to Croydon's future success.

WINDFALL SITES: WHAT ARE THEY?

1.2.4 Windfall sites are sites which are not identified for development as an allocated site under the Croydon Local Plan, including many suburban sites. For example, existing homes that are redeveloped to provide several homes or proposals for building homes in rear gardens.

WHAT IS AN SPD?

1.2.5 An SPD is a Supplementary Planning Document. SPDs form part of the Local Development Framework (LDF). They are produced to provide supplementary guidance, information or clarification on the Local Plan or other Development Plan policies. While SPDs do not carry the statutory weight that the Local Plan policies or Development Plan documents do, they should be used as guidance and material consideration in preparing and assessing planning applications.

RELATIONSHIP TO THE LOCAL PLAN

1.2.6 The Croydon Local Plan provides the planning policy context for this guide. The policies within the Local Plan have greater weight in determining planning applications as part of the Council's development plan, but it is expected that applicants shall adhere to this guide as a significant material consideration to the determination of planning applications. When determining applications, the Croydon Local Plan and its policies, along with relevant guidance, are taken as a whole to reach a balanced decision.

1.2.7 The Croydon Local Plan was adopted in February 2018 and sets out the housing target for the borough. Croydon is planning for 32,890 new homes by 2036. Given the limited developable land available for residential development in the built up areas, the need to accommodate homes across the borough to meet the borough's need, whilst not undermining the valued character and heritage of Croydon is imperative. In order to deliver on the housing target for the borough, it is expected that these homes will be provided through approximately: 11,000 new homes in the Croydon Metropolitan Centre; 7,000 on allocated sites across the borough; 10,000 on windfall sites; and a further 5,000 being either completed or under construction already. This equates to approximately 1,600 new homes per year by 2036 amounting to roughly 1 new home for every 5 that currently exist. This reliance on windfall sites is supported by the NPPF and the Croydon Local Plan provides the evidence base to support this position, having been

² As amended from time to time.

found sound at the Croydon Local Plan examination. Furthermore, policies within the Local Plan protect from the substantial loss of residential gardens in line with the NPPF guidance for windfall sites.

1.2.8 In the Croydon Local Plan, Policy DM10 outlines the expected modes of suburban development on windfall sites including conversion, additions, infill and plot subdivision, rear garden development and regeneration, while Table 6.3

designates four (4) Areas of Focussed Intensification; areas with established infrastructure but relatively low density and the potential to accommodate a significant increase in residential development. Policy DM10.11 provides the policy that development in areas of focussed intensification should be assessed against. The Local Plan states that *‘Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character.*

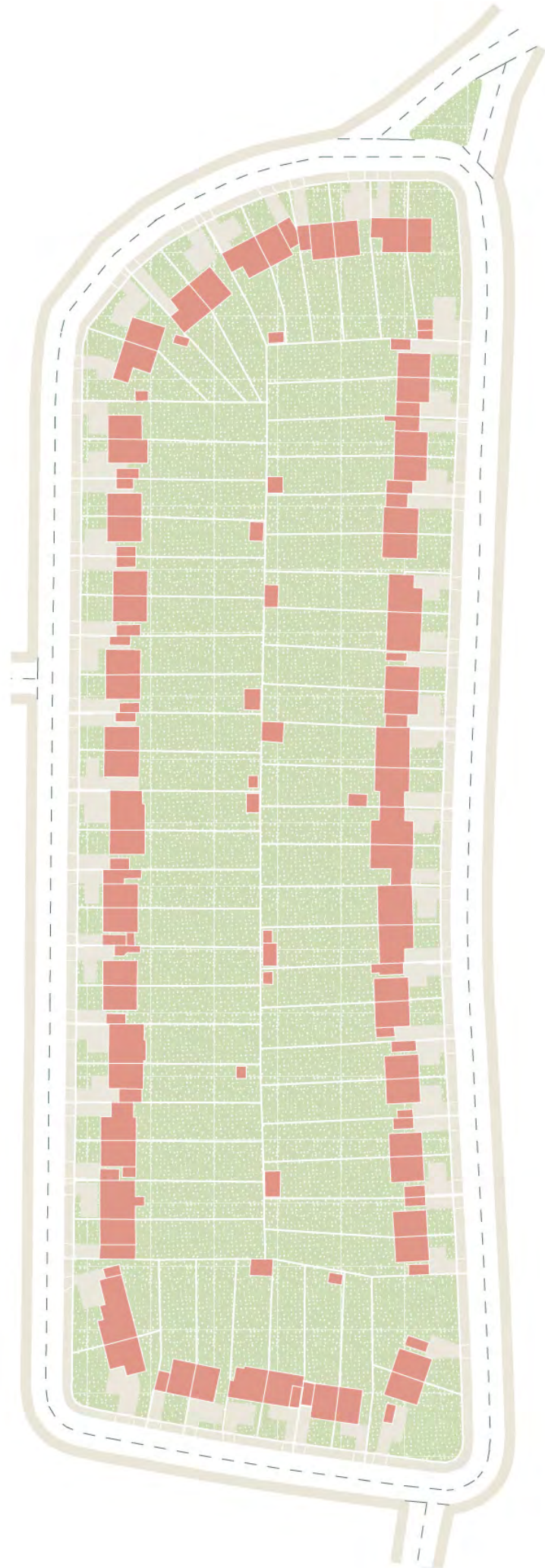
They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed’. Further detail in relation to the expected evolution or change in character of different areas is set out in Table 6.4 of the Local Plan (see Figure 1.2d below).

Method of accommodating growth and improving Croydon	How it works	Applicable policies
Evolution without significant change of area’s character	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant local character. Most development throughout the borough will be of this nature.	DM10.1 – DM10.10
Guided intensification associated with enhancement of area’s local character	Areas where the local character cannot be determined as a result of no one character being dominant, further growth can be accommodated through place specific enhancement policies.	DM34 – DM49
Focussed intensification associated with change of area’s local character	Further growth can be accommodated through more efficient use of infrastructure. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth.	DM10.11
Redevelopment	In larger areas where growth would result in a change to the local character it must be supported by masterplans or design codes.	DM36.2 DM38.1 DM49.1

Figure 1.2d: Table 6.4 from the Croydon Local Plan

1.3 EVOLUTION OF THE SUBURBS

1.3.1 The suburbs as we know them today have largely evolved over the past century. Inter and post-war development saw the construction of large areas of suburban housing, expanding from the terraced suburban streets built in the Victorian era. In the past 50 years, the suburbs have continued to evolve, through the construction of new homes, as well as extensions and alterations to existing homes. Development coming forward today is part of this on-going evolution of the suburbs to provide new housing for younger and older generations, and will continue across the borough in all types of neighbourhoods. Whether through development of land to the rear of a row of terraced houses, or the redevelopment of a larger home into several family homes, the indicative evolution of typical street patterns is illustrated in Figures 1.3a, 1.3b and 1.3c, and will result in more and larger buildings. The process of suburban evolution indicated here is expected over a period of 10 – 15 years, however it is recognised that market conditions may bring about change in a shorter period of time. The guidance is written so that it is relevant to creating sustainable neighbourhoods regardless of the rate of development to ensure that the benefits of such growth are optimised.



2018

Key

- Existing Houses
- Existing back lands (including garages)
- New Homes

— — — — —
→ 2036

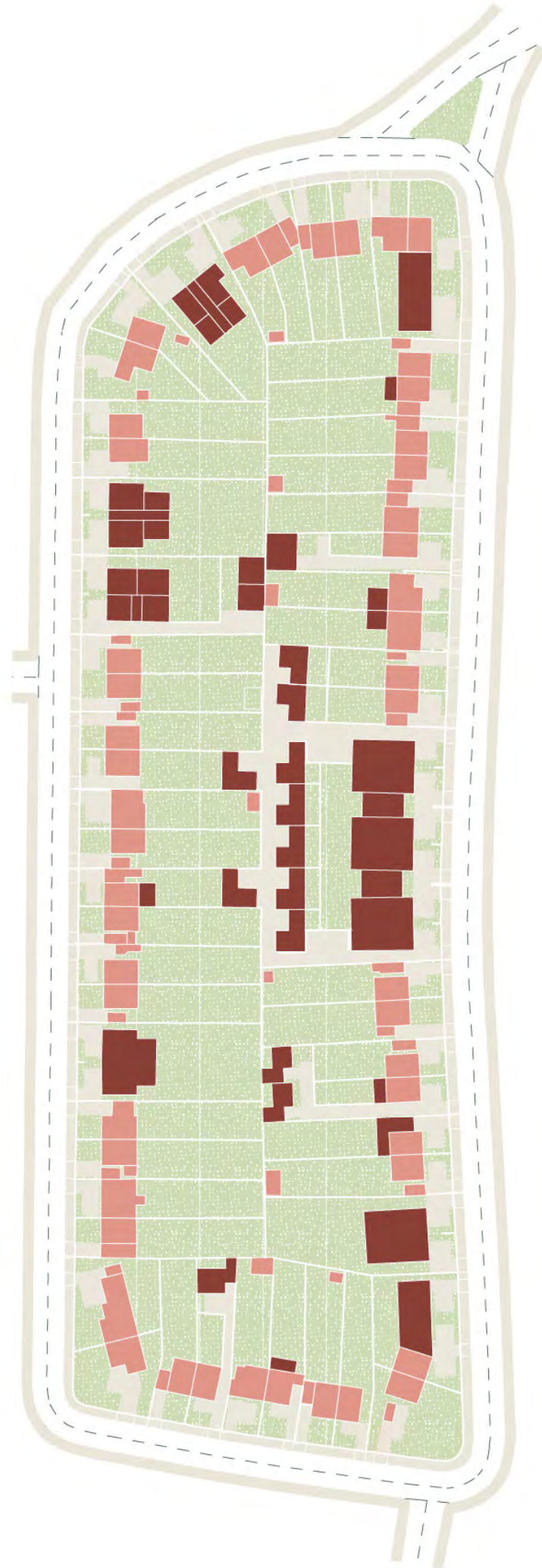
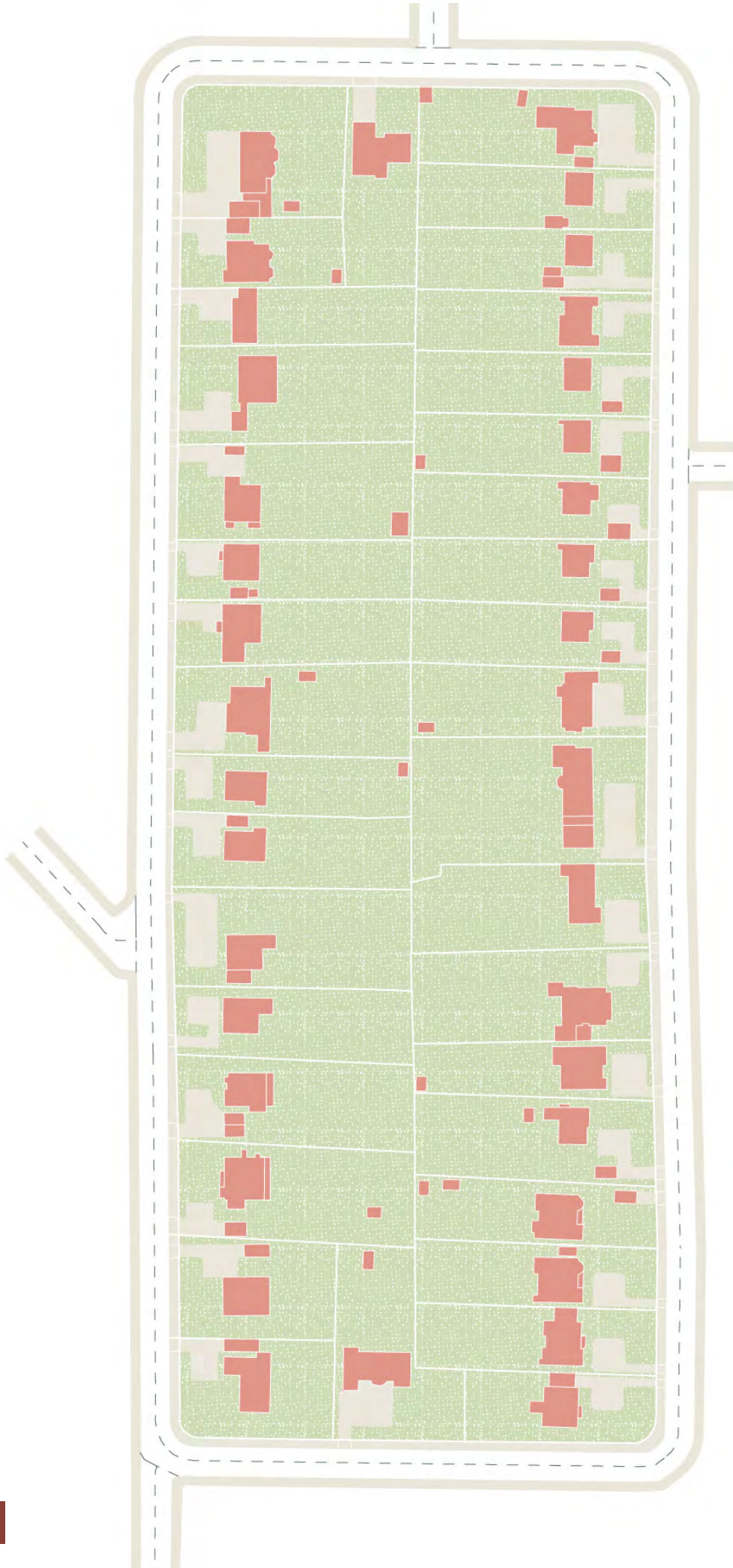


Figure 1.3a: Evolution of streets with semi-detached homes

Key

- Existing Houses
- Existing back lands (including garages)
- New Homes






2018

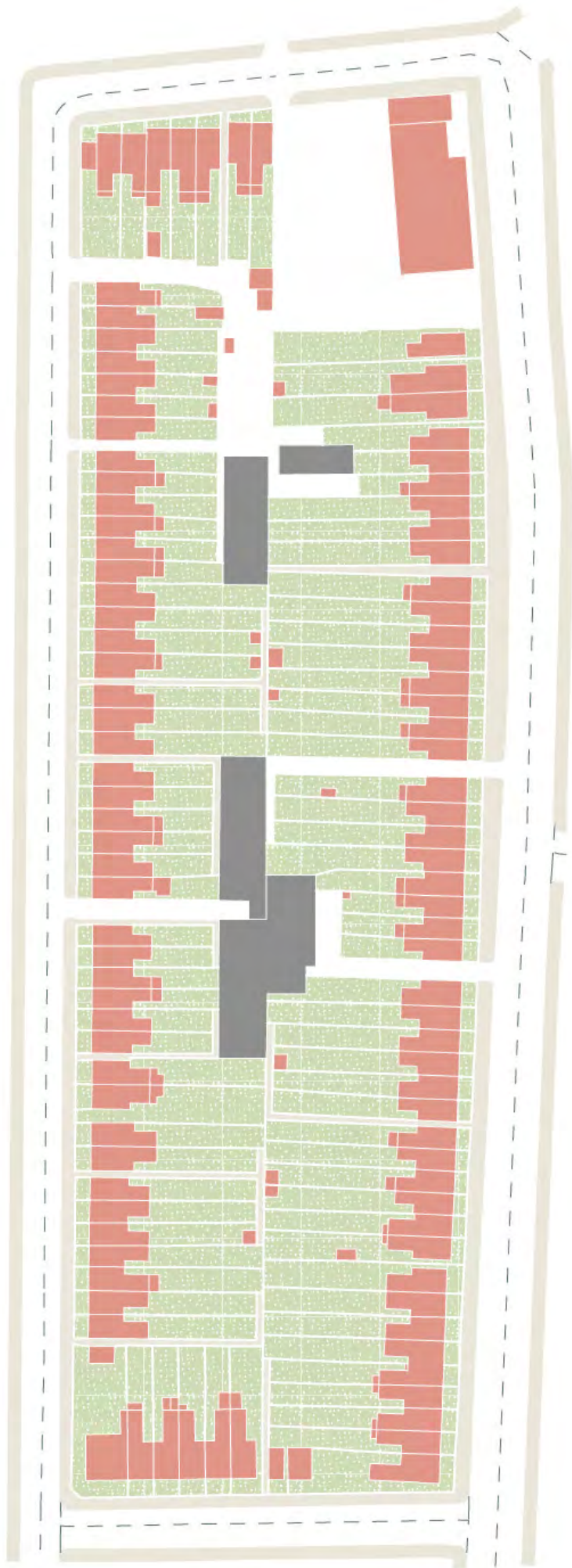
→ 2036



Figure 1.3b: Evolution of streets with detached homes

Key

-  Existing Houses
-  Existing back lands (including garages)
-  New Homes



2018

— — — — —
→
2036



Figure 1.3c: Evolution of streets with terraced homes

1.3.2 The evolution of the suburbs is underpinned by the strategic objectives of the Croydon Local Plan which are required to fulfil Croydon's spatial vision and deliver the Croydon Local Plan policies. Key design principles that support the objectives of the Croydon Local Plan and will help to ensure suburban growth is suitable and sustainable include:

- Creating places where people can live, work and play within their neighbourhood;
- Providing homes for people of all ages and needs to live in one neighbourhood, with the services to support them;
- Delivering developments that respond to and enhance the existing character of a neighbourhood and its built appearance;
- Delivering development that preserves or enhances designated heritage assets³,

³ Designated heritage assets include Listed Buildings, Conservation Areas, Registered Parks and Gardens and Scheduled Monuments.

- non-designated heritage assets⁴, views and landmarks;
- Resilient and adaptable built form that is capable of accommodating future change;
- Delivering environmentally sustainable communities which are designed to minimise environmental impacts and reduce consumption of energy and other resources;
- Creating places that are legible and easy to navigate;
- Creating well-designed streets⁵, that are attractive and operational;
- Delivering walkable and cycle-friendly communities;
- Providing access to open spaces;
- Providing access to transport infrastructure and other public services;
- Providing access to shopping

⁴ Non-designated heritage areas include Locally Listed Buildings, Local Heritage Areas, Locally Listed Historic Parks and Gardens (Archaeological Priority Areas).

⁵ Refer to TfL's Healthy Streets for London guidance available at: <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>.

- and leisure facilities;
- Contributing to the community's health and well-being;
- Contributing to economic activity and prosperity; and
- Supporting and encouraging social cohesion.

1.3.3 Suburban growth occurs whether it is planned or not. As families grow and the population increases, housing needs to change and the suburbs change with them. Some residents choose to renovate their homes to accommodate a growing family and others redevelop, while some downsize or seek alternate housing options. This evolution shapes the suburbs and identifies a need for the guidance set out in this document to ensure that the suburbs are sustainable for future generations.



Figure 1.3d: Larger suburban developments, of up to 25 homes as covered by this guide, may result in the creation of a new suburban street with a mixture of flats and houses.



Figure 1.3e: A development of flats designed by Alison Brooks Architects within an existing residential street. (Photo: Paul Riddle)

1.4 DESIGN AND PLANNING PROCESS

1.4.1 The Council requires development to be high quality and this should inform the design of a project brief at the earliest stage, as well as the subsequent design proposals.

1.4.2 For some residential extensions and alterations, the proposal may be covered by Permitted Development rights. It is crucial to determine whether a proposal needs planning permission before undertaking any work⁶. Any works to a Listed Building, including those covered by Permitted Development rights, are likely to require Listed Building consent in addition to any planning permission.

1.4.3 For further advice on whether planning permission may be required, or for any planning enquiries, please refer to the Council's website⁷.

⁶ Information about the planning process and relevant documents, policy and legislation can be found on the Planning Portal at: <https://www.planningportal.co.uk/>.

⁷ Information on the pre-application services provided by Croydon Council can be found at: <https://www.croydon.gov.uk/planningandregeneration/pre-application-meeting-service>.

PROFESSIONAL SERVICES

1.4.4 Engaging an architect, designer and/or planning professional can help to ensure your proposal meets your requirements, along with relevant planning policies and guidance.

1.4.5 By working with a professional, applicants are more likely to achieve high-quality proposals, which will add greater value to a development.

1.4.6 It is strongly advisable to employ a registered architect or competent agent to design your proposal.

1.4.7 For more complex developments, it can be necessary to seek the assistance of planning consultancies to advise and to help take your scheme through the planning process. You may also need to take advice from other consultants including structural engineers, quantity surveyors and transport consultants.

DEVELOPING A BRIEF

1.4.8 Regardless of the size of your project, a brief should be developed in consultation with your architect and/or any other consulting professionals. A brief should clearly set out the required outcome of the proposal, be that in terms of required space or a particular architectural ambition. It should also identify potential constraints. A brief should respond to the relevant aspects within this guide depending on type of project.

SCOPING CONSTRAINTS AND OPPORTUNITIES

1.4.9 In order to understand how a proposal might respond to the site and surrounding context, it is important to understand what constraints and opportunities might be relevant to a future development.

1.4.10 Planning constraints, including flooding, Metropolitan Green Belt Land, Conservation Areas, Local Heritage Areas, Historic Parks and Gardens and archaeology, can be searched using the Local Plan interactive map⁸. Listed Buildings and Locally Listed Buildings are not contained on this map and should be searched on the relevant council webpages⁹. Listed Buildings, Registered Parks and Gardens and Scheduled Monuments can also be searched using Historic England's National Heritage List for England¹⁰.

1.4.11 For proposals affecting the historic environment, including Listed Buildings and Conservation Areas, further advice is provided in section 1.4 Heritage.

1.4.12 Applicants should consider both the existing constraints on a site and future constraints, such as where planning permission has been granted on neighbouring land but has not yet been built. Wherever possible it is helpful to include both existing and approved neighbouring developments on submitted drawings to help illustrate the cumulative impact of development along a street and how this may affect the streetscene.

⁸ Available at: <http://www.planvu.co.uk/croydon2018/>.

⁹ Available at: <https://www.croydon.gov.uk/planningandregeneration/framework/conservation/buildings>.

¹⁰ Available at: <https://historicengland.org.uk/listing/the-list/map-search?clearresults=True>.

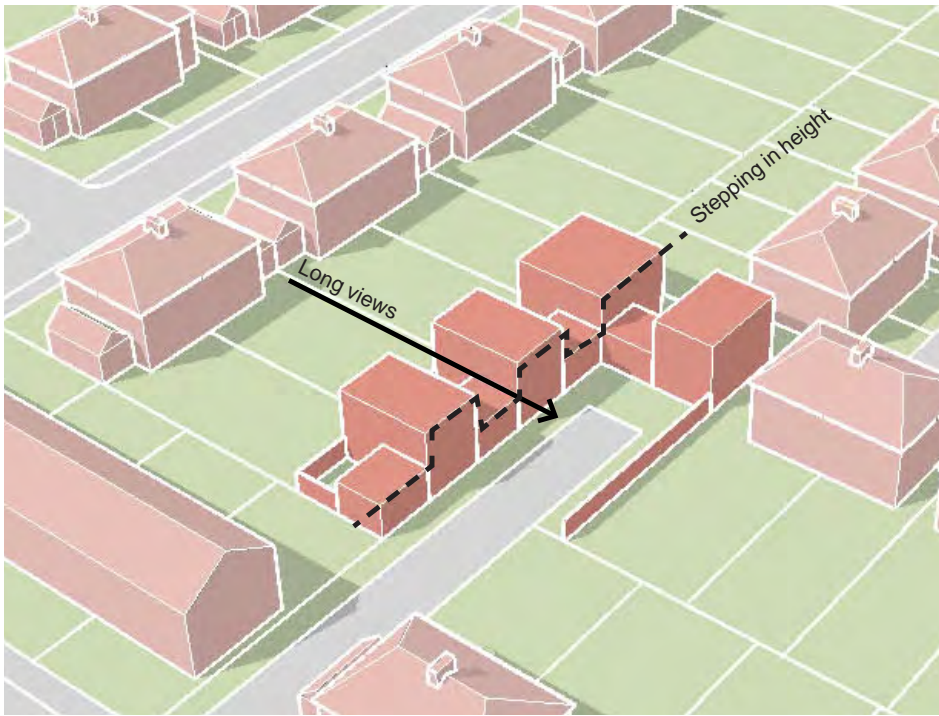


Figure 1.4a: A diagram indicating how site constraints and opportunities might inform the development of the design. The proposal has introduced a stepping form as per guidance Section 2.13.



Figure 1.4b: A pair of houses designed by Bell Phillips Architects with a strong suburban character and contemporary design. (Photo: Kilian O'Sullivan)

HERITAGE

1.4.13 Particular care must be taken for a proposal which impacts on heritage assets. These include Listed Buildings, Conservation Areas, Locally Listed Buildings and Local Heritage Areas. Heritage assets can be physically affected by proposals, and also affected by proposals in their surroundings (their setting).

1.4.14 Much of the guidance contained in this document is relevant to proposals affecting heritage assets. However, where there is conflict between this guidance and the conservation of heritage assets, the conservation of heritage assets has more planning weight and should be prioritised.

1.4.15 Where a proposal affects a heritage asset, the following process should be followed:

1. Identify heritage assets affected by the proposals. Information on scoping

constraints and opportunities is available in section 1.4.9. For larger proposals, heritage assets in the surrounding area as well as on the site itself should be identified.

2. Understand what is important about the heritage asset (its significance). The reasons why a heritage asset is significant differs in each case. A number of resources are available via the Conservation pages of the council's website¹¹ to help identify significance. Dependent on the nature of your proposal and the asset(s) affected, further historic research may be needed to understand the significance of the site, such as looking at historic maps, or on-site assessment.
3. Design the proposal to respond to the significance of the

¹¹ Available at: <https://www.croydon.gov.uk/planningandregeneration/framework/conservation>.

heritage assets. Elements of a proposal such as scale and massing, layout, proportions, materials, architectural style or positioning should be designed to preserve or enhance the significance of heritage assets. Dependent on their particular significance, it may be appropriate for your proposal to directly imitate the architectural style, or for a complementary but distinct modern approach to be taken.

1.4.16 The above process should be outlined within a Heritage Statement, and submitted with your planning application to explain and justify your approach.

1.4.17 Please check the Conservation pages of the Council's website for further resources. For conservation areas, the council's Conservation Area General Guidance (CAGG) and area-specific Conservation Area Appraisal and Management Plans (CAAMPs) provide a summary of significance and detailed guidance on the type of development which may be appropriate¹². These documents should be consulted at the start of any design process affecting a conservation area.

1.4.18 Where a proposal affects heritage assets, engaging with the council at a pre-application stage is strongly encouraged. Engaging a heritage specialist and/or conservation architect can also be extremely beneficial¹³.

¹² Available at <https://www.croydon.gov.uk/planningandregeneration/framework/conservation/conservation-areas>.

¹³ Although not exhaustive nor a recommendation, the Institute of Historic Building Conservation (IHBC), Royal Institute of British Architects and Architects Accredited in Building Conservation Ltd. all hold lists of relevant conservation specialists.



Figure 1.4c: An infill development in the East India Conservation Area

ALTERNATIVE HOUSING MODELS

1.4.19 The council seeks to support good-quality innovative models of housing, particularly self-provided housing.

1.4.20 For non-standard, bespoke and innovative models of residential development such as co-housing, co-living, community-led housing, self-build and custom build, there may be flexibility in the application of aspects of this guidance, however the Council will not accept any reduction in design quality or standard of residential accommodation. For co-housing and co-living schemes that propose shared amenities and facilities in place of amenities and facilities ordinarily provided within or as part of a residential unit, the Council will seek to ensure that individual units are appropriately sized and liveable and that any shared amenities and facilities are also appropriately sized, comfortable and genuinely useable by all residents. Any community-led scheme would be required to conform to the accepted principles of a community-led project¹⁴.

1.4.21 Non-standard or innovative housing models will not be supported if they are being proposed as a way of avoiding residential space and design standards or that would result in substandard residential accommodation.

DEVELOPING A DESIGN

1.4.22 The development of a design proposal is a dynamic process and can take many iterations before it is successful. It should develop out of the brief and should adhere to the relevant planning policies and guidance. Certain aspects, such

¹⁴ Principles and further information available at: <https://www.communityledhousing.london/clh/>.

as sustainable design and building regulations, must be considered in all proposals.

SUSTAINABLE DESIGN

1.4.23 It is important that the design of a suburban proposal does not have a detrimental impact on the environment. Adaptable, sustainable buildings will better respond to the changing needs of society and the environment as the suburbs continue to evolve.

1.4.24 Proposals should be designed to reduce reliance on energy; for instance, utilising natural daylight and ventilation, whilst being orientated to avoid overheating. Materials with better performance qualities, such as insulation, should be used wherever possible. Landscaping is a key factor in embedding environmental sustainability into a design and should be treated as an integral part of any proposal, where appropriate. If considered at an early stage, insulation, heating, ventilation systems and lighting can all be integrated with the building design. Integrated design ensures that comfort and conditions are optimised at minimum cost and energy consumption.

1.4.25 An environmentally responsive proposal will consider the local environmental impacts of the development, such as biodiversity and flooding. Developments within Flood Zones 2 and 3 will not usually be supported and would require sequential and exception tests as outlined in Policy DM25 and Table 8.1 of the Croydon Local Plan. Development should seek to protect and enhance biodiversity and should refer to Section 2.33 for guidance.

1.4.26 Sustainable design also takes into account the need to create lifetime neighbourhoods,

providing places where people of all ages can live and work. Therefore, proposals should consider how it can be adapted for different users and uses.

BUILDING REGULATIONS

1.4.27 Building regulations should be considered from the early stage of a design process. Building Regulations approval will be required for all suburban residential developments and the majority of residential extensions & alterations, including fire safety, energy efficiency, sound and thermal insulation and the structural stability of an extension.

ENGAGING YOUR NEIGHBOURS

1.4.28 It is important and recommended that you talk to your neighbours and anyone else who may be affected by your proposals at as early a stage as possible to properly consider how neighbouring amenity may be affected. This should occur before a planning application is submitted or when development occurs under Permitted Development. Responding to neighbours' concerns in a meaningful manner can help to develop an acceptable proposal.

SUBMITTING APPLICATIONS

1.4.29 For information and guidance on the application process, including pre-applications¹⁵, Design and Access Statements (DAS) and the Validation Checklist¹⁶, please refer to Croydon Council's website and the Planning Portal¹⁷.

¹⁵ <https://www.croydon.gov.uk/planningandregeneration/pre-application-meeting-service>.

¹⁶ <https://www.croydon.gov.uk/planningandregeneration/make-application/validation-checklist>.

¹⁷ Information about the planning process and relevant documents, policy and legislation can be found on the Planning Portal at: <https://www.planningportal.co.uk/>.



CHAPTER 2: SUBURBAN RESIDENTIAL DEVELOPMENT

INTRODUCTION

2.1 SUBURBAN DEVELOPMENT

2.1.1 This section of the SPD is relevant to the delivery of new homes through conversion or redevelopment of existing properties or new housing built in rear gardens and back lands.

2.1.2 The Croydon Local Plan has identified that some existing residential areas have the capacity to accommodate growth without significant change to its character. In these locations, to accommodate the target for additional homes in the suburbs, new residential units may be created through the interventions described in Figures 2.1a – 2.1e.

2.1.3 These approaches to development are set out in Table 6.4 of the Croydon Local Plan and the supporting text. The guidance set out in this section responds to Policies DM10.1 – DM10.10 of the Croydon Local Plan regarding design and density, including ensuring growth is accommodated without significant change to the character of an area.



CONVERSION

Figure 2.1a: The conversion or subdivision of a large buildings into multiple dwellings without any major alterations to the size of the building.



ADDITION

Figure 2.1b: A rooftop addition to an existing development that provides new homes.



IN-FILL INCLUDING PLOT SUBDIVISION

Figure 2.1c: The filling of gaps and left over spaces between existing properties in a design by Peter Barber Architects. Infilling may also include the subdivision of large plots of land into smaller parcels with a layout that complements the existing urban pattern. (Photo: Morley von Sternberg)



REAR GARDEN DEVELOPMENT

Figure 2.1d: The construction of new buildings in rear gardens of existing properties in a design by Dallas–Pierce–Quintero that builds along the boundary wall. (Photo: David Butler)



REGENERATION

Figure 2.1e: The replacement of the existing buildings (including the replacement of detached or semi-detached houses with flats) with a development that increases the density and massing. The proposal alongside was designed by Proctor & Matthews Architects.

2.2 OVERARCHING DEVELOPMENT PRINCIPLES FOR SUBURBAN DEVELOPMENT

2.2.1 Developments in suburban locations seeking to deliver new homes will be expected to meet the overarching development principles below which support the strategic objectives and Strategic Policies SP2 and SP4 of the Croydon Local Plan:

- Provide the right mix of homes in the right location
- Improve or positively contribute to local character
- Minimise impact on neighbouring amenity as far as possible
- Safeguard for future development of neighbouring sites
- Embody environmentally sustainable development.



Figure 2.2a: Back land development providing family homes on a site to the rear of properties on Church Road, Upper Norwood

OPTIMISING SITES

2.3 DELIVERING THE RIGHT HOMES

HOUSING MIX & DEVELOPMENT TYPE

2.3.1 Croydon requires, in Policy SP2.1 of the Croydon Local Plan, a mix of homes to cater to the evolving and growing population, and while many suburban sites present opportunities to deliver a mix of homes, the need to provide and protect family sized homes is set out in Policy DM1.1 of the Croydon Local Plan.

2.3.2 Policy SP2.7 sets a strategic target of 30% of new homes to have three or more bedrooms with Policy DM1 establishing how this will be achieved on specific sites of 10 or more units. Developments on sites under 10 units are also encouraged to deliver homes with three or more bedrooms. In some cases this is potentially at the expense of delivering a larger quantity of smaller 1 or 2 bedroom units if the site specifics are such.

2.3.3 Developments should be designed to ensure that family sized units:

- Where located above ground level, demonstrate the site constraints which prevent ground floor family sized units.
- Where located above ground level, include a directly accessible balcony or terrace, as well as access to shared outdoor amenity space with grassed areas appropriate for play. This shared outdoor amenity space should be easily accessible from the indoor communal space of a development (Refer to Section 2.34 for guidance).

2.3.4 Table 6.5 of the Croydon Local Plan lists the suitable development of various local

character types in the borough. Development should be in accordance with Policy DM10 and Table 6.5 of the Croydon Local Plan.

EFFICIENT USE OF SITES

2.3.5 Development proposals should be designed to:

- Ensure they make the best use of the site. This may include the provision of higher density housing such as terraced houses and flats, rather than detached houses; and
- Where possible, seek to combine sites to create a larger development potential (Refer to Section 2.4 for guidance).

2.3.6 The Local Planning Authority will not support proposals which are considered to be an under-provision of a site. Applicants must not intentionally circumvent the affordable housing provision of the Croydon Local Plan by delivering 9 unit schemes where the site can accommodate the delivery of 10 or more units. A development proposal that seeks to deliver a scheme that could form part of a larger potential development on the same or adjoining land will be assessed as an application for the greater development potential.

2.4 ADJOINING SITES AND COMPREHENSIVE DEVELOPMENT

COMBINING SITES

2.4.1 Where sites present the potential to be developed to achieve comprehensive development in conjunction with neighbouring plots, development proposals should seek to bring sites forward collaboratively.

2.4.2 By bringing neighbouring sites forward for development together, proposals have the opportunity to:

- Optimise the development potential of sites to provide more homes. The footprint of a development that spans two (2) sites is typically larger than the combined footprint of two (2) separate developments on neighbouring sites, providing an uplift in the potential number of homes. This may be achieved through additional heights and/or larger floorplates (Refer to Figure 2.4a).
- Reduce overhead and construction costs.
- Create a more holistic approach to development in the area, allowing a more resolved approach to character, issues of overlooking, site access and servicing.

2.4.3 Where combining sites would result in building across existing street-facing plot boundaries applicants should refer to Section 2.15 to avoid creating over-bearing developments that disrupt the rhythm of a street.

PROTECTING FUTURE DEVELOPMENT POTENTIAL

2.4.4 Development proposals must not prejudice the development potential of neighbouring sites, specifically in regards to access (Refer to Section 2.29 for guidance), daylight and sunlight and overlooking (Refer to Section 2.9 for guidance). Where applicable, proposals may be required to demonstrate how a potential development on a neighbouring site may come forward following the development of their site.

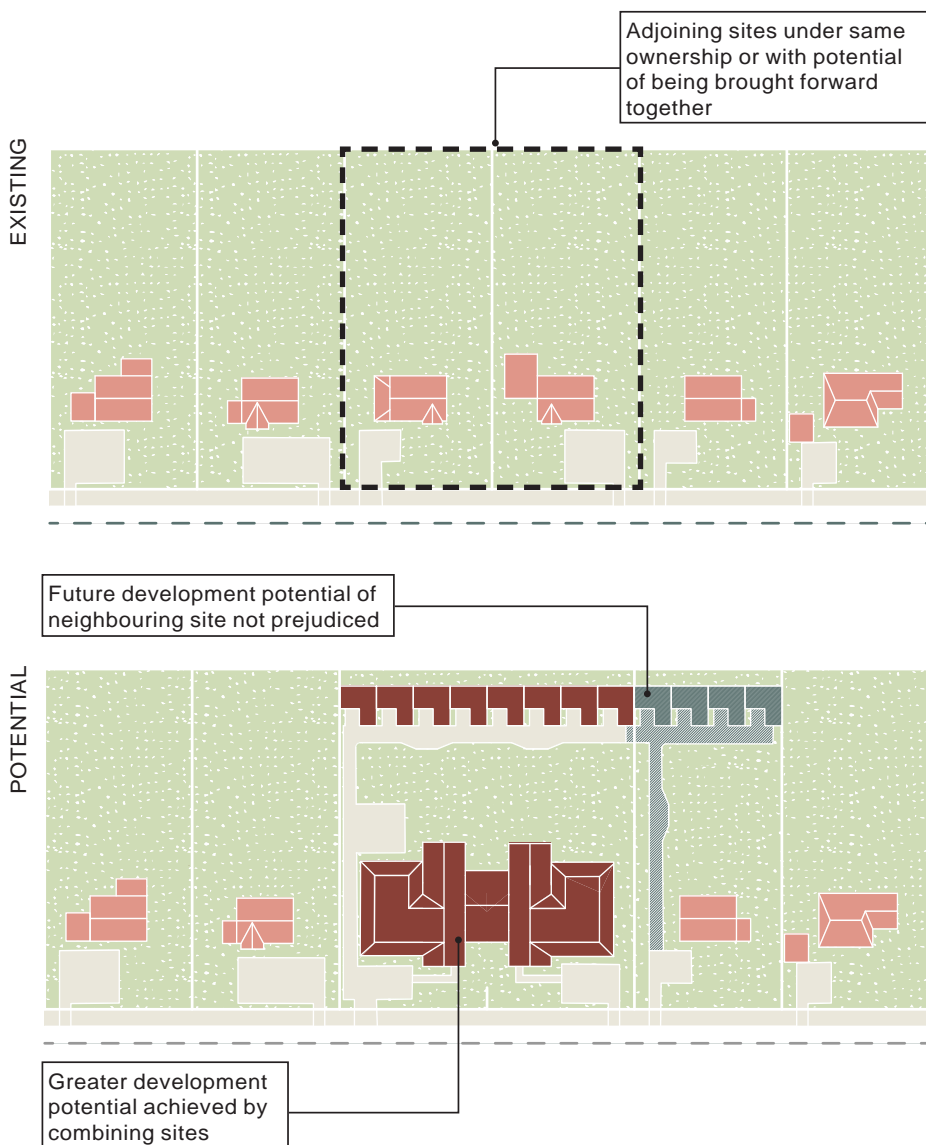


Figure 2.4a - Combining adjoining sites to provide greater development potential

2.5 CHANGE OF USE AND CONVERSIONS

2.5.1 Suburban blocks with back lands, as well spaces above shops, present opportunities for a change of use, dependent on Croydon Local Plan policies.

2.5.2 Where existing houses or spaces above shops are converted to provide new dwellings, consideration must be given to the design and layout to ensure awkward layouts and limited access to natural light is avoided. All new dwellings as a result of conversions must meet minimum space standards. Where spaces above shops which front busy roads are converted or developed into flats, bedrooms should generally be located away from the road.



Figure 2.5a: Oval Mews, before redevelopment with a change of use.



Figure 2.5b: Oval Mews, after redevelopment with a change of use by Chartwell Land & New Homes.

2.6 CONNECTIVITY

2.6.1 The growth of the suburban population means an increased demand on public transport services, resulting in a need to deliver increased public transport capacity and provision.

2.6.2 Whilst intensification may come forward gradually over time, there is the clear need for a holistic, forward-looking approach to infrastructure and supporting services. This should put people, and their health, at the centre of the design of our neighbourhoods, in line with TfL's Healthy Street Approach¹⁸. Croydon Council is committed to working with TfL and other service providers to ensure suburban growth is delivered in conjunction with adequate access to active and public transport facilities. The Croydon Local Plan, Infrastructure Delivery Plan and the London Plan¹⁹ provide detail on this.

¹⁸ Refer to <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/healthy-streets>

2.6.3 On-site parking provision will be restricted in line with the evolving London Plan¹⁹ maximum standards and minimal necessary car parking will be the starting point for all development proposals.

2.6.4 The borough will encourage lower parking provision than the maximum car parking standards set in both the current and draft new London Plan in locations that meet the following criteria and on a case by case basis:

- Site is within a controlled parking zone (or where one is under development);
- Site is within an area of moderate to good connectivity to the wider public transport network and the Growth Zone by public transport, walking and cycling (PTAL 4 and above);
- Site is in an area that will be subject to future public transport or walking and

cycling improvements as part of the Growth Zone delivery proposals or Mayor's Transport Strategy proposals that will result in it having moderate to good connectivity (PTAL 4 and above).

2.6.5 In areas of PTAL 4 or more or where there are areas of existing parking stress (Refer to Policy DM30(a) of the Croydon Local Plan), to make the development acceptable, the Council will require the development to be permit-free whereby residents will be restricted from applying for on-street parking permits through the use of legal S106 agreements where existing Controlled Parking Zone exists.

2.6.6 Appropriate disabled persons parking for Blue Badge holders will be provided in accordance with the London Plan¹⁹.

2.6.7 Parking spaces within communal car parking facilities should be leased rather than sold.



Figure 2.6a: Electric bikes allow easier commuting in hilly areas. (Photo: Road.cc)



Figure 2.6b: On-street shared cycle stores



Figure 2.6c: Trams connecting into suburban locations



Figure 2.6d: Bus routes connecting into suburban locations.

SUSTAINABLE TRANSPORT FACILITIES

2.6.8 In order to realise the development potential and intensification of the suburbs, there is a need to improve the connectivity and public transport accessibility of these areas which can be delivered through new types of flexible bus, taxi-bus services and new cycle routes.

The following sustainable transport facilities and provision will need to be provided, where appropriate, for all new residential developments and will be necessary to enable an acceptable level of minimal parking provision:

- Electric vehicle charging infrastructure should be provided in accordance with London Plan¹⁹ standards;
- A Parking Design & Management Plan needs to be submitted for all applications which include car parking provision setting out how the car parking will be designed and managed;
- A Travel Plan Statement will be required for all developments that the Council considers would generate significant amounts of movements in relation to the existing context. This will be judged on a case by case basis considering factors such as existing parking stress, PTAL, adjacent site uses and cumulative impact of development in an area. The statement should respond to the particular concerns highlighted by the Council, outlining how the residents will be informed about the sustainable travel options in their area and how and why there are restrictions on their parking provision;
- Active transport routes, including better connections for pedestrians and cycle lanes. Particular emphasis will be placed on the use of electric bikes which present a good solution to hills. The use of both electric and standard bikes can greatly increase access to public transport; in the time taken to walk to a bus stop or station (built into TfL's PTAL model) a far greater distance can be cycled, potentially transforming PTALs;
- Secure cycle parking provision in accordance with the London Plan¹⁹, including the provision of charging points for electric bicycles (e-bikes). Consideration of parking for cargo bikes for family homes is strongly encouraged;
- Car Club parking space provision should be in line with the requirements in Table 10.1 of the Croydon Local Plan. Where suburban residential developments present an opportunity to provide additional car club spaces or membership to nearby schemes, the Council will encourage this.
- Future bus services - On demand bus services are expected to start operating in suburban areas that currently cannot support dedicated TfL bus routes. With future transport options²⁰, it is anticipated that connected and autonomous²¹ (also known as driverless) bus services will be operating in suburban locations in a few decades, as well as an increased number of traditional bus services. The provision of these services will strengthen the existing transport network and allow areas lacking in access to public transport to be better connected.

¹⁹ As amended from time to time.

²⁰ Refer to: https://www.london.gov.uk/sites/default/files/future_transport_report_-_final.pdf for further information.

²¹ Refer to: <https://www.smmmt.co.uk/2018/05/worlds-first-autonomous-bus-service-begins/> for further information.



Figure 2.6e: Development of a larger scale designed by Peter Barber Architects is successfully integrated into the context through a stepped form on the top floor and careful choice of high-quality materials that respond to local character. (Photo: Morley von Sternberg)



Figure 2.6f: A development of flats designed by Haworth Tompkins that uses the form of the balconies to add interest to an otherwise simple but well-designed facade giving character to a contemporary proposal. (Photo: Philip Vile)

CHARACTER

2.7 DEFINING CHARACTER

CHARACTER IS IDENTIFIED BY THE GROUP OF QUALITIES THAT MAKE IT DISTINCTIVE, INCLUDING THE COLLECTIVE APPEARANCE OF BUILDINGS, STREETS OR LOCAL AREAS AND CAN BE BOTH HISTORIC AND CONTEMPORARY. THIS MAY INCLUDE STREET LAYOUTS, BUILDING FORMS AND POSITIONING, LANDSCAPING, MATERIALS AND ARCHITECTURAL DETAILS.

2.7.1 The built character of an area is not defined by the people who live there, but rather the physical characteristics that it is composed of. Character can change over time and it should be acknowledged that well-designed proposals can have a positive effect on an area. This means that new types of dwelling can be integrated into an existing community.

2.7.2 Development does not need to replicate existing qualities, but should seek to respond to character through one of the approaches outlined in Section 2.8. Development should seek to evolve the character in a manner that enhances the neighbourhoods as enjoyable places to live, work and play in. This can be achieved through pursuing development that references and reinforces existing architectural styles or introduces new well-designed architectural styles that add interest to the area. This does not exclude increased building sizes.

2.7.3 Each of Croydon's 16 Places has a distinct character. Applicants should consider the area they are working in and for more detail on the character of the place refer to

the Borough Character Appraisal²². Some areas within Croydon are defined by the predominance of certain types of homes; the physical characteristics that help to define different types of housing are detailed in the Borough's Character Typology document²³. Physical constraints that can inform the character of an area include, but are not limited to:

- The layout of streets and the relationship of built form to the street and other buildings;
- The predominance and/or design of landscaping along the street and within plots, including hardstanding;
- The layout of plots and how this informs the streetscene, including boundaries and entrances;
- The form of building footprints and the shape of roofs;
- Materials used on buildings, boundaries and hardstanding;
- Size, style and positioning of windows, architectural details & features.

2.7.4 Applicants should undertake contextual analysis that identifies the positive physical characteristics of an area and informs the approach to character for a development proposal as set out in Section 2.8. An example of contextual analysis is provided in Figure 2.7a.

2.7.5 There are many areas within the borough that have predominant physical characteristics; it is expected that through growth in

suburban locations that some of the physical characteristics of these areas will evolve to accommodate the homes we need. Whilst physical characteristics may evolve, the sense of a place that defines its character should be enhanced through development as outlined in Policies DM10.1 – DM10.10 of the Croydon Local Plan. For the Areas of Focused Intensification, greater flexibility in responding to existing character will be allowed to achieve higher densities across the areas as per Policy DM10.11. However, it is expected that developments should still demonstrate a clear approach to character in line with the guidance in Section 2.8 and that collectively developments in these area will contribute to the gradual change in character.

²² A document which identifies and analyses the character of the Places in Croydon. Available at: <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Borough%20Character%20Appraisal.pdf>

²³ A study of the different types of housing in Croydon, based on a range of criteria and characteristics. This document supports the Borough Character Appraisal by giving a typological explanation of housing in Croydon. Available at: https://www.croydon.gov.uk/sites/default/files/articles/downloads/BoroughCharacter_typology_20150921.pdf



Figure 2.7a - Contextual analysis of local character that has informed the appearance of a proposal. This figure demonstrates one possible approach and such analysis should allow for creative responses and does not necessarily require existing forms, materials and details to be replicated. (Images: MATAArchitects)

2.8 APPROACHES TO CHARACTER

2.8.1 Development proposals should identify characteristics of the area and how they have been responded to, in accordance with Policy DM10 of the Croydon Local Plan. Crucially, respond does not mean replicate and allows for interpretation of existing character to create something new that enhances the area and its character. In developing an approach to character, applicants should refer to Section 2.7 of this guide to help identify the existing character.

2.8.2 The following three (3) broad approaches to how to respond to local character in the design of new development have been identified. Applicants should seek to follow one of the approaches below and will be expected to justify why the particular approach that they take has been employed, and how it is manifested in the design of the proposal.

INNOVATIVE AND ORIGINAL

2.8.3 Schemes should use unique solutions that respond to the context of the site through contemporary use of form, materiality and detailing. This may be different from the predominant local character, but must respect existing character and not create any negative impacts on it, and will only be acceptable where there is a demonstration of high-quality design in the proposal. As per the NPPF, *innovation, originality or initiative through unsubstantiated requirements to confirm to certain development forms or styles should not be stifled*. Areas of an inconsistent character can present a compelling opportunity to pursue an innovative and original approach, as unique additions to such an area may positively evolve its character. However, this does not limit the innovative and original approach to areas with inconsistent character.



Figure 2.8a: Eagle Hill - example of an Innovative and Original approach designed by Coffey Architects. Use of contemporary form and materials carefully arranged on a back land site (formerly occupied by garages) to create a visual connection with the street. The form is designed to allow residents to look onto their own courtyards rather than out to neighbouring gardens, making use of the sloping site to maximise the delivery of units. Refer section 2.42 for more details on this case study.

CONTEMPORARY REINTERPRETATION

2.8.4 Schemes could seek to create a development that reads as contemporary whilst working with traditional character forms and/or features and materials predominant in an area. When pursuing a contemporary reinterpretation approach, it is often possible to successfully integrate contemporary details into traditional forms or traditional detailing into contemporary forms. Contemporary reinterpretation should not allow for the poor marrying of architectural styles, or poorly applied features or pastiche.



Figure 2.8b: Coombe Road - an example of a Contemporary Reinterpretation approach designed by Common Ground Architects. The massing and materials of the proposal refer to the surrounding buildings, but distinguishes itself through the folded form of the roof and contemporary detailing. The proposal delivers several new homes across two buildings.

SYMPATHETIC AND FAITHFUL

2.8.5 Schemes should closely relate to the existing surrounding typologies by pursuing a similar form, style, materials and detailing. Proposals which adopt this approach and create poor-quality copies of the characteristic architecture of an area will not be acceptable. It can be challenging to be sympathetic and faithful where a proposal departs from the predominant density or scale of buildings in the area.



Figure 2.8c: Oval Mews - an example of a Sympathetic and Faithful approach in this development by Chartwell Land & New Homes. Attention to detail in the selection of materials, choice of windows and proportions of the proposal. The new development delivers several new homes; refer section 2.44 for more details on this case study.

MASSING

2.9 RELATIONSHIP BETWEEN BUILDINGS

ACCESS TO DAYLIGHT & SUNLIGHT

2.9.1 When considering the relationship with other built form, whether proposed or existing, applicants should ensure adequate daylight and sunlight that is appropriate for future residents, and that there is not unreasonable loss of light for neighbours.

2.9.2 The scale of development covered by this guide will not usually require daylight and sunlight testing, however applicants are advised to consult the BRE guidance²⁴ on good practice for access to natural light. Where this guidance would inhibit the efficient use of a site, there may be flexibility in the application of these standards. This will only be applicable to constrained sites and may not be used to justify substandard design of proposals. Flexibility in the application of BRE standards will only be acceptable where a proposal has a compelling design that mitigates daylight and sunlight issues.

2.9.3 Where there is concern that the orientation of the proposal and proximity to neighbouring buildings will limit access to natural light within the proposed and/or neighbouring dwellings, proposals will be required to

²⁴ Guidance is available via the 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2011).

provide a daylight and sunlight analysis study²⁵. Such studies will not normally be required where a neighbour's window directly faces onto or over an application site in a manner that is considered to be un-neighbourly. These un-neighbourly windows place undue restraints on the development, and as such the light and outlook they receive will not receive significant protection.

2.9.4 New dwellings should maximise access to daylight and sunlight, including consideration for:

- a. Avoiding creating single aspect dwellings, particularly if north-facing.
- b. Orientation and layout of proposals to allow a minimum of one room in every dwelling to receive direct sunlight at some point within the day.
- c. Well-positioned windows in relation to neighbouring built form.
- d. Well-positioned windows in relation to room layout.
- e. Well-considered room layouts that are not overly deep or awkwardly shaped that limit the opportunity for access to natural light.
- f. Dual aspect rooms with windows on two (2) external walls to allow light from different angles and greater opportunity for direct sunlight,

²⁵ Tests required for a daylight and sunlight analysis study are set out in the Building Research Establishment (BRE) document 'Site Layout Planning for Daylight and Sunlight: A guide to good practice' (2011).

particularly where rooms are north facing.

- g. Large areas of glazing that maximise light, generally with a window to floor ratio of no less than 15%. Where glazing is within 60° of due south, consideration should be given to heat gain from sunlight as a result of large areas of glazing.
- h. The use of courtyard arrangements in constrained sites which can provide outlook and access to light.
- i. The use of rooflights. When located on a flat roof, not allowing a view out, they should be used to supplement another window or skylight that allow some form of outlook.

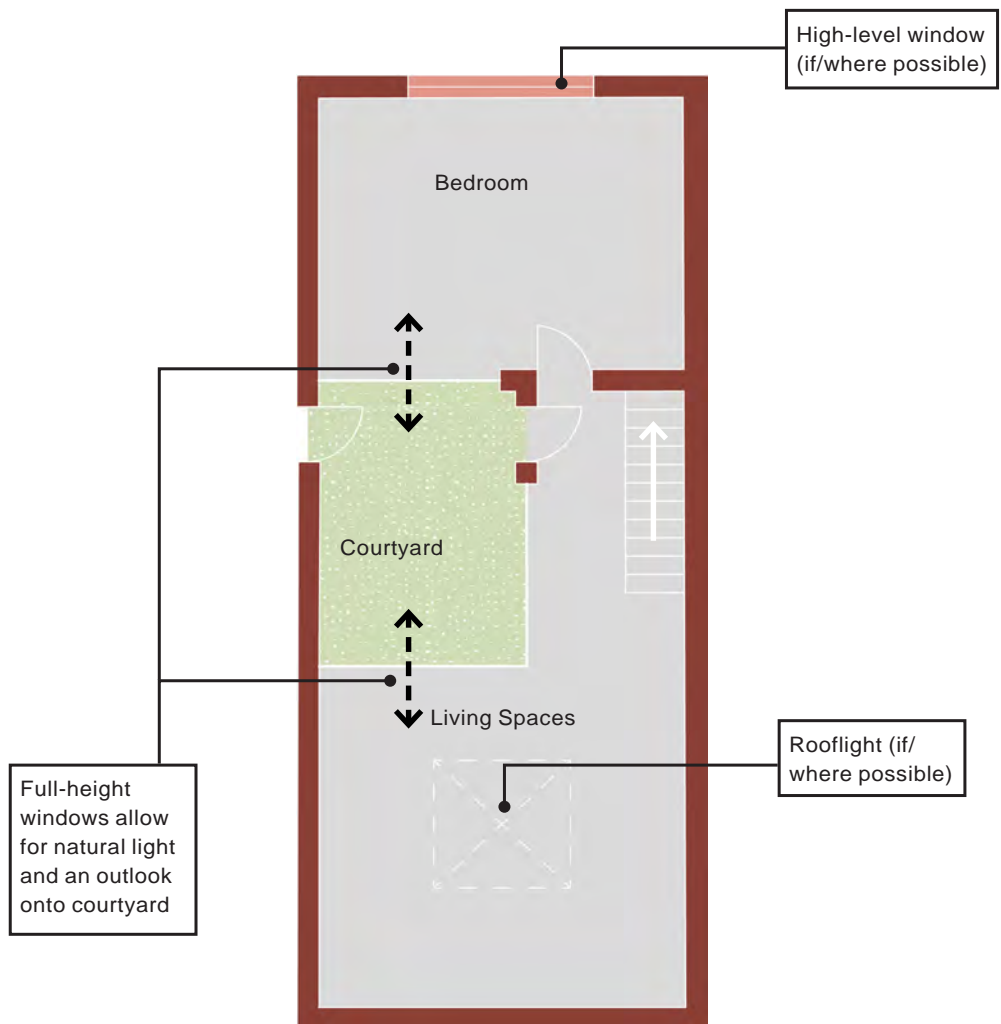


Figure 2.9a: Diagram illustrating solutions to access natural light on a constrained site that limits externally facing windows.



Figure 2.9b: The interior of a house designed by Dallas–Pierce–Quintero on an infill/backland site that uses rooflights and a courtyard to provide dual aspect rooms with access to natural light on a constrained site. (Photo: Tom Gildon)

FRONT TO FRONT DISTANCES

2.9.5 A front to front separation is considered to be the distance between the front elevation of two properties. The front is typically identified as the elevation that faces a public highway or shared access route.

2.9.6 The relationship between the front elevation of a proposal and a neighbouring property (whether the neighbouring property is existing or part of the same development) should be determined by the following factors:

- Design of the streetscene (the look and feel of the place, informed by scale, form and material treatment); and
- Access to daylight & sunlight.

2.9.7 In suburban locations, the separation distance between front elevations should generally be no smaller than the height of the developments that are facing each other. For example, where a 6m high front elevation faces another front elevation, there should be a separation of at least 6m (Refer to Figures 2.9c and 2.9d)

2.9.8 Where sites are constrained, such as back lands and rear gardens, and such separation distances are difficult to achieve, the massing of a proposal should be stepped backwards and forwards so that these distances can be achieved at intervals, with tighter areas in between.

2.9.9 Where there is a concern that a development would appear overbearing to a neighbouring property across the street and/or create a poorly designed streetscene, they will not be supported. This will be judged on a case by case basis in light of this guidance and Policy DM10 of the Croydon Local Plan.



Figure 2.9c: A new suburban street where separation between front elevations is equal to the height of the elevations facing the street.



Figure 2.9d: A mews street where separation between front elevations is equal to the height of the elevations facing the street.

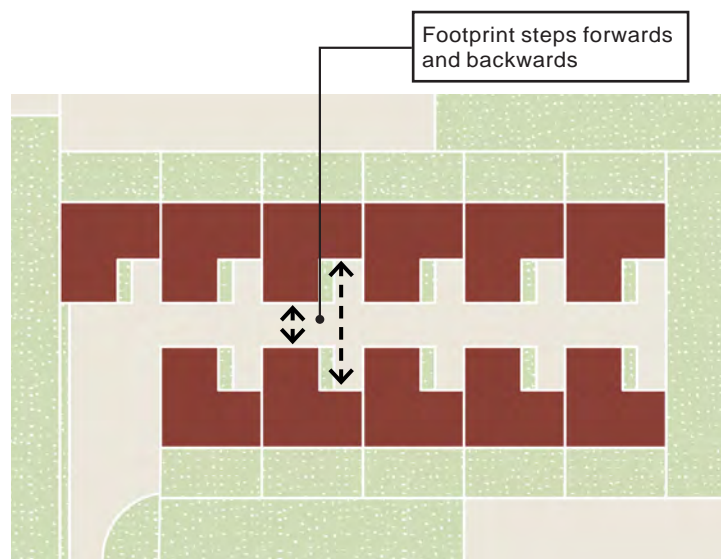


Figure 2.9e: Stepping of massing to achieve acceptable front to front separation distances at intervals, as per guidance Paragraph 2.9.8.

BACK TO BACK DISTANCES

2.9.10 The relationship between the rear elevations of a proposal and existing or other new developments is primarily concerned with maintaining privacy. Whilst the design of suburban streets typically limits direct overlooking through separation distances, an amount of overlooking is a fact of living in the suburbs and can be beneficial in providing natural surveillance. It is inevitable that development and the evolution of the suburbs will result in an increase in overlooking as well as impact on outlook from neighbouring properties, however careful design can help to mitigate this.

2.9.11 Back to back distances between habitable rooms should be managed through acceptable distances as described in Figure 2.9d which should provide sufficient privacy to existing and new residents.

2.9.12 Direct overlooking into circulation spaces, such as entrance halls and stair wells, utility rooms and bathrooms is usually acceptable. Bathroom windows should be obscure glazed or screened for privacy.

2.9.13 Separation distance from a balcony should be the same as the distances in Figure 2.9d. This should be measured from the edge of the balcony.

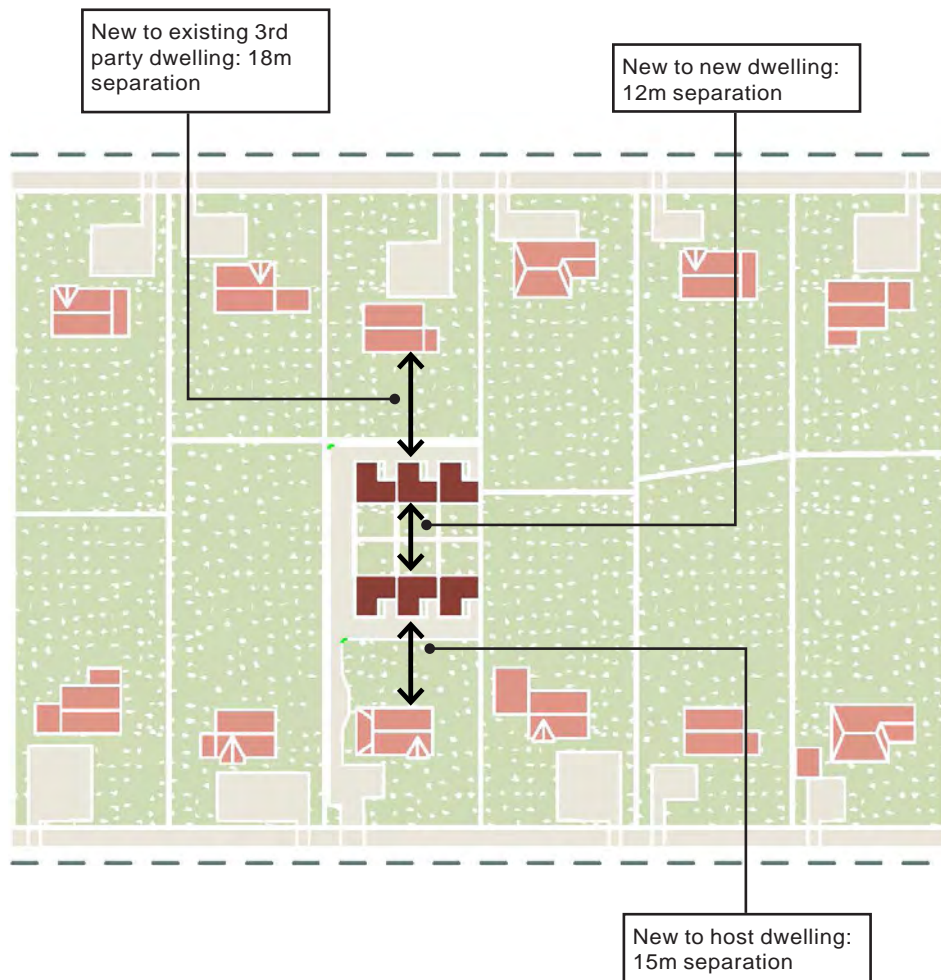


Figure 2.9f: Overlooking distances concerning solely new development reflects the establishment of a new condition associated with new residences, rather than a loss of existing amenity through a new development

OBLIQUE OVERLOOKING, ORIENTATION & SCREENING

2.9.14 The massing of a proposal, including the orientation of the facade, can minimise issues of overlooking between rear elevations.

2.9.15 Windows on rear elevations that do not directly face each other, i.e. are at angles to one another and would provide oblique or obscured views, are not considered to result in direct overlooking. As such separation distances may be reduced. The acceptability of this will be assessed on a case by case basis.

2.9.16 Examples for orientation to minimize overlooking include:

- Developing a built form, such as courtyard or stepping footprint that allows the development to be inward looking.
- Developing a built form that directs views away from neighbouring dwellings.

2.9.17 Where acceptable separation distances cannot be achieved due to site constraints, devices may be used to mitigate direct overlooking as per the following and Figure 2.9g:

- External panels, perforated screens, louvres, frosting and other methods used to obscure views will be acceptable where there are no alternative solution (such as massing and orientation). Screening in these forms must be integrated with the building design and will not be acceptable where it appears to add clutter and conflicts with the appearance of the proposal.
- Projecting, oriel or angled windows that direct views will only be acceptable where they are part of a compelling design proposal and should generally provide an area of glazing that allows sufficient natural light.

- Where required, the staggering of windows to allow only oblique views between habitable rooms may be acceptable.
- Landscaping treatments often provide attractive methods for resolving overlooking without the need for architectural devices and will be considered on a case by case basis. This could include the planting of mature trees and hedges as part of a new proposal. Where such planting would not impact the neighbouring amenity and there is consideration for future maintenance, this approach may be encouraged.

2.9.18 The acceptability of the use of any of these devices to overcome issues of overlooking and insufficient separation distances will be judged on a case by case basis. This will include consideration for an overbearing appearance, quality of design and unreasonable loss of natural light to neighbouring properties.

2.9.19 Where projecting balconies are provided, there can be a need to screen the sides of balconies. This can be achieved through the following methods:

- Perforated screens or louvres. They will only be acceptable where there is a high level of investment in their design so that they are integrated within the language and materiality of the proposal. Where they appear to add clutter or dissonate with the design of the building they will not be acceptable.
- Hit and miss brickwork or stone that responds to the language and materiality of the proposal.
- The colour and appearance of frosted glazing is uncharacteristic of the suburbs and will generally not be acceptable unless it is part of a compelling design proposal.

OVERLOOKING PRIVATE OUTDOOR AMENITY SPACES

2.9.20 In certain circumstances in the borough where overlooking to a neighbouring garden is not present, this may be introduced as development occurs. While a greater level of protection will be afforded to the first 10m of a neighbouring garden (in line with Policy DM10.6 of the Croydon Local Plan), the remainder of the garden may be overlooked from neighbouring developments provided it does not prejudice development.

2.9.21 In most circumstances, the back to back distances provided in paragraph 2.9.11 are considered to provide significant separation to ensure the first 10m of garden in a third party or host dwelling are protected from direct overlooking where the rear of properties face each other.

2.9.22 Where a development may result in overlooking to the first 10m of a neighboring garden, the design should be such that only obscured, diagonal or oblique views are possible which would not be considered to be direct overlooking. This may require the introduction of architectural devices as described in paragraph 2.9.17.

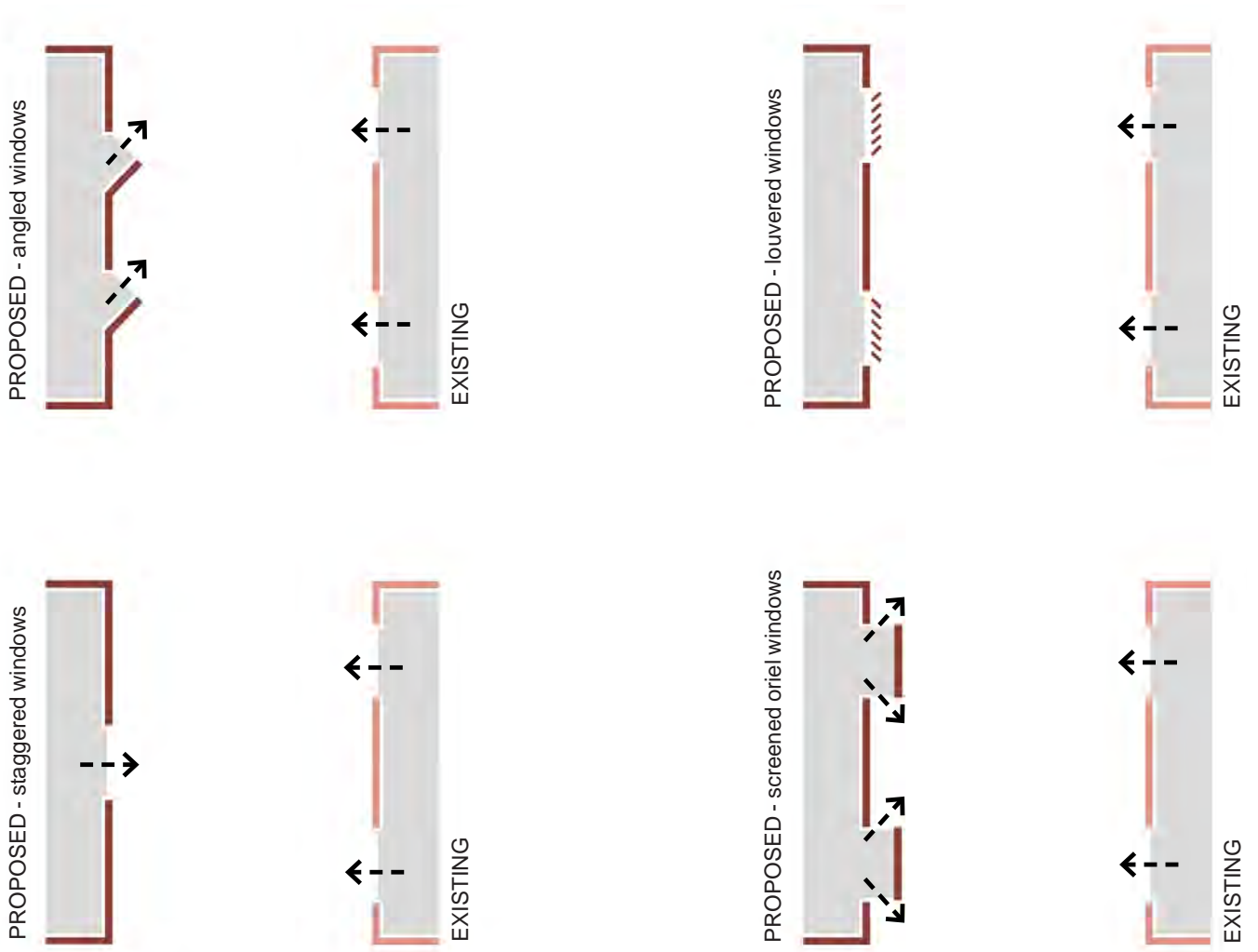


Figure 2.9g: Methods for resolving overlooking where necessitated by reduced separation distances.



Figure 2.9h: A development of two houses in a back land that is orientated around a triangular courtyard between the new houses. The design by vPPR Architects provides a form that responds to the site constraints and windows looking into an outdoor amenity space between the new houses, avoiding overlooking to neighbouring properties.

2.10 HEIGHTS OF DEVELOPMENTS FACING ONTO THE STREET

2.10.1 The Croydon Local Plan states that buildings across the borough should generally be of at least three (3) storeys. Three (3) storeys may be accommodated by employing the following methods based on the context outlined in Figures 2.10c, 2.10d, 2.10e and 2.10f. Such changes in height along a street already occur across the borough, and as such developments do not necessarily need to step down in height towards neighbouring buildings of a lesser height.

2.10.2 DM10.1 of the Croydon Local Plan recommends a minimum of 3 storeys, as such where suburban contexts allow for additional accommodation in a roof space or basement these should be afforded as follows:

- Where a design includes a roof space in addition to three full floors, it is then possible that this space is used for accommodation; this may be within the eaves or in set-back roof form.
- Where a basement is partially concealed and not fully visible from the street, there is scope for accommodation on an additional lower level as this will not be read as full storey in the streetscene.



Figure 2.10a: A development of 3 storeys containing flats sits next to a bungalow and does not appear overbearing.



Figure 2.10b: A change in height along a suburban street adds to the character and feel of the area.



Figure 2.10c: Where surrounding buildings are predominantly detached dwellings of two (2) or more storeys, new developments may be three (3) storeys with an additional floor contained within the roof space or set back from the building envelope below.



Figure 2.10d: Where surrounding buildings are predominantly single storey, new development should seek to accommodate a third storey within the roof space.



Figure 2.10e: Where surrounding buildings are semi-detached homes in a planned estate, new developments should seek to accommodate a full third storey partially contained within the roof space to ensure the characteristic scale of the buildings along the street is maintained.



Figure 2.10f: The addition of a third storey within terraced houses will only generally only be through accommodation within the roof. The acceptability of this will be based on the merit of design and the impact on street scene, given the consistent nature of continuous eaves and roof heights. A terraced house on a corner plot may seek to provide a full additional storey.

2.11 FORM OF PROJECTIONS EXTENDING BEYOND REAR BUILDING LINES

2.11.1 Where a development projects beyond a rear building line, the height and footprint of the projection does not necessarily need to be lower or narrower, provided the guidance on relationship to boundaries (Refer to Section 2.16) and overlooking (Refer to Section 2.9) is followed. It should be demonstrated that there would be no unreasonable impact on neighbouring amenity. Where it is necessary to mitigate impact on neighbouring amenity, the projection beyond the rear building line may need to step down in height and width, to meet

the guidance below:

- It follows the 45 degrees rule demonstrated in Figure 2.11b and 2.11c. In exceptional circumstances, where orientation, topography, landscaping and neighbouring land uses allow, there may be scope for a depth beyond 45 degrees.
- The flank wall is designed to minimise visual intrusion where visible from neighbouring properties.

2.11.2 Applicants should also refer to the guidance on Daylight and Sunlight (Refer to Section 2.9), where there would be unreasonable impact on neighbouring access to natural light, the depth of a projection beyond the rear building line

should be reduced. The design of a flank wall visible from neighbouring properties should be carefully designed to minimise visual intrusion.

2.11.3 Where stepping the height and width of a building, care should be taken as a stepping form can dilute the massing and architectural merit of a proposal. This in itself may draw more attention to the proposal through complicating form. Where stepping would overly complicate the form and create more visual intrusion on neighbouring amenity as demonstrated in Proposal 3 on pages 44 - 45, no stepping should be introduced and an overall smaller footprint that does not require stepping may need to be provided.



Figure 2.11a: A proposal designed by MATA Architects that steps in from the boundary and down in height where it extends beyond the rear of the neighbouring properties.

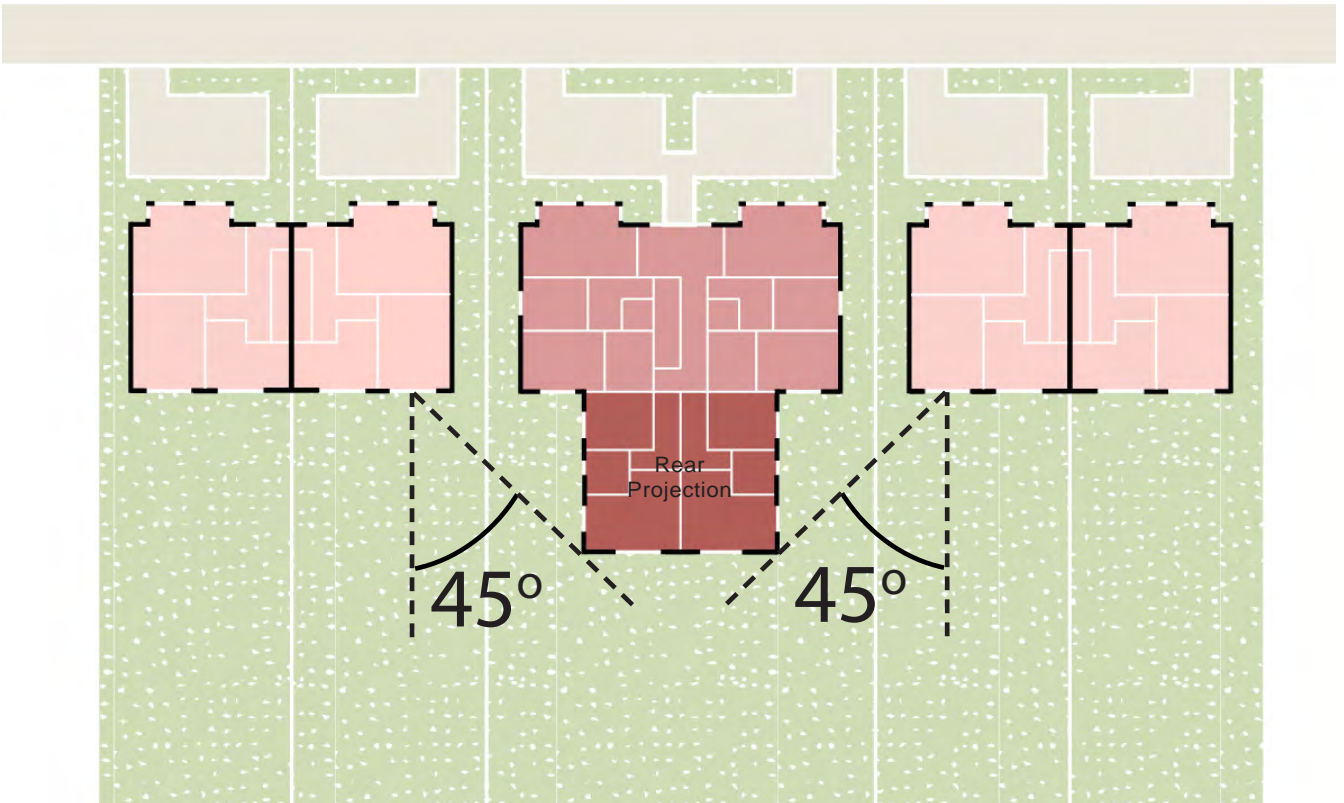


Figure 2.11b: Depth of projection no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

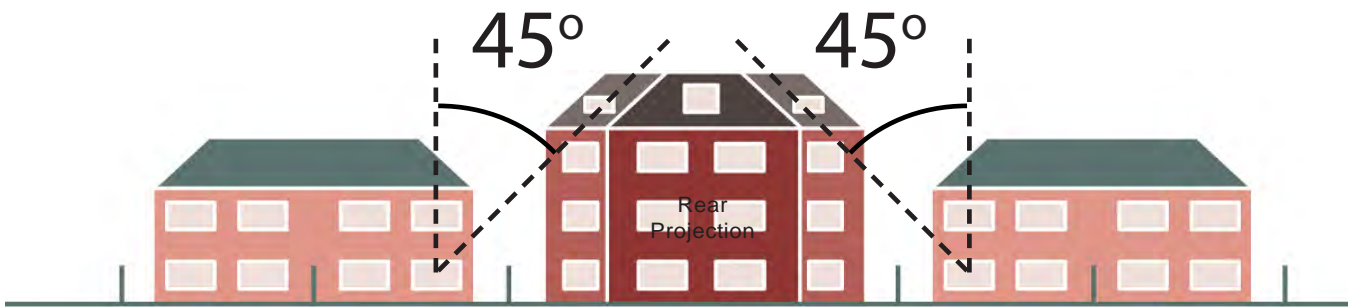


Figure 2.11c: Height of projection beyond the rear of neighbouring properties is no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

APPLYING 45° RULE & ASSESMENT OF POTENTIAL BUILT FORM

Existing:



Figure 2.11d: Existing plan view



Figure 2.11e: Existing outlook from neighbour's kitchen window

Proposal 1 - Acceptable

Simple architectural form that meets 45° rule (Refer to guidance 2.11).



Figure 2.11h: Proposal 1 plan view



Figure 2.11i: Apparent depth of Proposal 1 limited by 45° rule.

Proposal 2 - Acceptable

Simple architectural form that meets 45° rule (Refer to guidance 2.11) with stepped footprint to provide additional floorspace.



Figure 2.11l: Proposal 2 plan view



Figure 2.11m: Apparent depth of Proposal 2 limited by 45° rule.

Proposal 3 - Unacceptable

Incoherent form that meets 45° rule (Refer to guidance 2.11) but results in a complicated appearance which lacks design merit.



Figure 2.11p: Proposal 3 plan view



Figure 2.11q: Apparent depth of Proposal 3 limited by 45° rule.

Note: Figures 2.11i, m & q - impact is controlled by the 45° rule which dictates that a proposal appears at a similar depth when viewed from the neighbour's kitchen window regardless of form.

Note: Figures 2.11j, n & r - impact from the neighbouring garden varies depending on the form of the proposal.



Figure 2.11f: Existing view from neighbour's garden



Figure 2.11g: Existing aerial view



Figure 2.11j: Architecturally coherent appearance of Proposal 1 when viewed from neighbour's garden.



Figure 2.11k: Aerial view for Proposal 1 demonstrating a coherent form.



Figure 2.11n: Architecturally coherent appearance of Proposal 2 when viewed from neighbour's garden.



Figure 2.11o: Aerial view for Proposal 2 demonstrating a coherent form.



Figure 2.11r: Architecturally incoherent appearance of Proposal 3 when viewed from neighbour's garden.



Figure 2.11s: Aerial view for Proposal 3 demonstrating an incoherent form.

2.12 FORM OF DEVELOPMENTS IN REAR GARDEN SITES

2.12.1 Where a development is proposed within a rear garden, including redevelopment of a garage to the rear of a property, it should be subservient to accord with Policy DM10.1 of the Croydon Local Plan. Subservience can be achieved through proposals of either a lower height or articulated massing dependant on the context and as follows:

- i. If any part of the proposed development would be within 18m of the rear wall of any neighbouring dwelling, the proposal should be of a lower height. This may be best achieved by being 1 storey lower than the neighbouring dwelling, however accommodation may be provided within roofspace (Refer to Figure 2.12a).
- ii. Where no part of the proposed development would be within 18m of the rear wall of the host or any neighbouring dwelling, the proposal may be of the same number of storeys of the predominant building height in the area (Refer to Figure 2.12b) provided the footprint and/or articulated form helps achieve a massing that appears subservient to the existing dwellings.

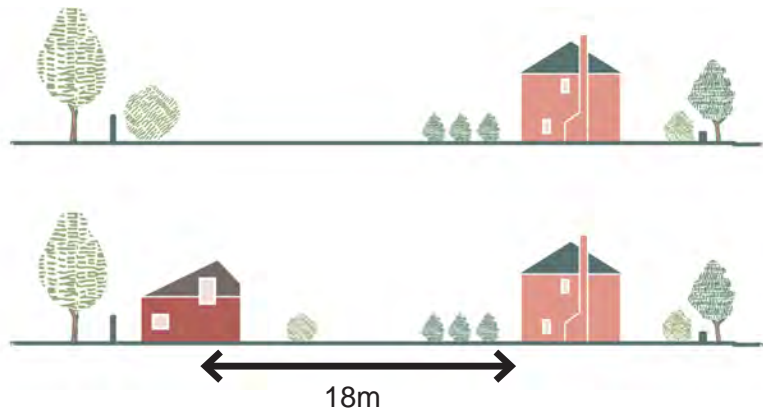


Figure 2.12a: Height of rear garden development is lower than the neighbouring dwelling where any part of the development is within 18m of the rear wall of the neighbouring property, however accommodation is provided in the roof space.

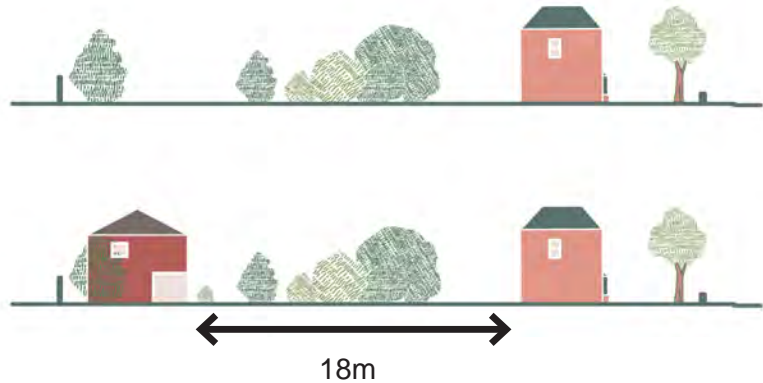


Figure 2.12b: Height of rear garden development may be equivalent to that of the neighbouring property where no part of the development is within 18m of the rear wall of the neighbouring property.



Figure 2.12c: A rear garden development that is within 18m of another dwelling that has a height that is subservient to the surrounding dwellings.

2.13 FORM OF DEVELOPMENTS ON BACK LAND SITES (INCLUDING BLOCKS OF GARAGES)

2.13.1 Back land sites and blocks of garages tend to be of a size to accommodate developments of a larger scale. The height of back land development should generally be no greater than the predominant surrounding buildings. If the development introduces a bigger built form to achieve 3 storeys as per Policy DM10.1 of the Croydon Local Plan, it can be advisable to step the height and/or footprint such that the proposal respects the scale, height, massing and density of the context in line with Policy DM10.1c. Stepping the height and/or footprint of a proposal can help to retain a sense of openness when viewed from neighbouring properties (Refer to Figure 2.13a and 2.13b).

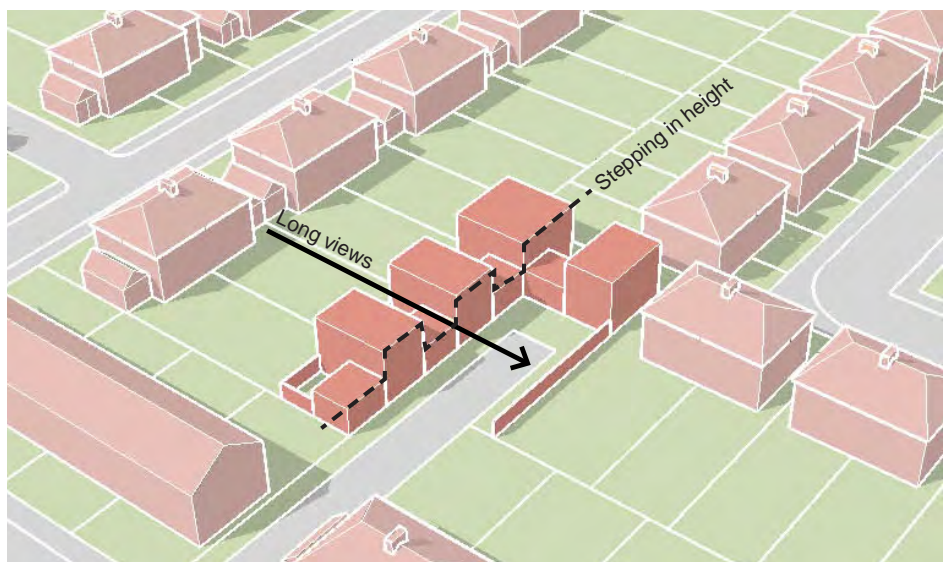


Figure 2.13a: Proposal for a back land site - height stepped to maintain sense of openness in neighbouring gardens and within the development itself.



Figure 2.13b: Visual of a proposal for a back land by Coffey Architects where the height has been stepped to maintain sense of openness



Figure 2.13c: A Brick by Brick proposal for a back land development designed by Stitch Studio. The proposal varies in height to respond to the context. Refer to guidance 2.13.



Figure 2.13d: A development of flats that faces onto the Croham Road is 4 storeys tall, with 1 floor contained with the roof. The development is formed of blocks that refer to the scale of dwellings along the street with recessed linking elements. Refer to guidance 2.10 and 2.15.

2.14 FORM OF DEVELOPMENTS ON CORNER PLOTS

2.14.1 By working with the dual aspect and prominent townscape position, proposals for the development of corner plots should seek to accommodate additional height and depth as marker points within the townscape.

2.14.2 Redevelopment of corner plots to provide new dwellings, including extensions or conversions:

- Should seek to include an (1) additional storey to the 3 storeys recommended in the Croydon Local Plan Policy DM10.1. Some corner plots may be able to accommodate further height provided the massing is responsive to neighbouring properties.
- May extend beyond the neighbouring rear elevations to a greater amount than set out in guidance in Section 2.11 where it would enhance the definition of a suburban block and contribute positively to the townscape. This will be judged on a case by case basis and balanced against any unreasonable impact on neighbouring amenity.
- Should respond to the positioning of neighbouring front elevations, which may require stepping in footprint to maximise development potential of a corner plot.
- Should ensure that where driveways and vehicle access points join the public highway that they meet minimum distance thresholds from junctions and allow for safe sightlines.

2.14.3 Whilst this allows for larger development, such proposals would still need to conform with relevant policy and guidance with regards to the amenity of neighbours and future residents, such as overlooking and provision of outdoor amenity spaces.



Figure 2.14a Additional height on corner plot

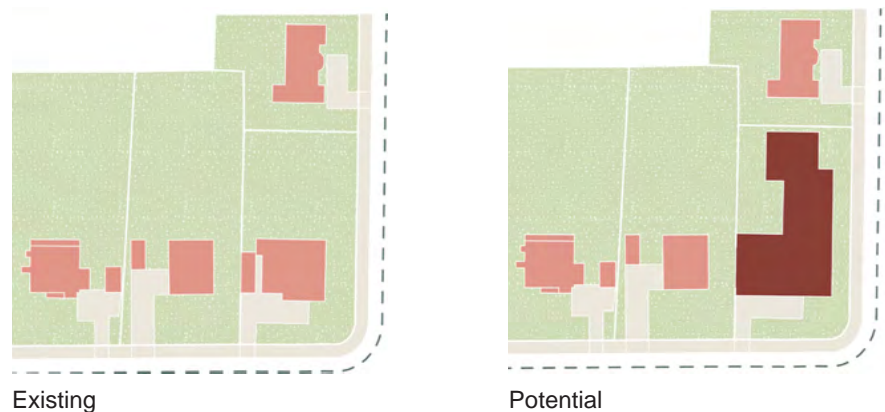


Figure 2.14b: Additional depth on corner plot with stepping of building footprint on a corner plot, responding to the position of neighbouring front elevations.

2.15 BUILDING ACROSS BOUNDARIES

2.15.1 Where neighbouring plots are redeveloped in conjunction, the form of the building may span the side boundary providing that the design responds to the gap in built form that historically existed across the boundary as drawn in Figure 2.15a. This is particularly important in areas where there is a consistent rhythm to the existing plot widths that contributes to the character of the area.

2.15.2 Proposals which span plot boundaries may seek to achieve this through:

- a. Stepping form to create a link element between two main building forms located on each of the original plots. (Care should be taken with the height of the roof form so that it does not appear awkward in the streetscene); and/or
- b. Use of fenestration and material treatment to differentiate the mass that spans the boundary from the mass either side.

A built example of the above is provided in Figure 2.13d.

2.15.3 Consideration should also be given to the landscape design of the forecourt as this can also impact how the relationship between built form and boundaries is read. Proposals which span plot boundaries should:

- a. Use landscaping to reference the former boundaries between plots, creating semi-separated areas of gardens and parking; and
- b. Ensure the design of the front boundary respects the original access points and rhythm of divisions along the street, wherever possible.

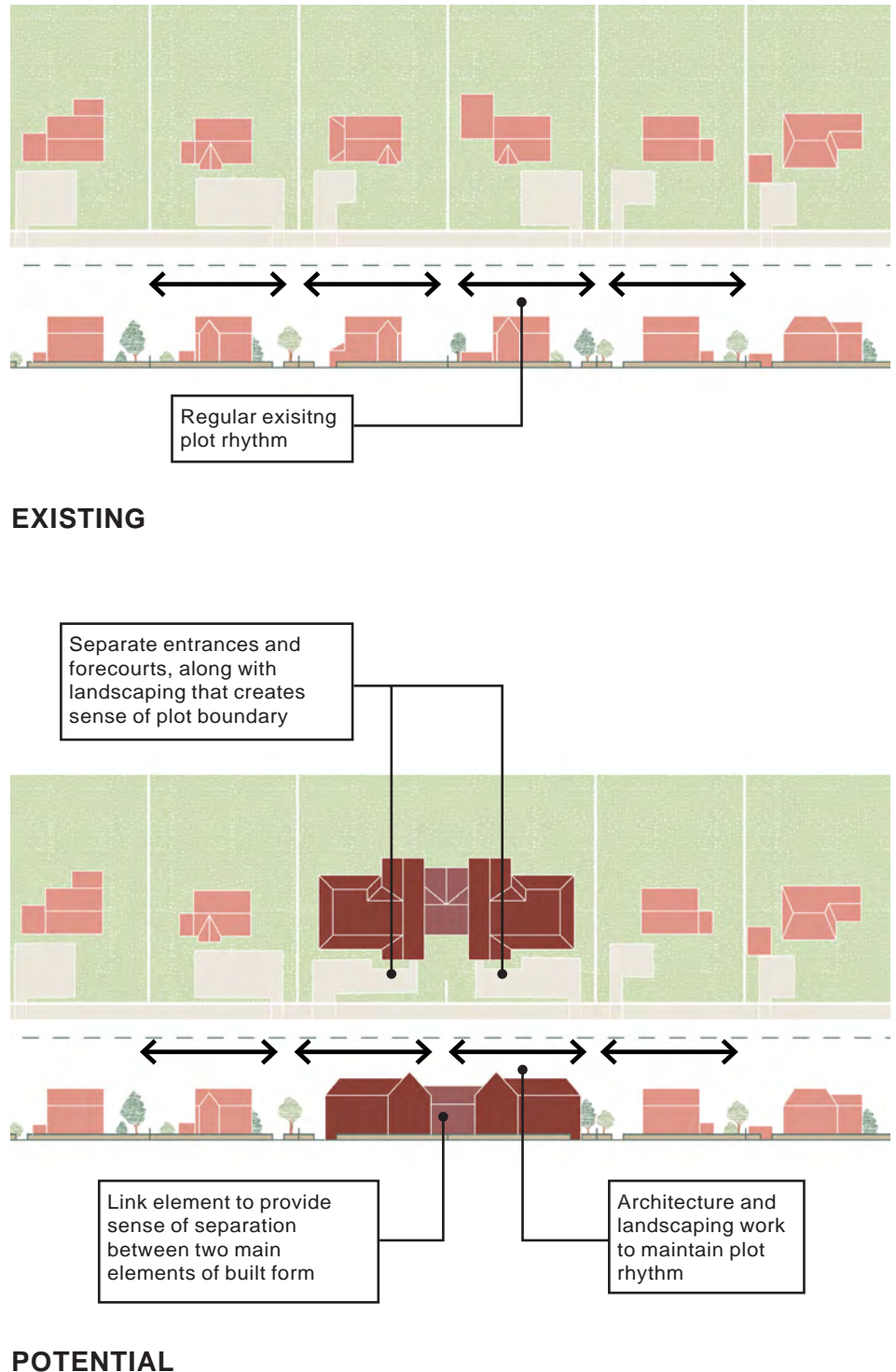


Figure 2.15a: Maintaining sense of original development pattern through massing and site layout.

2.16 RELATIONSHIP TO BOUNDARIES IN EXISTING STREETS

2.16.1 Where development faces onto an *existing* street, the position of buildings and the space between houses creates part of the suburban feel. This can include:

- The width of the plot perceived from the street;
- The frequency of driveways that access onto the street;
- The views afforded by gaps between properties; and
- How far properties are set back from the pavement.

2.16.2 Developments that face onto an existing street that seek to build closer to the boundary with neighbouring plots must demonstrate consideration to the impact on neighbouring amenity as well as the rhythm of development along the street.

2.16.3 Separation distances, where there are no habitable room windows on the side elevations of the neighbouring or proposed development, should be no smaller than 1m, to allow for access to the rear of a property. Where existing development is built closer to the boundary, a proposal may seek to build to the same line as the existing.

2.16.4 Where a street is characterised by greater separation distances and

development up to 1m of the boundary would impact the streetscene, a greater separation will be required. This should generally be landscaped. Similarly where a street is characterised by smaller separation distances to boundaries, a smaller gap may be provided.

2.16.5 When considering internal layouts, outlook and issues of overlooking, with regards to proximity to a boundary, it is important to consider how neighbouring buildings may be developed in a similar manner in the future. Where there are habitable rooms facing to the side boundary, walls should be offset from the boundary to a distances that ensures sufficient access to daylight & sunlight (Refer to Section 2.9 for guidance).

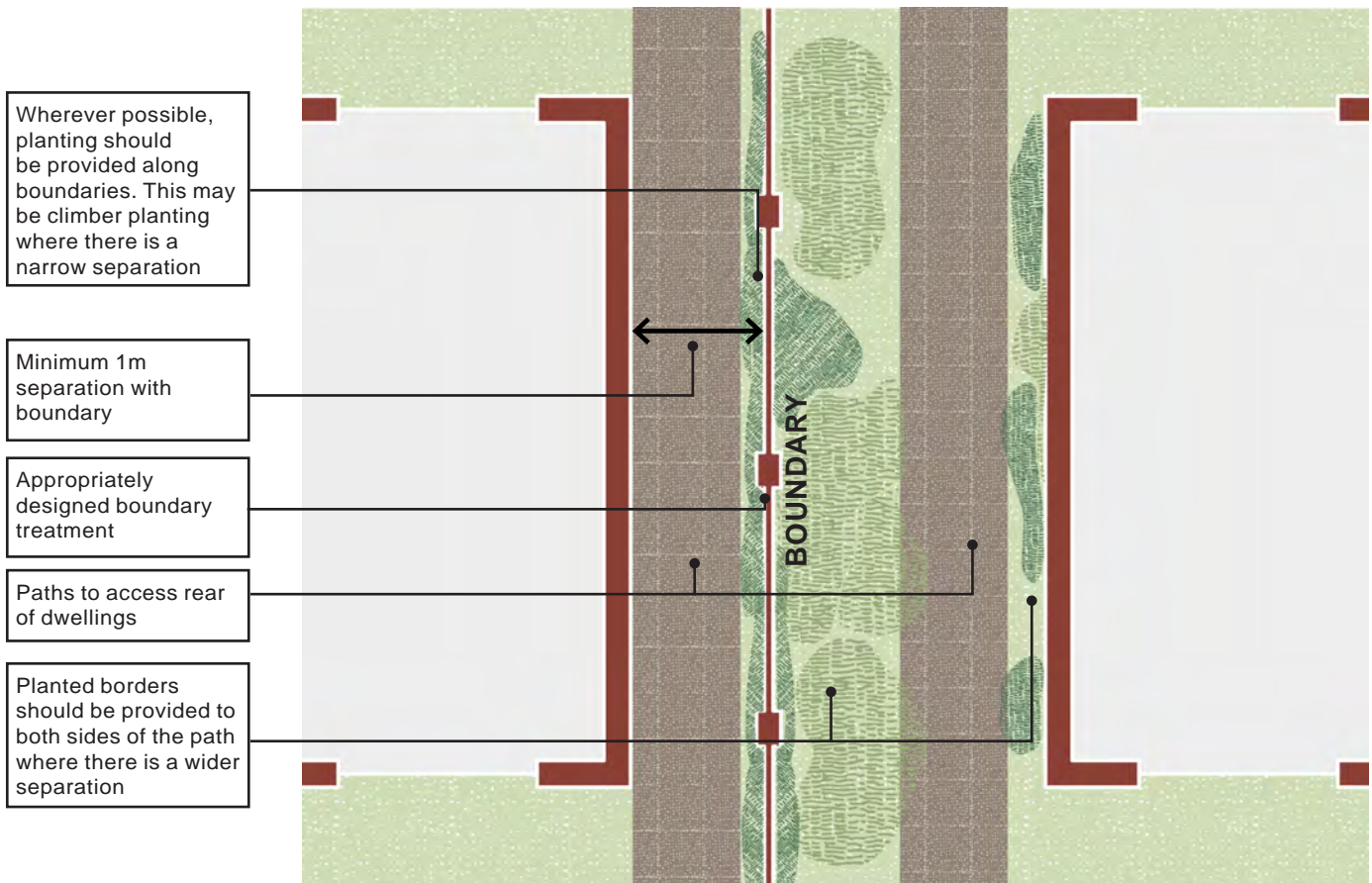


Figure 2.16a: Relationship with boundary.

2.17 FRONT ELEVATIONS – POSITIONING & WIDTHS

2.17.1 Proposals should consider the position of the front elevation of the proposal in relation to neighbouring properties and the streetscene to ensure that:

- a. Where there is a consistent front building line, any development should align with this unless it can be demonstrated it would positively enhance the character of the street; or
- b. Where there is an inconsistent front building line, the front elevation of a development may step forward or back provided it does not negatively impact the street scene. This may be needed to accommodate larger amenity spaces to the rear or increased parking provision to the front of a property.

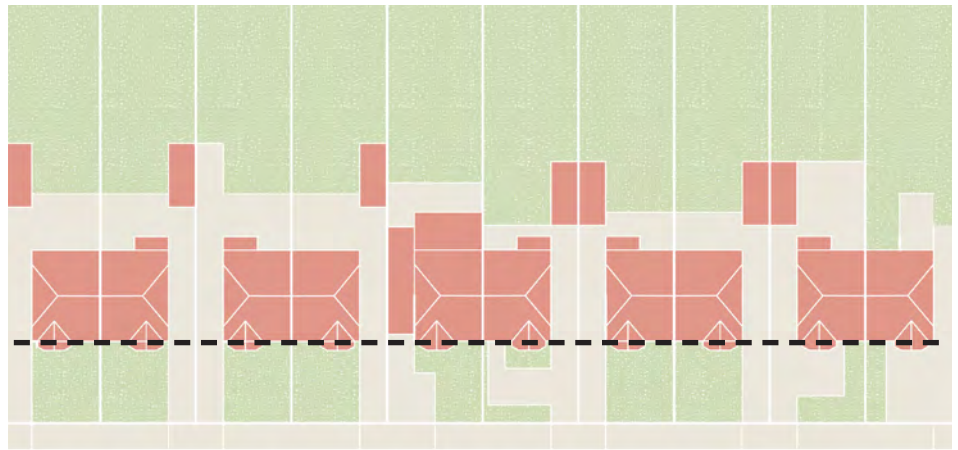


Figure 2.17a: A consistent building line facing the street

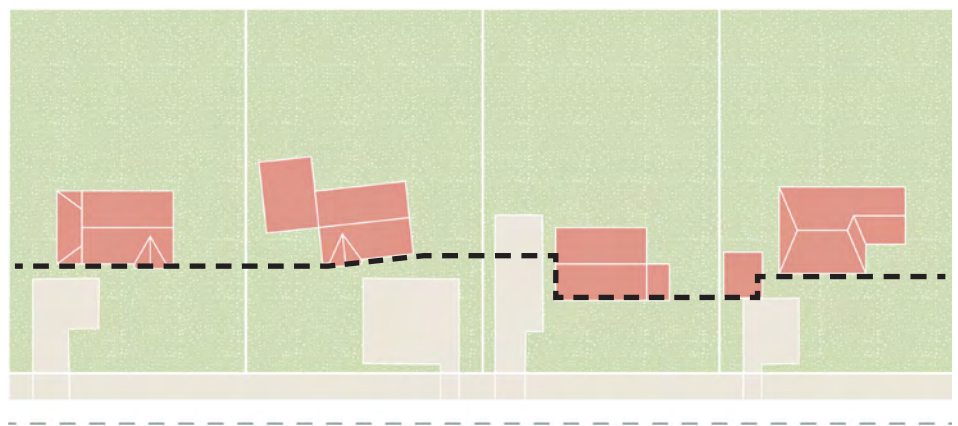


Figure 2.17b: An inconsistent building line facing the street

2.17.2 The width of a proposal should be determined by the appearance within the streetscene and proposed proportions and fenestration of the front elevation. The maximum width of a development should also be guided by the proposal's relationship to the plot boundary (Refer to Section 2.16 for guidance) and impacts on daylight & sunlight (Refer to Section 2.9 for guidance).

2.17.3 Fenestration and material treatment can be used to add interest to elevations and resolve proposals that would otherwise appear overly wide or narrow in the streetscene.



Figure 2.17c: A wide development which has successfully dealt with its width through proportions and fenestration



Figure 2.17d: A development which appears wide and squat as a result of poorly considered proportions and fenestration

2.18 POSITIONING OF DEVELOPMENT IN REAR GARDEN AND BACK LAND SITES

2.18.1 Due to varying plot sizes across the borough, it will often be desirable for developments in rear gardens and back land sites to build along or in close proximity to boundaries and existing buildings to maximise development opportunity. However, it is important that new developments are sited so as to minimise their impacts on the residential amenities of neighbouring properties.

2.18.2 Development in rear gardens, garage and back land sites should be positioned so that:

- If within a rear garden, the footprint of the proposal conforms with Policy DM10.4(e) of the Croydon Local Plan. The policy seeks a minimum retention of 10m length and no less than half or 200m² (whichever is the smaller) of the existing garden area to be retained for the host property. This is primarily to provide sufficient outlook and amenity to existing dwellings, but also provides additional benefits of maintaining a sense of openness within gardens.
- Proposed buildings along boundaries may be thoughtfully designed to ensure there is no unreasonable loss of sense of openness or overbearing to neighbouring properties. Developments that propose to build along boundaries must demonstrate:

1. That the appearance of the wall, as viewed from neighbouring properties,

2. How rainwater goods will be contained within the curtilage of their plot.
- All guidance on overlooking (Refer to Section 2.9) and form (Refer to Sections 2.12 or 2.13) have been adhered to.

2.18.3 All developments on rear garden, garage and back land sites should demonstrate how the proposal would not prejudice similar development on neighbouring sites in the future.



Figure 2.18a: A rear-garden house designed by Dallas–Pierce–Quintero that builds along the boundary wall. (Photo: David Butler)



Figure 2.18b: Existing - view from neighbour's kitchen window without rear garden development.



Figure 2.18c: Existing - aerial view of plots without rear garden development.



Figure 2.18d: Potential - aerial view with rear garden development in one of the plots.



Figure 2.18e: Potential - view from neighbour's kitchen window with a rear garden development built along the boundary. No windows face onto neighbouring garden and proposal drops down towards boundary, to minimise loss of amenity and ensure development potential of neighbouring garden.



Figure 2.19a: A street facing development of family homes on Purley Downs Road. The development provides accommodation within a mansard roof.

2.19 ROOF FORMS

2.19.1 Roof forms should be proportionate to the mass of the associated building and should respond to the design of the proposal. Whilst pitched roofs are commonly associated with suburbia, flat roofs are also acceptable. Proposals should ensure that:

- The proportions of the roof to the rest of the proposal is well considered. Where a pitched roof is proposed, deep plans can lead to shallower pitches which read poorly in the streetscene and will generally not be acceptable.
- Where a stepping roof form is used, it is done in a manner that adds interest to a proposal and helps reduce the appearance of mass, rather than overcomplicating the external appearance.
- Any projecting flat roofs associated with a development predominantly covered with a pitched roof are sensitively integrated into the design and do not confuse or detract from the external appearance. Where appropriate, projecting flat roofs can provide a functional use, such as a balcony.
- Where dormers are proposed that cut through the eaves line, the scale and positioning of the dormer in relation to the eaves is well considered (Refer to Figures 2.19g and 2.19h for good and bad examples).

2.19.2 It should be noted that pitched roof forms can read as overbearing in elevation drawings. Due to their pitch, the mass of such a roof is usually less when read in the streetscene. As such, it can be beneficial to provide a street level visual of the proposal to help describe the overall appearance of the proposal.



Figure 2.19b: Flat roof forms are acceptable. Set-back top floors with a change in material can be used to add interest and break down the mass.



Figure 2.19c: Unconventional roof forms are part of a compelling design by Alison Brooks Architects to break down the mass of a proposal. (Photo: Paul Riddle)



Figure 2.19d: Projecting flat roofs successfully designed by MATAArchitects to be used as balconies.



Figure 2.19e: Pitch of roof is steep enough to read positively in the streetscene.



Figure 2.19f: Pitch of roof appears too shallow in relation to mass of building.



Figure 2.19g: Well proportioned and positioned dormers contribute to design of roof.



Figure 2.19h: Poorly proportioned and positioned dormers and eaves results in a poorly resolved roof.

2.20 BASEMENTS & WORKING WITH TOPOGRAPHY

2.20.1 Croydon's topography presents many opportunities for new development in semi-submerged lower floors with level access on one side of a property. In other settings, it may be possible to provide fully submerged basements or lower-ground floor development, however these are often considered to be uncharacteristic of suburban settings and need to be carefully designed to minimise any negative impacts on the streetscene.

2.20.2 A sloping topography can provide opportunities to work with the landscape to achieve greater footprints which extend beyond neighbouring elevations by stepping the building mass. By stepping built form down a slope, impacts on neighbours can be avoided. It is important that the rhythm of stepping follows the gradient of the slope to avoid large built form protruding from the hillside.

2.20.3 Basements, lower-ground floor development and massing that steps down a slope that do not require the introduction of light wells will generally be acceptable provided that any habitable rooms have sufficient access to natural light (Refer to Section 2.9 for guidance). Proposals will be judged on a case-by-case basis, based on the impact to the street scene, neighbouring development potential and amenity.

2.20.4 Basements, lower-ground floor development or massing that steps down a slope that requires the introduction of lightwells will only be acceptable where:

- Located to the rear of a property, or if located to



Figure 2.20a: Stepping massing down a hill to gain additional accommodation

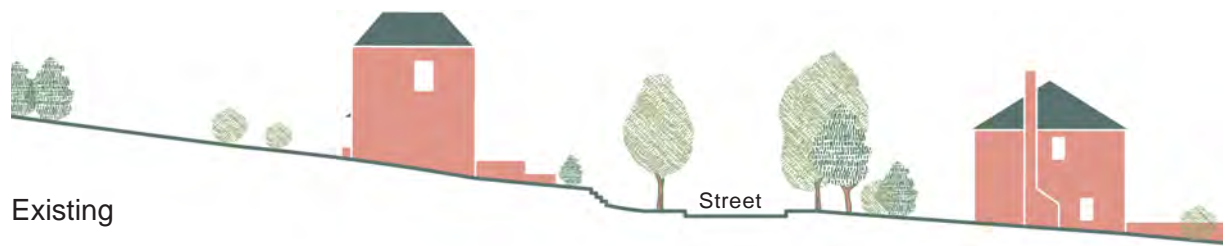
the front of a development, would not be intrusive on the streetscene. Where necessary, this may require railings to be screened with planting;

- Any retaining walls are integrated into the design of the proposal and wherever possible should be landscaped (Refer to Section 2.35 for guidance);
- Lightwells have a depth that is greater than 25 degrees as measured from 2m high on windows into habitable rooms and they meet BRE guidance (unless this would render development unviable on back land and rear garden sites, in such circumstances a compelling design would need to mitigate failure to meet this guidance);
- All flats within are dual aspect, and have well-considered internal layouts to ensure the accommodation is functional and liveable; and
- Not located in an area of groundwater flooding.

2.20.5 Basements or lower-ground floor development in areas where there is a historic pattern of such

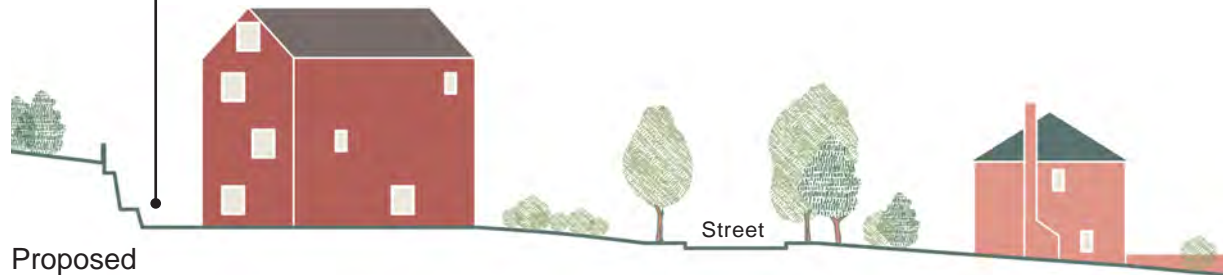
development will generally be acceptable where they are well laid out and have sufficient access to natural light and are designed to respond to the existing character of basement or lower-ground floor development in the area.

2.20.6 Where any proposal for basements, lower-ground floors or massing that steps down a slope would result in large retaining walls, they must be designed in line with landscaping guidance (Refer to Section 2.35 for guidance) and accompanied by landscaping plans detail the integration and resolution of impacts on the street scene and neighbouring amenity.



Existing

Area excavated to create lightwell to the rear of the property



Proposed

Figure 2.20b: A proposal for redevelopment with semi-submerged ground floor, including lightwell to rear, making use of the topography to provide additional accommodation.

Depth / width of lightwell determined by a 25° line measured from 2m high on the window of habitable room

Retaining wall does not break 25° line

Retaining walls should generally be landscaped to increase biodiversity and enhance appearance

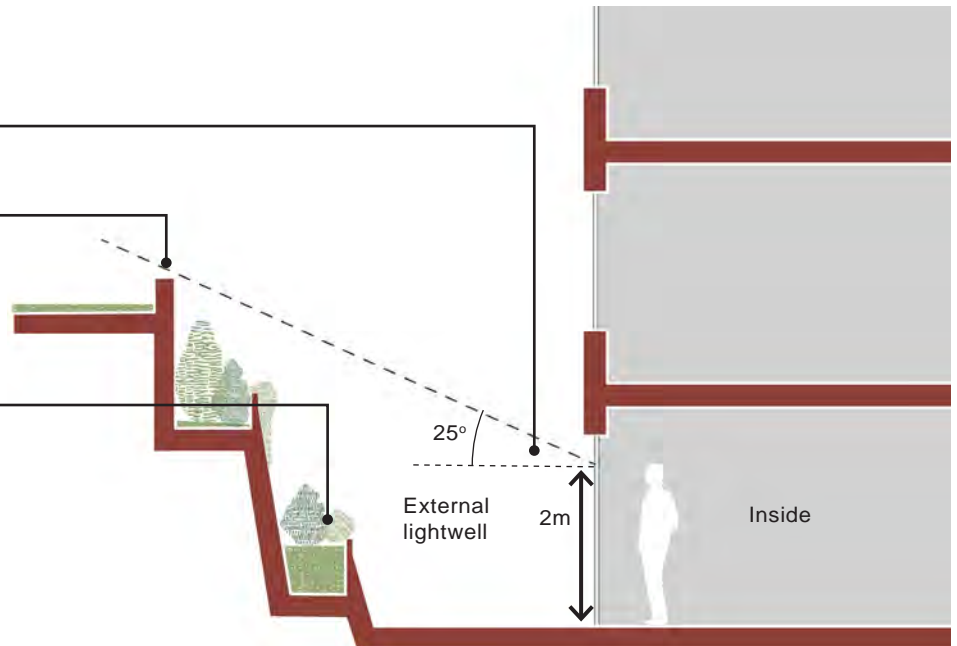


Figure 2.20c: Section showing the design guidance for creating a light well for a basement or lower-ground floor.



Figure 2.20d: Poorly designed and small lightwell that is not integrated into the design of the wider proposal.



Figure 2.20e: Successful use of topography to integrate parking into a basement. Once matured, planting will reduce appearance of retaining wall.

MATERIALS AND EXTERNAL APPEARANCE

2.21 MATERIALS

2.21.1 Materials should be of high quality and chosen as an integral part of the design.

2.21.2 The existing material palette in Croydon varies greatly depending on the age of development in the area. Detail on materials associated with specific housing typologies present in Croydon can be found in the Croydon Typology Appraisal²⁶.

2.21.3 Choice of primary facing materials should be informed by the specifics of the development and the specific nature of the context surrounding a development site, however in general, robust, natural materials with natural variation are characteristic of suburban locations. For example, this may include:

- Brick (including high quality red, multi-stock, London stock)
- High quality clay hung tiles
- High quality clay roof tiles
- High quality natural slate tiles.

2.21.4 Applicants should assess the surrounding area as this may inform their choice of materials. Materials which are innovative or different from their context may be acceptable where they are part of a compelling design, and where relevant give careful consideration to heritage assets (Refer to Section 1.4 Heritage for guidance).

²⁶ Available at: https://www.croydon.gov.uk/sites/default/files/articles/downloads/BoroughCharacter_typology_20150921.pdf

2.22 CHOICE OF MATERIALS & APPROACH TO CHARACTER

2.22.1 Choice of materials should form part of the approach to character as set out in guidance 2.8.

2.22.2 In an Innovative and Original approach, there is likely to be good scope for the use of contemporary materials, as well as more traditional materials. The choice of material should contribute to the Innovative and Original approach.

2.22.3 In a Contemporary Reinterpretation approach, contemporary materials could be used successfully in conjunction with more traditional building forms, provided they form a consistent and considered part of the overall design and are well detailed. It may also be appropriate to use traditional materials with contemporary detailing. The choice of materials in such an approach is likely to be informed by the local context.

2.22.4 In a Sympathetic and Faithful approach, applicants should, wherever possible, seek to use the same materials and detailing as the surrounding housing typologies. For this to be successful, applicants may wish to use reclaimed materials. Poor quality modern reproductions of traditional materials and their detailing will not be acceptable.



Figure 2.22a An innovative material approach to an infill development by Carl Turner Architects. (Photo: Tim Crocker)



Figure 2.22b The use of a mixture of contemporary and traditional materials contribute to a contemporary reinterpretation approach by Henley Halebrown Architects. (Photo: Andy Stagg)



Figure 2.22c Faithful replication of material and detailing in a street facing development. (Photo: Chartwell Land & New Homes)

2.23 MATERIAL APPLICATION & DETAILING

2.23.1 The extent of application of different materials within a proposal (i.e. the amount of area covered), along with the material joints between different elements, has significant impacts on the built quality of a building, how it weathers over time and its appearance in the short and long term. Development proposals should also consider how the choice of materials will be viewed at the scale of a door opening, window reveal, eaves overhang, material join and corner.

2.23.2 Changes in material can be useful to increase or reduce the emphasis of different parts of a building, as well as adding interest. For example a projecting bay may have a different material to draw attention to it as an architectural feature, whereas a mansard roof or top floor which is set-back may choose a lighter-appearing material to reduce emphasis. However, where they are not properly integrated into a design and lack depth (for example by being applied to one façade that meets a corner where you read the material junction, as in Figure 2.23j), they will not be acceptable.

2.23.3 Patterns of materials such as change in brick or metal perforation, or a combination of materials, can be used to add interest to large blank façades where such blank façades are considered unacceptable. Use of patterns must read as part of the overall architectural expression of the building, rather than as an alien element applied to the envelope of a building.



Figure 2.23a

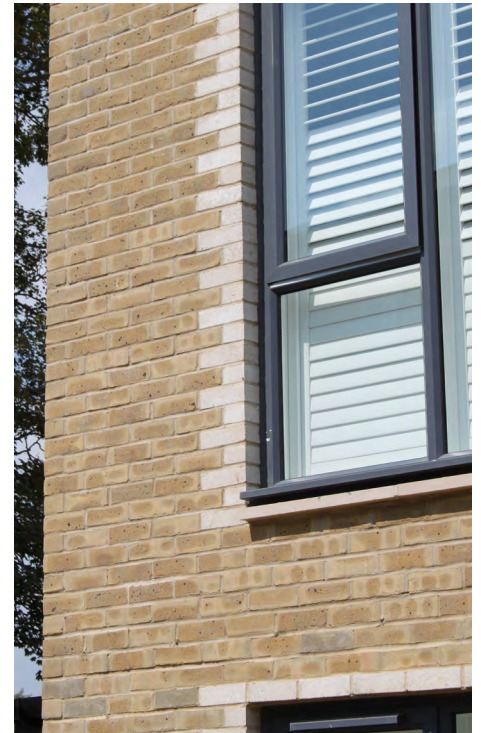


Figure 2.23b



Figure 2.23c

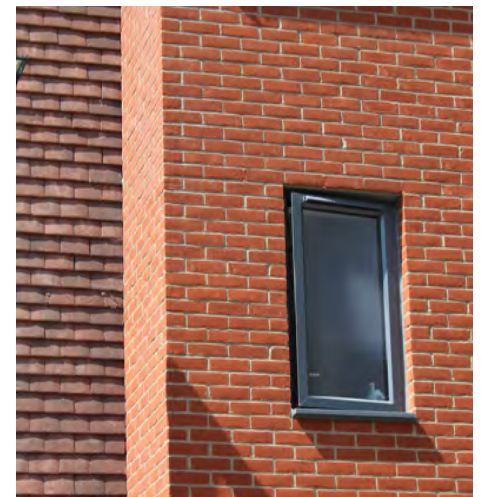


Figure 2.23d

Figure 2.23a - 2.23d: Effective use of high-quality materials in well considered details that express elements of the facade and add interest.

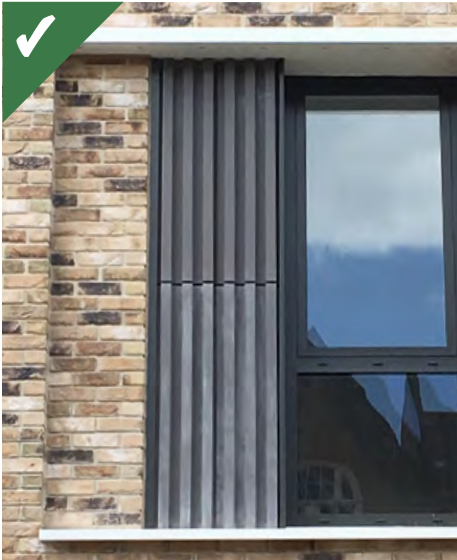


Figure 2.23e

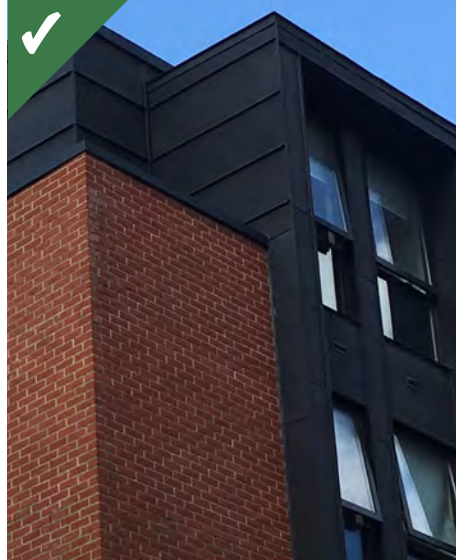


Figure 2.23f



Figure 2.23g

Figure 2.23e - 2.23g: Effective use of high-quality materials in well considered arrangements and patterns that express elements of the facade and add interest.



Figure 2.23h: Use of render that weathers poorly and not be maintained.



Figure 2.23i: Use of wood that weathers unevenly near material joins and has not been properly maintained.



Figure 2.23j: The change in render colour at the corner contributes to a flimsy appearance, highlighting that it is surface applied and lacks depth.



Figure 2.23k: Half-timbering has been wrapped around the side of the building but stops at the first window, highlighting that it is non-structural and is an applied detail. It should have either been continued along the length of the building or kept within the gable so it did not break the eaves line.

2.23.4 The use of timber and render for cladding can weather poorly, particularly where parts of a façade are exposed to the elements, creating visually unappealing, uneven discolouration or deterioration. This can be prevented through careful consideration of how a building's envelope may be unevenly exposed to weathering. For example, water run-off from roofs or windows can cause severe deterioration. Development proposals that seek to use timber or render cladding will only be acceptable where the detailing between elements of the building is carefully considered and demonstrated in sufficiently detailed drawings submitted as part of the application. Applicants should also consider the on-going maintenance of these materials, such as the need to re-paint or stain every few years.

2.23.5 Where a development is located in a street characterised by half-timbering and an applicant seeks to replicate this cladding, real timber pieces appropriately treated for weather protection and with detailing that is informed by traditional timber detailing should be used.

2.24 FENESTRATION / PLACEMENT OF OPENINGS

2.24.1 The placement of windows and doors within a façade should be carefully considered to provide relief from the materials covering the bulk of the building envelope. The regular pattern and proportions of windows and doors can also be a key characteristic of an area.

2.24.2 The regular or irregular sizing and placement of windows and doors in a local area should be identified through photographic and drawn contextual analysis, typically by line drawings of the street elevations. Development proposals may use this as a starting point for window and door proportions and positioning. Positioning may occur by replicating or departing from the pattern, provided it is part of a well-considered and compelling architectural expression. Where symmetrical elevations or a consistent pattern of openings are characteristics of an area and the proposal seeks to replicate this, the scale and proportions of the elevation should not be altered as this can create a weak pastiche.

2.24.3 The proportion and position of windows can be used to adjust the way the proportions, scale, mass and height of a building are perceived; this may include helping to emphasise verticality, horizontality or even reduce the apparent scale of a building that appears too wide or tall. For example, vertically proportioned openings on a wide façade can help to reduce the appearance of width by adding verticality to the expression of the façade. Arrangements of windows that create an in-balance across a

façade or appear poorly positioned or proportioned, and do not appear to form part of a compelling architectural approach, will be unacceptable. Large elevations with small openings can be overbearing and will generally not be acceptable. New developments of a scale larger than the existing predominant scale may struggle to replicate fenestrations of neighbouring properties successfully and as such may require larger opening sizes.

2.24.4 Front entrances to a property should be clearly identifiable and of a scale that responds to the scale of the development; standard domestic doors and surrounds usually appear small on larger developments containing flats. Applicants may consider the use of framing devices, such as porches, to add emphasis to a front entrance.



Figure 2.24a: Proportions and positioning of windows add to horizontal emphasis of the façade and contribute to a weak pastiche.



Figure 2.24b: Windows are too small and their positioning fails to break up mass of façade.



Figure 2.24c: Generously sized openings help to break up the mass of new terraced homes designed by Haworth Tompkins. Their position adds rhythm to the elevation. (Photo: Jack Hobhouse)



Figure 2.24d: Simple but robust material choices are given interest through the placement and detailing to windows and doors in a row of mews houses designed by Peter Barber Architects. (Photo: Morley von Sternberg)



Figure 2.24e: A development of homes in a backland uses a contemporary palette of brick, metal and timber. The most exposed surfaces are made of hardwearing brick, whilst protected features such as doors are of timber. Refer to guidance 2.21 - 2.23.

2.25 REVEALS & OVERHANGS

2.25.1 Interest can be added through detailing of eaves, window and door openings, lintels and plinths. The depth of window and door reveals should generally be at least 100mm deep so as to provide a provide substance, texture and character to elevations.

2.25.2 Varying the depth of a window reveal, from a recess to a bay, can be used to add interest to a façade, but should be done with care to avoid overly complicated façades.

2.25.3 Fully flush façades with windows and doors aligned to the external envelope, are only acceptable on contemporary proposals where it is justified as part of a well-considered and compelling overall architectural approach. Where applicable, development proposals will need to demonstrate that there is sufficient expression in façades through massing and material treatment to ensure that façades does not appear overly flat and/or overbearing.

2.25.4 Deep eaves or large overhanging roofs will only be acceptable where they are integrated into the design and would not result in unpleasant and shady spaces.

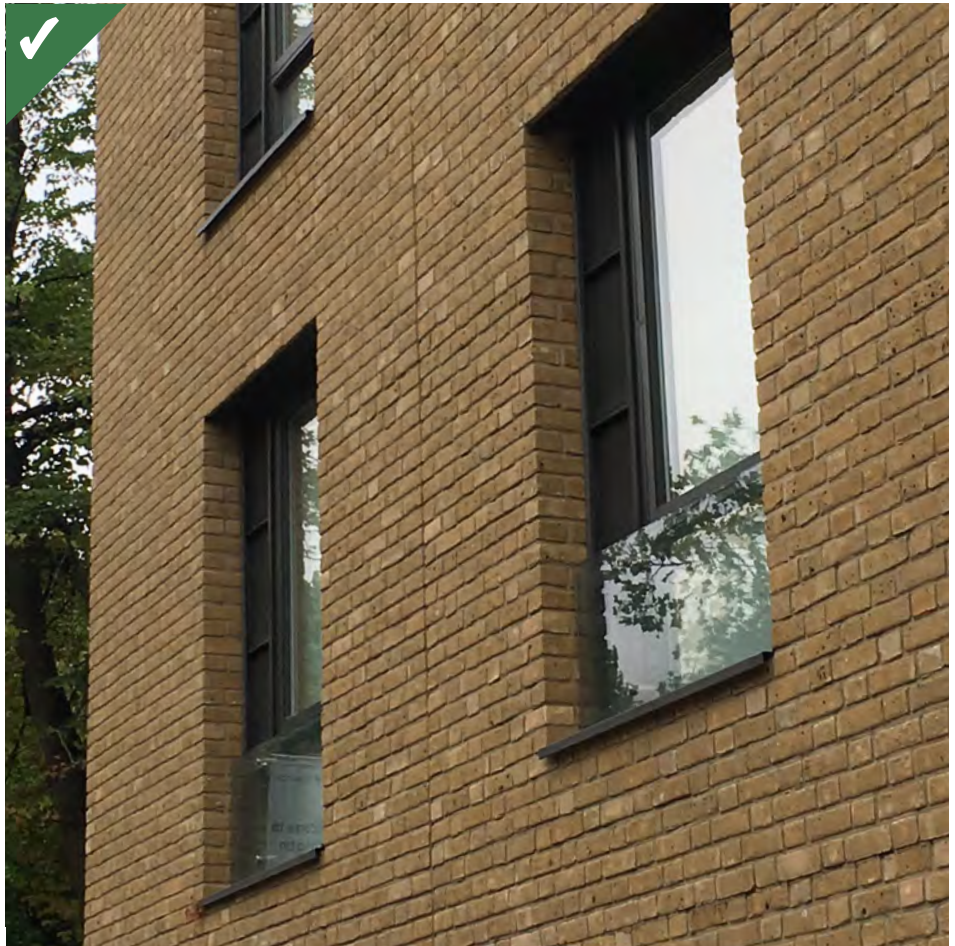


Figure 2.25a: Deep reveals provide a sense of solidness that can add appeal to façades.



Figure 2.25b: Shallow reveals can result in a poor appearance that lacks depth and windows appear as if they are stuck on. Shallow reveals should generally only be used where they are part of a compelling design.

2.26 BALCONIES

2.26.1 Balcony design is an integral part of a proposal and must be part of the initial design phase.

2.26.2 Balconies supported by columns will generally not be acceptable to the front of a property, but may be acceptable to the rear of a property where they are integrated into the design. Recessed and cantilevered balconies add less clutter to the external appearance of a development and may be acceptable to the front, as well as the rear of a property, where they are successfully integrated into the design of the proposal.

2.26.3 Balustrades may adopt the same material as the building envelope, minimising the impact on the external appearance. However, this may limit the amount of light to windows and doors set within the balcony, in which case, a metal or wooden balustrade

may be used as these can be appropriate in a suburban setting.

2.26.4 Metal and wooden balustrades should be finely detailed and of a colour that responds to the window frames and materials of the external envelope of the building.

2.26.5 Glass balustrades can dominate the appearance of a development as their reflectivity can cause them to stand out and they can often present an overly commercial character, therefore their use will generally be unacceptable. Where glass balustrades are proposed, it must be part of a compelling design and should avoid using tinted glass. Such glass balustrades will only be acceptable where they are designed with minimal framing. Glass balustrades with heavy metal framings and fixings will not be acceptable.

2.26.6 Wherever possible, the sides of balconies should be open

to maximise amenity for future residents, however in some cases screening may be required for overlooking purposes. Balconies that require screening to prevent sideways overlooking should be avoided as add-on screening devices often appear incongruous in a suburban residential setting. Where necessary, screening material that is climb-proof and responds to the materials and design of the building envelope should be used. For example, 'hit and miss' brickwork are acceptable means to resolve issues of sideways overlooking and appropriate response to a brick building. Similarly, perforated metal may be used to create a screen while drawing upon the material of the window frames (if relevant). Frosted glass screens are generally unacceptable as the material appearance often contrasts with the material of the building envelope, making a feature that is not traditionally characteristic of suburban settings unduly prominent.



Figure 2.26a: External balconies with supports that are not integrated into design of the proposal. The use of glass balustrades have resulted in occupiers retrofitting screening devices to provide privacy exacerbates the poor appearance.



Figure 2.26b: Balconies facing the street that are successfully integrated into the design of the proposal.



Figure 2.26c: A combination of recessed and cantilevered balconies are provided in this development designed by Peter Barber Architects that provide rhythm to the scheme and allow it to successfully sit alongside a traditional terrace. (Photo: Morley von Sternberg)

2.27 VISIBLE ANCILLARY ITEMS

2.27.1 With the exception of rainwater goods, no servicing items, such as vents, flues, pipes, wiring, telecommunication boxes or satellite dishes, should be located on the front elevation or prominent side elevation of a development. Such items add clutter and diminish the appearance of a building. All pipes should be grouped and, where technically possible, combined into a single pipe. Servicing items should be located to be as discreet as possible, at the end of an elevation or at the corner of a recess or, where possible, within the building envelope. Shadow gaps incorporating drainage could be incorporated within the design of the building, breaking up the built mass while reducing the visual impact of such ancillary items. Applicants should illustrate external servicing item locations on drawings submitted with planning applications.

2.27.2 Soil and waste pipes should be incorporated into the envelope of the building. Applicants will be expected to demonstrate there is appropriate space for servicing pipes to be accommodated within the envelope of a building.

2.27.3 Eaves and/or gutters which overhang a sites boundary are generally not acceptable as this could prejudice the development potential of adjoining sites.

2.27.4 Meter cupboards and service intakes should be located out of sight from the street or in subterranean meter cupboards where possible.

2.27.5 Solar panels should be integrated into the design from an early stage with a regular layout and a discreet appearance. If located on a flat roof, they should

be not visible from street level. Where located on a pitched roof, they should be integrated into the design of the roof so as to minimise impact on the appearance of the development.

2.27.6 Other items such as alarm systems and signage should be considered early in the design stage. The quantity should be limited and positioned to avoid the appearance of applied clutter on the external envelope.

2.27.7 If colours other than white are used in window and door surrounds, (i.e. grey aluminium), all externally applied items, such as pipes and meter cupboards, should generally be finished in the same colour. Applicants should indicate the colour and finish of ancillary items on drawings submitted with planning applications.



Figure 2.27a: Poorly coordinated placement of visible ancillary items on elevation visible from the street has a negative impact on the building's appearance.



Figure 2.27b: Example of where placement of servicing items has been considered early in the design development, ensuring elevations are kept free of clutter.



Figure 2.27c: Flues, vents and pipes add clutter to the façade.

SITE LAYOUT & SERVICING

2.28 SUBDIVISION OF PLOTS AND INFILLING

2.28.1 Proposals that seek to subdivide and/or infill must conform to Policy DM10.4(e) of the Croydon Local Plan and should refer to Section 2.16 or 2.18 of this guide (as relevant) in relation to building positioning. They should also consider the existing pattern of development along the street, and the associated visual amenity that breaks in built form provide.

2.28.2 Whilst spaces between sets of terraced homes and pairs of semi-detached homes are often characteristic of the original design and can provide visual amenity, in many streets this pattern of development has already been broken by side extensions and older infilling. In any street where it would not result in significant loss of visual amenity, infilling will be acceptable.

2.28.3 The pattern of front gardens, boundaries and driveways visible from the street can add rhythm to the street and contribute to the townscape. This can be negatively interrupted where a plot is subdivided.

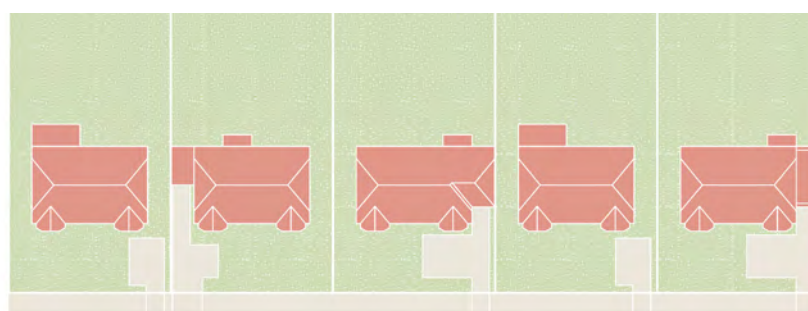
2.28.4 Where subdivision would be visible from the street, proposals should ensure that where there is a consistent pattern of forecourts, driveways and/or boundaries:

- They are retained or rebuilt to follow the existing pattern of the street. This should include minimising the number of new vehicular access points. Vehicular access points may be shared by several properties.
- The front garden is not subdivided with walls, fences or hedges. A larger front garden should be maintained with access to properties from one forecourt.

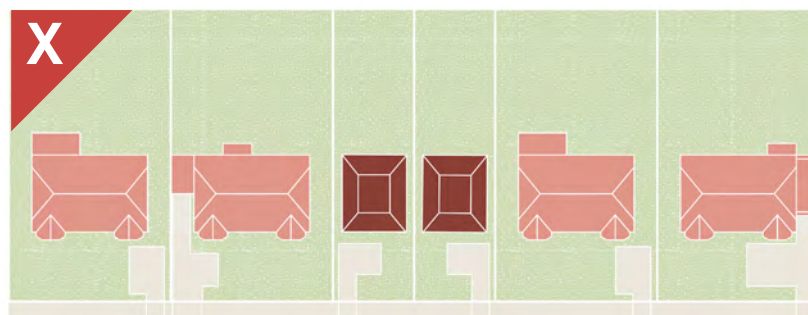
2.28.5 Subdivision will only be acceptable where it doesn't limit the provision of a larger development or the delivery of family homes.



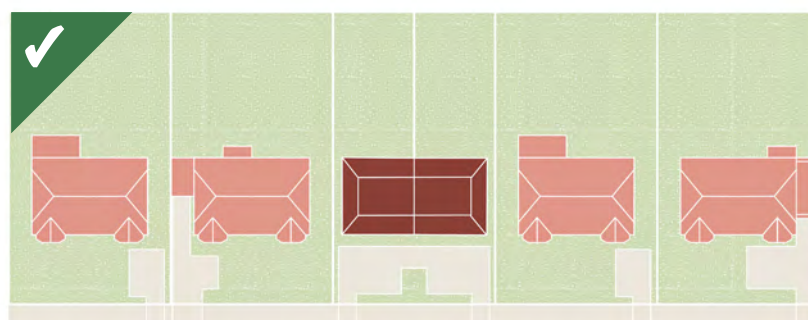
Figure 2.28a: Successful subdivision to provide two new homes, with one to the rear of the plot.



Existing: Even spacing of existing plots provides a consistent rhythm to the street



Unacceptable: Plot subdivision which divides the forecourt would interrupt consistent rhythm of the street



Acceptable: Plot subdivision with a shared forecourt that helps to maintain the consistent rhythm of the street

Figure 2.28b: Method for plot subdivision in a street with a consistent rhythm of plot sizes

2.29 DRIVEWAYS, ENTRANCES AND NEW ROUTES

2.29.1 Driveways, entrances and new routes should be designed to prioritise pedestrian flow and safety. This will generally mean limiting the number of vehicular access points to control vehicle flow and prioritising pedestrian and cyclist focussed designs.

ENTRANCES & BOUNDARY TREATMENTS

2.29.2 Entrances to new developments could be clearly marked with gate posts, planting or a built boundary treatment (such as a brick wall) that responds to the existing streetscene, the proposed dwelling and scale of the street.

2.29.3 Gated developments will not be acceptable.

2.29.4 Entrances should avoid tall walls or wooden fences either side of a new driveway that close off the development to the street.

2.29.5 Front boundaries should be designed to respond to any consistent boundary treatments along the street. Planting along the front boundary can help improve the streetscene and will generally be encouraged.

NEW DRIVEWAYS AND HARDSTANDING

2.29.6 New driveways should be designed in accordance with Figure 2.29e and Figure 2.29f. New driveways and hardstanding should be designed to ensure no net loss of vegetation or areas of planning and landscaping.

2.29.7 Entrances should generally be of a width that meets the criteria set out in Figure 2.29e and where possible, replicate any

characteristic scale and pattern of entrances and easements witnessed along the road. Overly wide entrances and easements that would impact the streetscene or result in loss of landscaping will not be acceptable. Where an existing entrance is narrower, the acceptability of this will be judged on a case by case basis and, where necessary, development applications will need to demonstrate that a modern vehicle can safely and easily access and exit from the site.

2.29.8 Undercroft arrangements are only acceptable where they do not negatively impact the streetscene, can be concealed from the street with a garage door and meet relevant emergency

access and highways regulations. A garage door should be of a scale appropriate to the street and the proposal.

2.29.9 Where a new driveway accesses onto a road within the Transport for London Road Network, applicants should consult and come to an agreement with TfL. TfL should also be consulted where a development accesses onto or is in close proximity to a tram route.



Figure 2.29a: Streetscene dominated by high fences used as boundary treatments.



Figure 2.29b: Failure to screen hardstanding and bin stores with a landscaped boundary treatment.



Figure 2.29c: A low-level boundary treatment which integrates planting.



Figure 2.29d: The impact of a retaining wall is minimised through the use of planting.

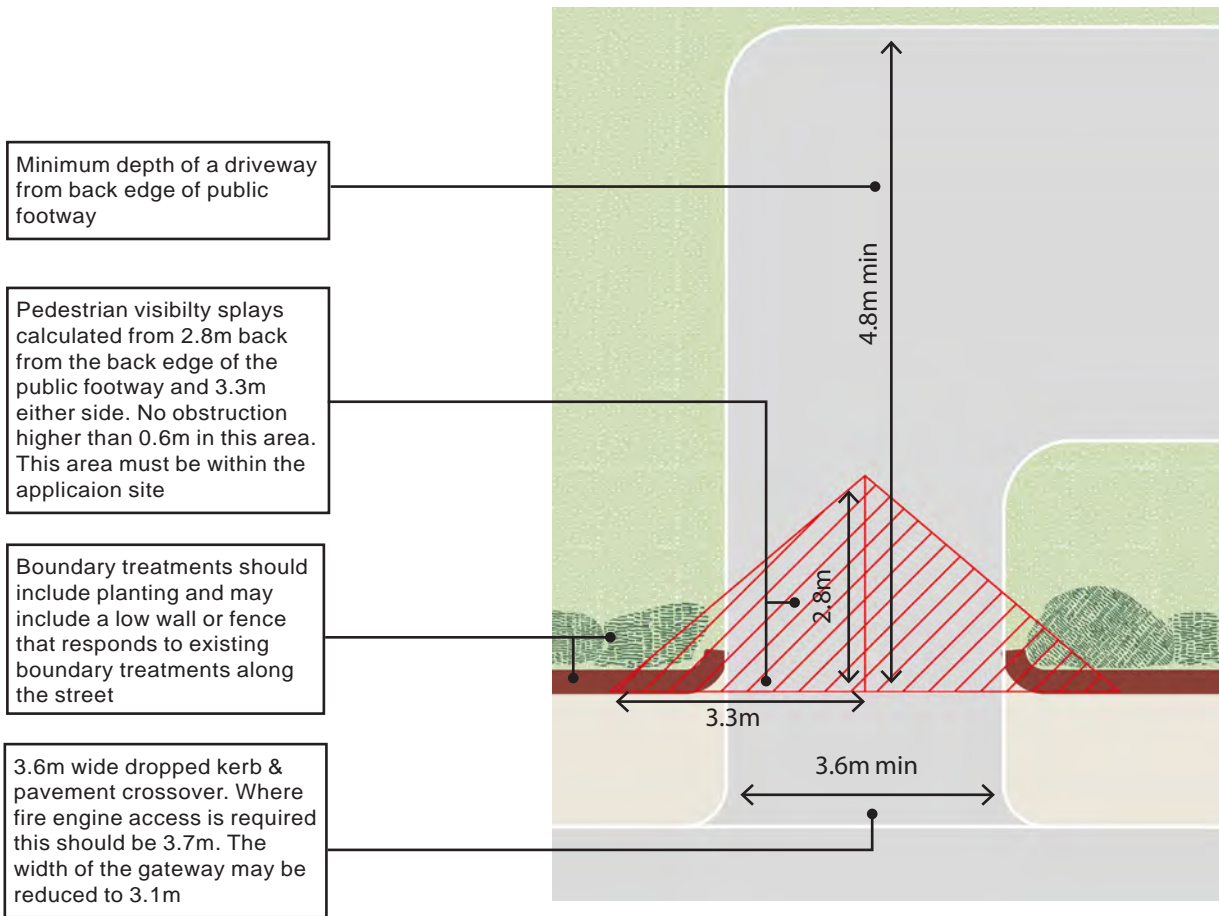


Figure 2.29e: Requirements for entrances and boundary treatments.

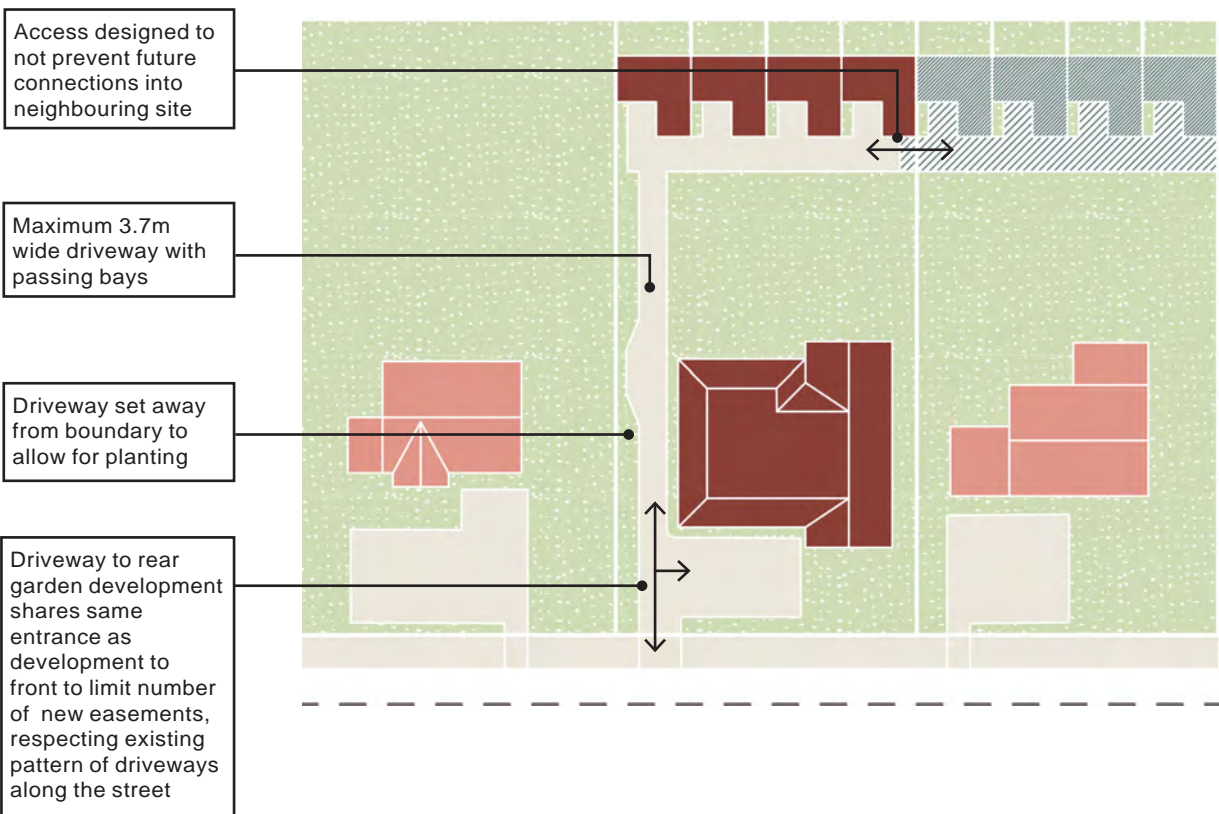


Figure 2.29f: Optimal layout of driveway for redevelopment of a detached home and for to access rear garden development.

ACCESS REQUIREMENTS:

2.29.10 When designing a proposal, consideration should be given to the need for appropriate access arrangements, including safety. This includes:

- Providing emergency service access²⁷ and refuse collections;
- Where emergency or service vehicle access is not possible, such as back land sites with narrow driveways, alternative service requirements should be discussed with the relevant authority;
- Where appropriate access and turning for refuse collection vehicles²⁸ is not possible, a refuse store must be provided within 20m of the street²⁹. This point must be no more than 30m from the front door of the dwelling (excluding vertical distance) (Refer to Figure 2.29g);
- Where it is not possible to find a suitable location for the refuse store, the proposed development may be required to demonstrate how the refuse associated with the development will be available on the street on collection days, for example, through an established management company and management schedule for the development;
- Where a car free development is proposed, it may be possible to provide pedestrian only access where the appropriate set down space is easily accessible from the closest highway to meet access requirements³⁰;

²⁷ As per Building Regulations. Available at: https://www.planningportal.co.uk/info/200135/approved_documents.

²⁸ Refer to Croydon Council's 'Waste and Recycling in Planning Document (2015)' for guidance, available at: <https://www.croydon.gov.uk/sites/default/files/articles/downloads/New-build-guidance.pdf>.

²⁹ As per Veolia waste collection standards.

³⁰ As defined by Building Regulations.

- Access into a building and individual units via circulation spaces should be designed to allow ease of access for all users. Consideration must be given to the accessibility of outdoor space and the provision of space for activities to occur outdoors which support the health and development of children (Refer to Figure 2.34a);
- Where a proposal on a rear garden or back land requires the use of a rear lane to access the development, this route ensures safety for users and residents through the use of lighting, high quality surfaces and overlooking. Where the location would prohibit any natural surveillance from a public highway or neighbouring properties over such an access route, proposals will generally not be acceptable.

NEW STREETS

2.29.11 If the scale of a development requires a new street, where the new street meets an existing road, this should be designed in accordance with the relevant highways guidance available on Croydon Council's website³¹ and the Public Realm Design Guide. Where this is the case the Council's Highways team should be consulted at an early stage.

2.29.12 The design of new streets and entrances should consider the safety of residents, avoiding over-engineered solutions that prioritise motorists and maximising the use of landscaping measures to control motor vehicle movement.

³¹ Available at: <https://www.croydon.gov.uk/transportandstreets/rhps>

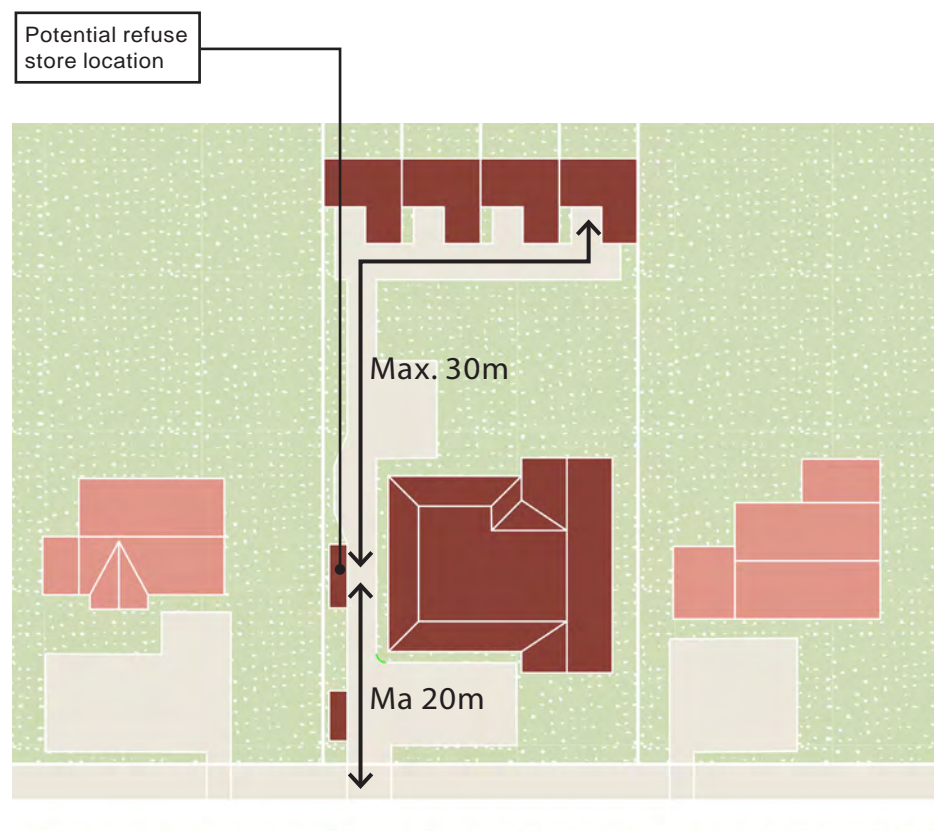


Figure 2.29g: Suitable location of bin stores on sites with limited access for refuse lorries.

CONNECTING INTO THE EXISTING NEIGHBOURHOOD

2.29.13 Where possible, development should seek to create pedestrian connections through suburban blocks, providing a thoroughfare that links between existing parallel streets. These will be encouraged where they create quicker access to transport services, parks and other amenities, and will be secured through planning agreements. Such connections should be designed to prioritise pedestrian movement and must ensure safety, including a good level of natural surveillance through overlooking

and optimised active frontages, along with the use of lighting and high quality surfaces.

2.29.14 These connections may require a development to obtain access to an existing shared access route outside the development site. Proposals should demonstrate that, where possible, they seek to provide connections through an agreement with neighbouring land owners.

2.29.15 Development should safeguard space to allow for future connections and avoid ransom strips.



Figure 2.29h: A new route created by a back land development is well lit, overlooked and has a legible destination.



Figure 2.29i: Existing street pattern with back lands

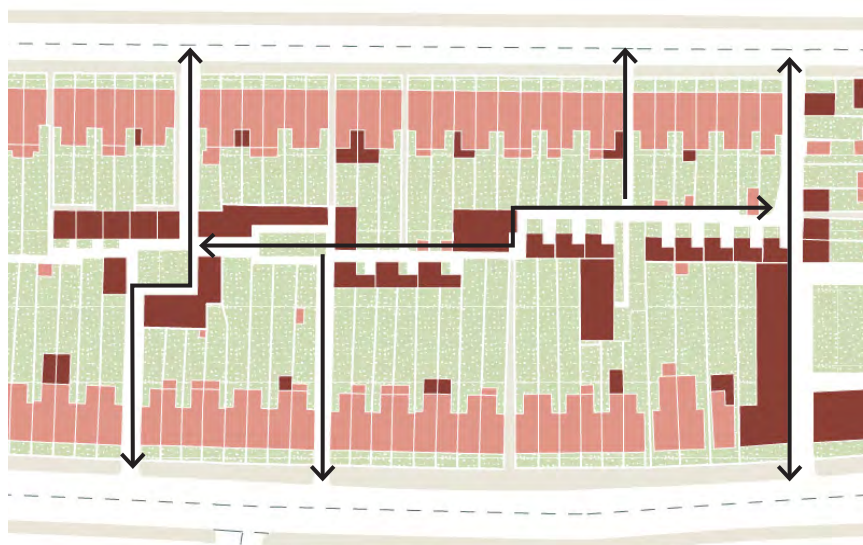


Figure 2.29j: New connections created through suburban block after a series of back land developments

2.30 PARKING DESIGN

2.30.1 The provision of car parking associated with a proposed residential development can often lead to the loss of both front and rear gardens. The cumulative loss of gardens within suburban locations can greatly impact biodiversity, presenting issues associated with flood risk and air quality, along with health and wellbeing. The loss of front gardens to parking is particularly problematic in terms of negative impact on the street scene.

2.30.2 Policy DM10.2 of the Croydon Local Plan states that parking within the forecourt of buildings will only be acceptable where it would not cause undue harm to the character or setting of the building and where there is sufficient screening without the vehicle encroaching on the public highway.

CAR PARKING

2.30.3 Car parking should be provided in a mixture of locations (including the front and rear of the property), thus reducing an overbearing and unacceptable amount of hardstanding in one location.

2.30.4 Car parking should only be accommodated in forecourts facing onto the street up to a quantum that is not considered to impact negatively on the street scene. Applicants will need to demonstrate this through an assessment of the prominence of forecourt parking within the existing street scene and include measures to mitigate impacts, such as mature planting. Car parking in forecourts must be set back from the front edge of the plot by at least 0.75m to provide for a boundary treatment (wall, fence or hedge) and landscaping (hedge, flower borders or grass).



Figure 2.30a: Poor design of parking without any landscaping; hardstanding dominates forecourt.

2.30.5 In instances where the topography can be utilised to provide subterranean car parking, it will be looked upon favourably as it can reduce the need for parking in forecourts and rear gardens. However, creating it in other circumstances is recognised as expensive and may undermine the viability of development³².

2.30.6 Back land or rear garden development may utilise a courtyard arrangement where car parking can be concealed between built form or where garages can be introduced at ground level with accommodation above.

2.30.7 In some locations, as a result of a development additional parking may occur on the street. In these cases, assessed on a case by case basis, this may be acceptable where it is deemed safe by the Council's Strategic Transport officers and will not unreasonably impact on pedestrians or cyclists. This must be supported by a documented parking assessment demonstrating that there is kerbside capacity for car parking (using Lambeth

³² Basement car parking should be balanced against cost and will not be an acceptable grounds for the lack of affordable housing provision (where applicable to schemes of 10 or more units).



Figure 2.30b: The use of a basement for parking allows the front garden to remain predominantly planted.



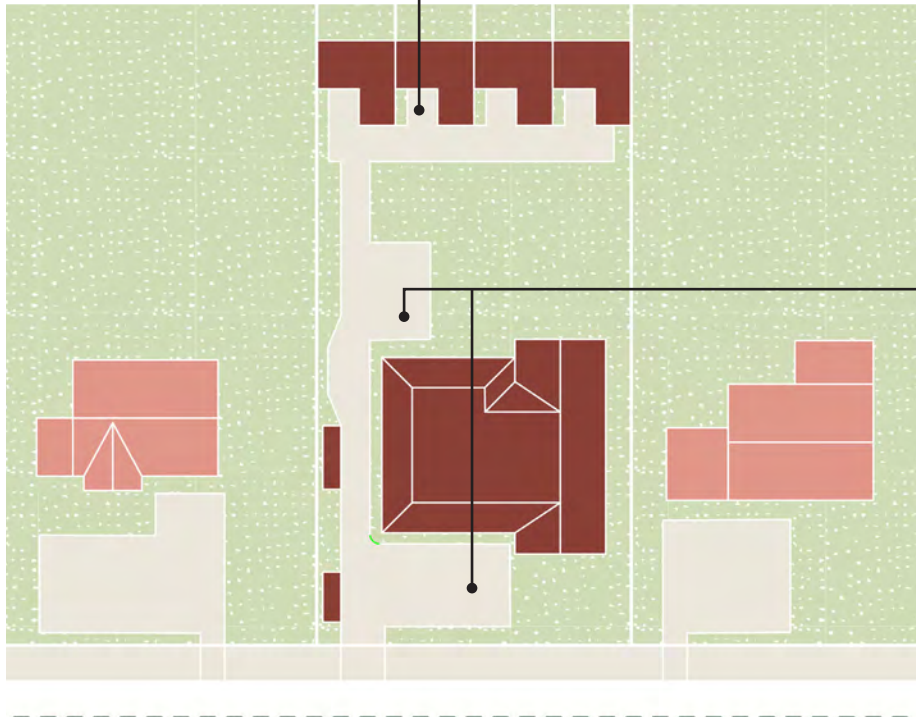
Figure 2.30c: Bays of parking separated by planting.

Methodology³³). Parking on streets should not be through designated bays.

2.30.8 In areas of very low transport accessibility such as PTAL 0-1, it will be harder to access sustainable transport and therefore may be more difficult to reduce reliance on private cars. In these areas the Council will seek to accommodate all parking within the site (off street) and any anticipated need for on-street parking will be judged on a case by case basis.

³³ Available at: <http://www.trafficssurveys.co.uk/lambeth-methodology.htm>

Parking in rear garden development incorporated into design to ensure it is discreet



Parking divided between front and rear of property to balance impact on streetscene and loss of rear gardens

Figure 2.30d: Indicative parking arrangement for a street facing and rear garden development

2.30.9 In locations where there are significant additional demands on kerbside space and parking pressure, the Council may introduce or amend parking controls on roads within the area. Where this is proposed, this can be taken into account when considering a development proposal to encourage more sustainable travel choices and reducing car ownership. In these locations the Council can restrict the occupants of new developments from applying for on street permits and in appropriate locations with good PTALs make the development completely car free.

2.30.10 Parking should:

- avoid impeding access to outdoor amenity space from ground floor properties or shared doors; and
- be screened with planting between and around bays and be informed by a landscaping plan which minimises visual

impact on the streetscene and neighbouring properties; and

- include within the design a flexible parking resource to accommodate motorbikes and microcars and smaller electric vehicles, or alternative future uses. Such flexible parking should recognise the changing sizes of and reducing demand for private vehicles.

2.30.11 Where existing lawns, planted areas and trees (soft landscaping) is lost to hardstanding associated with new development, including parking, this must be offset with appropriate landscaping and drainage systems (Refer to Section 2.36 for guidance).

2.30.12 Parking spaces within a development site should have dedicated electric vehicle charging provision in accordance with the London Plan minimum standards and the Croydon Local Plan, requiring the provision of active

spaces³⁴ and passive provision³⁵.

2.30.13 The active provision should be in the form of a wall mounted charging point adjacent to the parking bay. Stand-alone charging point posts should be avoided wherever possible. Tethered cable charging points should be avoided unless the occupier's vehicle is known. The charging point should be able to provide two power rating options, either a "standard" 3kW or "fast" 7kW³⁶.

34 Active spaces are fully wired and connected, ready to use, points at parking spaces.

35 Passive provision requires the necessary underlying infrastructure (eg capacity in the connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces) to enable simple installation and activation of a charge point at a future date.

36 Further information is available at: <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/electric-vehicle-charging-points#activation> and <https://www.zap-map.com/charge-points/charging-home/>.

2.31 ANCILLARY STORAGE FACILITIES AND BUILDINGS

2.31.1 Storage for refuse and cycles is an essential part of development and additional storage as part of domestic living is desirable. Where it is not feasible to incorporate storage facilities into the envelope of the building, they may be provided externally within a designed structure. Storage facilities whether within the envelope of the building or not, should be integrated into the design of a proposal from an early stage. New dwellings must provide suitable refuse and recycling, cycling and other ancillary storage facilities in line with Policy DM10 and DM30 - Cycling and Policy DM13 – refuse and recycling of the Croydon Local Plan.

2.31.2 Cycle and Refuse storage facilities should be designed to:

- Be of a capacity large enough for the development;
- Be of a secure, weatherproof and solid construction, with a material palette and design that responds to the design and material palette of the proposed development;
- Be secure on all sides;
- Be in an easily accessible location;
- For cycle storage, be in a well overlooked location;
- For refuse stores, be located in a visually discreet and easily accessible location. Generally, they should not be accessible via the front elevation of the building so as to avoid visual intrusion on the appearance of the building;
- Have minimal impact on the amenity of neighbours, including visual consideration, collection noise and odours associated with refuse;

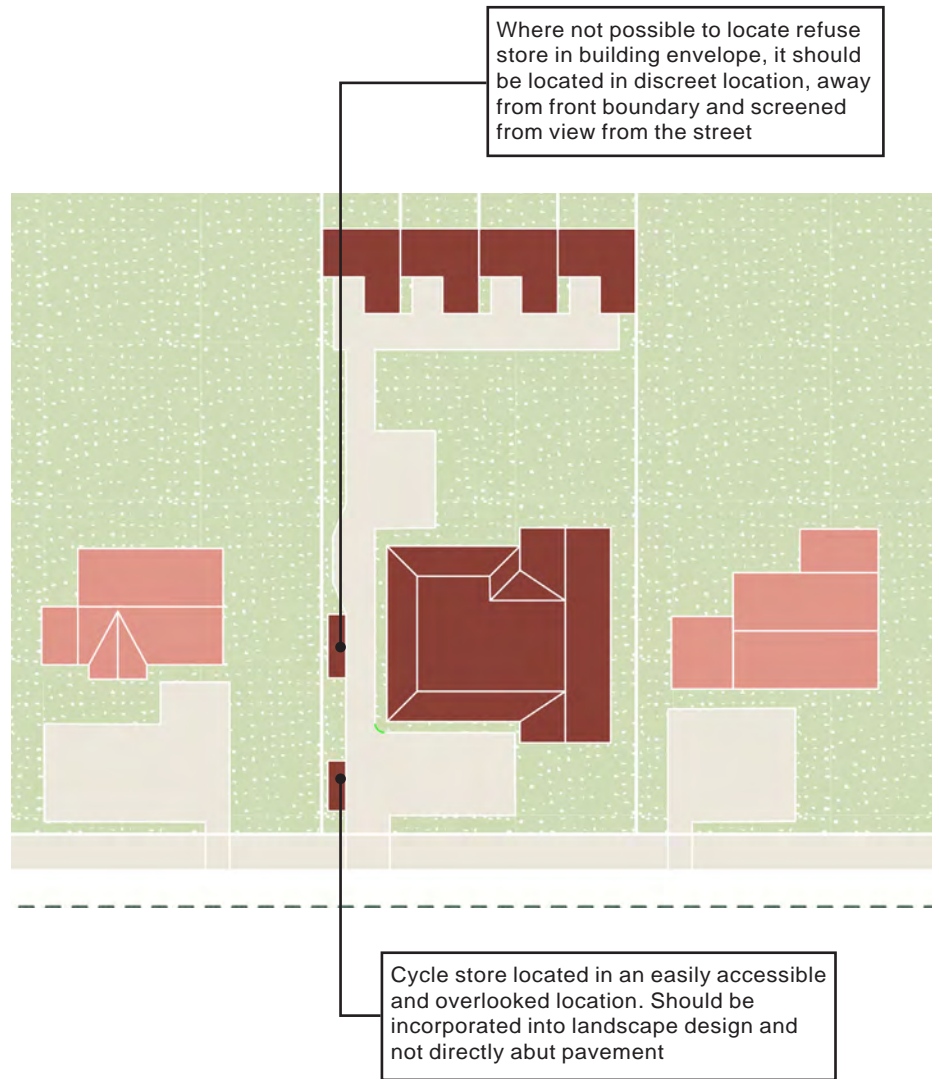


Figure 2.31a: Indicative refuse and cycle storage locations.

- Where possible, make use of subterranean storage;
- Where possible, be integrated into the landscape design;
- For cycle storage, it should be designed to allow occupants to choose how the space is used if they do not wish to store bicycles, providing the option to store other items;
- For cycle storage, does not require bicycles to be wheeled through living spaces;
- Be in addition and separate to the general storage provision required for each new dwelling.

2.31.3 Wherever possible, some provision for visitor cycle parking should be made. This is best provided with cycle racks or stands to the front of a property.

Where not possible to locate refuse store in building envelope, it should be located in discreet location, away from front boundary and screened from view from the street

Cycle store located in an easily accessible and overlooked location. Should be incorporated into landscape design and not directly abut pavement

2.31.4 For more detailed information on refuse stores, refer to Croydon Council's technical guidance³⁷.

2.31.5 The Council will, in exceptional circumstances, consider kerbside refuse, recycling and cycle stores for residential development only. This is only acceptable where these are designed so as to include public realm improvements to the street, potentially including planting that minimises visual intrusion. This is likely to be associated with conversions of residential units above shops, where the current

³⁷ Guidance is available at: <https://www.croydon.gov.uk/environment/rrandw/new-developments-and-conversions>.



Figure 2.31b: Refuse and cycle stores that are separate from the main building but integrated into the design of the proposal through the use of the same materials and architectural features. They are situated in a discreet location with minimal impact on the streetscene, neighbouring and residents outlook.



Figure 2.31c: Refuse stores in highly visible locations that are not integrated into the landscape design or any other aspect of the design.

lack of suitable refuse storage leads to waste presented in bags on the footpath, or a series of larger developments that are part of the wider regeneration of an area. In these circumstances, shared storage facilities are encouraged for efficiency and less impact on the visual amenity. These stores should be designed to ensure:

- They are secure and designed to prevent fly tipping;
- Where possible, they make use of subterranean storage;
- They use a material palette and design that responds to the

associated development and/or the surrounding context;

- They have minimal impact on the street scene through landscaping and other public realm improvements in the surrounding area.



Figure 2.32a: Successfully designed landscaping incorporating swales as part of the drainage strategy for the development of housing designed by Bell Phillips Architects. (Photo: Kilian O'Sullivan)

LANDSCAPING & OUTDOOR AMENITY SPACE

2.32 LANDSCAPING

2.32.1 The provision of landscaping is particularly important to support Croydon's ecology and biodiversity, as well as providing important amenity to residents. Policy DM10.8 of the Croydon Local Plan sets out the landscape policy which requires proposals to seek to retain existing landscaping features that contribute to the setting and local character of an area. Where proposals would result in the loss of existing garden space, they must be cognisant of Policy DM10.4e of the Croydon Local Plan that seeks to protect from the unreasonable loss of outdoor amenity space.

2.32.2 Landscape plans should be considered early in the design of a scheme. Proposals with varied planting and features will contribute to the biodiversity of an area, as well as the visual amenity of a property and neighbourhood. This will add value to a development and its setting.



Figure 2.32b

2.33 PROTECTING BIODIVERSITY

2.33.1 Natural and maintained landscaping within the suburbs provides important habitats that contribute to biodiversity and environmental health of our neighbourhoods. All proposals must have regard to Policy SP7.4, DM27 and DM28 of the Croydon Local Plan which seek to deliver ecological restoration across the borough. Suburban development proposals should seek to achieve this by supporting and enhancing the biodiversity on individual sites through:

- In the first instance, retaining existing trees and planting.
- Only where the removal of existing landscaping is unavoidable, they are replaced with mature trees and planting. This will only be acceptable where the loss is outweighed by the benefits of a development. Replacement planting should be native species that will help enhance the natural biodiversity of the area. This applies to planting lost both within and outside a site boundary as a result of development.



Figure 2.32c

Figure 2.32b & 2.32c: Well landscaped communal areas with a variety of planting that add interest.

- Providing a wildlife area of natural landscaping within gardens. This may be ideally located to the rear of sites and should seek to be at least 3m deep to allow sufficient space to encourage natural habitats.
- Providing landscaping that incorporate a range of features. This should include a mixture of trees, hedges, shrubs, planted borders, grassed areas and where possible water features. This should be demonstrated in landscaping plans submitted at application stage and may be conditioned as part of an approval. Plans which do not balance the provision of grassed areas with other landscaping elements will generally not be acceptable.
- Providing greenroofs where a significant amount of existing landscaping is lost to hard standing and/or the footprint of the proposal. Applicants may be required to calculate and demonstrate on a plan the quantity of landscaping lost.

2.33.2 Applicants are advised to refer to the Urban Tree Manual which provides advice on selecting the right tree for the right location³⁸.

³⁸ Refer to: file:///C:/Users/1003496/Downloads/7111_FC_Urban_Tree_Manual_V15.pdf

2.34 DESIGN OF PRIVATE & SHARED OUTDOOR AMENITY SPACE

2.34.1 New dwellings should include outdoor amenity space as set out in policy DM10.4 of the Croydon Local Plan and:

- Where possible, is directly accessible from the dwelling. Where this is not possible, applicants will need to demonstrate this and provide shared outdoor amenity space in lieu.
- Where possible, provides outlook from habitable rooms.
- In exceptional circumstances where directly accessible private outdoor amenity space is not possible or would negatively impact the external appearance of the proposal, extra emphasis will be placed on the provision of high quality shared outdoor amenity space.
- Where shared outdoor amenity space is provided, units with direct access should include an area of semi-defensible private space.
- Where a shared outdoor amenity space is provided in lieu of directly accessible private outdoor amenity space, provide a large area of shared space, along with a series of

semi-private spaces allocated to each unit, as shown in Figure 2.34c. These should be open to the shared areas and may be bordered by low hedges and shrubs but should not be divided from the other garden areas with fences or high hedges.

- Shared outdoor amenity space should be designed to accommodate a series of different uses, with quieter seating areas along with family orientated areas, and should seek to include a mixture of grassed and planted areas as a minimum, and a shared patio area.
- Schemes over 10 units and all schemes containing flats must provide play space in accordance with Policy DM10.4 (d) of the Croydon Local Plan. Play space need not be provided with off the shelf equipment, but can often be better accommodated with natural play as part of the landscape design.
- Shared access to a garden shed or similar, along with a garden tap, are encouraged and should be provided to facilitate maintenance and ownership over the space by residents.

2.35 LANDSCAPE DESIGN ASSOCIATED WITH RETAINING WALLS & LARGE FLAT ROOFS

2.35.1 Retaining walls may be required on sloping sites. Where necessary, retaining walls should respond to the materials and design of the proposed development and should be integrated into the landscaping proposal. This may include stepped planting borders within the retaining wall. Large, blank retaining walls that impact the street scene or neighbouring amenity will not be acceptable.

2.35.2 Where large flat roofs cannot be avoided and are visible, landscape design should be used to make these less prominent as viewed from the streetscene and neighbouring habitable rooms. This may include the provision of a green roof and planting surrounding the built form to help reduce impact on visual amenity.

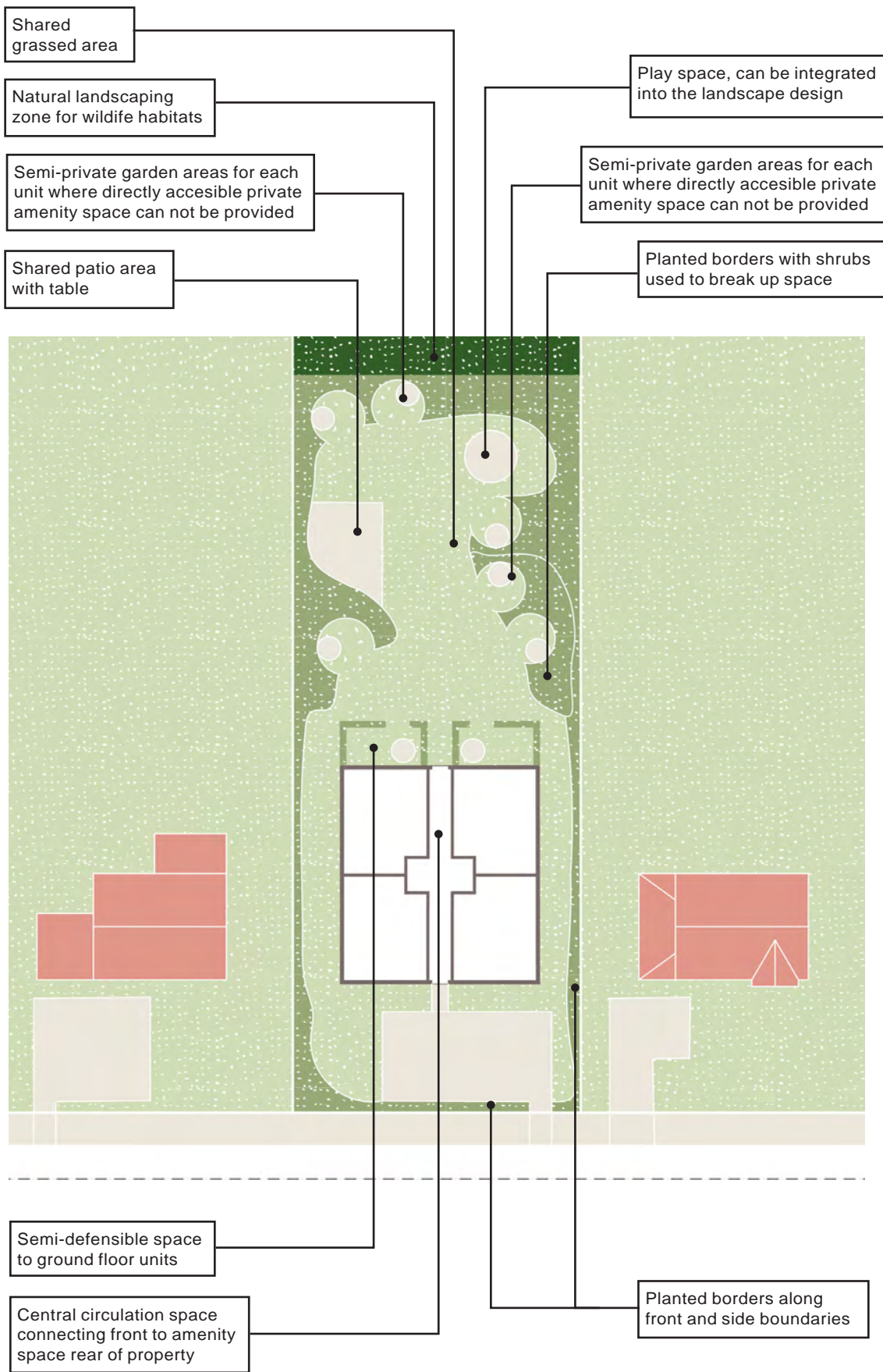


Figure 2.34a: Diagram for a typical shared amenity space layout

2.36 SUSTAINABLE DRAINAGE SYSTEMS (SUDS)

2.36.1 SuDS are an approach to managing surface water run-off which seeks to ensure that a proposed development is able to mimic natural drainage systems and retain water on the site, as opposed to traditional drainage approaches which involve piping water off site as quickly as possible. Where required, they should be integrated into the landscaping design at an early stage.

WHEN ARE SUDS REQUIRED?

2.36.2 SuDS are required where there is risk of surface water flooding or all or part of a proposed development is in a Flood Zone 2 or 3³⁹. Developments will be required to provide a Flood Risk Assessment in which mitigation, such as SuDS, may be recommended. All major developments (more than 10 residential units) are required to provide a Flood Risk Assessment and Drainage Strategy in accordance with the National Planning Policy Framework and Planning Practice Guidance. Where there is a potential issue associated with surface water or development in a flood zone, developers should, as early in the design process as possible, seek advice from the Lead Local Flooding Authority⁴⁰.

WHY USE SUDS?

2.36.3 SuDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water runoff from a site, promoting groundwater recharge and biodiversity benefits, as well as improving water quality and amenity value.

³⁹ For information on whether a proposed development site is located in a flood zone, refer to the Croydon Local Plan 2018 interactive mapping tool, available online at: <http://www.planvu.co.uk/croydon2018/>.

⁴⁰ Advice is available at: <https://www.croydon.gov.uk/environment/flood-water/advice-to-planning-applicants>.



Figure 2.36a: Green roof designed by Hayhurst & Co.



Figure 2.36b: Trench with planting. (Photo: James Hitchmough)



Figure 2.36c: Stepped roof with planters designed by Hayhurst & Co.



Figure 2.36d: Drainage pond. (Photo: 2b Landscape Consultancy)

DESIGN OF SUDS

2.36.4 SuDS should be incorporated and integrated into the design of the landscape and buildings in suburban development to maximise landscaping and biodiversity opportunities. Appropriate options for SuDS in residential suburban developments include:

- **GREEN ROOFS:** A specially designed roof covering that absorbs water and attenuates flow to a drainage layer below.
- **FILLER TRENCHES AND DRAINS:** Shallow trenches filled with shingle and gravel to allow for temporary surface attenuation.
- **DRAINAGE SWALES AND PONDS:** Vegetated spaces that can be used to store excess water and may include an existing level of water and capacity provision. Drainage swales and ponds may also be included in a landscaping plan for development that is free from water except in case of flooding.
- **BIORETENTION SYSTEMS:** Contained, lowered landscaped areas or pre-fabricated units with soil and vegetation to reduce run-off.
- **PERMEABLE PAVING:** Permeable paving that allows water to filter down to the layer below and be discharged into a controlled drainage system.
- **RAINWATER AND/OR GREYWATER HARVESTING:** The easiest and most common form that can be provided is a household water butt, where it can be stored and used for gardening and other purposes at a later date. Greywater (water from showers, baths, basins etc.) needs to be treated if stored for any amount of time. This should be considered to achieve sustainability and building control objectives.



Figure 2.36e: Permeable paving



Figure 2.36f: Water butts

CASE STUDIES

2.37 REGINA ROAD

2.37.1 A good example of a **proposal for a back land** development on a site which is highly constrained, narrowing at one end. The development proposes a larger block where the site is wider, containing flats, and then a series of 1 and 2 storey houses. The change in scale reflects the proximity to existing neighbours. The use of high-quality contemporary materials differentiates the proposal from its surroundings, with architectural forms that reinterpret traditional suburban building types to create unique homes that respond to issues of overlooking.

2.37.2 For more information, visit the planning public access register on the Council's website, using case number: 16/06023/FUL. The scheme was designed by Stitch Studio for Brick by Brick.



Figure 2.37a



Figure 2.37b

2.38 MULBERRY LANE

2.38.1 A good example of a **sympathetic and faithful approach** on a rear garden site. Well-chosen materials and considered detailing responds to the surrounding architecture. The development sits within the East India Conservation Area adjacent to other intensification examples, including the conversion and extension of existing properties into flats.



Figure 2.38a

2.39 ONSLOW GARDENS

2.39.1 A good example of an **innovative and original approach** in a rear garden development. The development provides 2 new family homes in the rear gardens of existing properties, with access being provided by the existing driveway of one of the host dwellings. The form and material approach is contemporary and seeks to enhance the local character by deliberately distinguishing itself from the existing street facing development.

2.39.2 For more information, visit the planning public access register on the Council's website, using case number: 16/00455/P



Figure 2.39a



Figure 2.39b



Figure 2.39c

2.40 RUSHDEN & RAVENSDALE

2.40.1 An example of 3 adjacent sites delivering a total of 28 homes in place of existing garages. Each site within the proposal presents a positive approach to suburban intensification. The proposal for a 7-storey block of flats on the **corner site** makes the most of its prominent location within the streetscene. Homes of 2 and 3 storeys located to the rear of existing dwellings are of a scale that respond to their context.

2.40.2 For more information, visit the planning public access register on the Council's website, using case number: 16/06374/FUL. The scheme was designed by HTA Design for Brick by Brick.



Figure 2.40a



Figure 2.40b



Figure 2.40c: Site plan

2.41 MELVILLE AVENUE

2.41.1 The redevelopment of a single dwelling into 6 flats within a 3 storey + basement dwelling. This proposal exemplifies a good **contemporary reinterpretation approach** to character through the use of high-quality contemporary architectural design that makes a contextually considered response to the site and neighbourhood characteristics. The units are large and carefully planned, with generous window sizes. The landscaping and roof terraces make the most of the topography of the site, providing well considered communal amenity spaces.

2.41.2 For more information, visit the planning public access register on the Council's website, using case number: 17/00720/FUL. The scheme was designed by MATA Architects.



Figure 2.41a



Figure 2.41b

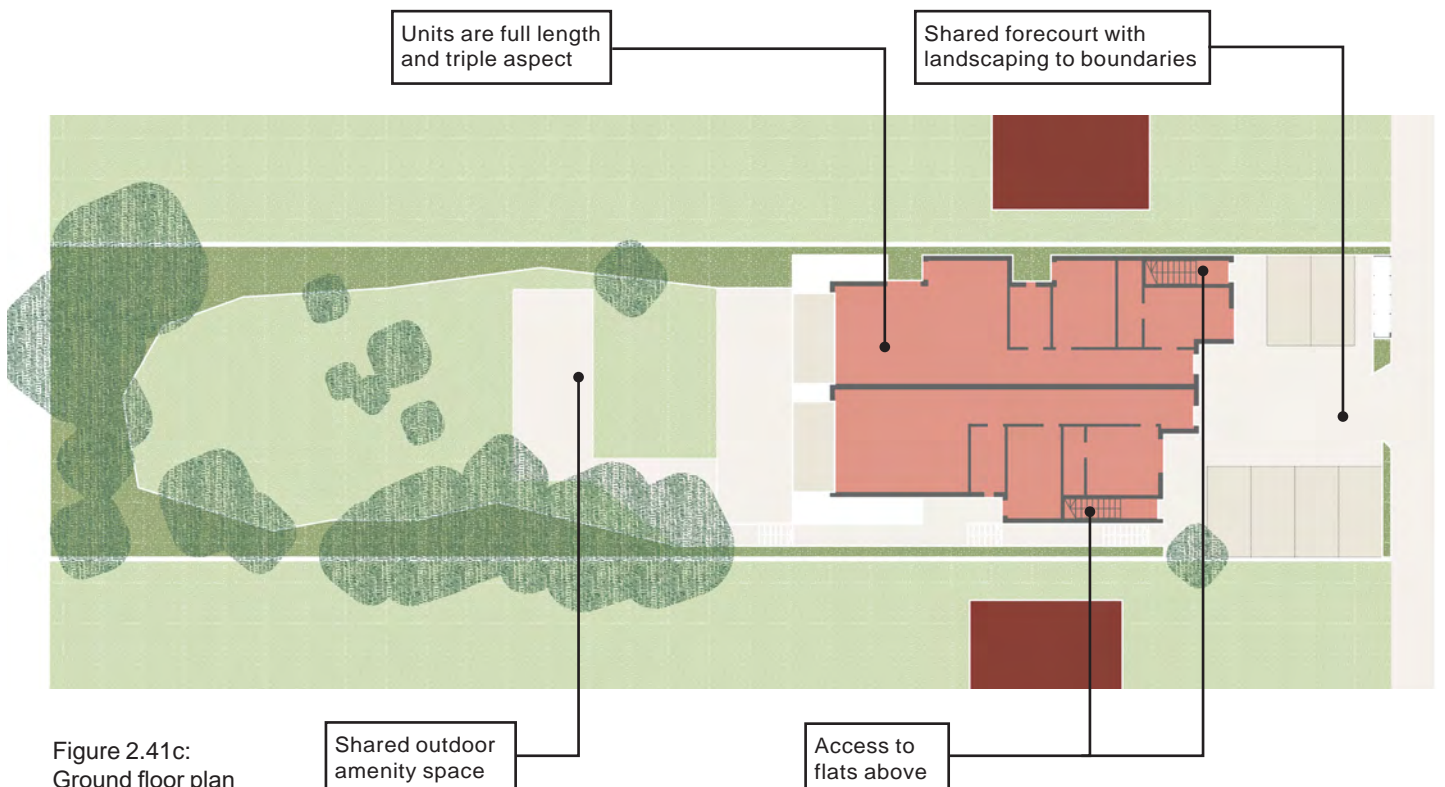


Figure 2.41c:
Ground floor plan

2.42 EAGLE HILL

2.42.1 The redevelopment of a constrained site formerly containing garages to provide 8 flats within a development that carefully steps down the site's steep topography. The homes are orientated around internal courtyards to bring light into deep plans and to prevent overlooking to neighbouring properties, whilst providing multiple outlooks. The building form is **innovative and original** but makes reference to the site's former use as garages.



Figure 2.42a

2.42.2 For more information, visit the planning public access register on the Council's website, using case number: 16/06275/FUL. The scheme was designed by Coffey Architects for Brick by Brick.



Figure 2.42b

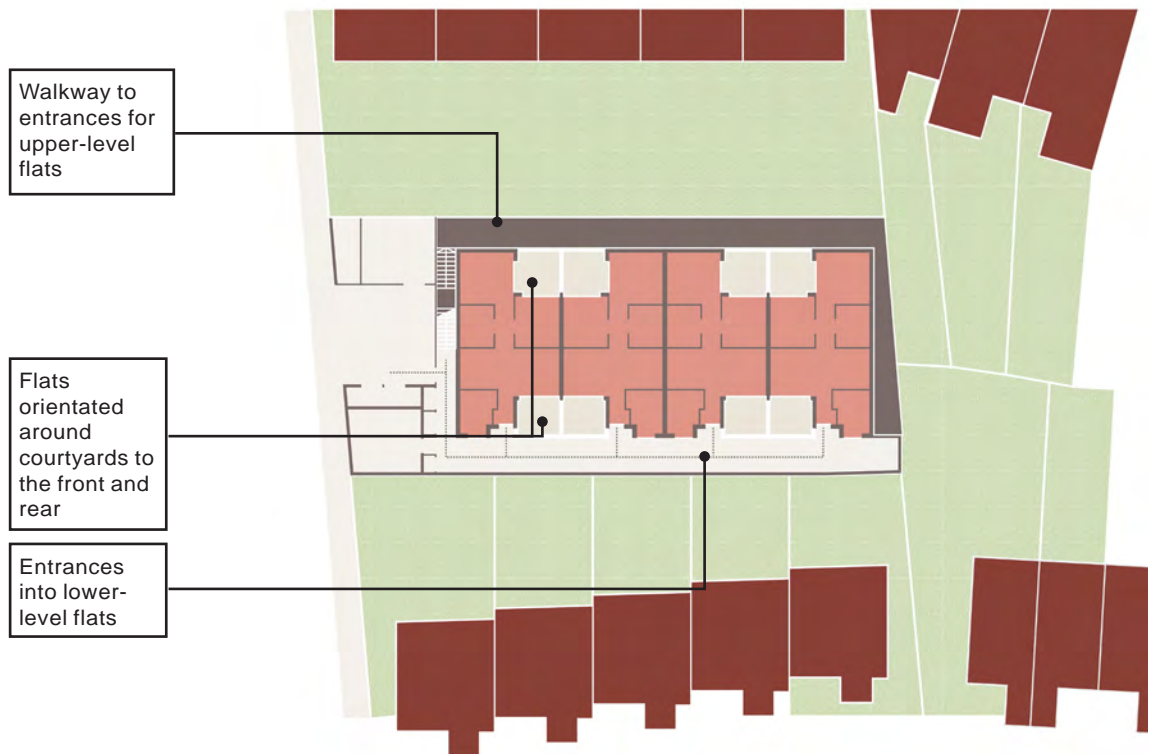


Figure 2.42c: Lower-level plan

2.43 PAIR OF SEMI-DETACHED HOUSES

2.43.1 The redevelopment of 2 adjoining semi-detached properties, typically each being 3-bedroom dwellings. The proposal **optimises the site** to provide a high proportion of family-sized homes. There are 6 x 3-bedroom flats located in the street facing block, the third floor of which is partially contained within the roof-space. The rear garden development provides 2 x 2-bedroom houses that are inward facing so as not to prejudice development on neighbouring sites. The distribution of mass across the site reduces the impact of intensification on streetscape whilst providing a high percentage of family-sized units. The proposal that faces onto the street makes use of symmetry to respond to the context of the semi-detached street, with an enlarged building envelope to provide increased footprint to ensure the delivery of family-sized units. Parking is distributed across the site to minimise visual intrusion.

2.43.2 This is a designed scheme to highlight the possibility of such redevelopment.



Figure 2.43a



Figure 2.43b: Ground floor plan

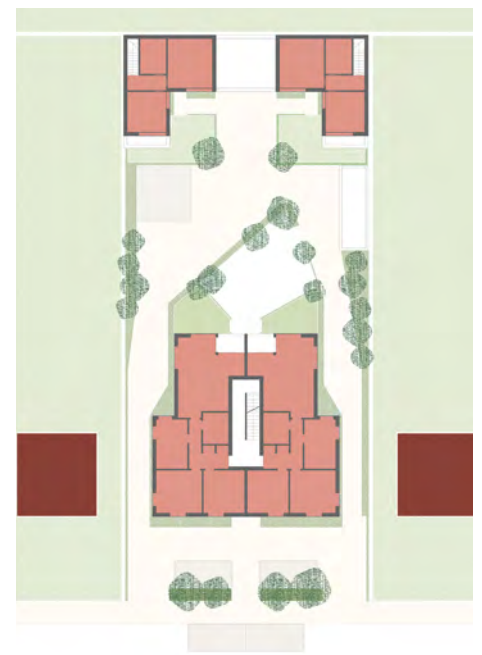


Figure 2.43c: First floor plan

2.44 OVAL MEWS

2.44.1 Redevelopment of dis-used commercial/industrial buildings to provide 3 flats and 6 houses on an awkwardly shaped site with challenging overlooking issues. Where the proposal fronts the street it takes a **sympathetic and faithful approach**, matching materials and details to the neighbouring properties. To the rear, a mews style language is developed with a close-knit plan orientated around a shared access path. The layout ensures homes are dual aspect and have access to private outdoor amenity space.

2.44.2 For more information, visit the planning public access register on the Council's website, using case numbers: 5/01118/P. The scheme is a development by Chartwell Land & New Homes.



Figure 2.44a



Figure 2.44b

2.45 PURLEY DOWNS ROAD

2.45.1 A good example of the redevelopment of a single family house to provide into a 8 **family-sized homes**, each containing four-bedrooms. 2 houses face onto the road, with a further 6 houses set in the rear garden. The development is designed in a traditional style using high quality and robust materials that responds to the existing local architecture.

2.45.2 For more information, visit the planning public access register on the Council's website, using case number: 16/04186/FUL



Figure 2.45a



Figure 2.45b

An aerial, isometric illustration of a city neighborhood. The scene includes residential houses, a school building with a playground, a multi-story commercial building with a cafe and shop, a parking lot with cars and a bus, and a street with a double-decker bus. A semi-transparent white rectangular box is overlaid on the upper half of the image, containing the chapter title in orange text.

CHAPTER 3: AREAS OF FOCUSSED INTENSIFICATION

INTRODUCTION

3.1 DESIGNATION IN THE CROYDON LOCAL PLAN

3.1.1 To achieve the current housing target of the Croydon Local Plan, the Areas of Focussed Intensification were identified from evidence which indicated that they were areas with established infrastructure but relatively low density and the potential to accommodate a significant increase in residential development to meet the borough's housing target. The areas of focussed intensification are:

- The area around **Kenley** station;
- The area around **Forestdale** Neighbourhood Centre;
- **Brighton Road** (Sanderstead Road) Local Centre with its setting; and
- Settings of **Shirley** Local Centre and Shirley Road Neighbourhood Centre.

3.1.2 Policy DM10.11 of the Croydon Local Plan provides the policy against which development in areas of focussed intensification should be assessed against. It states that *'Developments in focussed intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed'*.

3.1.3 Furthermore, the Croydon Local Plan sets out how Croydon will accommodate growth and improvement through different methods, one of which being focussed intensification associated with change of area's local character. Specifically, supporting text 6.103 states that

'focussed intensification aims to maximise the existing growth capacity through an increase in density of development and a gradual change in character to similar but higher density forms of development. Sites will be redeveloped with denser forms of development of a different character to that which exists in the local area currently as it would not be justified, when there is unmet housing need, to move towards a more consistent character that replicates surrounding low density development types'.

3.1.4 New development in Areas of Focussed Intensification may be significantly larger than existing and should;

- a. Be up to double the predominant height of buildings in the area;
- b. Take the form of character types "Medium-rise block with associated grounds", "large buildings with spacing", or "Large buildings with Continuous frontage line";
- c. Assume a suburban character with spaces between buildings.

3.1.5 Policy DM10.11 further states that intensification will be supported in and around District Local and potential Neighbourhood Centres which have sufficient capacity for growth due to the high availability of community services. Further growth can be accommodated through more efficient use of existing infrastructure.

3.1.6 The Areas of Focussed Intensification have been designated due to their capacity to accommodate development. As such, these areas could relieve development pressure on more sensitive locations in the borough, including conservation areas or protected open spaces. It is expected that the evolution

of these places will result in a managed change of their character over a period of 10-20 years to meet the housing need.

3.1.7 As stated in Policy DM10.11 set out previously, intensification is expected to enhance and sensitively respond to existing character. Elements which contribute positively to the character of each Focussed Intensification Area – including public spaces, community facilities and infrastructure, Heritage Assets and Locally Designated Views – should be preserved and enhanced, and new development should be designed to respond positively towards them. Development should therefore consider Listed Buildings, Locally Listed Buildings, views and the relationship to the Metropolitan Green Belt land.

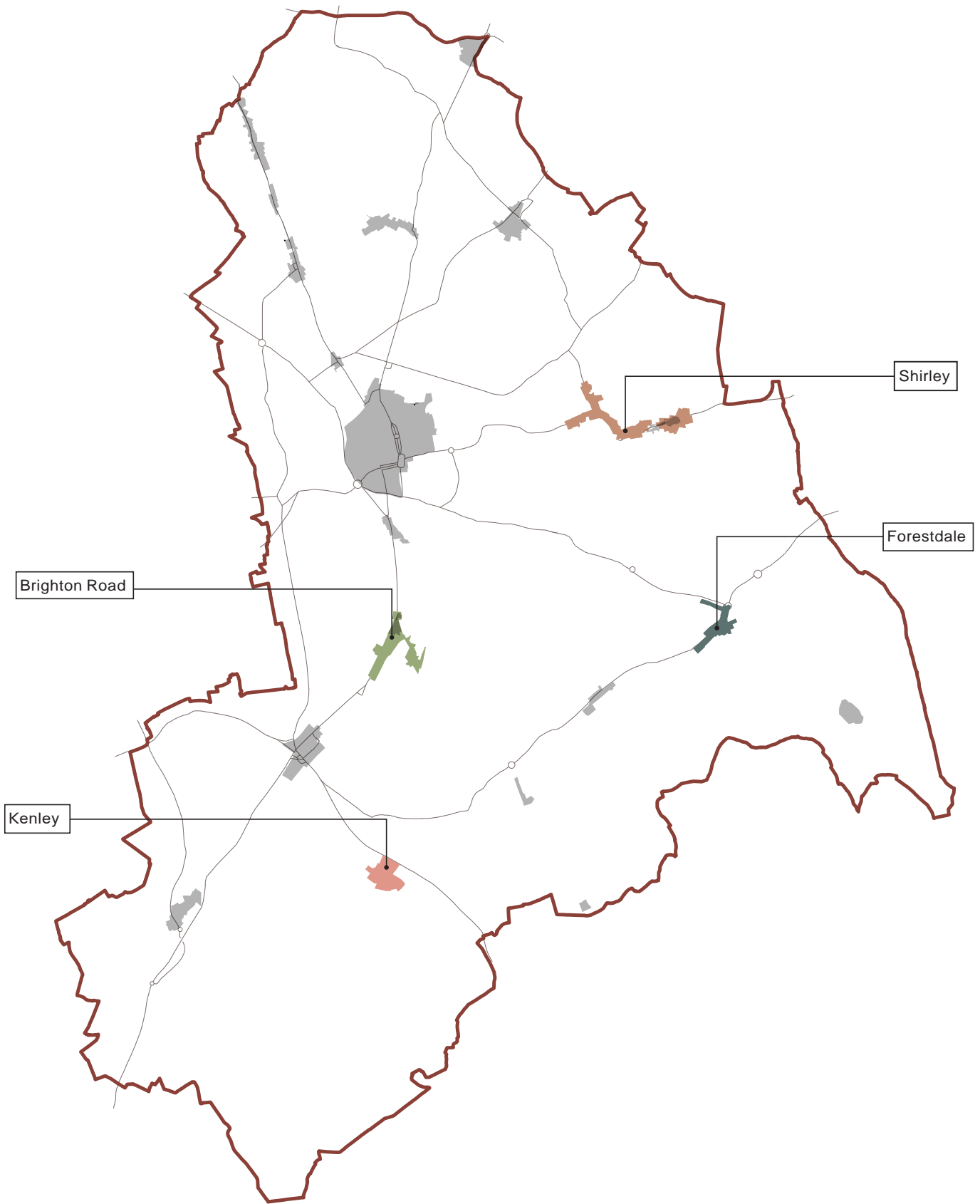


Figure 3.1a: Map of Croydon with Areas of Focussed Intensification highlighted and the Croydon Metropolitan Centre, District Centres and Local Centres shaded in grey which are all expected to accommodate intensification, along with Neighbourhood Centres where they have sufficient capacity for growth, in accordance with the Croydon Local Plan.

3.2 GENERAL GUIDANCE FOR AREAS OF FOCUSED INTENSIFICATION

3.2.1 Developments within the Areas of Focussed Intensification should primarily refer to the guidance within this chapter and, where relevant, refer to guidance within the previous chapter, 'Chapter 2: Suburban Residential Development'. The guidance on materials & external appearance, site layout & servicing, and landscaping & outdoor amenity space within Chapter 2 remain relevant. Policy DM10.11 of the Croydon Local Plan provides greater flexibility on massing and character for the Areas of Focussed Intensification than set out in Chapter 2, however it is still important that proposals develop an approach to character (refer to Section 2.7 & 2.8) that contributes to positive change and are aware of how the massing of a proposal will inform the future appearance of the area. All applications for residential extensions and alterations within the Areas of Focussed Intensification should refer to Chapter 4 for guidance.

3.2.2 As the number of residents

increase in the areas, it provides the business case to improve and sustain services and facilities, providing tangible benefits that result from intensification. Whilst this guide is primarily a residential design guide and therefore cannot address all issues, the Council will seek opportunities to work with communities within the Intensification Areas to deliver this.

3.2.3 Beyond strengthening the provision of services, infrastructure and commercial offers in the areas, development should come forward in a manner that collectively promotes thriving, healthy and safe communities within the Intensification Areas. This includes contributing to biodiversity and recreational space through landscaping design both within private development sites and in the public realm in a manner that contributes to leafy suburban characteristics wherever possible.

3.2.4 The provision of sustainable transport facilities will be facilitated through transport improvement schemes such as the South Croydon Bus Review. Developments will be able to contribute to the development of sustainable transport options through promoting walking and cycling opportunities, for example in the design of access routes into a site and the provision of cycle storage as per the guidance in Chapter 2.

3.2.5 As demand on road infrastructure changes with reduced car ownership in line with national trends or where the need to address road safety issues emerges, the Council will seek to work with stakeholders and local communities to address these and wherever possible provide opportunities that will enhance the area.

3.2.6 The guidance in the following pages sets out a more detailed vision for each of the Focussed Intensification Areas and outlines indicatively the development potential within each area based on different building typologies. These building typologies are derived from the Croydon Typology Appraisal⁴¹. Applicants should refer to this for further information on the different typologies identified.

⁴¹ Available at: https://www.croydon.gov.uk/sites/default/files/articles/downloads/BoroughCharacter_typology_20150921.pdf.

EVOLUTION OF STREET WITH A MIXED CHARACTER IN AN AREA OF FOCUSSED INTENSIFICATION

2018



Figure 3.2a: **2018** - Medium-rise blocks of flats with associated garages sit opposite Victorian terraces. A mixture of buildings of different ages, underutilised garages and hardstanding dominates the street scene.

2036



Fig 3.2b: **2036** - Garages are redeveloped to provide new homes, whilst the existing flats and terraces are retained. Landscaping improves the street scene and shared bike storage is provided.

EVOLUTION OF A STREET WITH DETACHED & SEMI-DETACHED HOMES IN AN AREA OF FOCUSED INTENSIFICATION

2018



Figure 3.2c: **2018** - A mixture of detached and semi-detached homes bring variation to this street, but there is no dominant typology, while large gardens and landscaping shape the streetscene.

2036

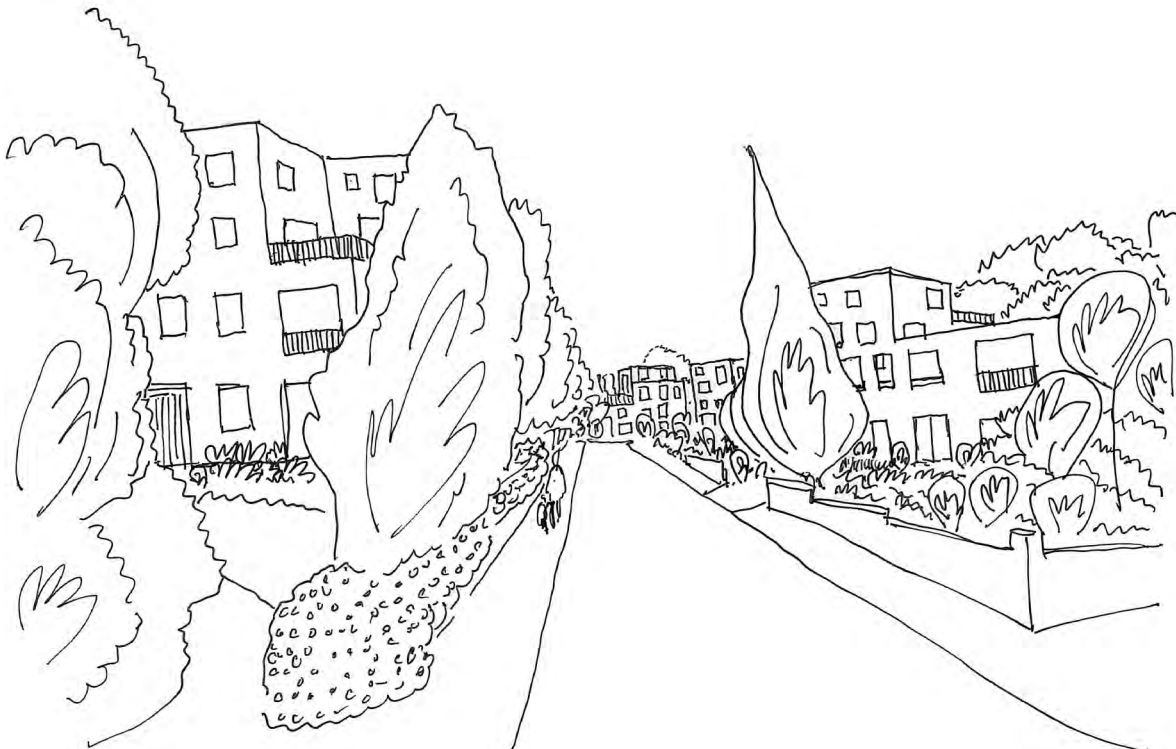


Figure 3.2d: **2036** - Redevelopment provides flats and townhouses set in generous gardens. The leafy character of the street is retained.

EVOLUTION OF AN ARTERIAL ROAD IN AN AREA OF FOCUSSED INTENSIFICATION

2018



Figure 3.2e: **2018** - Housing occupies one side of the road, with a mixture of uses on the other. There is no predominant scale and the street scene is dominated by the road.

2036

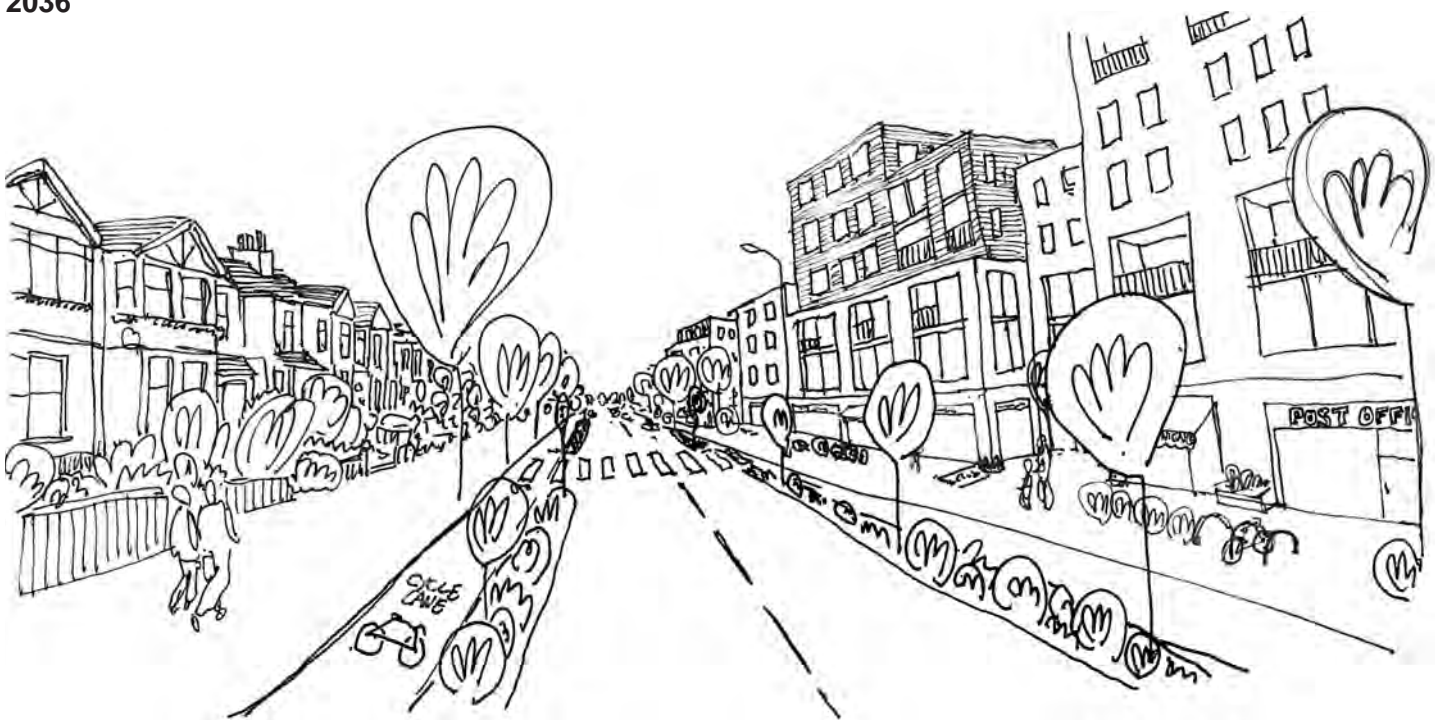


Figure 3.2f: **2036** - New developments of additional height provide an active road frontage, giving it a human scale and reducing the dominance of the road. Through interventions by the Council, or where relevant TfL, the thoroughfare is maintained but adjusted to provide public realm improvements to help prioritise pedestrian movement.

KENLEY

3.3 INTENT OF THE KENLEY INTENSIFICATION AREA:

3.3.1 Redevelopment and development in the area (as designated in the Croydon Local Plan) should seek to provide additional housing and support an associated increase in population. This is proposed to be achieved through a variety of dwelling types and a revitalisation of local businesses and services along Godstone Road, providing long-term benefit to the community. Developments in Kenley should seek to maintain the leafy character of the area with increased focus around a regenerated village centre. The shopping parade, train station, church, nursery, GP surgery and memorial hall should be supported and improved as necessary to continue to provide important community services.



Figure 3.4a: Station Road



Figure 3.4b: Corner of Kenley Lane and Welcomes Road

3.4 AREA APPRAISAL

3.4.1 The area around Kenley Station identified for focussed intensification is characterised by predominantly scattered houses on large plots and overall has a green and leafy feel with a variety of building forms separated from the street. The area south of Kenley Lane, including Hayes Lane and Welcomes Road, a private road, is comprised of predominantly detached homes on relatively large plots. These plots typically include off-street parking by way of a garage and driveway. The topography of Hayes Lane is quite steep, with a significant slope further south into the intensification area. These residential plots back onto, and subsequently overlook the residential plots on Welcomes Road. Kenley Lane is also comprised of detached homes on large plots and runs parallel to the railway station before heading south and branching into Welcomes Road.

3.4.2 The western part of the Intensification Area has a largely suburban feel and includes Park Road and Oaklands which contains predominantly medium rise blocks with associated grounds as well as on-street parking and localised green space. Part of Oaklands is designated as a Site of Nature Conservation Importance; any development on this site must take account of this.

3.4.3 The area north of the train line includes some medium rise blocks with associated grounds along with terraced houses and cottages and a small strip of retail uses on Godstone Road. This is opposite the Riddlesdown greenbelt land, which provides significant recreational amenity to the area, including the Kenley Panorama. Any development

proposal should seek to protect and enhance this panorama.

3.4.4 The area is reasonably well accessed by public transport, including buses, and is walkable from Kenley train station. Public transport in the area is expected to improve as a result of the South Croydon Bus Review and improvements to the Brighton Main Line in the East Croydon area. There are however a number of road safety issues that result from local narrow lanes which lack pavements, along with gradients, blind corners and the humpback bridge over the railway. It is noted that the A22 is subject to a current TfL improvement proposal that seeks to address issues resulting from traffic, lack of pedestrian crossing, car parking aside the road and the junction with Hayes Lane. It is important that development seeks to reduce car reliance and there is the potential to introduce schemes, such as a Home Zone or Quiet Lane, that prioritise pedestrians. The safety of the lanes may also be improved by the provision of lighting.

3.4.5 There is an existing GP surgery, local schools, the Kenley Memorial Hall and local church which all contribute to the community and character of the area. The existing parade of shops also provides focus to the community and development should seek to enhance this offering.

3.4.6 Development in Kenley should seek to reduce flood risk as the area is prone to flooding with Station Road and Godstone Road being within Flood Zone 3. Any development proposals within the flood zone should refer to Policy DM25 and Table 8.1 of the Croydon Local Plan which require sequential and exception tests.

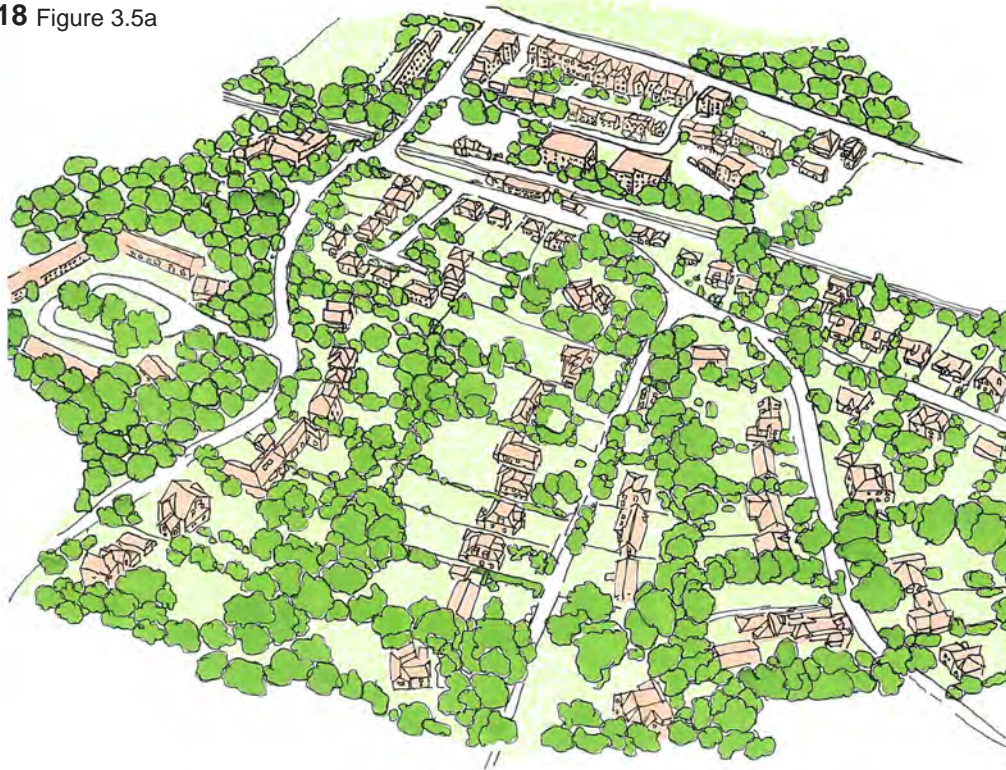


Figure 3.4d: Map with boundary of Kenley Intensification Area (As designated in the Croydon Local Plan)

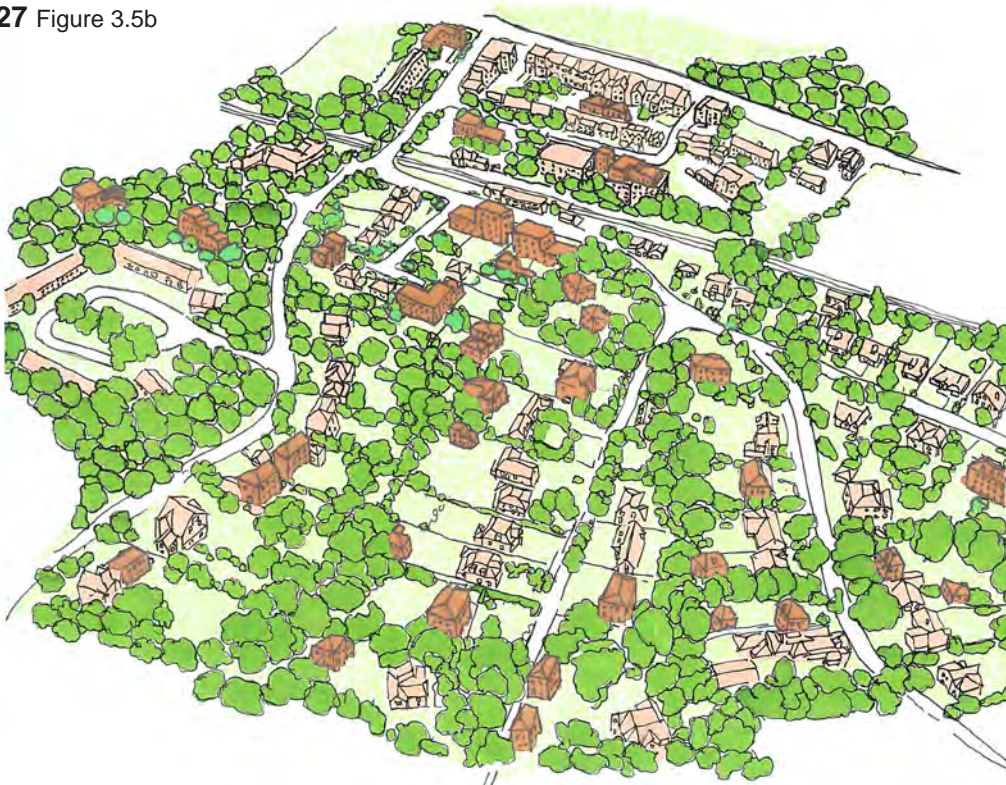
3.5 POTENTIAL DEVELOPMENT SCENARIO (KENLEY)

3.5.1 The scenario described in the following images is indicative and describes one potential way in which the area may be developed. Proposals within the area will be subject to consideration against the Croydon Local Plan, London Plan and this guidance document.

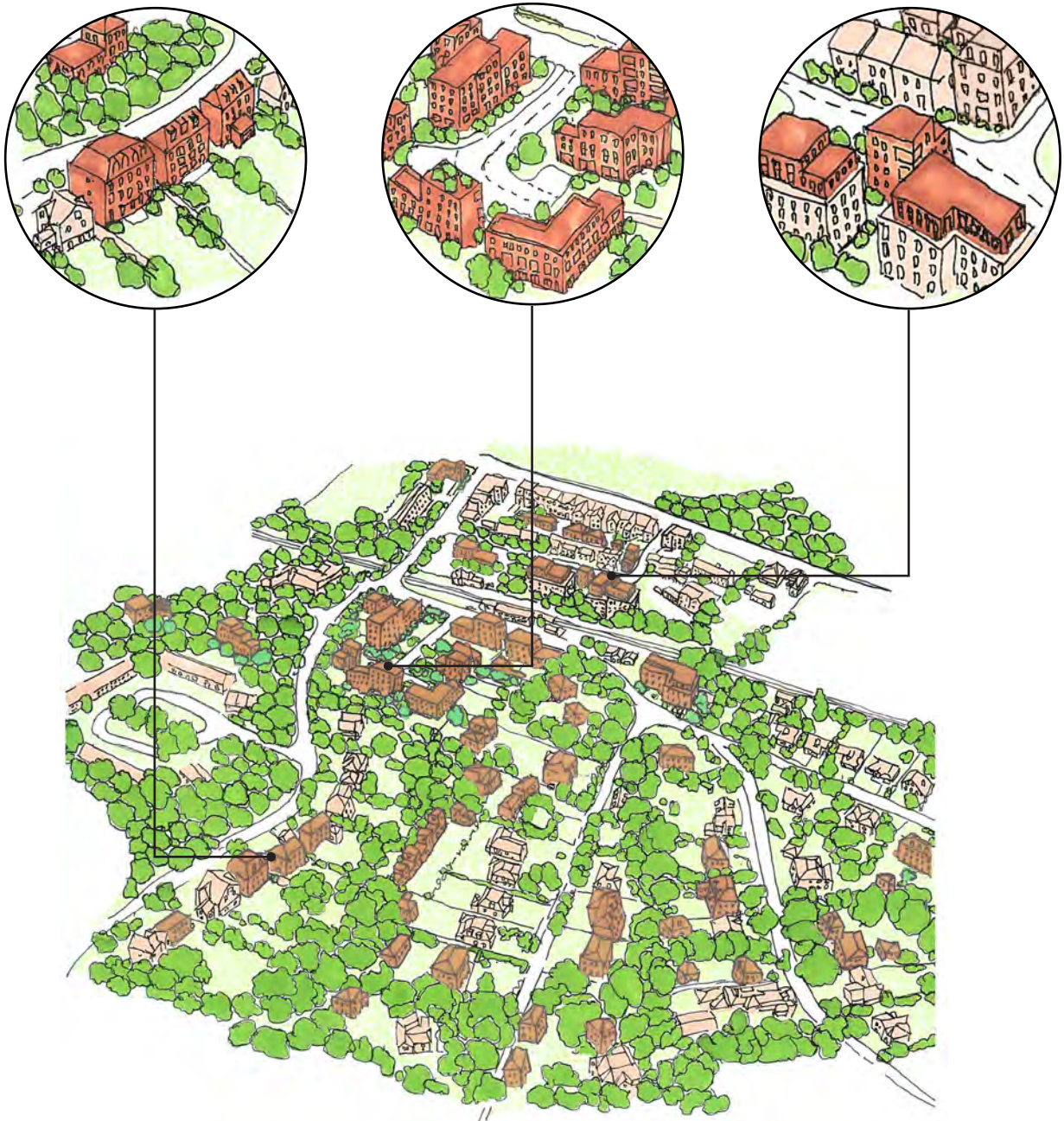
2018 Figure 3.5a



2027 Figure 3.5b



2036 Figure 3.5c



3.6 TYPOLOGY DEVELOPMENT POTENTIAL (KENLEY)

MEDIUM-RISE BLOCKS WITH ASSOCIATED GROUNDS:

- Existing blocks of flats may be redeveloped or extended to provide up to 6 storeys in height where possible.
- Garages associated with these flats present opportunities for development to the same height as the blocks of flats themselves, where this would not unreasonably impact existing residents. Where necessary, garages at ground level may be maintained with accommodation provided above.
- A parking survey will be required to show that the loss of garage parking would not result in a negative impact on parking stress in adjacent roads. If this survey suggests that there will be an impact then the developer will be required to enter into a legal agreement restricting future occupiers from applying for an on street parking permit (Refer to Policy DM30(a) of the Croydon Local Plan). If the site is outside a controlled parking zone then the development will be expected to accommodate parking on site.
- Proposals for existing low & medium-rise blocks should seek to minimise the amount of hardstanding land onsite and introduce a greater amount of landscaping to prioritise pedestrians over vehicles.

AREAS OF TERRACED HOUSES, COTTAGES & COMPACT HOUSES:

- These housing typologies should be preserved to maintain the character of the area. There may be scope for additional accommodation within roofs, with dormer windows to the front and box extensions to the rear roofs.
- In some instances, these typologies may allow for mews style development to occur.

AREAS WITH SUBURBAN SHOPPING & LINEAR INFRASTRUCTURE:

- The retail and service function of Kenley Neighbourhood Centre should be maintained and enhanced with greater provision of local amenities. The public realm may benefit from both soft and hard landscaping improvements, along with rejuvenated shopfronts and the provision of outdoor seating associated with cafes and restaurants.
- Accommodation above shops is encouraged and the conversion of roof spaces into acceptable habitable rooms is supported, where it does not have a negative impact on the operation and viability of retail units or other employment functions. There may be scope for additional accommodation within roofs, with smaller dormer windows to the front and larger box extensions to rear roofs.
- Car parks may present some development opportunity to provide mixed-use schemes, provided the required quantum of parking is maintained (Refer to Policy DM30 and DM31 of the Croydon Local Plan).
- Social infrastructure and community services should be

accommodated as part of the sustainable growth of the area.

SCATTERED & DETACHED HOMES:

- Developments of 4 storeys will generally be acceptable.
- Smaller plots may provide opportunities to merge with neighbouring sites to form large, comprehensive and coherent development sites; this approach would be encouraged to aid the delivery of affordable housing. Where applicable, these must meet the affordable housing requirements in accordance with Policy SP2.4 of the Croydon Local Plan.
- Where plots are subdivided to create rear garden development, these applicants should consider the development potential of the neighbouring rear gardens and the potential to create a larger site with one comprehensive development proposal. Where there is neighbouring development potential but sites do not come forward in one application, the proposed development should be designed to ensure future access can be accommodated from the access route to the first rear garden development⁴².
- Development proposals must consider the topography carefully to ensure appropriate access and minimise the use of retaining walls (Refer to Section 2.35 for guidance).
- These plots currently provide significant landscape amenity and contribute to the biodiversity of the area. As such the significant loss of landscaping will not be accepted and must be balanced with re-provision of

⁴² Such approvals may be subject to conditions to secure this.

high quality mature planting of native species which will support the local ecology and should be demonstrated on plans provided as part of the development application. Applicants should refer to Sections 2.32-2.36 in Chapter 2.

- Developments accessing onto narrow lanes without pavements should provide a 1.5m buffer strip along the front of the site directly adjacent to the road, allowing greater space for pedestrians, cyclists and passing vehicles. This area should not be planted with shrubs or trees

or enclosed from the road, and may function best as a grass verge or gravelled area. This may require a reworking of landscaping to the front of properties to bring the boundary treatment away from the road. Any lost planting should be reprovided within the scheme.

- Where individual plots are developed into multiple units or there is a loss of a parking garages, the Council may require a parking survey to show that it will not result in a negative impact on parking stress in adjacent roads. If there is deemed to be a

negative impact on parking stress then the Council may seek to minimise the overall impact of parking demand on the adjacent roads by requiring the developer to enter into a legal agreement restricting future occupiers from applying for an on street parking permit in the Controlled Parking Zone (CPZ), as per Policy DM30a of the Croydon Local Plan in areas of PTAL 4 and above or in areas of parking stress. If there is evidence of parking stress and the site is outside a CPZ then the development will be expected to accommodate parking on site.



Figure 3.6a: Hayes Lane

FORESTDALE

3.7 INTENT OF THE FORESTDALE INTENSIFICATION AREA:

3.7.1 The area around Forestdale Neighbourhood Centre (as designated in the Croydon Local Plan) provides opportunity for intensification and revitalisation to create a better public realm surrounded by shops and services, to support new and existing homes. By anchoring development around the existing neighbourhood centre and the Forestdale Centre on Selsdon Park Road, there is an opportunity to enhance the suburban village heart to service greater development. Development should seek to maximise underutilised land to deliver an increased housing density with a suburban feel.



Figure 3.8a The Forestdale Centre



Figure 3.8b: Shopping Parade

3.8 AREA APPRAISAL

3.8.1 The area around Forestdale Neighbourhood Centre identified for intensification is a mix of character typologies supported by small-scale suburban shopping areas. Gravel Hill and the eastern side of Selsdon Park Road are typified by semi-detached houses. Whilst the topography along Gravel Hill nearest to the roundabout is gentle, the semi-detached homes along Selsdon Park Road are on plots which slope away from the road, providing opportunities to use the topography to maximise development.

3.8.2 The existing Shopping Parade on Selsdon Park Road is set back from the dual carriageway, with a slip-lane for access. The ground level retail includes residential accommodation above, with large backlands accessed via a rear lane. The Forestdale Centre, located to the south of the road junction between Selsdon Park Road and Featherbed Lane, provides further retail offer. These two shopping areas are disconnected and dominated by the dual carriageway and car parking. Through revitalising the public realm and delivering mixed-use schemes, there is an opportunity to create a heart in the area that prioritises pedestrians



Figure 3.8c: Selsdon Park Road

and encourages the wider community to utilise its services.

3.8.3 There are two (2) fuel stations within the Intensification Area, servicing different directions of traffic. The service station at the Selsdon Park Road roundabout occupies a prominent corner and road frontage, separating the semi-detached homes on Gravel Hill from the terraced houses south along the main road. This corner could better define the street and contribute to a developing character for the area. The Esso service station on the southern side of Selsdon Park Road creates a separation between the neighbourhood centre retail, including The Forestdale Arms, and the medium rise blocks to the west along the main road. These blocks of flats occupy large associated grounds, providing potential for increased development in terms of density and intensity that could deliver greater definition to the main road.

3.8.4 The plots on the eastern side of Featherbed Lane within the intensification area include a variety of houses and services with an inconsistent typology. Accessed by a separate carriageway, this area provides an opportunity to allow connections into the Metropolitan Greenbelt for recreational use. It will be important to strengthen pedestrian links from the Neighbourhood Centre across Featherbed Lane to this location.

3.8.5 The area is served by a number of schools, along with a GP surgery, three bus routes and access to the tram from Gravel Hill. Improvements to infrastructure are set out in the Croydon Infrastructure Delivery Plan.



Figure 3.8d: Map with boundary of the Forestdale Intensification Area (As designated in the Croydon Local Plan)

3.9 POTENTIAL DEVELOPMENT SCENARIO (FORESTDALE)

3.9.1 The scenario described in the following images is indicative and describes one potential way in which the area may be developed. Proposals within the area will be subject to consideration against the Croydon Local Plan, London Plan and this guidance document.

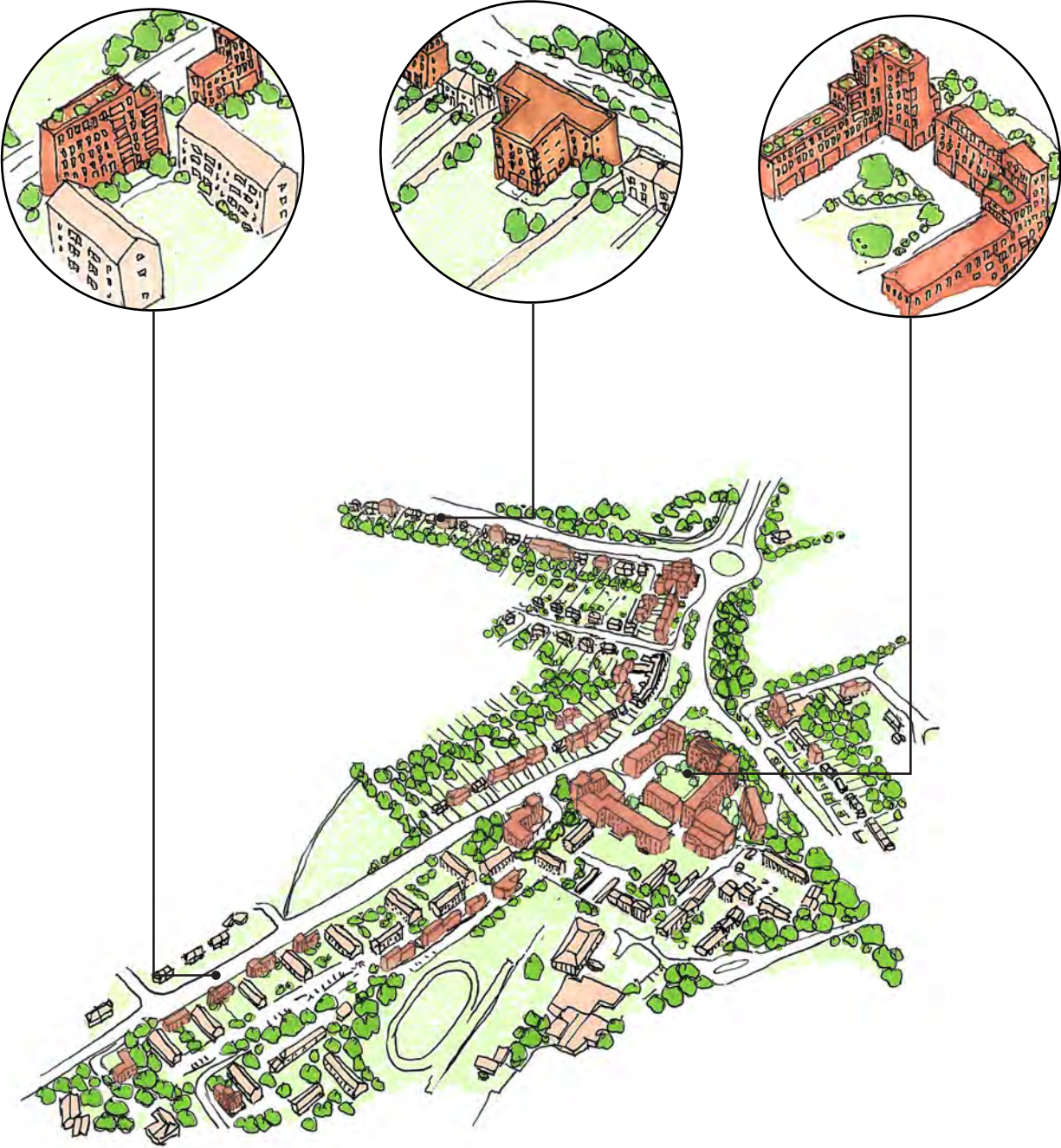
2018 Figure 3.9a



2027 Figure 3.9b



2036 Figure 3.9c



3.10 TYPOLOGY DEVELOPMENT POTENTIAL (FORESTDALE)

SEMI-DETACHED HOUSES:

- Pairs of semi-detached houses may be developed together to provide large developments of flats, maisonettes or terraces. These should seek to provide up to 4 storeys of accommodation, one of which is accommodated in the roof.
- Where possible, proposals may seek to amalgamate 4 or 6 houses (i.e. 2 or 3 pairs of semi-detached houses) in a row to create larger developments which respond to topography. Applicants should refer to the guidance for building across boundaries where this is proposed (Refer to Section 2.15 for guidance).
- Where there is an inconsistent ridge line and change in topography, additional height may be accommodated and, where possible, provide basements and undercroft parking to utilise the slope of the land. Large retaining walls should be avoided. Ramps leading from undercroft parking onto the public highway must be well set back from the back of the footway and the ramp levelled off before a vehicle gets close to the public highway to ensure clear visibility and the safety of pedestrians on the footway at all times.
- Large gardens provide opportunities for rear garden development. These can be accessed by driveways created along the side of the existing houses, particularly where neighbouring properties have similar potential. In these circumstances, the

proposed development should be designed to ensure future access can be accommodated from the access route to the first rear garden development.

TERRACED HOUSES AND COTTAGES:

- Where a set of terraced houses can be redeveloped comprehensively, there is potential for increased development of up to 4 storeys of accommodation, one of which is accommodated in the roof.
- Terraced houses also provide opportunities to create back land developments up to 2 storeys where garages to the rear exist.
- Where individual plots are developed into multiple units, the Council will seek to minimise the overall impact of parking demand on the adjacent roads by restricting permission to apply for on street permits in controlled parking zones.

SHOPPING PARADE (NORTH OF SELSDON PARK ROAD):

- The Shopping Parade should be maintained in terms of use and appearance, without inhibiting the potential for public realm improvements including better connections across to the Neighbourhood Centre and green belt.
- Development should maintain the retail units and encourage additional residential storeys through the provision of small dormer windows to the front roof and box extensions to the rear roofs.
- Underutilised land to the rear of shopping parades may be considered for back land developments of up to

2 storeys, where it does not compromise the functionality of the Shopping Parade or centre.

NEIGHBOURHOOD CENTRE:

- The existing Neighbourhood Centre provides an opportunity to create a central village that includes residential provision, in the form of ground floor retail with 4-5 storeys of residential above.
- Development should help to define the public realm and strengthen the positive characteristic of the neighbourhood centre, providing a stronger frontage to Selsdon Park Road and Featherbed Lane, and establishing pedestrian connections to the shopping facilities and houses across these roads.
- Where car parking is provided, it should not dominate the environment and should be discreetly located, including in basement car parking where possible.
- Development should safeguard or re-provide pedestrian routes into the Neighbourhood Centre, ensuring they are well overlooked, with good surfaces and lighting, to ensure safety.

MEDIUM RISE BLOCKS WITH ASSOCIATED GROUNDS:

- Land associated with these blocks provide amenity space along with opportunities for intensified development to create a stronger frontage along Selsdon Park Road and a better connection into the neighbourhood centre. Any development should respond to the setting of the existing blocks and not significantly reduce the amount of existing amenity space.

- Garage sites may be considered for development but should seek to minimise the substantial loss of garden areas.
- Where there is a loss of garages, the Council may require a parking survey to show that it will not result in a negative impact on parking stress in adjacent roads. If there is deemed to be a negative impact on parking

stress then the Council may seek to minimise the overall impact of parking demand on the adjacent roads by requiring the developer to enter into a legal agreement restricting future occupiers from applying for an on street parking permit in the Controlled Parking Zone (CPZ), as per Policy DM30a of the Croydon Local Plan, in areas of PTAL 4 and above or in areas of parking stress.

- If there is evidence of parking stress and the site is outside a CPZ then the development will be expected to accommodate parking on site.
- Development must be considerate of adjoining uses and ensure issues of overlooking and safety are mitigated.



Figure 3.10a: View across part of the Forestdale Intensification Area

BRIGHTON ROAD

3.11 INTENT OF THE BRIGHTON ROAD (SANDERSTEAD ROAD) INTENSIFICATION AREA:

3.11.1 Developments in the Brighton Road (Sanderstead Road) Local Centre (as designated in the Croydon Local Plan) should seek to develop the sense of place where it is diminished by the busy nature of Brighton Road and under-utilised plots. Redevelopment in the Intensification Area should deliver increased housing density, supported by an active and vibrant local centre of mixed uses and recreation areas in conjunction with the existing recreation ground. Development should encourage public transport connections, utilising the opportunity to deliver developments of greater height with active frontages along the main roads.



Figure 3.12a: Vacant buildings and commercial uses along Brighton Road



Figure 3.12b: Terraced houses along Purley Road

3.12 AREA APPRAISAL

3.12.1 The Brighton Road Focused Intensification Area is a mix of residential, local retail, light industrial and car parking. The houses along Brighton Road are predominantly close-knit, Victorian, semi-detached homes, interwoven with other the typologies and scales of development. Away from Brighton Road, the area is characterised by low density residential development on suburban streets, intermixed with small cafes, shops and community uses.

3.12.2 The upper half of Brighton Road within the Intensification Area is characterised by clusters of denser, high street parades which stretch along a large length of Brighton Road. This is at the heart of the Local Centre, where Brighton Road meets Sanderstead Road, and presents significant opportunity to improve the public realm and provide development to create a vibrant local centre that is attractive to the broader community, with the Locally Listed Red Deer Public House building at its centre.

3.12.3 The lower half of Brighton Road contained within the Intensification Area is predominantly low-rise, light industry intermixed with residential housing. While outside the focussed area boundary, the large recreation ground nearby provides an opportunity for intensified development to overlook open space, creating a park and village green at the heart of the Intensification Area.

3.12.4 The area along Sanderstead Road either side of the railway tracks is leafier than the rest of the Intensification Area. The width of the road and

presence of cafes and shops gives the area a village feel. Development should seek to exploit the opportunity presented by under-utilised areas of grounds associated with medium-rise blocks and back lands to provide new housing.

3.12.5 The area is well-connected and easily accessible by public transport providing the opportunity to create new developments of greater density. However, the area has distinct a lack of clarity in character with large pockets without a sense of place, and is severed by the existing transport infrastructure. Public realm improvements should seek to establish a unified character to help tie new and existing development together and create connections across the existing road and rail infrastructure. This should help establish an area that is identifiable through character and services, while providing intensified development along the main routes and elsewhere within the area.

3.12.6 There are a number of developments underway or subject to planning permissions in the area, providing a mix of uses that will deliver new homes along with commercial and retail offers.

3.12.7 Development should seek to reduce flood risk recognising the Flood Zone 3 designation running along the Brighton Road. Any development proposals within the flood zone should refer to Policy DM25 and Table 8.1 of the Croydon Local Plan.

3.12.8 The area provides a good level of employment spaces, along with community facilities. Where proposals seek to redevelop these, they must conform to the Croydon Local Plan policies which seek the re-provision of such floorspace.



Figure 3.12c: Map with boundary of Brighton Road Intensification Area (As designated in the Croydon Local Plan)

3.13 POTENTIAL DEVELOPMENT SCENARIO (BRIGHTON ROAD)

3.13.1 The scenario described in the following images is indicative and describes one potential way in which the area may be developed. Proposals within the area will be subject to consideration against the Croydon Local Plan, London Plan and this guidance document.

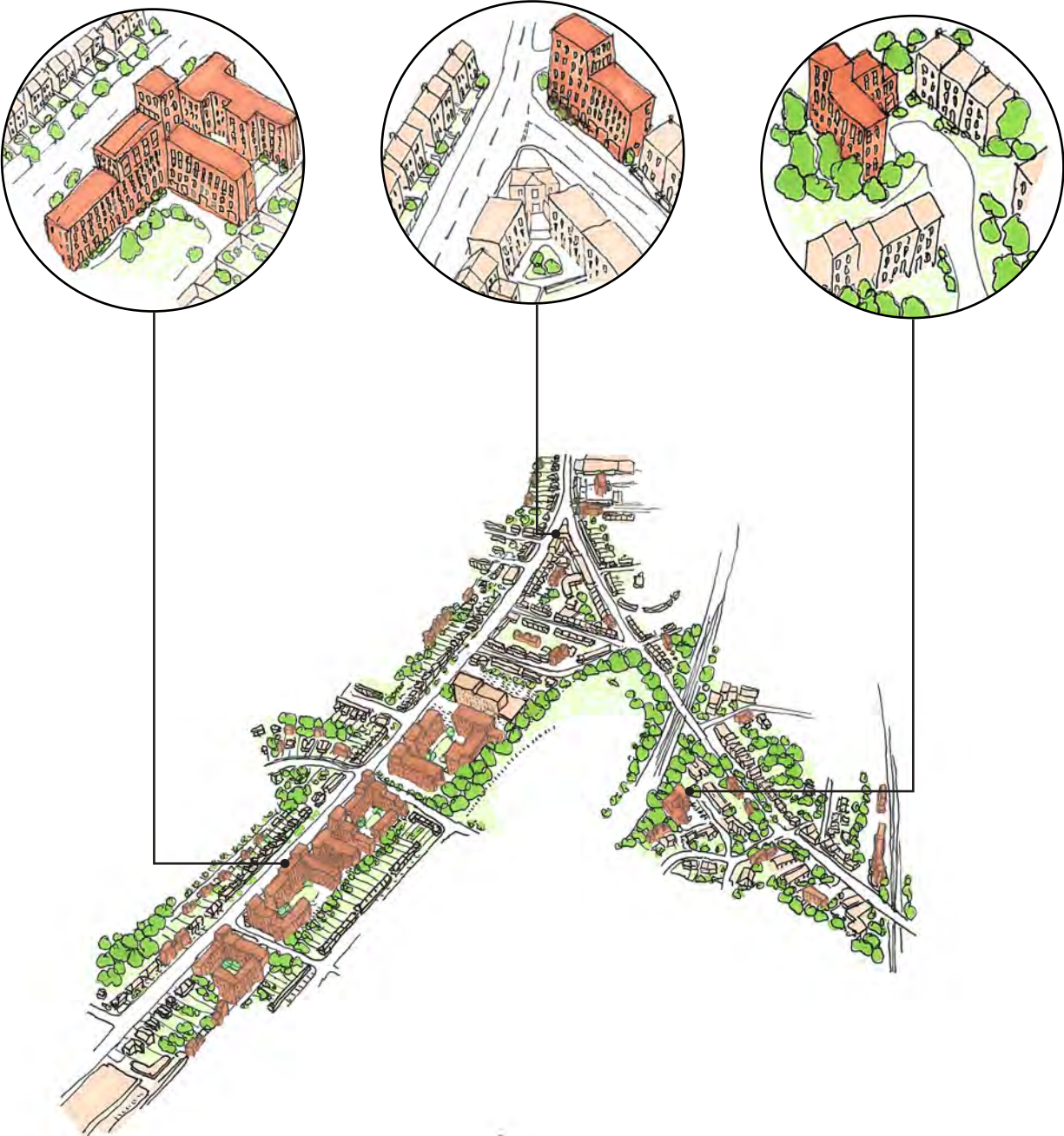
2018 Figure 3.13a



2027 Figure 3.13b



2036 Figure 3.13c



3.14 TYPOLOGY DEVELOPMENT POTENTIAL (BRIGHTON ROAD)

TERRACED HOUSES AND COTTAGES & SEMI-DETACHED HOUSES ALONG BRIGHTON ROAD:

- Where appropriate and safe access via lanes is available, intensification may seek to provide new development within rear gardens (including garages). These should be single storey height with additional accommodation in the roof.
- Where there are back land sites with clearly redundant & un-neighbourly light industrial units and warehouses situated to the rear of existing homes, these may provide opportunities for redevelopment into housing. Mews style houses of up to two (2) storeys are appropriate in these locations and dependent on the setting, there may be potential for additional accommodation within roofs.
- Where there is a consistent ridge line across terraces and pairs of semi-detached, the gradual change in height will occur as properties are redeveloped to a greater height.
- Where individual plots are developed into multiple units the Council will seek to minimise the overall impact of parking demand on the adjacent roads by restricting permission to apply for on street permits in controlled parking zones.

SUBURBAN SHOPPING AREAS:

- Suburban shopping areas should maximise opportunities to create vibrant, Neighbourhood Centres with active frontages.
- The retail provision must be retained or re-provided. Where shops are not part of a unified parade or they are in a parade that is single storey, there may be opportunities for redevelopment of up to 4 storeys tall. These should be of a scale that brings definition to the public realm and responds to the context of any of the older or established Shopping Parades.
- Where existing parades of 2 or more storeys exist, these should be retained or reprovided. Where possible, spaces above shops may be converted into residential units⁴³, where it does not compromise the functionality of the Shopping Parade or centre. It may be more beneficial for parades to be redeveloped to a greater height to provide additional accommodation above. This should range between 4-6 storeys depending on the setting.

UNDERUTILISED LARGER BUILDINGS⁴⁴:

- Large, underutilised sites provide potential for the creation of mixed-use developments. These may include active frontages along Brighton Road, with associated public realm improvements.
- Development should seek

⁴³ Conversions from retail to residential must meet the requirements of the relevant policies of the Croydon Local Plan.

⁴⁴ Where not an allocated site in the Croydon Local Plan 2018 and where development is in line with Policy SP3.2 regarding the retention and redevelopment of land and premises relating to industrial/employment activity.

to significantly intensify the area through the development of flats and increased heights. The height of new development should vary to respond to the context and streetscene. Heights should therefore vary from 3 to 6 storeys. Development facing onto Brighton Road or South Croydon Recreation Ground may seek to be up to 6 storeys tall.

- Prioritised pedestrian spaces should be provided within the development plots that are open to the public and allow for connections to the park.
- The provision of family accommodation close to parks and open space is encouraged.

MEDIUM RISE BLOCKS WITH ASSOCIATED GROUNDS:

- Larger sites provide infill development opportunities, including redevelopments of garage blocks. Infill development should be of a massing to allow the open character of these sites to be maintained.
- Garage blocks may be redeveloped to the same height of the host blocks, provided there would be no unreasonable impact on access to light on neighbouring properties.
- Where there is a loss of a parking garages, the Council may require a parking survey to show that it will not result in a negative impact on parking stress in adjacent roads. If there is deemed to be a negative impact on parking stress then the Council may seek to minimise the overall

impact of parking demand on the adjacent roads by requiring the developer to enter into a legal agreement restricting future occupiers from applying for an on street parking permit

in the Controlled Parking Zone (CPZ), as per Policy DM30a of the Croydon Local Plan, in areas of PTAL 4 and above or in areas of parking stress. If there is evidence of parking

stress and the site is outside a CPZ then the development will be expected to accommodate parking on site.



Figure 3.14a: Brighton Road

SHIRLEY

3.15 INTENT OF THE SHIRLEY INTENSIFICATION AREA:

3.15.1 Developments in Shirley (as designated in the Croydon Local Plan) should seek to enhance the Local Centre and further establish the neighbourhood characteristics of the area. Redevelopments should seek to provide an increased density in housing through varying development types and an uplift along Wickham Road to enrich the existing amenities, providing lasting growth to the area as a Local and Neighbourhood Centre. The neighbourhood feel along Wickham Road should be encouraged further west, with improvements to the East-West route leading towards Central Croydon and associated infrastructure along Shirley Road allowing land to be unlocked for development and to improve the public realm.



Figure 3.16a: Shirley Road

3.16 AREA APPRAISAL

3.16.1 The area defined for focussed intensification in Shirley is predominantly residential-focus intertwined with Local and Neighbourhood Centre services.

3.16.2 The area along Addiscombe Road is identified by semi-detached homes to the north, with detached homes on larger plots on the southern side of the road, as well as the Shirley Park Golf Clubhouse. The roundabout at Shirley and Addiscombe Roads is bordered by a successful parade of independent shops that provide a useful service to the community at this key intersection. Denser development exists at the northern end of the section of Shirley Road within the Intensification Area with some terraced houses, cottages and compact houses on relatively small plots. At the southern end, Shirley Road rises up and dominates the environment, with semi-detached homes on one side separated from the Trinity School of John Whitgift by dual-carriageway and associated slipways.

3.16.3 The Wickham Road portion of the Intensification Area includes Locally Listed Shirley Methodist Church, a mix of semi-detached



Figure 3.16b: A232 Dual Carriageway

houses and medium rise blocks and Shirley Parish Hall. Importantly, the existing retail strip on Wickham Road is not included in the Area of Focussed Intensification identified for development. Whilst this portion of retail land separates the defined area, the eastern side of Wickham Road is included which is typified by semi-detached bungalows, leading to small scale retail and industry, along with Shirley Library. The number of local community spaces will be important to the continued success of the area and development should seek to enhance these offers.

3.16.4 The Intensification Area as a whole is severed by the dual carriageway road. Creating better pedestrian and cycle crossings is crucial to providing a people focussed link between the Shirley Road Neighbourhood Centre and Shirley Local Centre. Where possible, and as reliance on private car ownership reduces in line with national trends, there may be future opportunity to reduce the width of the road.

3.16.5 There are 6 bus routes that serve the area and there is the potential for the area to provide an improved connection from the east of the borough, creating a gateway to the Croydon Metropolitan Centre. This provides opportunities to look at ways to encourage a lower reliance on cars from East to West entering Croydon, making the roadway safer for cyclists and pedestrians. The inclusion of a designated cycle lane each way would allow denser development to occur with lesser car dependency. Improvements to the dual carriageway area provides an opportunity to make a place that is distinctively recognisable and identifiable as a focus within Shirley.

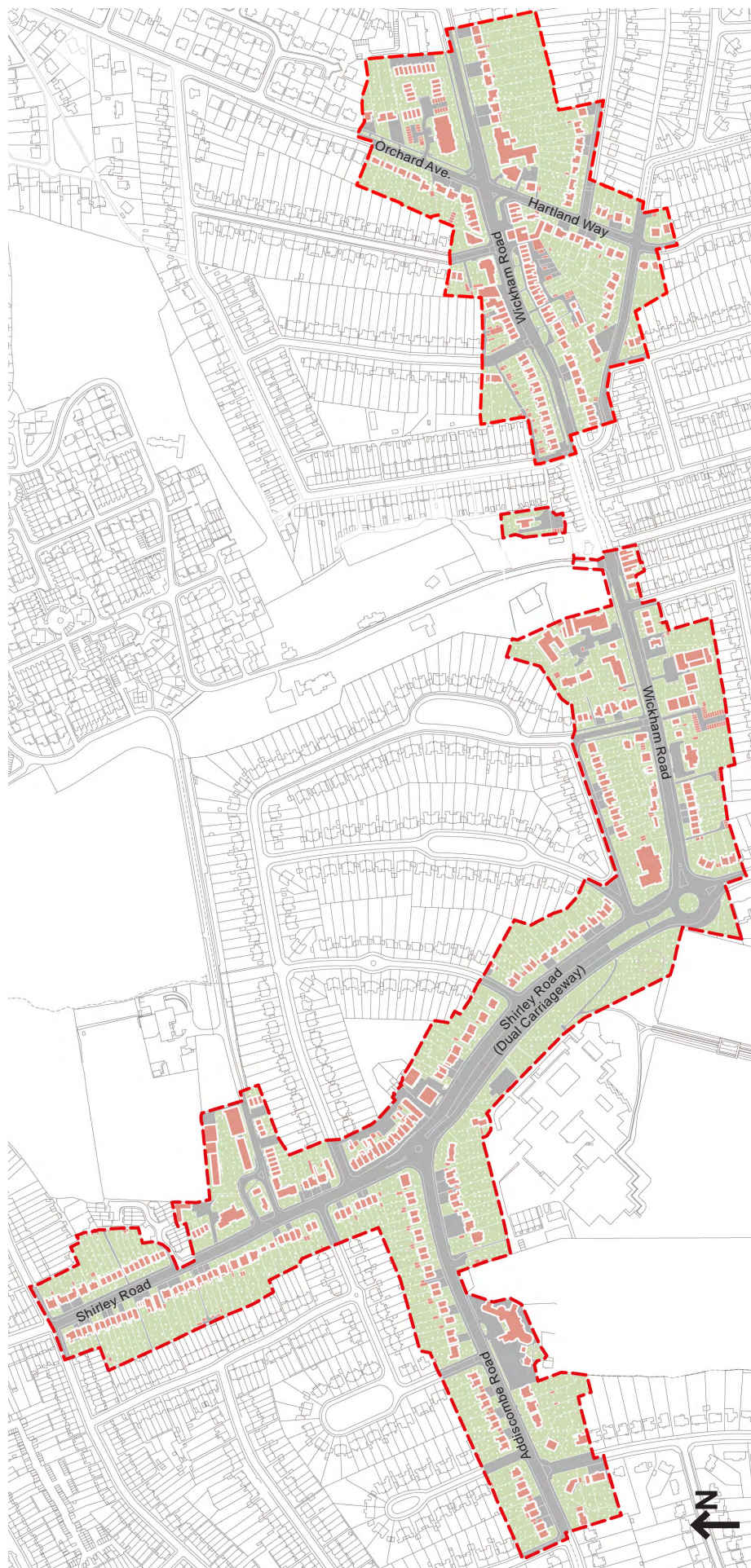


Figure 3.16c: Map with boundary of Shirley Intensification Area (As designated in the Croydon Local Plan)

3.17 POTENTIAL DEVELOPMENT SCENARIO (SHIRLEY)

3.17.1 The scenario described in the following images is indicative and describes one potential way in which the area may be developed. Proposals within the area will be subject to consideration against the Croydon Local Plan, London Plan and this guidance document.

2018 Figure 3.17a



2027 Figure 3.17b



2036 Figure 3.17c



3.18 TYPOLOGY DEVELOPMENT POTENTIAL (SHIRLEY)

AREAS OF SEMI-DETACHED HOMES:

- Pairs of semi-detached houses may be developed together to provide large developments of flats, maisonettes or terraces. These should provide up to 4 storeys of accommodation, one of which is accommodated in the roof.
- Where possible, proposals may seek to amalgamate 4 or 6 houses (i.e. 2 or 3 pairs of semi-detached houses) in a row to create larger developments which respond to topography. Applicants should refer to the guidance for building across boundaries where this is proposed (Refer to Section 2.15 for guidance).
- Semi-detached houses with large gardens may provide opportunities for rear garden development, particularly where neighbouring properties have similar potential. In these circumstances, the proposed development should be designed to ensure future access can be accommodated from the access route to the first rear garden development.

AREAS OF DETACHED HOMES ON RELATIVELY LARGE PLOTS:

- Redevelopment of 2 storey detached properties into small blocks of apartments may be acceptable. These developments should typically be 4 storeys in height. There may be some scope for additional accommodation in the roof space.
- Rear gardens may be subdivided to create new

houses of no more than 2 storeys tall.

AREAS OF LARGE HOMES ON RELATIVELY SMALL PLOTS:

- Development may seek to amalgamate small plots to establish larger development sites. Larger sites may accommodate blocks of flats or townhouses of up to 4 storeys in height where facing the street.
- Only those with the largest gardens may present the opportunity to be subdivided to provide new homes.

TERRACED HOUSES AND COTTAGES & COMPACT HOUSES ON RELATIVELY SMALL PLOTS:

- Standalone houses may present some opportunity for redevelopment into dwellings of up to 3 – 4 storeys tall, depending on the context and impact on the street scene.
- Where suitable access to the rear of a property exists, there may be some opportunity to provide new development within rear gardens (including garages). These should be single storey height with additional accommodation in the roof.

SUBURBAN SHOPPING AREAS:

- Suburban shopping areas should maximise opportunities to create vibrant, neighbourhood centres with active frontages.
- The retail provision must be retained or re-provided.
- Where shops are not part of a unified parade or they are in a parade that is single storey, there may be opportunities for redevelopment up to a

height of 3 storeys. These should be of a scale that brings definition to the public realm and responds to the context of any of the older or established shopping parades.

- Where existing parades of 2 or more storeys exist, these should be retained or reprovided. Where possible, spaces above shops may be converted into residential units⁴⁵, where it does not compromise the functionality of the shopping parade or centre. It may be more beneficial for parades to be redeveloped to a greater height to provide additional accommodation above. This should range between 4-6 storeys depending on the setting.
- Back land to the rear of existing shops may present the opportunity for redevelopment into housing. These may be mews style houses of up to 3 storeys, dependent on the setting and resulting impacts on neighbouring amenity and the streetscene.

INSTITUTIONS WITH ASSOCIATED GROUNDS⁴⁶:

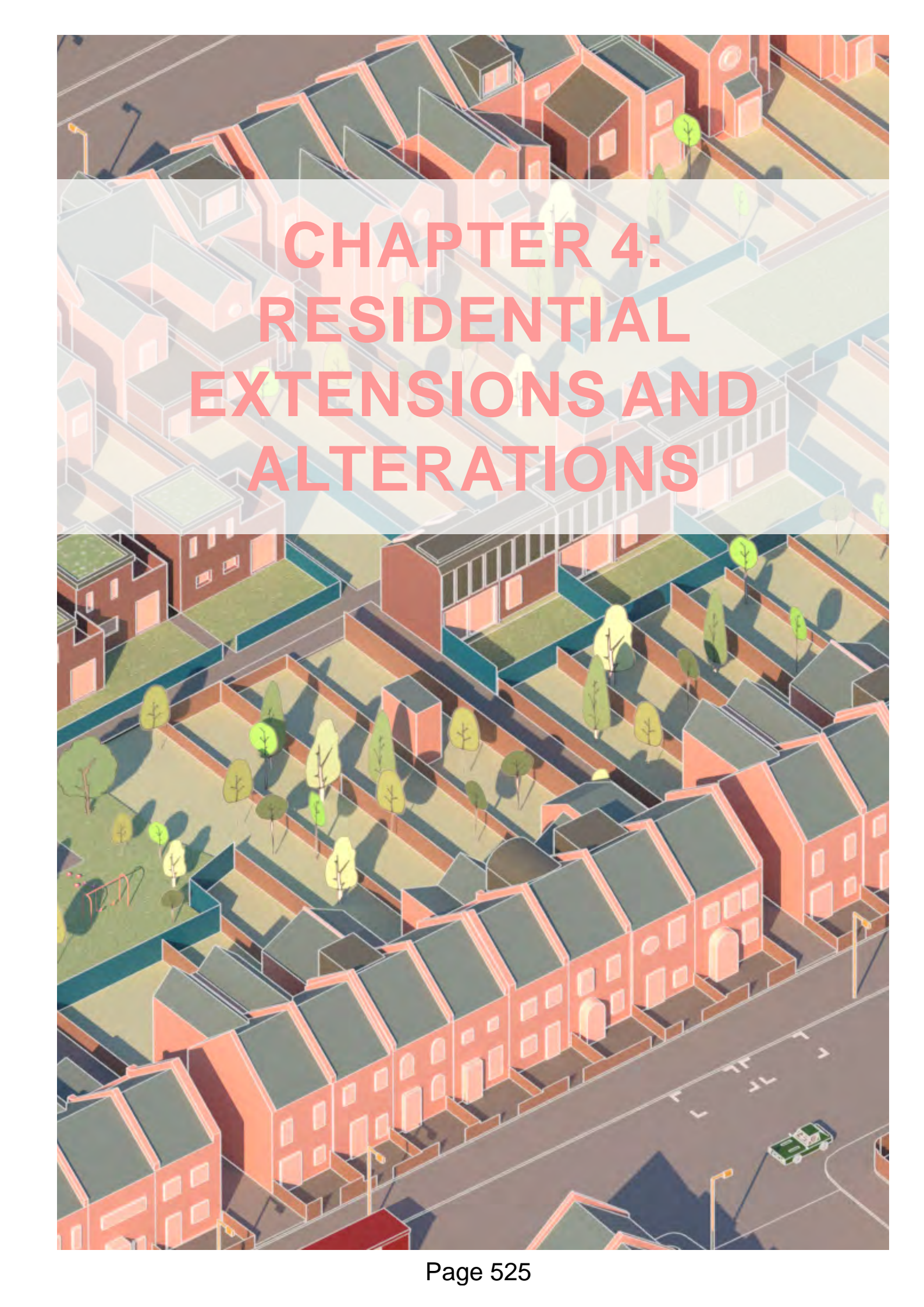
- Larger sites provide opportunities to revise infrastructure provisions to create new mixed-use development potential and increase density.
- Where existing spaces allow, there may be opportunity for infill development.

⁴⁵ Conversions from retail to residential must meet the requirements of the relevant policies of the Croydon Local Plan 2018.

⁴⁶ Where in accordance with Policy SP5 Community Facilities of the Croydon Local Plan 2018.



Figure 3.18a: Wickham Road

An aerial, isometric illustration of a residential neighborhood. The buildings are primarily red brick with dark grey roofs. The layout shows a mix of single-family houses and multi-unit buildings. There are several green spaces with trees and a playground. A street with a car and a bus is visible in the lower right. The title text is overlaid on the upper half of the image.

CHAPTER 4: RESIDENTIAL EXTENSIONS AND ALTERATIONS



Figure 4.1a: A semi-detached home with set-back side extensions. (Photo: Ruth Ward)

INTRODUCTION

4.1 EXTENSIONS & ALTERATIONS

4.1.1 Extensions and alterations enable existing housing stock to be improved and evolve for the occupiers. Innovative and creative design solutions for extensions and alterations are encouraged and proposals must demonstrate the design merits of the development. In some circumstances, extensions and alterations may not require planning permission. Where a proposal is deemed to be Permitted Development, applicants should refer to Section 4.6 for further guidance.

4.1.2 Extensions and alterations can significantly change the appearance of a property and, where poorly designed, this can have a detrimental impact on the character and amenity of an area. They can also have significant impacts on neighbouring properties. Any extension should be designed and developed appropriately to ensure that it does not cause a harmful loss of light, visual intrusion or privacy. The scale and appearance of an extension or alteration should also consider the impact on the neighbourhood, and whether it would result in the loss of soft vegetation that contributes significantly to the appearance of the area.



Figure 4.1b: An extension that successfully uses contemporary details and an un-symmetrical roof pitch to add interest to this design by Trehwela Williams. (Photo: Simone Bossi)

DESIGN PRINCIPLES: EXTENSIONS & ALTERATIONS

4.2 RESPOND TO CHARACTER

4.2.1 Developments should consider the character of the area and dwelling to which an extension or alteration is proposed. The built character of an area includes, but is not limited to the size, shape and positioning of buildings, the associated landscaping, materials and details. Extensions and alterations should seek to respond to the character of a dwelling and the existing appearance of the streets. Respond does not mean replicate and the Council will encourage innovative designs that work with the existing character of a building and place. Any proposals which are considered to have a detrimental impact on character will generally be unacceptable.

4.2.2 For further information on how to assess the character of a building or place, applicants should refer to the documents below:

- Detailed information on the characteristics of each area of Croydon is available in the Borough Character Appraisal⁴⁷.
- Detailed information on the characteristic of the predominant housing types within Croydon is available in the Borough Character Typology study⁴⁸.

4.2.3 Where considering proposals that may impact on heritage assets, such as in Conservation Areas or to Listed Buildings, please refer to Heritage guidance in Section 1.4.

4.3 SCALE

4.3.1 Extensions and alterations should generally be of a scale that is subservient to the existing dwelling in accordance with Policy DM10.1 of the Croydon Local Plan. Subservience is required to prevent terracing between and to the rear of existing properties, or to avoid uncharacteristically large additions to the front of a property that would detract from the appearance of the street. Through following the guidance in this chapter (Refer to Sections 4.11 – 4.22) subservience will usually be achieved. However, this should not however stifle or discourage high quality design in terms of form, fenestration, materials and detailing, as set out in Approaches to Design (Refer to Section 4.5).

4.4 SUSTAINABILITY

4.4.1 The environmental impacts and long term sustainability of extensions and alterations is a key consideration in the design of an extension and/or alteration. Proposals for extensions and alterations should seek to integrate materials, insulation, heating, lighting and ventilation systems which minimise energy consumption and improve the environmental performance of the building. This should be considered from the outset of developing a proposal.

4.5 APPROACH TO DESIGN

4.5.1 Extensions and alterations to an existing dwelling should respond to character (Refer to Section 4.2) and be subservient in scale (Refer to Section 4.3), whilst developing a high quality approach to the design in terms of the form, fenestration, materials and detailing. The following two distinct approaches, **Supplementary** or **Innovative**, provide broad design direction to the development of a proposal, however there may be other successful approaches and those outlined here should not stifle creativity in achieving high quality design.

⁴⁷ Available at: <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Borough%20Character%20Appraisal.pdf>.

⁴⁸ Available at: https://www.croydon.gov.uk/sites/default/files/articles/downloads/BoroughCharacter_typology_20150921.pdf.

SUPPLEMENTARY

4.5.2 This is the approach that most proposed extensions and alterations are likely to take as it can be easiest to achieve successfully and affordably. A supplementary approach will typically have a form that does not distract from the appearance of the existing house, but may still introduce contemporary elements, such as increased proportions of glazing or new materials. The materials and details should complement the existing house, but do not necessarily need to replicate them and should allow the existing house to maintain its prominence.



Figure 4.5a: A supplementary side extension designed by Selencky Parsons. The form clearly relates to the existing house, but successfully introduces larger windows and combines new materials with brickwork to complement the existing house. (Photo: Andy Matthews)

INNOVATIVE

4.5.3 This approach may be suitable for challenging sites that require a particular design response or where the context provides opportunity to depart from traditional domestic aesthetics. This might be through the use of contemporary materials, unique forms and/or new construction methods. An innovative approach should provide the highest quality design and allow an extension and alteration to be distinguished from, whilst enhancing, the existing dwelling. An innovative approach will require more investment in the design and construction of a proposal due to its bespoke nature.



Figure 4.5b: This innovative extension designed by Alison Brooks Architects enhances the existing dwelling through its contrasting form, use of the highest quality materials and contemporary detailing. (Photo: Paul Riddle)



Figure 4.5c: A series of extensions designed by fourth_space that appear supplementary to the original house by clearly responding to its existing form and materials.

PLANNING CONSIDERATIONS FOR RESIDENTIAL EXTENSIONS AND ALTERATIONS

4.6 PERMITTED DEVELOPMENT

4.6.1 Many proposals for extensions and alterations to a home may be possible under Permitted Development (PD) rights. PD provides rules that allow people to alter existing buildings, and in some circumstances create new buildings, without needing to apply for planning permission. However, the scope of an extension and alteration under PD is limited and technical guidance is available on the Planning Portal⁴⁹.

4.6.2 This guide provides a level of design quality for proposals and therefore those seeking to develop under PD may also find the guidance useful to ensure that all proposals for extensions and alterations contribute positively to the existing dwelling and the character of an area, with limited impact on neighbouring amenity.

4.6.3 Where a PD alteration is pursued, homeowners can obtain a Lawful Development Certificate (LDC) from the Council to demonstrate their project is legal under PD rights. PD rights do not generally apply to flats and are more limited for Listed Buildings and conservation areas. In some areas, an Article 4 Direction has also been put in place to manage change in an area by further restricting PD rights.

4.7 MINOR ALTERATIONS

4.7.1 Applicants are advised to contact Croydon's Planning Department⁵⁰ for minor alterations to determine whether planning permission or Listed Building consent is required, or if other relevant legislation or development restrictions are applicable.

4.7.2 All proposals, including those that do not require planning permission and minor alterations should utilise the Detailed Design for Extensions and Alterations sections 4.23 - 4.27. Further advice should be sought from Council's Pre-application Service⁵¹.

4.8 SHARED PROJECTS

4.8.1 In some circumstances, a joint planning application between neighbours can be beneficial. Where both parties seek to create an extension at the same time, this may provide an opportunity to achieve larger proposals than would normally be acceptable due to the impacts on neighbouring properties. A joint application will be subject to a legal agreement that requires both extensions to be constructed and completed at the same time. Applicants should consider this prior to a submission.

4.9 HOME BUSINESSES

4.9.1 Home businesses and the ability to work remotely is increasingly common meaning many people use their home as the base for their business. Provided the primary use of the building remains as a dwelling and the use as a business does not cause disruption to neighbours, planning permission for the change of use may not be required. Where this is the case, planning permission may still be required for the creation of additional space for a home business but this will generally be considered the same as a residential use and should follow the guidance contained within this document. Where a plan to use a home business would result in several employees using the premises and/or it could disturb neighbours, planning permission for change of use may be required. For further advice please contact the Local Planning Authority as part of the Councils formal pre-application service.

4.10 SUBDIVISION

4.10.1 Where proposals seek to subdivide a dwelling to create multiple dwellings, such as the conversion of a house into flats or the subdivision of a rear garden to create a separate dwelling, applicants should refer to the relevant guidance on site layout & servicing and landscaping & outdoor amenity space in the Suburban Residential Development section of this guide and Policy DM10.1 of the Croydon Local Plan.

⁵⁰ Applicants should utilise Council's duty planning officer service. More information is available via: <https://www.croydon.gov.uk/planningandregeneration/duty-planning-officer-service>.

⁵¹ For more information, refer to: <https://www.croydon.gov.uk/planningandregeneration/pre-application-meeting-service>.

⁴⁹ <https://www.planningportal.co.uk/>.

SINGLE STOREY EXTENSIONS

4.11 SINGLE STOREY REAR EXTENSIONS

4.11.1 Single storey rear extensions are not normally visible from the streetscene, so are usually less visually intrusive than side or two-storey rear extensions. However, these extensions can still have an impact on neighbouring amenity including access to sunlight and daylight and outlook. To resolve these potential issues, single storey rear extensions should be designed to ensure:

- That in a terraced or semi-detached property it is no deeper than 3.5m⁵² from the rear elevation of the original dwelling.
- That in a detached dwelling, it is no deeper than 45° (in plan) as measured from the centre of the nearest ground floor window on the neighbouring property or 3.5m from the rear elevation of the original dwelling, whichever is greater. In semi-detached dwellings, where there is sufficient separation from neighbouring boundaries the 45° rule can be applied to achieve a deeper extension, up to a maximum of 45° as measured from the centre of the window of the nearest habitable room in the neighbouring properties.

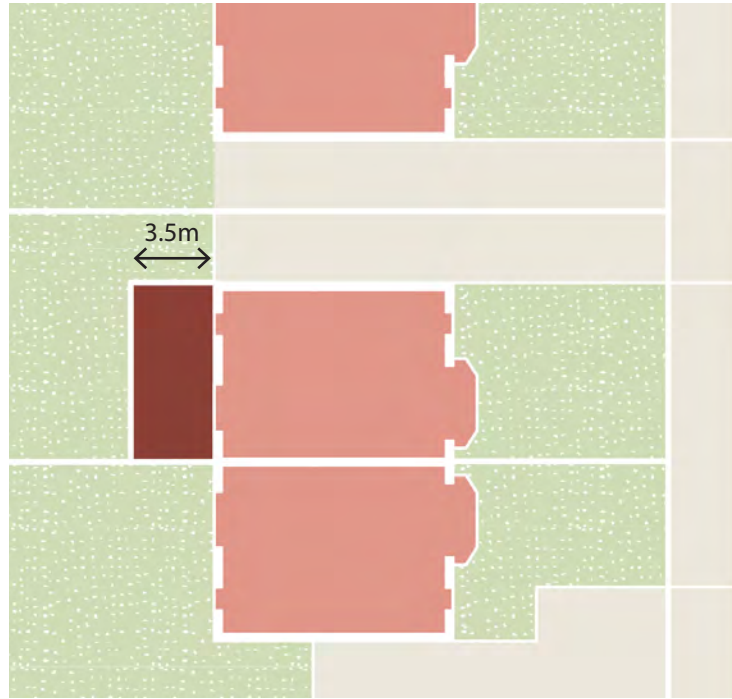


Figure 4.11a: An extension to a terraced house that is no more than 3.5m deep



Figure 4.11b: An extension to a semi-detached house that is set away from neighbouring boundary, allowing for a deeper extension, up to a maximum of 45° as measured from the centre of the window of the nearest habitable room in the neighbouring properties.

⁵² Permitted development is limited to 3m in all dwellings except detached properties.

- Where there are existing outriggers or extensions, it may be possible to create a dog-legged extension as per Figure 4.10c where the resulting projection of each part of the extension is no more than 3.5m from the respective rear walls.
- Where an existing outrigger or extension is deeper than 3.5m, in some circumstances it may be possible for a new extensions to extend up to the depth of the existing outrigger or extension provided there is a compelling design that limits impact on neighbouring amenity.
- The height of a single storey rear extension at its highest point should generally not exceed 4m. The height of a side wall of a single storey that directly abuts a neighbouring boundary will generally need to be less than 4m to minimise impact on neighbouring amenity. Particular consideration needs to be given to the orientation and topography of the site, where this may exacerbate impacts on neighbouring amenity. Refer to Figure 4.11d.
- The detailed design, including specification of materials, windows and doors, should be informed by the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).

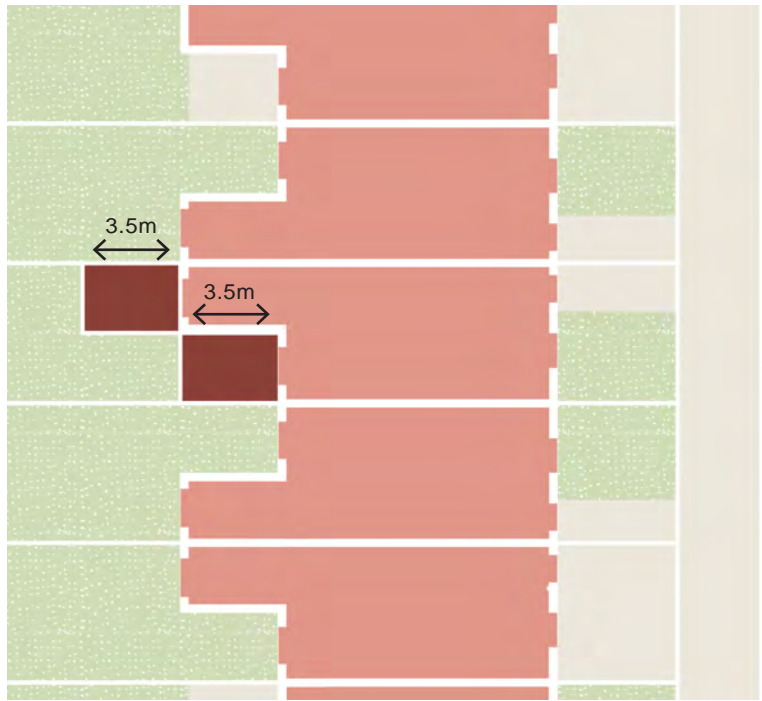


Figure 4.11c: A dog-legged extension where there is an existing outrigger.



Figure 4.11d: Maximum height and relationship with neighbouring boundary.

Height reduced depending on potential impacts to neighbouring amenity

No greater than 4m

4.12 SINGLE STOREY SIDE EXTENSIONS

4.12.1 Side extensions should consider the impact on the appearance of the street. Care is also needed when considering the relationship between any proposed extension and the boundary with neighbouring properties as the separation between properties can provide access routes to the rear of the property and in some locations are part of the character of the area. Depending on the orientation of the neighbouring property, side extensions also have the potential to impact their amenity. To ensure these potential issues are resolved, single storey side extensions should be designed in accordance with the guidance below.

- They may be as deep as the existing house and extend beyond the rear elevation to the distances and in line with the design guidance prescribed in Section 4.11 Single Storey Rear Extensions.
- The height of a wall of an extension that directly abuts a neighbouring boundary should be designed to minimise impact on neighbouring amenity.
- To prevent overlooking of neighbouring properties, windows and doors should normally be placed in the front and rear walls of the extension. If windows are proposed on side walls where they would create issues of overlooking, they should be at high level, non-opening and fitted with obscured glass. Any windows on side elevations should not prejudice the development potential of adjoining land.
- Extensions that are irregular to an existing pattern of buildings along a street will only be acceptable where it can be



Figure 4.12a: A single storey side extension that extends beyond the rear elevation of a property.

Depth beyond rear elevation limited according to guidance on rear extensions

demonstrated they would enhance the appearance of the street and character of the area. In such circumstances the design approach should not upset the balance and proportions of the existing dwelling.

- Where an extension seeks to build beyond the existing front elevation, they should also refer to the guidance on front extensions (Refer to Section 4.14). If they do extend beyond the front building line, applicants are encouraged to combine this with a new or existing porch where applicable.
- The detailed design, including specification of materials, windows and doors, should be informed by the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).



Figure 4.12b: A poorly designed single storey side extension that fails to respond to the original dwelling. It has an awkward combination of roof forms and the appearance is further exacerbated by the porch extension, which hasn't been combined with the side extension.

4.13 SINGLE STOREY WRAP-AROUND EXTENSIONS

4.13.1 Wrap-around extensions which seek to extend to the side as well as to the front or rear of an existing house must have regard to impacts on neighbouring amenity and the appearance from the street. Wrap-around extensions should refer to the relevant combination of guidance for side and rear or front extensions.

4.14 SINGLE STOREY FRONT EXTENSIONS AND PORCHES

4.14.1 Front extensions can change the character of the original building and where poorly designed have a negative impact on the appearance of the street; due to their visibility these kind of extension are most likely to have an impact on the wider streetscene. It is therefore important to invest a high level of design quality in such proposals following the guidance below:

- Extensions that are irregular to an existing pattern of development will only be acceptable where it can be demonstrated they would enhance the appearance of the street and character of the area. This is likely to be challenging in streets with a consistent pattern of development.
- Front extensions must be designed to respond to and enhance the character of the existing dwelling.
- They should generally be no deeper than 1.5m and avoid being full width; overly-wide or deep extensions which



Figure 4.14a: Example of a good side extension wrapping around to incorporate a well-designed porch, successfully integrating with the existing dwelling.

would appear to dominate the appearance of the existing dwelling and fail to enhance character will not be supported.

- The detailed design, including specification of materials, windows and doors, should be informed by the guidance on Detailed Design (Refer to Sections 4.23-4.27 for guidance).

4.14.2 Porches can be added to a house to provide a threshold space between the exterior and interior, whilst adding emphasis to the entrance:

- The scale and design of new porches should respond to the existing dwelling. Care should be taken to preserve the appearance of existing features, such as bay windows and avoid porches that would impact these. The roof design of a porch should be carefully considered to ensure its appropriateness to the existing house.
- Existing porches that are open to the street and are an original



Figure 4.14b: A poor example of two porches that have been built up to and over original bay windows. The design fails to respond to the historic pattern of development and materials are low quality.

feature that form part of a local pattern of development should generally not be enclosed.

- The detailed design, including specification of materials, windows and doors, should be informed by the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).

4.15 ROOF DESIGN FOR ALL SINGLE STOREY EXTENSIONS

4.15.1 The shape or form of the roof can have a significant impact on the appearance of an extension, but can also add interest to a design. The design of a roof needs to consider the relationship with the existing house and surrounding context. It is therefore important to consider their appearance and performance as part of the design following the guidance below:

- The design of roofs for all single-storey extensions must not create unreasonable negative impacts on neighbouring amenity. Roof designs that result in excessive visual intrusion and/or the blocking of natural light to neighbouring properties must be avoided.
- Where a pitched roof is proposed, care needs to be taken with how this may relate to windows on the first floor, where the roof meets the outer walls of the existing house. (Refer to Figure 4.15a).
- Where a flat roof is proposed, this should not normally be proposed to be used as a terrace or balcony. This is to protect the privacy of neighbours. However, in some cases it may be possible if it is demonstrated that neighbour's amenity in both directions is not impacted. The introduction of screening devices to help prevent overlooking from terraces or balconies are generally not considered acceptable as these can be detrimental to suburban character.
- Consideration should be given to how rainwater goods will be accommodated into the design



Figure 4.15a: An example of a roof design to a single storey extension by Nimtim Architects that has been designed to ensure it doesn't overlap with the windows above. (Photo: Anna + Tam)

of the roof (Refer to Section 4.24 for guidance).

- Applicants are advised to consider how the roof of an extension can be used to enhance the environmental performance of their home. This may include providing solar panels or a green roof. Any such proposals are encouraged by the Council but should be clearly shown on drawings submitted with the application. The acceptability of such proposals will however have regards to any potential negative impacts on the visual amenity of neighbouring properties or the appearance of the street.
- The detailed design, including specification of materials and rooflights should be informed by the guidance on Detailed Design (Refer to Section 4.23 - 4.27 for guidance).



Figure 4.15b: A side and front extension with a series of different roof forms results in a poorly considered composition that has a negative impact on the streetscene.



Figure 4.16a: Example of a two-storey rear extension of a terraced house designed by Gundry+Ducker Arch. that infills between existing extensions and outriggers, refer to Section 4.16 for guidance. This scheme also features a well-designed parapet detail to the roof (refer to Section 4.15) and concealed rainwater goods (refer to Section 2.24) giving a clean appearance. (Photo: Andrew Meredith)

TWO-STOREY EXTENSIONS

4.16 TWO-STOREY REAR EXTENSIONS

4.16.1 Two-storey rear extensions are often desirable to create more space within a home, however they need to be carefully designed to avoid negatively impacting neighbouring properties. Proposals for two-storey rear extensions should consider the surrounding context and ensure:

- For all types of housing, they are positioned so that they do not result in unreasonable loss of daylight to habitable rooms in neighbouring properties or result in an unreasonable level of overlooking.
- For terraced houses, they are only proposed where they would be infilling between two existing two-storey extensions or outriggers (Refer to Figure 4.16b) and therefore wouldn't impact on neighbouring amenity. Where this is the case, the extension should be of a height and depth no greater than the existing extensions or outriggers.
- For semi-detached properties, they are located on one side of the rear of the property that does not abut the adjoined property (Refer to Figure 4.16d); or they adjoin the neighbour where it already contains a two-storey rear extension (Refer to Figure 4.16c). They should generally be no wider than half the width of the existing house and no deeper than 45° (in plan) as measured from the nearest habitable room window on neighbouring properties to both sides of the dwelling and should not exceed the eaves and roof ridge line of the existing house.

- For both terraced and semi-detached properties, there may be greater potential to create two-storey rear extensions where a joint scheme comes forward, subject to a legal agreement (Refer to Section 4.8 for guidance).
- For detached properties, they are generally be of a depth no greater than 45° as measured from the nearest habitable room window on neighbouring properties to both sides of the dwelling. They should not normally exceed the eaves and roof ridge line of the existing house.
- The specification of materials, windows and doors is in accordance with the guidance on Detailed Design (Refer to Section 4.23 - 4.27 for guidance).

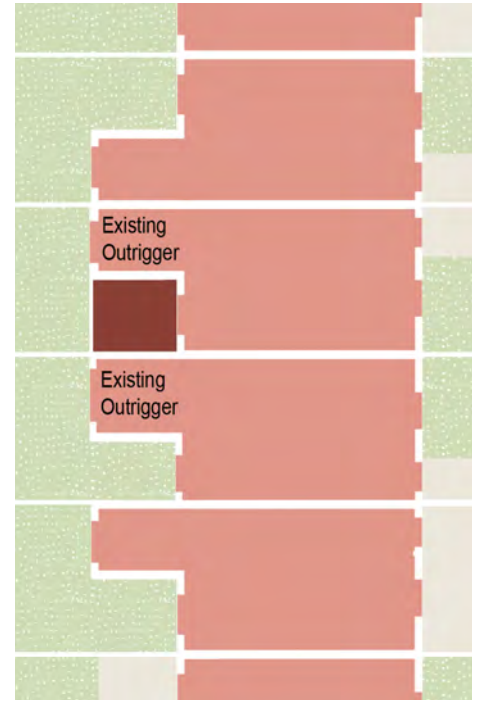


Figure 4.16b: Example of where a two-storey rear extension may be acceptable where it would be infilling between existing extensions / outriggers and would not result in no additional impact on neighbouring amenity.

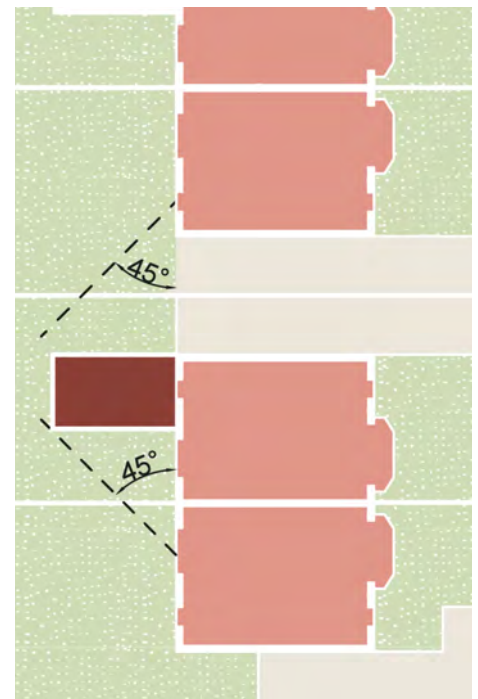


Figure 4.16c: A two-storey extension to a semi-detached house set away from the directly adjoining neighbour.



Figure 4.16c: A two-storey extension proposed to a semi-detached where a neighbour already has a two-storey extension.



Figure 4.16e: A two-storey extension to a semi-detached house set away from the directly adjoining neighbour.

4.17 TWO-STOREY SIDE EXTENSIONS

4.17.1 Two-storey side extensions are appropriate where space is sufficient and the impacts on the townscape and neighbouring properties are considered.

Two-storey side extensions must consider the surrounding context and ensure:

- They are designed so as not to create an unreasonable impact on access to daylight and overlooking in habitable rooms on neighbouring properties.
- The existing rhythm of the street, including for example characteristic gaps between properties, the symmetry of pairs of semi-detached homes or groups of terraced houses, would not be unreasonably interrupted.
- They do not result in an overly wide or poorly proportioned elevation facing the street. This can usually be avoided by setting the extension back from the existing front elevation; this should be at least 1m at the first floor, while a ground floor setback of approximately 1 brick (215mm) could be provided. In some special circumstances a reduced setback may be allowable and would need to be justified in an application and considered on a case by case basis.
- They do not exceed the eaves and roof ridge line of the existing house.
- The specification of materials, windows and doors is in accordance with the guidance on Detailed Design (Refer to Section 4.23 - 4.27 for guidance).

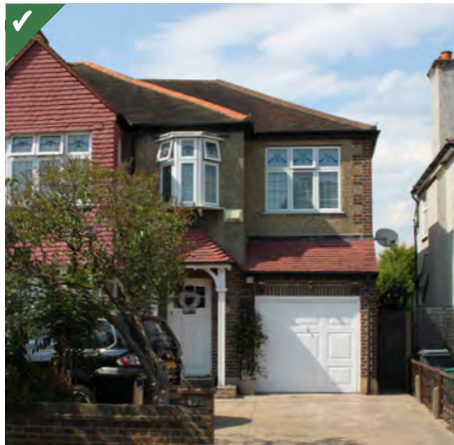


Figure 4.17a: A good example of a setback at first floor on a two-storey side extension.



Figure 4.17b: A low-quality two storey side extension which is overly dominant, upsetting the balance of this pair of semi-detached homes. The brick neither matches nor distinguishes from the existing and the junction at the eaves is poorly detailed.



Figure 4.17c: Example of a subservient two-storey side extension designed by Selencky Parsons that introduces contemporary elements, such as the windows and their surrounds, to help distinguish the new from the existing. (Photo: Andy Matthews)

4.18 TWO-STOREY FRONT EXTENSIONS

4.18.1 Two-storey front extensions are likely to have a significant impact the appearance from the street and will be determined on a case-by-case basis.

4.19 TWO-STOREY WRAP-AROUND EXTENSIONS

4.19.1 Two-storey wrap around extensions can introduce a large additional volume and therefore need to be carefully designed to respond to the character of the existing dwelling and neighbouring properties.

4.19.2 Two-storey wrap-around extensions which cover the side and rear or side and front of a dwelling will generally be determined on a case-by-case basis and where they follow a combination of guidance for the applicable extension (Refer to Sections 4.16, 4.17 and 4.18 for guidance).

CORNER PLOTS

4.20 EXTENSION TO HOUSES ON CORNER PLOTS

4.20.1 Corner plots provide opportunities to create large extensions that face onto the return road and in some cases can create a landmark building feature. Their location makes them highly visible from two streets and can provide an opportunity to improve the appearance of an area. Houses on corner plots may have capacity for two-storey extensions that extend to the side or rear. They should be designed to create a positive relationship with the existing dwelling, neighbouring properties and street scene and ensure:

- Where extensions are proposed that would project beyond the rear of the existing dwelling, they follow the guidance on rear extensions (Refer to Sections 4.11 or 4.16 for guidance). Where separation with the neighbours and orientation allows, there may be scope for a deeper

extension.

- Where extensions are proposed that would project beyond the side wall of the existing dwelling they follow the guidance on side extensions (Refer to Sections 4.12 or 4.17 for guidance).
- Any projection forward of the building line on the return street is carefully designed as this will be highly visible. This may be resolved through the massing (such as stepping), fenestration or material treatment of the proposal. Views along the return street to the proposed building should be considered.
- The relationship between the roof of the existing property and an extension on a corner is carefully considered. Extensions that result in overbearing end walls, including uncharacteristic gables, will generally not be acceptable.
- The specification of materials, windows and doors is in accordance with the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).

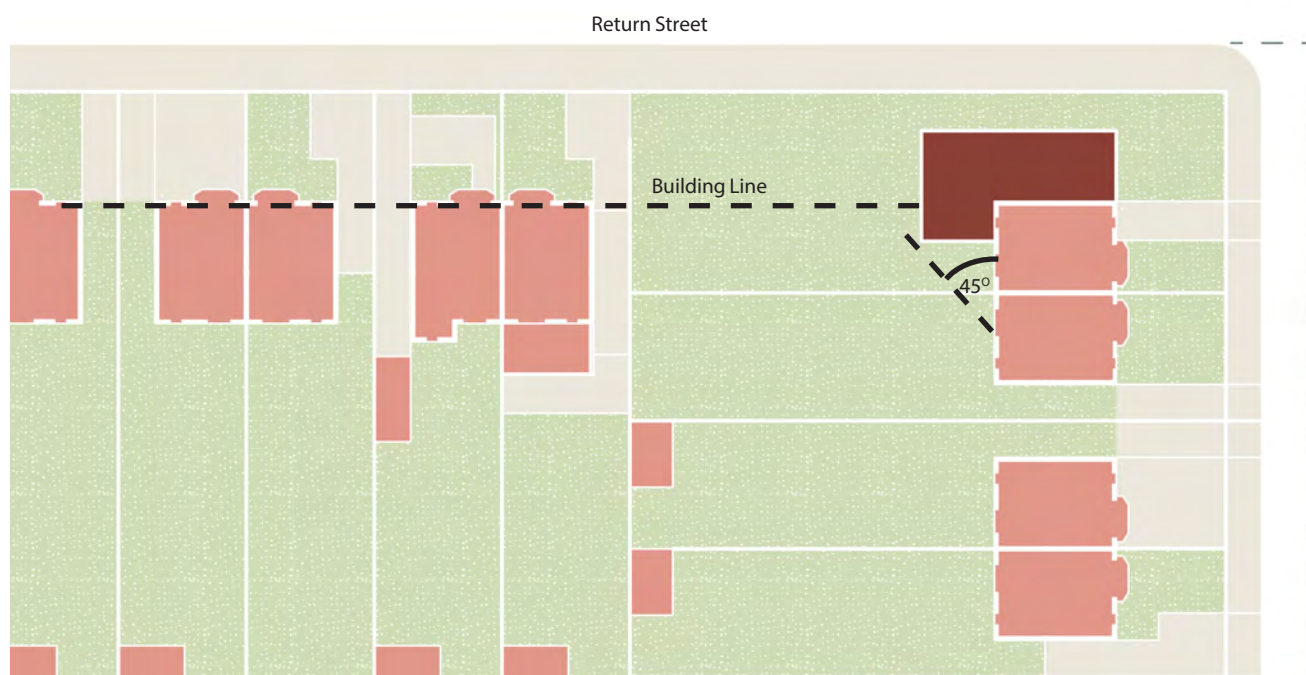


Figure 4.20a: A plan of an acceptable corner plot extension

ROOFS

4.21 EXTENSIONS & ALTERATIONS TO ROOFS

4.21.1 The use of loft space to provide additional accommodation can often provide more space for relatively little cost, using natural light through the use of skylights. Roof extensions, such as dormer windows or box extensions which project out from the roof slope, should be used where there is a need to enlarge the useable floor space within a loft or where they are more characteristic of the area. Extensions and alterations to roofs should follow the guidance below:

- Ideally be located on the rear elevation of a dwelling to minimise impact on the street.
- May be full-width for mid-terrace houses, but should be set in from the edge of a hipped roof or gable end on end of terrace houses (refer to Figures 4.21b and 4.21g).
- May be no more than two-thirds the width of the existing roof on a semi-detached or detached house, and should be set in from the edge of a hipped roof or gable end (refer to Figures 4.21a and 4.21g).
- Should be no higher than the existing ridge-line.
- Should not wrap around two-sides of a hipped roof unless in special circumstances where it can be justified; this will be judged on a case by case basis.
- Should include generously sized windows that are generally best if positioned to relate to the existing doors and windows on the floor below. Large blank facades on dormers can have an overbearing appearance and will not generally be acceptable.
- If proposing a hip to gable roof extension, should not interrupt



Figure 4.21a: Dormers on a semi-detached or detached house, no more than two thirds the width of the existing roof, and set in from the edge of a hipped roof (or a gable end).



Figure 4.21b: Dormers on a terraced houses that are full-width for mid-terrace houses, but set in from the edge of a gable end (or hipped roof) on the end of terrace house.

the pattern of roof forms visible from the street.

- If proposing a side roof extensions, be no more than two thirds the width of the existing roof and should not interrupt the appearance of the roof when viewed from the street (refer to Figure 4.21e). Habitable room windows in the side elevation facing a neighbouring property would not normally be acceptable if it results in overlooking to habitable rooms or the first 10m of the rear garden of a neighbouring property.
- Choose materials, windows and doors in accordance with the guidance on Detailed Design (Refer to Sections 4.23-4.27 for guidance). This is important for roof extensions due to their visibility, the need to avoid creating an overbearing appearance and the potential to add design interest through materials and detailed design.

4.21.2 It will generally not be acceptable to create dormers on the front of a property. They will only be possible in exceptional circumstances which includes the Areas of Focussed Intensification (Refer to relevant guidance in Chapter 3) or other locations where they would not negatively impacting the appearance of the street and not disrupt the rhythm of development along a street. Where this may be possible, they should not be full width or large box dormer, and should generally be setback from the eaves line by a minimum of 0.3m. They should be positioned to be part of the composition of the front elevation, relating to the shape, size, position, and design of the existing doors and windows on the lower floors including space between windows and offsets from side walls. Rooflights may be less disruptive to the streetscene and should be considered for front elevations.



Figure 4.21c: A good example of a box dormer on the rear of a terrace house successfully designed by Selencky Parsons to integrate into the existing dwelling; the dormer replicates existing roof tiles, conceals rainwater pipes and aligns the glazing with the windows below. The dormer provides a generous amount of glazing, avoiding an overbearing appearance and benefiting the internal spaces.



Figure 4.21e: Example of where a side roof extension to a house has not been setback from the original roof. In this situation it has compromised the symmetrical form of the original semi-detached houses and therefore negatively impacts the appearance of street.



Figure 4.21f: Example of an inappropriate addition of a front dormer to a mid-terrace house. This addition lacks design merit and breaks the uniformity of the roofs that contributes to the positive characteristics of the street.



Figure 4.21d: The addition of 3 dormers by Threefold Architects that have been sympathetically designed to the existing building and respond to the positioning of the windows below.



Figure 4.21g: Example of where a highly visible roof extension dominates the original building and negatively impacts the appearance of the street. This could have been avoided had the rear box extension been set in from the gable end of the roof to allow the gable and the rear extension to read as two separate elements.

ADDITIONAL STOREYS

4.22 EXTENDING UPWARDS

4.22.1 Where appropriate, an additional storey added across all or any part of a dwelling can be effective for increasing internal floor area, particularly for dwellings with flat roofs. Proposals for additional storeys should ensure:

- They are generally limited to 1 additional storey, except where in exceptional circumstances, such as on larger flat roofs.
- They are generally only applied to detached houses, blocks of flats or on corner plot for any type of house with adequate separation from the boundary of their plot.
- They do not result in

unreasonable loss of light and direct overlooking to habitable rooms or the first 10m of the rear garden in neighbouring properties.

- They are designed to respond to the existing building. In some circumstances, a 'seamless' approach that continues the form, proportions, materials and details of the floor below may be appropriate. This needs to be approached with care to ensure it does not result in an overbearing or poorly proportioned elevations, and presents a risk materials do not quite match and therefore appear to clash. Where this would be the case a setback may be appropriate taking a supplementary or innovative

design approach (Refer to Section 4.5).

- The specification of materials, windows and doors is in accordance with the guidance on Detailed Design (Refer to Sections 4.23 - 4.27 for guidance).

4.22.2 Where additional storeys would result in the creation of new residential units, they should refer to the guidance provided in Chapter 2 with regards to Site Layout & Servicing and Landscaping & Provision of Outdoor Amenity Space.



Figure 4.22a: An example of additional storeys being added to an existing building historic example of additional storeys being added toto provide new homes.

DETAILED DESIGN FOR RESIDENTIAL EXTENSIONS & ALTERATIONS

4.23 DETAILS

4.23.1 The detail incorporated into the design of a proposal will have a significant impact on the finished appearance of an extension or alteration. There are many aspects which should be considered when developing proposals, such as choice of materials, windows & doors, architectural detailing and ancillary items such as flues and rainwater goods.

4.24 RAINWATER GOODS & OTHER ANCILLARY ITEMS

4.24.1 Rainwater goods, such as downpipes, and other ancillary items, such as flues and soil vent pipes, can add clutter to the appearance of a dwelling. The impact on the appearance of a proposal should be considered in the early design stages and should ensure:

- The positioning of rainwater goods, flues, vents and other pipes, are in a discreet location and the number of downpipes is limited to avoid cluttered elevations.
- Pipework does not overhang the boundary of neighbouring properties⁵³. For flat roofs, the introduction of a parapet is often a successful way to contain rainwater collection within the curtilage of the property. Where the roof slopes towards a boundary, proposals should have a wall setback from the boundary to allow for eaves and gutter overhang. A sloped roof should not generally be combined with a parapet (Refer to Figure 4.24c).
- Where for a single storey side extension, consideration is given to future development of a first floor extension. A single storey side extension up to the boundary could limit the design at first floor if eaves and guttering were to extend over the boundary.
- Meter boxes are placed in a discreet location, generally away from the main entrance or where they are not prominent on the front elevation or subterranean where possible.

⁵³ Information about Party Walls and the Party Wall etc. Act 1996 for boundaries of land belonging to two (or more) different owners is available at: https://www.planningportal.co.uk/info/200187/your_responsibilities/40/other_permissions_you_may_require/16

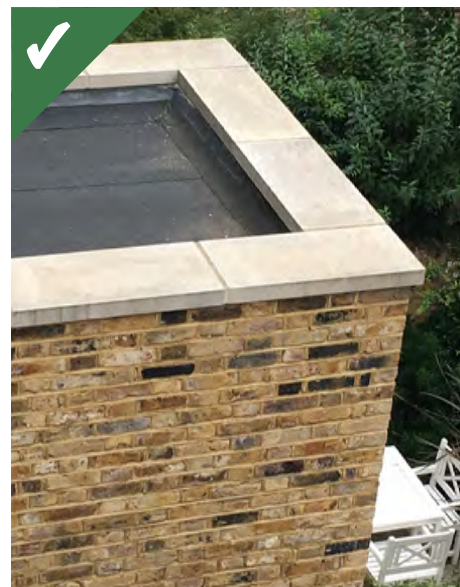


Figure 4.24a: A parapet can be used on a flat roof to remove the need for gutters, creating a less cluttered appearance.

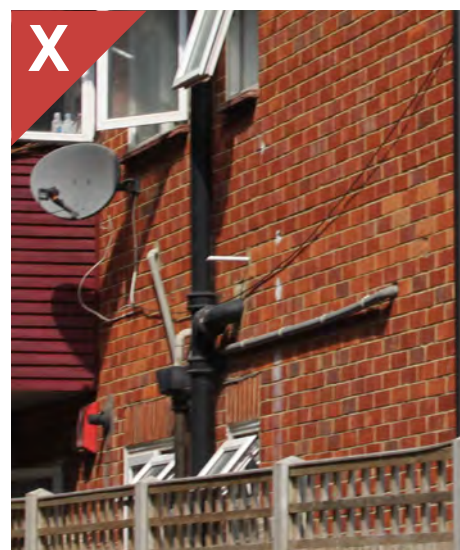


Figure 4.24b: Poorly considered pipework on a side extension, visible from the street.



Figure 4.24c: The combination of a pitched roof with a parapet results in an unattractive appearance.

4.25 WINDOWS AND DOORS

4.25.1 Windows and doors should be designed to avoid poorly proportioned, positioned and detailed openings. The relationship between a proposal and existing openings should also be carefully considered. Designs should ensure:

- Where an extension or alteration meets the existing dwelling, they should generally be at least 215mm (1 brick width) clear of any opening on the existing dwelling.
- The positioning and proportions of windows and doors should avoid an elevation that appears imbalanced or that result in large blank facades that would appear overbearing.
- Consideration is given to whether windows or doors as part of an extension or alteration should be:
 - recessed, semi-recessed or flush with the external envelope;
 - in a symmetrical or asymmetrical composition; or
 - match the proportions of windows in the existing house.
- Where the original doors and windows are characteristic features of the existing dwelling or the area, such as bay windows, they are retained.
- Decorative features to door and window surrounds are retained where possible, particularly where they contribute to the character of a building or area.
- The replacement of an unsympathetic door or window is with one of a design that is characteristic of the original dwelling.
- The choice of material of new windows and door frames is consistent. Where wooden frames are already used, this should be continued unless



Figure 4.25a: A wall with different depths of window and door reveals. Deeper reveals add emphasis and solidity to the appearance of a house.

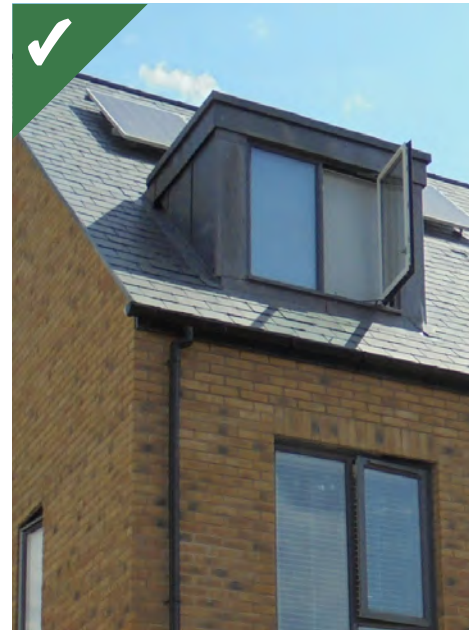


Figure 4.25b: An example of well-designed dormer window, set in from the edges of the roof, with a simple frame that does not draw the attention of the eye.

there is a particular design rationale for introducing a different framing system. Metal frames may be appropriate in contemporary proposals. The quality and appearance of wooden and metal frames tends to be superior to uPVC and are therefore preferable.

- Where the porch is an important part of the original design of a house, these are retained. The enclosure of porches with glazing can interrupt the rhythm of a street and should be avoided. The removal of a porch can result in an under-scaled entrance, diminishing the uniformity of a street where the porch is a feature on all houses.
- Where a porch is added to a dwelling, the building style and impact on the street scene is considered.

4.26 MATERIALS

4.26.1 The choice and use of materials for an extension or alteration can significantly impact the appearance of a dwelling. Choice of materials should consider the neighbouring properties and ensure:

- In areas where there is a strong sense of character through the use of particular materials, extensions and alterations should use materials that respond to this character. Where appropriate, this may allow the introduction of new, high-quality materials, including in historic environments where contemporary materials may be used to offer a contrast to the appearance of traditional materials and enhance the qualities of and provide a clear distinction from the original fabric.
- Materials chosen to match the existing dwelling are carefully chosen to consider the effects of weathering and time. This is crucial where a seamless approach is taken and materials need to match the existing.
- The long-term wearing of materials is considered. Materials such as render and wood can wear drastically if poorly detailed and not maintained, particularly if north



Figure 4.26a: Strong and consistent material palette, features and details contributes to character of a suburban street. (Photo: Ruth Ward)

facing.

- The reuse of materials where possible for a repair or extension. Elevations which are visible from the street, including roofs, should be prioritised in the reuse of materials. A mixture of old and new materials is more appropriate on rear-facing elevations, and should ensure that similar colours, textures and sizes are used to those of the original roof covering.

4.26.2 Innovation or the use of new materials will be encouraged, except where it detracts from the character of an area.

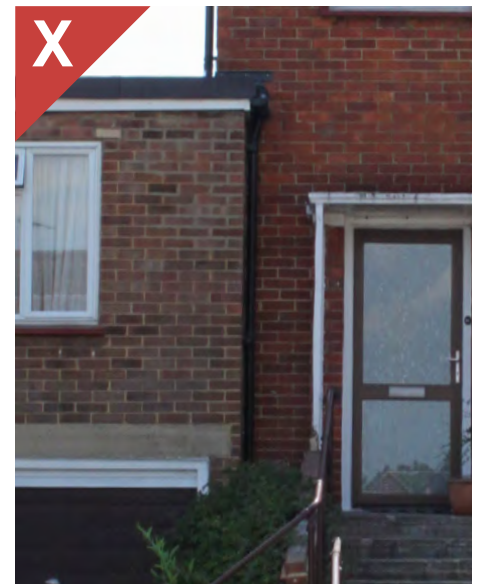


Figure 4.26b: An example of a side extension that attempts to match the existing brick work but fails to do so.



Figure 4.26c: An example of the successful introduction of contemporary materials in this metal clad side extension by HUT Architecture.



Figure 4.26d: An example of inappropriate cladding to a house that hinders the appearance of the street.

4.27 ARCHITECTURAL DETAILS & FEATURES

4.27.1 The architectural details and decorative features of a building significantly contribute to the appearance of a dwelling. Design proposals for extensions and alterations should consider the response to existing features and how new details may be introduced to add interest and respond to the local character.

- In a seamless approach or where rebuilding part of the existing dwelling, the continuation of plinths, string courses, bond patterns, decorative brickwork, barge boards and fascias should be integrated into the design.
- Decorative features such as terracotta panels, carved bricks, glazed tiles, decorative ridge tiles and finials, lintels or plaques should be retained and restored, if damaged.
- Functional features, such as chimneys help provide rhythm to a street, particularly on semi-detached and terraced housing. Where chimneys are no longer used to service fireplaces, they can provide ventilation and reduce condensation within a home. Where they contribute to the original design, their retention is encouraged. Where a new chimney would be appropriate to the scale and position of an extension, they can assist with the integration into the suburban setting and provide a functional use.
- The addition of contemporary features and details will be encouraged where they respond to the design of the proposal, the existing house and the character of the local area.

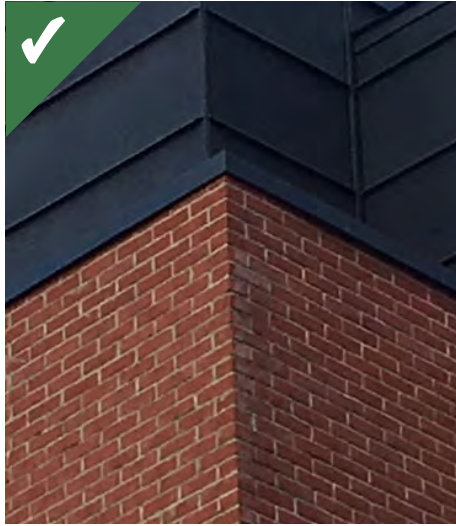


Figure 4.27a: Standing seam metal and brick.

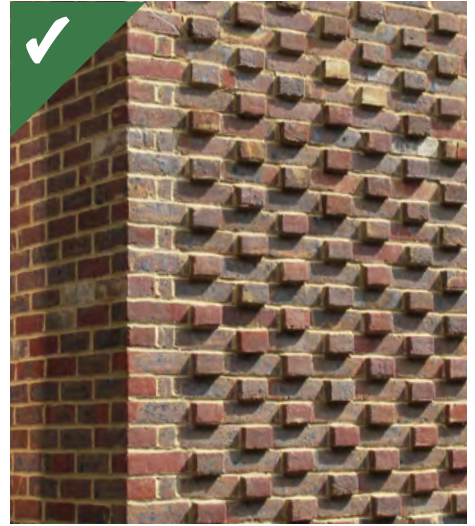


Figure 4.27d: Patterned brickwork.



Figure 4.27b: Crafted wooden shingles.



Figure 4.27e: Stepped courses of brickwork.

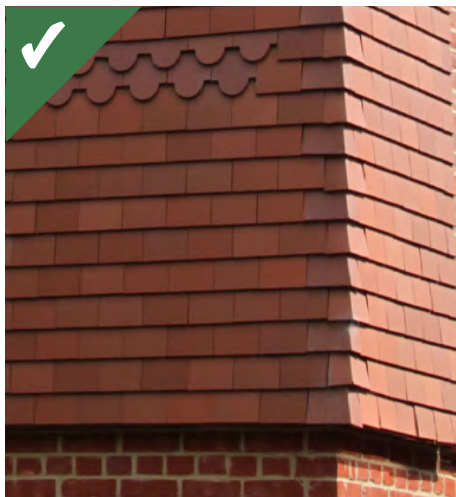


Figure 4.27c: Hung tiles, including decorative tiles.

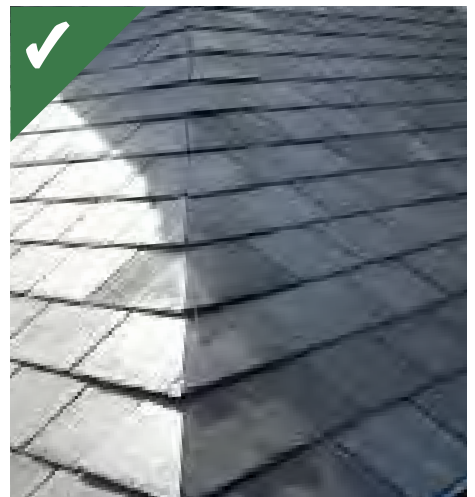


Figure 4.27f: Slate tiles.

OUTBUILDINGS

4.28 BUILDING IN GARDENS

4.28.1 Outbuildings providing additional space associated with a dwelling, such as storage, a home office or summer house should not result in the creation of a separate dwelling and should share access, gardens and services with the main dwelling.

4.28.2 Such proposals may be required to demonstrate that the proposed outbuilding is ancillary to the existing house so as not to be considered a separate dwelling. Where an outbuilding would result in a separate dwelling, applicants should refer to the guidance on subdivision and rear garden development (Refer to Chapter 2).

4.28.3 Outbuildings should be designed to:

- Provide an ancillary function such as a home office, garage or storage.
- Be located in a position that provides access requirements relevant to the use, but should not be dominant in the street scene or in a location where they would appear to add clutter. Consideration should also be given to the level of natural surveillance over the outbuilding.
- Be of a scale that is subservient to the main house. The maximum height and footprint of an outbuilding should be determined on a case-by-case basis, dependent on the size of the plot, scale of the host building and impact on neighbouring amenity.
- Be innovative, standalone buildings. Outbuildings do not need to respond to the style of the host dwelling, except where visible from the street. Where visible from the street, proposals for outbuildings should respond to the character



Figure 4.28a: An example of an outbuilding proving an ancillary living space and home office designed by Surman Weston and Joseph Deane. (Photo: Wai Ming Ng)

of the existing dwelling.

- Ensure that where a garage is proposed, it should not directly abut a pavement or highway. The garage doors should not open onto a pavement or highway.
- Outbuildings and garages should generally be set behind the main building line.

4.28.4 If the outbuilding is to be used as a habitable space⁵⁴, proposals should consider heating (and insulation) and access to light and ventilation.

⁵⁴ Habitable spaces may include a home office or study.

FRONT GARDENS, PARKING & STORAGE

4.29 FRONT GARDEN DESIGN, INCLUDING PARKING

4.29.1 Except in certain circumstances⁵⁵, most front garden works do not require planning permission. All front garden works requiring planning permission should follow the guidance below. Where works do not require planning permission, homeowners should consider the following guidance to achieve the best possible outcome. Homeowners should also consider the need to notify neighbours under the Party Wall Act if proposed works may affect a shared boundary and generally for any proposed development.

4.29.2 The design of front gardens, including landscaping, can significantly enhance a home and the character of the street. Proposals for front gardens and forecourt parking should follow the guidance described in Figure 4.28a and:

- Provide parking which is proportionate to the size of the dwelling and avoid paving over a significant amount of the forecourt. Forecourts that are completely covered in hardstanding should be avoided, as a minimum a planted border along all boundaries should be provided.
- Allow sufficient space between the car and the dwelling to allow access to the front door and side of the property. Front garden parking must be designed to avoid cars

⁵⁵ Circumstances where planning permission is required include where the property is within a Conservation Area, where the works are dealing with a Tree Protection Order or where a proposal seeks to create a new driveway across the pavement. Applicants should contact Council's Planning Department before undertaking works.

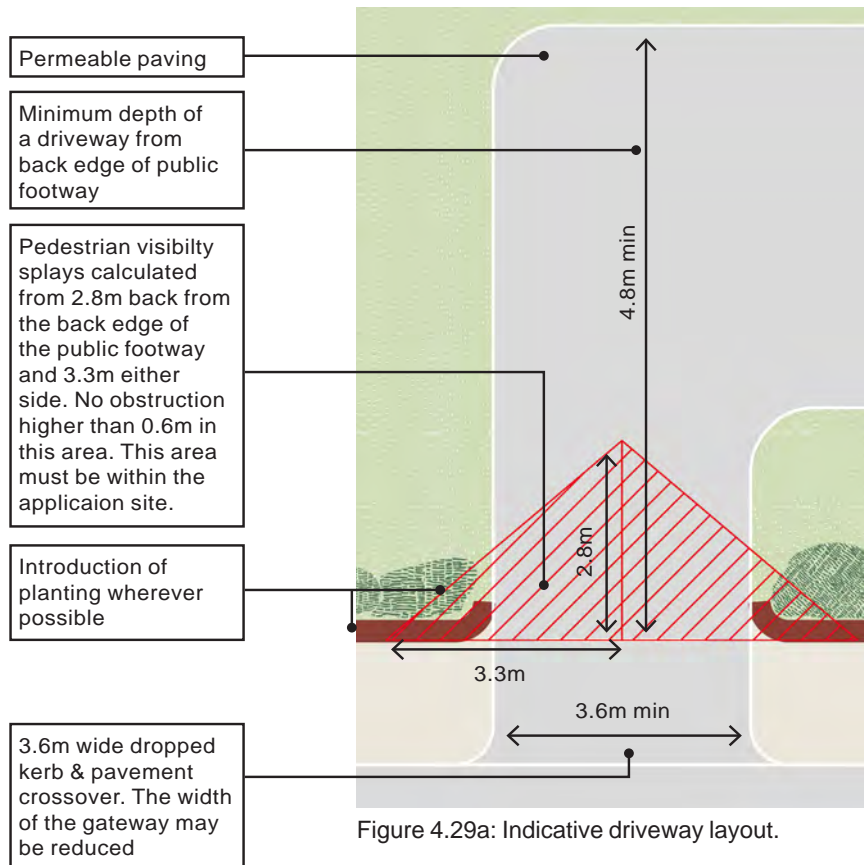


Figure 4.29a: Indicative driveway layout.

- overhanging the pavement.
- Should not include gates. Where gates already exist, they must not open outwards and should allow enough space for them to be opened inwardly (if relevant) whilst a car is parked in the forecourt. Gates should enable a pedestrian on the footway to have clear visibility of any vehicle exiting (i.e. they should be railings or have some form of transparency) and should not be of a height that blocks visibility of passing pedestrians and should enable visibility from the footway.
- Avoid the need to remove any existing trees or established hedges.
- Introduce new planting wherever possible.
- Introduce permeable paving to new areas of hardstanding to minimise rainwater run-off issues, as per the requirements of PD⁵⁶.

⁵⁶ For more information, refer to Schedule 2, Part 1, Class F, available at: http://www.legislation.gov.uk/uksi/2015/596/pdfs/ukxi_20150596_en.pdf.

- There should be no water run-off from the forecourt onto the public highway.
- Repair or restore any original decorative tiled paths that are a characteristic or historic feature of the existing dwelling.
- Pedestrian and visibility splays for the crossover and vehicle access must be in accordance with Croydon Guidance⁵⁷.
- If a new dropped kerb and crossover is required then applicants must apply for and obtain consent via the Croydon Highways Department⁵⁸.

⁵⁷ Available at: <https://www.croydon.gov.uk/sites/default/files/articles/downloads/visibility-splays-layout.pdf>.

⁵⁸ For advice, refer to: <https://www.croydon.gov.uk/sites/default/files/articles/downloads/VCO%20application%20Sep%202016.pdf> and <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Residential%20Driveways%20and%20Car%20Accesses.pdf>.

4.30 FRONT GARDEN BOUNDARY TREATMENTS

4.30.1 Boundary treatments help to define the relationship between a dwelling and the street. They can include garden walls, fences, railings and hedges. A strong front boundary treatment should be incorporated into proposals, particularly where this is characteristic of the street. Boundary treatments visible from the street should:

- Respond to the design of the dwelling;
- Be consistent with the height of other enclosures on the road;
- Avoid the introduction of different styles along the street. Treatments should reinforce the dominant boundary type along the street, ensuring consistency with the style and age of the property;
- Consider well-maintained planting as an alternative solution and retain any hedgerow;
- Incorporate visibility splays and sight lines for pedestrian and vehicular safety.

4.31 REFUSE & CYCLE STORAGE

4.31.1 Refuse and bicycles often create clutter on the street scene. Dedicated external storage can resolve the impact on the character of an area. Where possible, this should be located in a discreet location to the side or rear of a property.

4.31.2 Where storage is located in front of a property, it should be:

- Located away from the front boundary and in a discreet location where it does not intrude on the street scene; and

- Be of a design that does not negatively impact the setting of the dwelling or local character. Simple wooden structures or simple metal storage products (Refer to Figure 4.30a and 4.30b) surrounded by landscaping are a common and effective solution, where structurally secure and with a Police security recommendation.



Figure 4.31a: An example of a secure cycle store located in an easily accessible position. (Photo: Trimetals Ltd.)



Figure 4.31b: Ancillary storage for individual homes are best accommodated in the front garden of a property where they are well integrated into landscaping, as demonstrated in the bin stores alongside. (Photo: www.bikebox.london/)

An isometric illustration of a city street scene. The scene is viewed from an elevated perspective, showing a grid of streets. Buildings are rendered in a stylized, blocky manner with various colors like red, orange, and grey. There are several trees with green foliage scattered throughout the scene. A few vehicles, including a red car, a white van, and a motorcycle, are visible on the streets. The overall style is clean and modern, with a focus on geometric shapes and a limited color palette.

CHAPTER 5: APPENDIX

GLOSSARY

ARCHAEOLOGICAL PRIORITY AREAS:

Areas that are known to be of archaeological importance because of past finds, excavations or historical evidence.

BACK LAND:

Land behind an area which can be built on or otherwise developed. In some instances, this may include land that is already developed.

CONSERVATION AREAS:

Conservation Areas are designated by the Local Planning Authority. A Conservation Area is an area of special historic or architectural interest that make it unique and are protected by law against undesirable changes. The main attributes that usually define the special character of a Conservation Area are its history and physical appearance, including building form, materials and architectural style. The Planning (Listed Buildings and Conservation Areas) Act 1990 defines the quality of a Conservation Area as being: " the character or appearance of which it is desirable to preserve or enhance". Croydon Council provides specific guidance for these areas in the Conservation Area General Guidance and Conservation Area Appraisal and Management Plans.

CROYDON LOCAL PLAN:

The planning policy document that sets out the spatial vision and plan for the future of the borough and how it will be delivered.

EVOLUTION WITHOUT SIGNIFICANT CHANGE OF AN AREA'S CHARACTER:

This is detailed in the Croydon Local Plan Policies DM10.1-10.10 and is relevant to Chapter 2 of this SPD2.

FLEXIBLE BUS:

This refers to demand-responsive transport where vehicles alter their routes based on particular transport demand rather than using a fixed route or timetable and can be used to provide a public transport service in areas of lower densities where a regular bus service is not considered to be financially viable.

FOCUSSED INTENSIFICATION ASSOCIATED WITH CHANGE OF AREA'S LOCAL CHARACTER:

This is detailed in the Croydon Local Plan Policies DM10.11 and is relevant to Chapter 3 of this SPD.

FORECOURT:

An area to the front of a building which may typically include landscaping and some space for parking.

GUIDED INTENSIFICATION:

This is detailed in the Croydon Local Plan Policies DM34-39 which provide place specific policies for development.

HABITABLE ROOMS:

Habitable rooms are described as any room designed *and* used for sleeping, cooking, living or eating purposes. Undersized rooms performing these functions will not be considered habitable rooms, and this will be judged on a case by case basis. Enclosed spaces such as bathrooms or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are not considered to be habitable rooms. Ancillary spaces in a separate structure to the main dwelling, such as garden rooms, are not considered to be habitable rooms.

HARDSTANDING:

An area of paved ground (for example with tiles, bricks, pavers or concrete etc.) that sits outside the external envelope of a property. This may include driveways and patios.

HERITAGE ASSET:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).

HIGH QUALITY DESIGN:

A design that has a developed approach to character, with a massing and coherent form that responds to the site context and provides good standards of accommodation and amenity, internally and externally, making use of quality materials and detailing.

HIT & MISS BRICKWORK OR STONE:

Brick or stone that is stacked with spaces between the bricks/stones. These spaces are generally of a size that reduces perceived overlooking sufficiently whilst allowing light to filter through.

HOST DWELLING:

This is a dwelling which is under the same ownership and forms part of the original plot on which development is proposed.

INCOHERENT FORM:

The shape (in plan and/or section and/or elevation) of a development that is overly complicated and negatively impacts the appearance of a proposal.

LISTED BUILDINGS:

Means a building which is for the time being included in a list compiled or approved by the Secretary of State under this section; and for the purposes of this Act -

(a) any object or structure fixed to the building;

(b) any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948, shall subject to subsection (5A)(a) be treated as part of the building.

LOCAL HERITAGE AREAS:

Local Heritage Areas (LHA) is a designation based upon the original criteria for designating Local Areas of Special Character. The criteria for designating an area as an LHA were consulted upon in autumn 2013 as part of the Croydon Local Plan: Detailed Policies (Preferred and Alternative Options). To be designated as an LHA an area:

- Must be of heritage significance; and

- Meet one or more of the following three criteria:

1. Architecture – the architecture in the area must be of a high quality, distinctive and well preserved. This is because the collective value of a group of historic buildings has a consistent architectural form, style, features, detailing or materials and the group will often, but not always, have been built as a single development over a short period of time.
2. Townscape – the townscape of the area must be of a high quality, distinctive and well preserved. This is because of the attractive and historic composition of the urban form and the area will often, but not always, have been planned.
3. Landscape – the landscape of the area must be of a high quality, distinctive and well preserved. This is because of the distinguishing quality, extent or features of its historic landscape and it will often, but not always, have been planned.

LOCALLY LISTED BUILDINGS:

The locally listed buildings and structures within Croydon are considered by the public and the Council as having special local architectural or historic interest, to be of significance to the local community and to contribute to the environmental and cultural heritage of the borough. All locally listed buildings should satisfy at least two of the following criteria:

- **Authenticity:** Buildings and groups selected for the local list should be substantially unaltered and retain the majority of their original features;
- **Architectural significance:** Buildings which are of good architectural quality or are good examples of a particular building type;
- **Historical significance:** Buildings which represent specific architectural and social building periods or which are associated with, local historical events, the development of Croydon, well known people or noted designers;
- **Technical significance:** Buildings that display exceptional innovation and craftsmanship;
- **Townscape Value:** Buildings and/or groups of buildings which due to their form, massing, appearance and positive role in the streetscene, such as key corner buildings, local landmarks, uniformly designed terraces.

LOCALLY LISTED HISTORIC PARKS AND GARDENS:

The criteria for the local list of historic parks and gardens are set by Historic England along with the London Parks and Gardens Trust. This stipulates that the site have at least one of the following:

- evident historic features or design
- buried archaeology
- connections with famous designers or nurserymen
- connections with nationally or locally famous individuals
- a design typical of a landscape style.

LONDON PLAN:

The strategic plan for London, setting out an economic, environmental, transport and social framework for development.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF):

The National Planning Policy Framework is a key part of Government reforms to make the planning system less complex and more accessible, and to promote sustainable growth. The NPPF replaces all existing Planning Policy Statements and Planning Policy Guidance.

OUTRIGGER:

An addition to the main building mass, commonly through a rear extension that is not full-width. These are common in terraced houses and often are part of the original dwelling.

OVERBEARING:

Where a development is considered to have an unreasonable impact on neighbouring and local amenity as a result of its scale and appearance. The level of reasonableness is dependent on the site context and must be balanced by the need to provide homes. Developments that adhere to the guidance within SPD2 will generally not be considered to be overbearing, however this will be judged on a case by case basis.

PERMITTED DEVELOPMENT:

Permitted development rights are a national grant of planning permission which allow certain building works and changes of use to be carried out without having to make a planning application.

RAINWATER GOODS:

Items attached to a dwelling to remove rainwater from roofs into the drainage system.

REAR GARDEN DEVELOPMENT:

The construction of new buildings in rear gardens of the existing properties.

REGISTERED PARKS AND GARDENS:

A site included on the Register of Historic Parks and Gardens in England. Registered parks and gardens are designated heritage assets and subject to the planning policies within the NPPF.

SCHEDULED MONUMENTS:

Means any monument which is for the time being included in the schedule (compiled and maintained by the Secretary of State for Culture, Media and Sport).

SELF-PROVIDED HOUSING:

This is the delivery of housing that is steered by the future resident(s). This commonly includes community-led, self-build and custom build housing.

SETTING OF A HERITAGE ASSET:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

SIGNIFICANCE:

- 1) The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 2) The sum of the cultural and natural heritage values of a place, often set out in a statement of significance.

STREET:

A road that is either adopted or to an adoptable standard, and does not include rear access lanes or driveways.

SUBURB:

A predominantly residential area that has grown up on the outskirts of district and metropolitan centres.

TRANSPORT FOR LONDON (TFL):

Transport for London (TfL) is the organisation responsible for London's transport system. Its role is to implement the Mayor's Transport Strategy and manage transport services in London, for which the Mayor has ultimate responsibility.

UN-NEIGHBOURLY WINDOWS:

Where such a window already exists on any type of development (including windows within extensions), it is a window that faces onto a potential development site in a way that would not be permitted if the window did not currently exist as it would unreasonably preclude development on the neighbouring site. Where such a window does not currently exist, it is a window proposed within any type of development application (including extensions) that would unduly preclude development on the neighbouring site.

FIGURES

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No. Credit

- 1.1a - Photo: Morley von Sternberg; Architecture: Peter Barber Architects
- 1.3e - Photo: Paul Riddle; Architecture: Alison Brooks Architects
- 1.4b - Photo: Kilian O'Sullivan; Architecture: Bell Phillips Architects
- 2.1c - Photo: Morley von Sternberg; Architecture: Peter Barber Architects
- 2.1d - Photo: David Butler; Architecture: Dallas - Pierce - Quintero
- 2.1e - Proctor & Matthews Architects
- 2.5a - Chartwell Land & New Homes
- 2.5b - Chartwell Land & New Homes
- 2.6a - Road.cc
- 2.6e - Photo: Morley von Sternberg; Architecture: Peter Barber Architects
- 2.6b - Photo: Philip Vile; Architecture: Haworth Tompkins
- 2.7a - MATA Architects
- 2.8a - Coffey Architects (for Brick by Brick)
- 2.8b - Common Ground Architects (for Brick by Brick)
- 2.8c - Chartwell Land & New Homes
- 2.9b - Photo: Tom Gildon; Architecture: Dallas - Pierce - Quintero
- 2.9d - Wikimedia Commons
- 2.9h - vPPR Architects
- 2.11a - MATA Architects
- 2.13b - Coffey Architects (for Brick by Brick)
- 2.13c - Stitch Studio (for Brick by Brick)
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- 2.22a - Photo: Tim Crocker; Architecture: Carl Turner Architects
- 2.22b - Photo: Andy Stagg; Architects: Henley Halebrown
- 2.22c - Chartwell Land & New Homes
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- 2.24d - Photo: Morley von Sternberg; Architecture: Peter Barber Architects
- 2.24e - Stitch Studio for Brick by Brick
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- 2.36a - Hayhurst & Co.
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- 2.37a - Stitch Studio for Brick by Brick
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- 2.40a - HTA Design LLP for Brick by Brick
- 2.40b - HTA Design LLP for Brick by Brick
- 2.40c - HTA Design LLP, redrawn by Croydon Place Making Team
- 2.41a - MATA Architects
- 2.41b - MATA Architects
- 2.41c - MATA Architects, redrawn by Croydon Place Making Team
- 2.42a - Coffey Architects for Brick by Brick
- 2.42b - Coffey Architects for Brick by Brick
- 2.42c - Coffey Architects, redrawn by Croydon Place Making Team
- 2.44a - Chartwell Land & New Homes
- 2.44b - Chartwell Land & New Homes
- 4.1a - Ruth Ward
- 4.2a - Photo: Simone Bossi; Architecture: Trehwela Williams
- 4.5a - Photo: Andy Matthews; Architecture: Selencky Parsons
- 4.5b - Photo: Paul Riddle; Architecture: Alison Brooks Architects
- 4.5c - fourth_space
- 4.15a - Photo: Anna + Tam; Architecture: Nimitim Architects
- 4.15a - Photog: Andrew Meredith; Architecture: Gundry + Ducker Arch.
- 4.17c - Photo: Andy Matthews; Architecture: Selencky Parsons
- 4.21c - Architecture: Selencky Parsons
- 4.21d - Threefold Architects
- 4.26a - Ruth Ward
- 4.26c - HUT Architecture
- 4.28a - Photo: Wai Ming Ng; Architecture: Surman Weston and Joseph Deane
- 4.31a - Trimetals Ltd.
- 4.31b - Photo: www.bikebox.london
- Animation stills - Matthew Lucraft

USEFUL WEBSITES

CROYDON COUNCIL PLANNING AND CONSERVATION WEB PAGES:

www.croydon.gov.uk/planningandregeneration

www.croydon.gov.uk/planningandregeneration/framework/localplan/clppolicies

www.croydon.gov.uk/planningandregeneration/framework/localplan/supplementary

www.croydon.gov.uk/planningandregeneration/framework/conservation/conservation-areas/conservation-guidance

GREATER LONDON AUTHORITY (FOR THE LONDON PLAN):

www.london.gov.uk/thelondonplan

MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT

<https://www.gov.uk/government/organisations/ministry-of-housing-communities-and-local-government>

CONTACTS

Croydon Council, Bernard Weatherill House, 8 Mint Walk, Croydon CR0 1EA.

Phone: 020 8726 6000

Email: contact.thecouncil@croydon.gov.uk

SPATIAL PLANNING (including Urban Design and Conservation Officers)

Email: spatial.planning@croydon.gov.uk

DEVELOPMENT MANAGEMENT (including Enforcement & Tree Officers)

Email: development.management@croydon.gov.uk

BUILDING CONTROL

Email: building.control@croydon.gov.uk

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REPORT TO:	CABINET 25 MARCH 2019
SUBJECT:	STAGE 1: RECOMMENDATIONS ARISING FROM SCRUTINY
LEAD OFFICERS:	JACQUELINE HARRIS BAKER, EXECUTIVE DIRECTOR RESOURCES AND MONITORING OFFICER STEPHEN ROWAN – HEAD OF DEMOCRATIC SERVICES & SCRUTINY
LEAD MEMBER:	COUNCILLOR SEAN FITZSIMONS CHAIR, SCRUTINY AND OVERVIEW COMMITTEE
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT:	THE CONSTITUTIONAL REQUIREMENT THAT CABINET RECEIVES RECOMMENDATIONS FROM SCRUTINY COMMITTEES AND TO RESPOND TO THE RECOMMENDATIONS WITHIN TWO MONTHS OF THE RECEIPT OF THE RECOMMENDATIONS.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations contained within this report:

1. RECOMMENDATIONS

Cabinet is asked to:

- 1.1 Receive the recommendations arising from the Scrutiny & Overview Committee (15 January 2019) and from the Streets, Environment & Homes Scrutiny Sub-Committee (22 January 2019) to provide a substantive response within two months (i.e. at the next available Cabinet meeting on **7 May 2019**)

2. EXECUTIVE SUMMARY

- 2.1 Recommendations that have been received from the Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting are provided in Appendix A. The constitution requires that an interim or full response is provided within 2 months of this Cabinet meeting.

3. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 3.1 There are no financial implications arising directly from the contents of this

report.

4. LEGAL CONSIDERATIONS

- 4.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the recommendations are presented to Cabinet in accordance with the Constitution.
- 4.2 This requires that the Scrutiny report is received and registered at this Cabinet Meeting and that a substantive response is provided within 2 months (i.e. **Cabinet, 7 May 2019** is the next available meeting).

Approved by Sandra Herbert, Head of Litigation & Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

CONTACT OFFICER: Simon Trevaskis, Senior Democratic Services & Governance - Scrutiny
T: 020 8726 6000 X 64840
Email: simon.trevaskis@croydon.gov.uk

BACKGROUND DOCUMENTS:

Background document 1: Reports to the Scrutiny & Overview Committee on 15 January 2019.

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=1521&Ver=4>

Background document 2: Reports to the Streets, Environment & Homes Sub-Committee on 22 January 2019.

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=1496&Ver=4>

APPENDICES

Appendix A – Scrutiny Recommendations: Stage 1

Scrutiny Recommendations: Stage 1

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	15/01/2019	Budget	That it would be beneficial to scrutinise the budget setting process in the new municipal year, to provide reassurance on the preparation of the budget at an early stage.	That the Cabinet Member for Finance and Resources be invited to attend a meeting of the Committee early in the new municipal year to discuss with Members on the process for setting the next budget.	Simon Hall	Lisa Taylor
Streets, Environment & Homes	22/01/2019	Question Time: Cabinet Member for Homes & Gateway Services	The Councils decision to utilise Article 4 conditions for conversions of property to HMO was applauded	That the Council ensured that the use of Article 4 be implemented on a borough wide basis and not ward by ward	Alison Butler	Yvonne Murray
Streets, Environment & Homes	22/01/2019	Question Time: Cabinet Member for Homes & Gateway Services	Partnerships with social housing providers had to be strengthened	That the Council and Social Housing providers work on reinforcement of their relationships	Alison Butler	Yvonne Murray
Streets, Environment & Homes	22/01/2019	Question Time: Cabinet Member for Homes & Gateway Services	The lack of support for young people to help them onto the housing market was concerning	That different ideas and initiatives to provide support for young people into housing be explored.	Alison Butler	Yvonne Murray

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	The Committee agreed that there were locality issues with some areas being underrepresented by voluntary organisations than others.	That the final Strategy should set out how it will identify the unmet need within the Borough and how it will work with the voluntary and community sector to meet this need.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	The Committee agreed that there were locality issues with some areas being underrepresented by voluntary organisations than others.	That more funding should be made available for grass root organisations than at present.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	There was a concern that feedback from service users was not being taken into account, as it could be used to help measure the success of a service.	That feedback from service users should be taken into account when monitoring the outcomes from grant funding.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	There was a concern that feedback from service users was not being taken into account, as it could be used to help measure the success of a service.	That feedback from service users should be used to inform future needs and priorities.	Hamida Ali	Gavin Handford

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	It was agreed that the Council should not be too prescriptive on the type of grants it offered.	Within the Community Grants fund the majority of funding should be retained for three year contracts, but an increased amount should be retained for flexible funding as required.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Voluntary & Community Sector Strategy for Croydon	The Committee had significant concerns about the benefit provided by the infrastructure support organisations supported by the Council and felt that the current relationship should be reviewed.	There should be a fundamental review of infrastructure support organisations to ensure they were achieving their expected outcomes.	Hamida Ali	Gavin Handford
Scrutiny & Overview	11/02/2019	Culture Plan for Croydon	The Committee concluded that the biggest risks to the success of the Cultural Plan lay outside of the control of the Cabinet Member.	The Cultural Plan needed to take into account the Council's aspirations for the borough on a wider level and ensure that its own aims were aligned with these.	Oliver Lewis	Paula Murray
Scrutiny & Overview	11/02/2019	Culture Plan for Croydon	The Committee concluded that the biggest risks to the success of the Cultural Plan lay outside of the control of the Cabinet Member.	It was essential that the Cultural Plan clearly set out how it will interact with the other key strategies and plans of the Council and external partners to achieve its aims	Oliver Lewis	Paula Murray

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	11/02/2019	Culture Plan for Croydon	The Committee agreed that the redevelopment of the town centre represented a major risk to the Plan and as such there was a need to focus upon culture in district centres.	The Cultural Plan should be a three to five year plan to cover the period of major redevelopment in the Town Centre.	Oliver Lewis	Paula Murray
Scrutiny & Overview	11/02/2019	Culture Plan for Croydon	The Committee agreed that the redevelopment of the town centre represented a major risk to the Plan and as such there was a need to focus upon culture in district centres.	Actions in the Cultural Plan should cover the whole of the borough and be a reflection of the diverse population in Croydon.	Oliver Lewis	Paula Murray
Scrutiny & Overview	11/02/2019	Culture Plan for Croydon	It was acknowledged that many of the actions set out in the Cultural Plan would not be new, but would need to be clear on aspirations and constraints.	That all actions should include SMART objectives to define how they will be achieved.	Oliver Lewis	Paula Murray
Scrutiny & Overview	11/02/2019	Culture Plan for Croydon	The Committee concluded that the biggest risks to the success of the Cultural Plan lay outside of the control of the Cabinet Member.	The Cultural Plan should be signed off by the Cabinet as a whole, with actions allocated to those Cabinet Members who will have a role in delivering it.	Oliver Lewis	Paula Murray

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	11/02/2019	Library Plan for Croydon	That the seven national outcomes were a useful basis for understanding future provision.	<p>That the national outcomes for library usage should be used as a basis for the strategy, with the service offered being evaluated against these outcomes.</p> <p>The strategy should also be informed by usage data and other available sources of information.</p> <p>The Strategy should interlink with other Council strategies and plans where appropriate.</p>	Oliver Lewis	Kirsteen Roe
Streets, Environment & Homes Sub-Committee	19/02/2019	Grounds Maintenance Service	During the discussion, there were various ideas raised for future service delivery, but the Sub-Committee agreed that for the immediate future the business plan for the service should have a primary focus on providing the core services at an acceptable level.	That the immediate focus for the Grounds Maintenance Service should be on providing its core services at an acceptable level for the residents of Croydon.	Stuart Collins	Tom Lawrence
Streets, Environment & Homes Sub-Committee	19/02/2019	Grounds Maintenance Service	The Sub-Committee recognised that there was a wide variety of parks and open spaces in the borough and as such felt that a bespoke approach, tailored to the specific circumstances in each area was needed rather than an overarching, one size fits all approach.	That the business plan should be developed on a park specific level.	Stuart Collins	Tom Lawrence

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Streets, Environment & Homes Sub-Committee	19/02/2019	Grounds Maintenance Service	The move toward increased engagement with the various Friends Groups of the parks in the Borough was welcomed, but it was questioned how the Council would engage with users of parks without Friends Groups.	That consideration should be given to how to consult with the public in those areas without friends groups.	Stuart Collins	Tom Lawrence
Streets, Environment & Homes Sub-Committee	19/02/2019	Grounds Maintenance Service	The Sub-Committee welcomed the development of a Service Improvement Plan for the Grounds Maintenance Service.	That the Cabinet Member for Clean, Green Croydon be invited to attend the meeting of the Sub-Committee on 1 October 2019 to provide an update on the Service Review and future plans.	Stuart Collins	Tom Lawrence
Streets, Environment & Homes Sub-Committee	19/02/2019	Grounds Maintenance Service	It would have been preferable for the Cabinet Member for Clean, Green Croydon to consult with the Sub-Committee prior to the decision being made to bring the Grounds Maintenance service back in-house.	That Scrutiny should be consulted before decisions are made that would change the method of service delivery, such as bring a service back in-house.	All Cabinet Members/ Simon Hall	Sarah Warman
Scrutiny & Overview	05/03/2019	Safer Croydon Partnership	The Committee agreed that the Safer Croydon Partnership seemed to be on the right track and that the progress reported was positive. A further update in twelve months to review further progress would be welcomed.	That the Cabinet Member for Safer Croydon & Communities and other members of the Safer Croydon Partnership be invited to the meeting of the Scrutiny & Overview Committee on 25 February 2020 to provide an update on the work of the partnership over the previous twelve months	Hamida Ali	Shifa Mustafa

Committee	Meeting Date	Agenda Item	Conclusion	Recommendation	Cabinet Lead	Officer Lead
Scrutiny & Overview	05/03/2019	Safer Croydon Partnership	As the evidence had demonstrated that schools would need to play a significant role in the programme if it was to be successful, the fractured nature of education provision in the borough led to significant concern that this may be an impediment to the success of the partnership	That further consideration needed to be given to how to engage local schools with the work of the Safer Croydon Partnership.	Hamida Ali	Shifa Mustafa
Scrutiny & Overview	05/03/2019	Developing a Public Health Approach to Violence Reduction	The Committee felt that Scrutiny would have a role to play by providing additional challenge on the process as it progressed and where possible the key themes from the Public Health Approach should be incorporated into the Scrutiny Work Programme 2019-20 to allow for a more focussed approach.	The Scrutiny and Overview Committee agreed to recommend to the Cabinet Member for Safer Croydon & Communities to use Scrutiny as resource to provide additional challenge to the Public Health Approach as it developed.	Hamida Ali	Shifa Mustafa

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REPORT TO:	CABINET 25th March 2019
SUBJECT:	INVESTING IN OUR BOROUGH
LEAD OFFICER:	SARAH WARMAN, DIRECTOR OF COMMISSIONING & PROCUREMENT JACQUELINE HARRIS-BAKER, INTERIM EXECUTIVE DIRECTOR RESOURCES
CABINET MEMBER:	COUNCILLOR SIMON HALL CABINET MEMBER FOR FINANCE AND RESOURCES
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON: Effective outcome based commissioning and prudent financial transactions contribute to all corporate priorities. The Council's commissioning strategy sets out the approach to commissioning and procurement and puts delivery of outcomes at the heart of the decision making process. As the Council develops more diverse service delivery models, it is important to ensure that our contractual and partnership relationships are not only aligned to our corporate priorities but also represent value for money for citizens and taxpayers, contributing to the growth agenda for Croydon.	
FINANCIAL SUMMARY: There are no direct costs arising from this report.	
KEY DECISION REFERENCE NO.: There are key decisions mentioned in this report, but approval of the Recommendations would not constitute a key decision.	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1 RECOMMENDATIONS

1.1 The Cabinet is requested to note:

1.1.1 The contracts over £500,000 anticipated to be awarded by the nominated Cabinet Member, in consultation with the nominated Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader.

1.1.2 The list of delegated award decisions made by the Director of Commissioning and Procurement, between 12/01/2019 – 11/02/2019.

1.2 The Cabinet is requested to approve:

- 1.2.1 The establishment of the Passenger Transport Dynamic Purchasing System for the initial period of four years with options to extend for two subsequent periods each of two years with a total estimated value of £68,000,000, pursuant to the procurement strategy approved by Cabinet on 15th October 2018, and as set out at agenda item **12a**;
- 1.2.2 The list of delegated award decisions for contracts over £500,000 in value and procurement strategies over £5,000,000 in value made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.
- 1.2.3 The Cabinet recommends to the Leader of the Council that prior to the next meeting of Cabinet in May, in respect of any contracts and property acquisitions and disposals valued over £500k and that have not previously been notified or reported to Cabinet, the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated member is the Cabinet Member for Finance and Resources in consultation with the Leader, be authorised to agree the award of such contracts. Note that any awards made under this delegation will be notified in the standard contracts report to the next meeting of Cabinet.

2 EXECUTIVE SUMMARY

- 2.1 This is a standard report which is presented to the Cabinet, for information, at every scheduled Cabinet meeting to update Members on:
- Delegated contract award decisions made by the Director of Commissioning and Procurement 12/01/2019 – 11/02/2019;
 - Contract awards and strategies to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item;
 - Contracts anticipated to be awarded under delegated authority from the Leader by the nominated Cabinet Member, in consultation with the Cabinet Member for Finance and Resources and with the Leader in certain circumstances, before the next meeting of Cabinet;
 - Delegated award decisions for contracts over £500,000 in value and procurement strategies over £5,000,000 in value made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet;
 - Delegated contract award decisions under delegated authority from the Leader by the Nominated Cabinet Members for Finance and Resources & for Children, Young People & Learning related to the new Addington Valley SEN School;
[As at the date of this report there are none]

- Delegated contract award decisions under delegated authority from the Leader by the Cabinet Member for Finance and Resources & Cabinet Member for Families, Health & for Social Care related to the Crosfield House Redevelopment;
[As at the date of this report there are none]
- Property acquisitions and disposals agreed by the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet;
[As at the date of this report there are none]
- Partnership arrangements to be agreed by the Cabinet at this meeting which are the subject of a separate agenda item.
[As at the date of this report there are none]

3 DETAIL

- 3.1 Section 4.1.1 of this report lists those contract and procurement strategies that are anticipated to be awarded or approved by the Cabinet..
- 3.2 Section 4.1.2 of this report lists those contracts that are anticipated to be awarded by the nominated Cabinet Member.
- 3.3 Section 4.1.3 of this report lists the delegated award decisions made by the Director of Commissioning and Procurement, between 12/01/2019 – 11/02/2019.
- 3.4 Section 4.1.4 of this report lists the delegated decisions made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.
- 3.5 The Council's Procurement Strategy and Tender & Contracts Regulations are accessible under the Freedom of Information Act 2000 as part of the Council's Publication Scheme. Information requested under that Act about a specific procurement exercise or contract held internally or supplied by external organisations, will be accessible subject to legal advice as to its commercial confidentiality, or other applicable exemption, and whether or not it is in the public interest to do so.

4 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

4.1 Contract Awards

- 4.1.1 Contract award for the purchase of goods, services and works with a possible contract value over £5 million decisions to be taken by Cabinet which are agenda item 12a.

Strategy	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Establishment of the Passenger Transport Dynamic Purchasing System	£68,000,000 (4+2+2 years)		Children, Young People & Learning / Cllr Flemming

4.1.2 Revenue and Capital consequences of contract award decisions to be made between £500,000 to £5,000,000 by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is the Cabinet Member for Finance and Resources, in consultation with the Leader.

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
SEN Passenger Transport In House Service Vehicles	£2,424,000 (5 years)		Children, Young People & Learning / Cllr Flemming

4.1.3 Delegated award decisions made by the Director of Commissioning and Procurement.

Revenue and Capital consequences of delegated decisions made by the Director of Commissioning and Procurement for contract awards (Regs. 18, 27 a & b) between £100,000 & £500,000 and contract extension(s) previously approved as part of the original contract award recommendation (Reg. 27.d) and contract variations (Reg.29).

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Procurement of Cremators and Maintenance	£32,950 (5 years)	£464,132	Culture, Leisure & Sport / Cllr Lewis

4.1.4 Delegated award decisions for contracts over £500,000 in value made by the nominated Cabinet Member in consultation with the Cabinet Member for Finance and Resources or, where the nominated Cabinet Member is

the Cabinet Member for Finance and Resources in consultation with the Leader since the last meeting of Cabinet.

Contract Title	Contract Revenue Budget	Contract Capital Budget	Dept/Cabinet Member
Commissioning of School Places for Pupils with SEN – Beckmead Family of Schools	£3,212,000 (5 months)		Children, Young People & Learning / Cllr Flemming

Approved by: Ian Geary, Head of Finance - Resources on behalf of Lisa Taylor, Director of Finance, Investment and Risk and Section 151 Officer.

5 LEGAL CONSIDERATIONS

- 5.1 The Director of Law and Governance comments that the information contained within this report is required to be reported to Members in accordance with the Council's Tenders and Contracts Regulations and the Council's Financial Regulations in relation to the acquisition or disposal of assets.

Approved by: Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer.

6 HUMAN RESOURCES IMPACT

- 6.1 There are no immediate HR issues that arise from the strategic recommendations in this report for LBC staff. Any specific contracts that arise as a result of this report should have their HR implications independently assessed by a senior HR professional.

Approved by: Sue Moorman, Director of Human Resources

7 EQUALITY IMPACT

- 7.1 An Equality Analysis process has been used to assess the actual or likely impact of the decisions related to contracts mentioned in this report and mitigating actions have been defined where appropriate.
- 7.2 The equality analysis for the contracts mentioned in this report will enable the Council to ensure that it meets the statutory obligation in the exercise of its functions to address the Public Sector equality duty (PSED). This requires public bodies to ensure due regard to the need to advance

equality of opportunity; foster good relations between people who share a “protected characteristic” and those who do not and take action to eliminate the potential of discrimination in the provision of services.

- 7.3 Any issues identified through the equality analysis will be given full consideration and agreed mitigating actions will be delivered through the standard contract delivery and reporting mechanisms.

Approved by: Yvonne Okiyo, Equalities Manager

8 ENVIRONMENTAL IMPACT

- 8.2 Any issues emerging in reports to the relevant Cabinet member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

9 CRIME AND DISORDER REDUCTION IMPACT

- 9.2 Any issues emerging in reports to the relevant Cabinet Member will require these considerations to be included as part of the standard reporting requirements, and will not proceed without full consideration of any issues identified.

CONTACT OFFICER:

Name:	Rakhee Dave-Shah
Post title:	Head of Commissioning and Procurement (Corporate)
Telephone no:	63186

BACKGROUND DOCUMENTS:

The following public background reports are not printed with this agenda, but are available as background documents on the Croydon Council website agenda which can be found via this link [Cabinet agendas](#)

- *Award of SEN Passenger Transport In House Service Vehicles*

For General Release

REPORT TO:	CABINET 25th March 2019
SUBJECT:	Award of Passenger Transport Dynamic Purchasing System (DPS)
LEAD OFFICER:	Shifa Mustafa, Executive Director, Place Steve Iles, Public Realm, Director
CABINET MEMBER:	Councillor Alisa Flemming, Cabinet Member for Children, Young People and Learning Councillor Jane Avis, Cabinet Member for Families, Health and Social Care Councillor Simon Hall, Cabinet Member for Finance and Resources
WARDS:	All
<p>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</p> <p>The delivery of a high quality Passenger Transport service has a positive impact on the outcomes of children, young people and vulnerable adults. It contributes to the following corporate objective:</p> <ul style="list-style-type: none"> • Growth: To enable people of all ages to reach their potential through access to quality schools and learning <p>It also reflects the following priorities within the Community Strategy 2016-2021:</p> <ul style="list-style-type: none"> • To support individuals and families with complex needs 	
<p>FINANCIAL IMPACT</p> <p>The financial impact of this report covers the DPS for taxis. The DPS agreement is for a term of four years, plus 2 extension periods of two years (4+2+2), to deliver taxi services to the total of £68 million (across 8 years).</p>	
<p>FORWARD PLAN KEY DECISION REFERENCE NO.: . 0619CAB</p> <p>This is a Key Decision as defined in the Council’s Constitution. The decision may be implemented from 13.00 hours on the expiry of 5 working days after it is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors.</p>	

The Cabinet is recommended to approve and note the recommendation that for the reasons contained within set out in paragraph 3 of this report, the Leader of the Council be requested to approve:

1. RECOMMENDATIONS

- 1.1 The establishment of a Passenger Transport Dynamic Purchasing System ('DPS') for the initial period of four years with options to extend for two subsequent periods each of two years with a total estimated value of £68,000,000, pursuant to the procurement strategy approved by Cabinet on 15th October 2018;
- 1.2 The initial appointment of suppliers listed in Part B of this report to join the DPS on the basis of contract terms issued as part of inviting tenders, such suppliers being those who have satisfied specified selection criteria;
- 1.3 That authority to approve the appointment of further suppliers who meet the specified selection criteria over the life of the DPS be delegated to the Council's Contracts and Commissioning Board (CCB);
- 1.4 That the award of contracts called off under the DPS shall be approved in accordance with Regulation 8 of the Council's Tender and Contracts Regulations and notified to Cabinet in accordance with paragraph 3.4 of this report.

2. EXECUTIVE SUMMARY

- 2.1 The Council provides home-to-school/college travel support for children and young people with Special Education Needs and/or Disabilities (SEND), and home-to care provision travel support for vulnerable adults, in accordance with its statutory obligations and published eligibility policies. Travel support takes many forms, including the provision of independent travel training to enable clients to travel independently on public transport, and personal travel budgets and direct payments to enable clients to make their own travel arrangements. Nevertheless, the direct provision of passenger transport is still the most common provision for eligible clients. The outcomes the service are trying to achieve are as follows:
 - A quality transport service for all clients
 - Transport which meet the clients' needs, no matter how complex
 - A service which works within the Council's budgetary restraints
 - An increase in clients becoming independent
- 2.2 The current Passenger Transport framework is coming to an end in August 2019 and a new service needs to be procured before the new academic year 2019/20.

- 2.3 The DPS is for a contract term of four (4) years (with a two plus two year extension period) for a maximum contract value of £68 million.
- 2.4 The content of this report has been endorsed by the Contracts and Commissioning Board.

CCB Approval Date	CCB ref. number
05/03/2019	CCB1458/18-19

3. DETAIL

- 3.1 The purpose of this report is to advise the Cabinet of the tenders received and the evaluation undertaken, further to which the recommendation is made for establishment of a Dynamic Purchasing System (DPS) for the delivery of passenger transport services for children/young people with Special Educational Needs/Disabilities and vulnerable adults (the services).
- 3.2 The services within the DPS have been divided into 9 separate categories that are required either with a 'Driver Only' or with a 'Driver and Passenger Assistant'.
- 3.3 The new routes for 2019 will be identified from May onwards and through until the new academic year starts in September 2019. The service relies on the school placement timetables and placements can generally arise any time in the academic year for SEND children and young people. The statutory service needs to begin on 1st September.
- 3.4 Quarterly reports will be produced for Cabinet as part of the Investing in Our Borough (IIOB) report for the life of the DPS, detailing the call offs from the DPS and also the providers which have joined the system.
- 3.5 The overall financial impact of the call off process for the DPS will be reviewed in consultation with the Cabinet Member for Children, Families and Learning, Cabinet Member for Families, Health and Social Care and the Cabinet Member for Finance and Resources. This will take place on a monthly basis at the Travel Governance Board, through the production of regular reports and briefings.
- 3.6 The procurement strategy for Passenger Transport Services was approved by Cabinet on 15th October 2018 (ref: 88/18).
- 3.7 Procurement Approach
- 3.7.1 The DPS for taxis followed the rules of the restricted tender (reg 34 (5) PCR 2015), and advertised through OJEU on 20th November 2019 (Ref: 2018/S 226-517464), the eportal and industry publications. The Procurement Team spent time specifically engaging with sole traders in the taxi market, distributing leaflets and meeting with the providers. The team also held drop in sessions for all providers looking to tender on the DPS, which allowed them to discuss any issues one-to-one.

3.7.2 London Living wage was a requirement of this tender. Tenderers have to take this into account when submitting prices on the DPS for all routes tendered for. The successful Tenderer(s) are also obliged to provide management information to assist the Council with monitoring the impact of the LLW.

3.7.3 All providers on the DPS will be held accountable for their social value progress throughout the contract term. Once a provider gets £100,000 value of work on the DPS, the Contracts and Procurement Officer will contact the provider to set out a social value action plan for the next year (as contracts on the framework will last a year to fit in with school terms). The social value requirements will be embedded in the specification and Strategic Contract Management meetings. Social Value will be discussed twice yearly at Strategic Contract Meetings for the providers with the highest value work and then other providers with lower value contracts will be met once a year. There will be a proportionate approach to the contractors. The DPS will be an open and proactive engagement, which will create social value, by increasing the sole traders on the framework.

3.8 Evaluation Stage – ITT

3.8.1 Tenderers were required to submit responses to the standard suite of questions relating to matters such as company and financial information, insurance, equalities, health and safety, safeguarding and environment in the SSQ. Those tenders who passed the initial evaluation were then subject to a further qualitative evaluation of their ability to meet the Council's service requirements, also on a 'pass-fail' basis, in one of two ways. For those tenderers with recent experience of providing similar passenger transport services and confirmed to be currently licensed by the Public Carriage Office, the references provided as part of their tender response were taken up with referees by the Panel. Potential new entrants to the market, who were unable to provide directly relevant references, were invited in the tender to submit responses to a number of critical questions that were used in conjunction with interviews as necessary to determine whether they can meet the Council's requirements for the provision of services. This approach reflects DfT guidance (Tendering Road Passenger Contracts - Best Practice Guidance - dated October 2013) on the qualitative assessment of tenders for passenger transport services.

3.9 The Evaluation Panel

3.9.1 The evaluation panel was made up of three people, two from within the Croydon Transport Service and one service user (external evaluators). It was felt that the involvement of external service user representatives was very important in this process to ensure all voices were heard. The external service user is the Chair of Croydon Disability Forum.

- 3.9.2 Each evaluator evaluated every qualitative submission independently and then the scores were brought together for a moderation panel. The moderation panel included the above seven evaluators and representation from the Council's Commissioning and Procurement Team.
- 3.9.3 There were 29 tenders received in total. Of the 17 tenders who chose the qualitative submission route, 8 were passed by the moderation panel to be recommended for appointment to the framework.
- 3.9.4 If the provider chose (and qualified for) the reference route, rather than qualitative submissions, the referee evaluated them, and fed back to the Council, on the original marking scheme. The provider was required to give the Council three references from public bodies with which they are currently contracted to provide passenger transport services for children and young people with Special Educational Needs or disabilities and/or vulnerable adults, or with whom they have been contracted to provide these services within the last three years. Of the 12 providers who chose the reference route, 8 were passed by the referees and confirmed on the DPS and 4 failed.

3.10 Results from the Evaluation Process

- 3.10.1 Tenders were received from a total of 29 suppliers for the Categories as follows, noting that tenderers may have submitted tenders for any number of Categories:

Categories		Bidders
1	Taxi	29
2	Taxi with PA	24
3	Wheelchair Accessible Taxi	27
4	Wheelchair Accessible Taxi with PA	24
5	Taxi with Digital Tracking	24
6	Taxi with Digital Tracking and PA	20
7	Wheelchair Accessible Taxi with Digital Tracking	22
8	Wheelchair Accessible Taxi with Digital Tracking and PA	20
9	Taxi Ad Hoc Routes	24
10	All of the Above Categories	19

- 3.10.2 The outcome of the tender evaluation process has involved the selection of a total of 16 suppliers for the following Categories:

Categories		Bidders
1	Taxi	16
2	Taxi with PA	13
3	Wheelchair Accessible Taxi	15
4	Wheelchair Accessible Taxi with PA	13
5	Taxi with Digital Tracking	13

6	Taxi with Digital Tracking and PA	10
7	Wheelchair Accessible Taxi with Digital Tracking	11
8	Wheelchair Accessible Taxi with Digital Tracking and PA	10
9	Taxi Ad Hoc Routes	11
10	All of the Above Categories	9

3.11 Call-off process

3.11.1 Following this stage of appointing suppliers to the DPS, any call off or mini competition from the DPS will comply with the Council's Tender and Contracts Regulations, adopting the standard 60 cost/40 quality weightings and all routes will be awarded accordingly. Quality will be assessed through service delivery, such as number of defaults and complaints. This information will be collected by the Contracts and Procurement Officer quarterly. Each supplier will be assessed against the contract KPIs and a percentage score based on contract performance calculated. This percentage score will be weighted at 40% and operate as the standard quality score for the supplier. The supplier's price submission will be assessed on the basis of lowest tendered price and weighted at 60%. These scores will be added together to identify the most economically advantageous tender.

4. CONSULTATION

4.1 There is no intended change in policy or entitlement associated procurement.

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2019/20 £'000	2020/21 £'000	2021/22 £'000	2022/23 £'000
Revenue Budget available				
Expenditure				
Income				
Effect of decision from report	4,250	8,500	8,500	8,500
Expenditure				
Income				
Remaining budget	_____	_____	_____	_____

**Capital Budget
available**

Expenditure

**Effect of decision
from report**

Expenditure

Remaining budget

_____	_____	_____	_____
_____	_____	_____	_____

2 The effect of the decision

The effect of the decision will cost the Council £68 million across 8 years. This will be estimated to around £8 million a year. The service is statutory and over the last 5 years there has been a 5% increase in service users.

Growth is being added to the service's budget in 2019/20 to address anticipated demand pressure, and the appropriateness of the budget will continue to be reviewed via the Council's financial management processes.

3 Risks

The main risk of the DPS is the continually increasing value due to the increase in complex needs of service users and increase in service users in total. The other risk is suppliers going bust, but this is mitigated by DPS and the nature of suppliers being able to join during the life of the contract.

4 Options

The options around the service are detailed in Section 12. The service is statutory.

Service users have different travel assistance options, traditional transport, Independent Travel Training and Personal Transport Budgets.

5 Future savings/efficiencies

The DPS will always stay competitive as the market will always be open. Suppliers can join at any time throughout the DPS.

Approved by: Ian Geary, Head of Finance, Resources & Accountancy

6. LEGAL CONSIDERATIONS

6.1 The Director of Law and Governance comments that there are no additional legal considerations directly arising in respect of this report.

6.2 Approved by Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer

7. HUMAN RESOURCES IMPACT

7.1 To confirm my authorisation and that there are no HR issues arising from the report for LBC employees.

7.2 Approved by: Gillian Bevan, Head of HR – Resources, on behalf of the Director of Human Resources

8. EQUALITIES IMPACT

8.1 An initial EA has been completed. There are no changes to current service, for the service user, there will be no significant impact on protected groups compared to non-protected groups so a full EA is not required.

8.2 Approved by: Yvonne Okiyo, Equalities Manager

9. ENVIRONMENTAL IMPACT

9.1 Taxis must adhere to the Public Carriage Office's (PCO) stringent requirements when gaining/renewing a licence. These requirements come from the Mayor's Taxi and Private Hire Action Plan. Vehicles cannot be older than 15 years and new vehicles will no longer be granted a licence if they run on diesel (would have to Euro 6 at least).

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 There are no crime and disorder reduction impacts arising from this report.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

11.1 The Council has a statutory requirement to provide home-to-school/college travel support for eligible children and young people with Special Education Needs and/or Disabilities (SEND). The Council, in accordance with its policy, needs to provide home-to care provision travel support for vulnerable adults.

12. OPTIONS CONSIDERED AND REJECTED

The following options have been considered for taxis:

- Bring routes in house, that cost the Council over £52,000 a year and deliver the remainder of the provision from an existing market through a DPS
- Set up a DPS to procure all taxi routes.

CONTACT OFFICER: Becky Saunders, Category Manager – Travel and Transport - x63263

BACKGROUND DOCUMENTS: None

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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