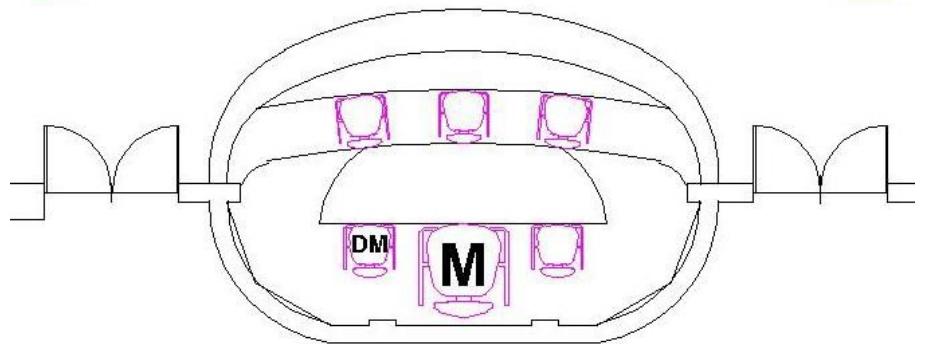
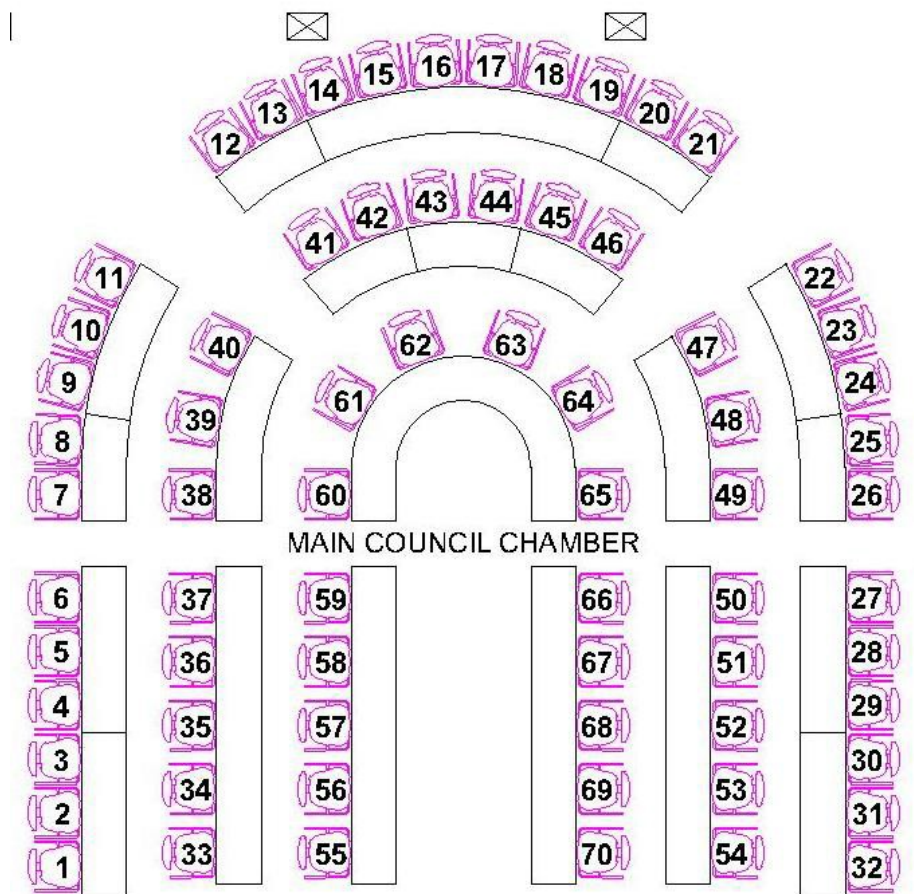




**COUNCIL
AGENDA**
for the meeting
on
1 April 2019 at
6.30 pm

1. Callton Young
2. Joy Prince
3. Toni Letts
4. Maddie Henson
5. Andrew Pelling
6. Pat Clouder
7. Pat Ryan
8. Felicity Flynn
9. Marys Croos
10. Robert Canning
11. Leila Ben-Hassel
12. Sherwin Chowdhury
13. Karen Jewitt
14. Jerry Fitzpatrick
- 15.
- 16.
17. Steve Hollands
18. Stuart Millson
19. Ian Parker
20. Michael Neal
21. Luke Clancy
22. Jan Buttinger
23. Sue Bennett
24. Jeet Bains
25. Gareth Streeter
26. Simon Brew
27. Mario Creatura
28. Helen Redfern
29. Oni Oviri
30. Margaret Bird
31. Scott Roche
32. Richard Chatterjee
33. Shafi Khan
34. David Wood



35. Nina Degrad
36. Patricia Hay-Justice
37. Louisa Woodley
38. Clive Fraser
39. Patsy Cummings
40. Sean Fitzsimons
41. Niroshan Sirisena
42. Janet Campbell
43. Stephen Mann
44. Chris Clark
45. Jamie Audsley
46. Mohammed Ali
47. Andy Stranack
48. Robert Ward
49. Badsha Quadir
50. Helen Pollard
51. Yvette Hopley
52. Vidhi Mohan
53. Steve O'Connell
54. Simon Hoar
55. Alisa Flemming

56. Hamida Ali
57. Stuart Collins
58. Alison Butler
59. Tony Newman
60. Simon Hall
61. Oliver Lewis
62. Jane Avis
63. Manju Shahul-Hameed
64. Paul Scott
65. Stuart King
66. Tim Pollard
67. Jason Cummings
68. Lynne Hale
69. Maria Gatland
70. Jason Perry

Notes etc.....

M – Mayor Councillor Bernadette Khan

DM – Deputy Mayor – Councillor Humayun Kabir

Please note that the numbers relate to microphone numbers.

May 2018

To: To All Members of the Council

Date: 22 March 2019

A meeting of the **COUNCIL** which you are hereby summoned to attend, will be held on **Monday, 1 April 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
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Annette Wiles 020 872 6000 x64877
annette.wiles@croydon.gov.uk
www.croydon.gov.uk/meetings
22 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

To receive any apologies for absence from any Members.

2. Minutes of the Previous Meeting (Pages 7 - 24)

To approve the minutes of the meeting held on 4 March 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.

5. Announcements

To receive Announcements, if any, from the Mayor, the Leader, Head of Paid Service and Returning Officer.

6. Croydon Question Time (Pages 25 - 72)

a) Public Questions (30 minutes)

To receive questions from the public gallery and questions submitted

by residents in advance of the meeting.

b) Leader and Cabinet Member Questions (105 minutes)

To receive questions from Councillors.

7. Maiden Speech

To hear the maiden speech from Councillor Leila Ben-Hassel, newly elected at the by-election held in Norbury & Pollards Hill Ward on 14 March 2019.

8. Special Council - 20 May 2019

For Members to agree to convene a Special Meeting of the Council, in accordance with paragraph 6 of Part 4A of the Constitution, to take place on 20 May 2019 to consider any recommendations from the Mayorality and Honorary Freedom Selection Sub-Committee regarding the admission of former Members to the Roll of Honorary Aldermen and Alderwomen.

9. Council Debate Motions

To debate any motions submitted in accordance with Council Procedure Rules.

10. Recommendations of Cabinet to Council for Decision (Pages 73 - 392)

To consider the recommendations made by Cabinet since the last ordinary Council meeting relating to the adoption of the Supplementary Planning Document - Suburban Design Guide.

11. 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

Council

Meeting of held on Monday, 4 March 2019 at 6.30 pm in Council Chamber, Town Hall,
Katharine Street, Croydon CR0 1NX

MINUTES

Present: Councillor Bernadette Khan (Chair);

Councillors Humayun Kabir, Hamida Ali, Muhammad Ali, Jamie Audsley, Jane Avis, Jeet Bains, Sue Bennett, Margaret Bird, Simon Brew, Alison Butler, Jan Buttinger, Janet Campbell, Robert Canning, Sherwan Chowdhury, Luke Clancy, Chris Clark, Pat Clouder, Stuart Collins, Mary Croos, Jason Cummings, Patsy Cummings, Nina Degrads, Jerry Fitzpatrick, Sean Fitzsimons, Alisa Flemming, Felicity Flynn, Clive Fraser, Maria Gatland, Lynne Hale, Simon Hall, Patricia Hay-Justice, Maddie Henson, Simon Hoar, Steve Hollands, Yvette Hopley, Karen Jewitt, Shafi Khan, Stuart King, Toni Letts, Oliver Lewis, Stephen Mann, Stuart Millson, Vidhi Mohan, Michael Neal, Tony Newman, Steve O'Connell, Ian Parker, Andrew Pelling, Jason Perry, Helen Pollard, Tim Pollard, Joy Prince, Badsha Quadir, Helen Redfern, Scott Roche, Pat Ryan, Paul Scott, Manju Shahul-Hameed, Niroshan Sirisena, Andy Stranack, Gareth Streeter, Robert Ward, David Wood, Louisa Woodley and Callton Young

Apologies: Councillor Richard Chatterjee, Mario Creatura and Oni Ovir

PART A

15/17 **Minutes of the Previous Meeting**

The minutes of the Council meeting held on 28 January 2019 were agreed as a true and accurate record.

16/17 **Disclosure of Interests**

There were no disclosures of pecuniary interests. Members confirmed their disclosure of interest forms were accurate and up-to-date.

17/17 **Urgent Business (if any)**

There was no urgent business.

18/17 **Announcements**

Madam Mayor, Councillor Bernadette Khan, provided Members of the Council with an update on the forthcoming events she would be attending. Those were a fundraising tea for International Women's Day, a Chinese Heritage Cultural Event, and a dinner for Croydon foster carers to celebrate their support for the borough's children.

Madam Mayor led the Members of Council in thanking Executive Director of Resources and Section 151 Officer, Richard Simpson, for his service to the Council, prior to his departure. Councillors Newman, the Leader of the Council, and Tim Pollard, Leader of the Opposition Group, were invited by Madam Mayor to also speak in recognition of the officer's work. The Leader highlighted that Richard had been an outstanding public servant for Croydon. He was particularly noted for having lead on the management of the borough's finances during a period of austerity. Councillor Tim Pollard highlighted that Richard was known for being calm and fair. It was noted that he would be very much missed.

19/17 **Council Tax and Budget**

a) Budget Presentation

A presentation on the budget reflecting the content of the report was provided by Lisa Taylor, the Director of Finance, Investment and Risk (Section 151 Officer) supported by Councillor Simon Hall, the Cabinet Member for Finance & Resources.

The Director of Finance, Investment and Risk highlighted the following points:

- I. Reserves and balances: earmarked reserves were planned to fall by £5m to fund the projected overspend. It was planned that this would be replenished by an anticipated collection fund surplus in 2019/20 and dividends from Brick by Brick. Capital reserves were planned to increase from the sale of land. Reserves were lower than those of some authorities but were holding firm and not changing significantly;
- II. Growth: three departments were to receive growth budgets: 1) Children, Families and Education, 2) Health, Wellbeing and Adults, and 3) Gateway, Strategy and Engagement. This was in response to increasing demand and to deliver the Children's Services Improvement Plan. Savings were also detailed including additional income from recent asset acquisitions, the Adult Social Care charging policy, the first dividend from Brick by Brick, more efficient commissioning and the reduction in the Pension Fund deficit as a result of a property asset transfer. Other savings were to be realised from better children's placements and as a result of the One Alliance;
- III. Council Tax: an additional £12.6m was to be raised in 2019/20 from the increase in the charge, the increasing size of the Council Tax base and improvements in the collection rate; and
- IV. Risks: increasing demand for social care and funding for Unaccompanied Asylum Seeker Children (UASC) were noted as the areas of highest risk. Added to this was the ongoing uncertainty regarding local government funding from local government given 2019/20 was the last year of the

spending review period with the government's Fair Funding Review ongoing.

The Cabinet Member for Finance & Resources highlighted the other pressures on the budget including the lack of funding for UASC, the decline in the public health grant, the fact that the grant for Council Tax support only covered half the costs and the government's underfunding of children with Special Educational Needs and Disability (SEND). The Cabinet Member noted the overall context for the budget was one of financial crisis across England.

It was explained that the budget had been determined based on the decision to protect frontline services and to continue to invest in innovation - for example Gateway Services and the One Croydon Alliance. Investment would continue to be made in schools and homes and the Council would continue to operate ethically for example through the continued implementation of London Living Wage for Council employees and through the terms of the Council's new contracts. The budget would continue to be managed by bringing services in-house and through a focus on prevention. It was noted that government funding was being reduced by £7.8m when over £5m was needed just to cover inflationary costs. It was planned to achieve £7m in savings and £8m in income initiatives.

b) Questions to the Leader

The Leader received questions from Members of the Council on the budget.

Councillor Tim Pollard asked for clarification on the costs of the redevelopment of Fairfield Halls. It was noted that these had recently risen by £11m from £30m to £41m with the development 18 months behind schedule. Additionally, the associated college development was not going to happen.

The Leader responded that this was a major capital scheme and that more asbestos than could have been anticipated had been found during the redevelopment. It was highlighted that this was a significant investment in what was going to becoming a major artistic hub.

In his supplementary question, Councillor Tim Pollard, asked for further explanation of the budget overspend and late delivery and called on the Leader to apologise to Croydon residents. In response, the Leader highlighted that whilst plans to redevelop Fairfield Halls under previous Administrations had not come to fruition, his Administration was delivering a once in a 50 year regeneration for the people of Croydon.

Councillor Pasty Cummings asked how, against a background of government cuts, it was possible for all Members to work together to deliver better outcomes for all residents. In his response, the Leader emphasised the importance of delivering a credible budget focused as much on spending priorities as savings.

Councillor Redfern asked whether it was right to take money out of the pockets of the most vulnerable following increases made to Member allowances. Reference was made to the cancellation of Health and Wellbeing Board meetings and therefore how it appeared Members were being paid more to do less.

In response, the Leader noted that no one should be prohibited from becoming a Councillor based on their personal circumstances and that his Administration was acutely aware of the pressures on the most vulnerable given all the work it was doing to address the issues caused by the introduction of Universal Credit.

In a supplementary question, Councillor Redfern noted declining vaccination rates when meetings of the Health and Wellbeing Board had been cancelled. The Leader highlighted that whilst meetings in the Town Hall are important the Chair of the Health and Wellbeing Board had been out in the Croydon community working for residents.

Councillor Audsley asked how the budget would address the national emergency of increasing knife crime. The Leader noted that his thoughts were with the most recent victims of knife crime and that money was not everything in terms of this being addressed. The work of the Violence Reduction Network was highlighted. It was noted that the budget included a precept to benefit the Metropolitan Police Service.

In his supplementary question, Councillor Audsley noted the impact of funding cuts on Safer Neighbourhood Teams and invited opposition Members to vote to support the Mayor of London's precept to increase police funding. In his response, the Leader noted the importance of neighbourhood police officers and their work with schools.

Councillor Bird asked why there had been so little consultation on the imposition of charges for services for disabled and vulnerable residents. In response, the Leader emphasised that there had been an open and transparent consultation. It was explained that cuts to funding meant there had to be clear choices made in terms of cuts to or charging for services. The Leader called on the Opposition to support the Adult Social Care precept.

In her supplementary question, Councillor Bird called for funding to be used for services to benefit those most in need rather than for activities that were seen as inappropriate such as art shows that had caused offense. The Leader stressed that it was not the role of elected politicians to determine what could be considered good art. Whilst the art show in question had not been everyone's cup of tea it represented a fractional percentage of the Council's overall budget.

c) Questions to the Cabinet Member for Finance & Resources

Councillor Hall, the Cabinet Member for Finance & Resources took the opportunity during his announcements to also pay tribute to Richard Simpson,

the outgoing Executive Director of Resources. He noted that he had worked closely with Richard during a time of unprecedented challenge and that he had made a significant difference to the Council's performance.

The Cabinet Member for Finance & Resources received questions from Members of the Council on the budget.

Councillor Jason Cummings noted that the budget predictions for the last two years had been missed and asked if the predictions underpinning the budget for 2019/20 would also be missed.

The Cabinet Member emphasised the scale of the financial challenges faced by the Council but that year-on-year forecasting was getting better. However, this would remain a constant challenge in the coming year.

In his supplementary question, Councillor Jason Cummings accepted that the Council was under financial pressure but also noted that the number of discrepancies in the budget was high. It was noted that if forecasting was getting better this should improve.

In response, the Cabinet Member noted that this was the Administration's fifth budget process which he believed was increasingly robust, involving lots of detailed work. However, it wasn't possible to look into the future and determine the budget calculations with certainty. During each year there would be changes resulting from central government that could not be predicted. There could also be in-year innovation.

Councillor Henson expressed her personal thanks to Richard Simpson, the outgoing Executive Director of Resources. She highlighted the hidden cuts to local government budgets being made by central government. For example, the expectation on councils to provide for UASC without any recourse to public funds.

Councillor Hall agreed with this assessment and noted that the Council was continuing to lobby central government to properly fund UASC. It was noted that this was hitting Croydon harder than others as it was a gateway authority for UASC. Nevertheless there was a commitment to maintain the quality of care provided.

In her supplementary question, Councillor Henson asked about the risks caused by the ongoing lack of funding for UASC. Councillor Hall highlighted that the lack of funding may impact on the number of UASC for which the Council could provide care as well as putting pressure on the regional dispersal mechanism. The Cabinet Member called on Councillor Jason Cummings to assist the call for fairer funding from the government.

The Cabinet Member confirmed that the budget priorities were correct in response to **Councillor Parker's** question. In his supplementary question, Councillor Parker asked if it was correct to increase Cabinet Member allowances by 40% at a time when budget reductions were hitting the most

vulnerable residents and, for example, limiting their access to adequate heating. Councillor Hall responded that the maximum increase to allowances received by Cabinet Members was 5% and that the Council was protecting services to vulnerable residents despite government cuts.

Councillor Hay-Justice gave her congratulations for mitigating the impact of austerity for example by transferring the value of affordable homes for the immediate benefit of the Pension Fund. Councillor Hall confirmed that the Council's interest in those affordable homes had reduced the Council's contribution to the Pension Fund from £31m to £29m during 2019/20.

In a supplementary question, Councillor Hay-Justice asked what advice had been received regarding the protection needed in order to undertake the property asset transfer. The Cabinet Member responded that the asset transfer decision had been approved by Council at its meeting in January 2019 and that a direct interest in the properties would be achieved by way of a lease between the Council and Affordable Homes charity and that this would be held by the Pension Fund. The actuary would advise the Pension Fund administrator to ensure it was fully funded. It was noted that the government stood as guarantor of the Pension Fund and therefore it was fully protected. Entering into the property asset transfer was based on the advice of the pension actuary and the fund's legal advisors.

Councillor Stranack asked the Cabinet Member to clarify how much was raised from the payment of parking fees and penalties and how much this was expected to increase during the 2019/20 financial year. The Cabinet Member said he would provide detailed information on the funds raised during 2018/19 from parking fees and penalties subsequent to the meeting. An increase of £4.3m during 2019/20 was anticipated from parking fees and penalties. This reflected that officers had previously been over prudent in their budget outturn predictions. Councillor Hall highlighted that residents could avoid the payment of fines by parking legally.

Councillor Stranack noted that £11.34 was taken from every resident in parking charges and asked if those parking charges would increase in the future. The Cabinet Member confirmed he supported the increase in parking charges; enforcement was right and proper both as a source of income generation and to ensure parking was done correctly and did not create danger by blocking roads. It was also noted that over half of all parking fines were levied on drivers who did not live in the borough.

d) Scrutiny Business Report

Councillor Fitzsimons, Chair of the Scrutiny and Overview Committee, commented that over the previous two months the scrutiny committees had been reviewing the budget proposals. It was noted that the government settlement was getting increasingly later every year, impacting on the time available for scrutiny to undertake its function. The details of conclusions and recommendations made by the scrutiny committee were noted as contained in the report in the agenda.

A dedicated session looking at the education budget had found that funding continued to be tight with schools struggling to meet demands. However, it was positive that there was an increased focus on prevention and the importance of places. In terms of Children's Services, it was thought that there would be longer term consequences resulting from budget cuts and it was noted that Adult Social Care was significantly underfunded nationally – the 1% precept increase was not enough to cover increasing demand for services with the impact particularly felt in the south of the borough. It was noted that the Cabinet Member for Finance & Resources had agreed to work with scrutiny to improve the process for reviewing the budget.

There were no questions from Members for Councillor Fitzsimons.

e) Council Tax Debate

The Leader moved the motion for the Council budget highlighting that this was set against a backdrop of cuts, austerity and Brexit but that there would still be investment in the local community and frontline services would be protected. Thanks were given for the hard work of the Cabinet Member for Finance & Resources, Richard Simpson, the outgoing Executive Director for Resources, Lisa Taylor, the newly appointed Director of Finance, Investment and Risk, in addition to the other Cabinet Members for their work on developing the budget for 2019/20.

Examples of how the budget would continue to invest in the borough were detailed including the Fairfield Hall redevelopment, the Music City Project, Culture Enterprise Zone and the Youth Zone, which was going to be the largest youth project ever in Croydon, providing opportunities for Croydon's young people every night of the week.

It was emphasised that there was a firm grip on Council finances and that there would still be innovation for example through the work of Brick by Brick. A focus on value for money meant that sheltered homes would come back into Council control with all their staff to receive the London Living Wage. The borough's libraries had also come back into the Council's control and would benefit from a programme of investment. Service developments in Norbury would be made in recognition of the late Councillor Mansell.

Whilst Children's Services had received a tough Ofsted inspection, the service would receive extra investment as it was clear this was required. Whilst the outcome of Ofsted's latest monitoring visit was yet to be published, it was clear that the improvement journey was happening. The Leader thanked Councillors Flemming and Shafi Khan along with frontline staff. The investment in Children Service's was highlighted as only possible thanks to prudent financial management.

The Leader noted the need to be honest about the average increase of £1.54 to Council Tax payments in addition to the increases for the Greater London Assembly (GLA) and the Adult Social Care precept. However, this was as a

result of the government driving austerity. The Leader therefore was proud to move the motion to support the budget as this would deliver and invest for the many and not the few.

Councillor Hall seconded the motion and reserved the right to speak.

Councillor Tim Pollard responded. He noted his disappointment that the budget was explained as all the fault of the government and highlighted that the need to decrease funding had resulted from the previous Labour Government's spending and the resulting structural deficit.

It was highlighted that the government wanted funding to be raised and spent locally. As a result there was nowhere for the Administration to hide its failings. The redevelopment of Fairfield Halls was £11m over budget and late, with the associated involvement of the college no longer going ahead. Westfield was yet to happen. Brick by Brick had borrowed to build private sector housing with no new Council housing provided. The Pension Fund had been subject to speculation. The new bin service was not fit for purpose with it assumed that the costs of the contract were going to be allowed to increase and there was no evidence of fines being levied. There had been a failure to administer Adult Social Care contracts leaving residents with no heating or bathing facilities. Charges were to be made for services for vulnerable residents. Children's Services had failed its Ofsted inspection and the speed of improvement was too slow. There had been a persistent failure to achieve set budgets whilst the Cabinet Member allowance had been increased along with publicity and press office budget increases. The Administration was putting up Council Tax and applying precepts as much as allowed. However, there was a need to get finances on a stable footing. For example, to benefit Children's Services and the bin service. For that reason, the Conservative Members would vote in support of the budget.

Councillor Butler, the Deputy Leader and Cabinet Member for Homes and Gateway Services, also spoke in favour of the budget. Making sure all Croydon residents had a home was a huge focus – having a home was a fundamental right. Children could be damaged if they had no home. The Council therefore needed to increase the supply of homes as demonstrated by the rise of the private rented sector. As a result, £39m would be invested in the coming year. Additionally, a sprinkler programme would mean 26 of the tallest blocks in the borough would benefit from installation despite this receiving no funding from government. Against a housing benefit freeze, the Council would use its landlord licensing scheme to ensure safe and decent standards in the rented sector. Brick by Brick would continue its building programme to address the housing waiting list, the numbers in temporary accommodation and those saving to buy for themselves. Stable and decent homes were fundamental to belonging somewhere. The Council would continue to fix Council homes and oppose no fault evictions.

Councillor Hopley criticised the budget, highlighting the excessive charges that would be imposed on the most vulnerable, elderly and disabled. Poor conditions in assisted homes were highlighted; it was noted that these were

only being rectified as a result of the focus these were given by Conservative Members. Charges for services for vulnerable residents were being increased despite an ineffective consultation; this had only achieved eight responses despite the charges applying to thousands of residents. Many carers were not even aware of these charges as they were not mentioned on the Council website and there was no clarity about how charges would be put in place. In the words of carers, it was wrong to charge for these services in the same way as the Council charges for planning. Arts and Member allowances should not be funded in preference for charges made to residents.

Councillor Avis, the Cabinet Member for Families, Health and Social Care, spoke in support of the budget and highlighted the effect of cuts to local government funding and the resulting cuts to services. The impact of cuts on services had been assessed by the Local Government Association, the Kings Fund, the Trussell Trust and the National Audit Office. It was noted that by 2025, social care would have a national funding gap of £3.4billion. The government was described as in a state of denial with regard to the impact of austerity on the poor. The Cabinet Member rejected the claims made by Councillor Hopley and highlighted that charges for services were as a result of austerity.

Councillor Hoar criticised the budget, stating the Administration had given free access to land speculation in the borough. Bus routes were being cut and the 20 mile per hour zone was enforced against the opposition of residents. The budget being based on parking fines was seen as the result of not being able to budget correctly. Imposing parking fines on those from outside the borough would impact on economic activity. This was described as punishing the car driver and not being on the side of residents.

Councillor Hamida Ali, the Cabinet Member for Safer Croydon and Communities, spoke in support of the budget. The GLA precept was being levied to fill the holes in government funding for the police and to put an additional 1,300 police officers on London's streets. Dame Louise Casey had highlighted the lack of government understanding regarding the financial stability of policing with police numbers at their lowest since 2003. The public health approach to tackling crime was not being effectively supported by the government. There had been a cut in the core grant with funding rounds pitting communities against each other. Work of officers in Croydon had seen a decrease in knife crime by 3% since January 2018. Local authorities were having to fill in the gaps left by central government.

Councillor O'Connell supported the police precept. It was highlighted how the local and national knife crime crisis needed leadership at all levels. As a result, Councillor O'Connell noted that London deserved a fair budget settlement in order to benefit the Metropolitan Police Force. He detailed how he had written to the government accordingly. The number one issue for London was the impact of knife crime on young people. The GLA supported the precept proposed by the Mayor of London but called for more to be done by the Mayor, Sadiq Khan. The increase in City Hall staff numbers by 30% was specifically noted. It was Councillor O'Connell's opinion that the public

health approach to crime reduction would take 10 years and that action was needed immediately.

Councillor Shafi Khan, the Deputy Cabinet Member for Children, Young People and Learning, spoke in support of the budget highlighting that government funding cuts were continuing to have an impact on services and jobs in the borough. It was noted that there was no sign of improvements to government funding with continuing growth in demand for services. It was noted that whilst it was preferable not to raise Council Tax, the Administration was determined to support the most vulnerable residents. It was emphasised that the Administration had attracted millions of pounds of investment to the borough and had delivered efficiencies of £20m with the Council's reserves above the minimum required. The Administration was realising its ambitions; bringing partners together to deliver for residents with 88% of primary and 82% of secondary school pupils in Croydon in school places judged good or better. The Youth Zone would deliver a universal offer whilst a new all-through special school in New Addington was being developed. The budget was optimistic and looked beyond austerity and would make Croydon a greater place to live and learn.

Councillor Bains criticised the budget describing it as the Cabinet Members picking the pocket of the ordinary people whilst giving themselves pay rises. Councillor Bains asked what had happened to the Westfield development. It was suggested that the Administration didn't want this in Croydon with the result that billions of pounds of investment and jobs were at risk. It was noted that this was in contrast to the last Conservative Administration that had passed the planning permission for the Westfield development. It was noted that the Administration had made no condemnation of anti-Semitism.

Councillor Sirisena spoke in support of the budget highlighting the effect of nine years of austerity cuts and the greater impact this had on inner city communities compared to middle England. The cuts were responsible for undermining the effectiveness of services and for putting Adult Social Care at risk. It was noted that the cuts had resulted in the collapsed of Conservative Councils such as Northamptonshire but that the government's Fair Funding Review of local government funding was leading to increased funding for Conservative areas. This was described as divide and rule. Councillor Sirisena stated that it did not have to be this way; at the next general election a new relationship could be formed providing a voice for local government through a local government commission which would be placed at the heart of decision making in Whitehall. This would work, including with Conservative councils, to rebuild Britain. This would reverse academisation to democratically provide the education that was needed. Adult Social Care would be fully funded and there would be a focus on early intervention and prevention. Whilst the Council's budget was under great duress, Croydon Labour was delivering for the many and not the few.

Councillor **Jason Cummings** criticised the budget. He noted that the financial pressures were not disputed. However, budget decisions were made behind closed doors with residents being forced to pay the bills. It was highlighted

that the Administration was unable to keep to the budget that it had set itself and expected residents to bail it out through the payment of parking charges and fines and new charges for social care. Councillor Jason Cummings predicted that the Administration would fail to meet its budget in the next municipal year. Croydon did need the money in the budget but he didn't trust what Labour would do with it.

Having previously reserved his right to speak, Madam Mayor called on **Councillor Hall** to speak which he did in favour of the budget. The Cabinet Member described the fiscal backdrop to the budget, highlighting the onslaught on local spending by the government, population increases and demographic changes which meant services needed to grow and change. It was noted that it would be easy to feel despair in such a situation and be forced to slice services. However, this was not the approach being taken by the Administration. The principles of the budget were innovation, investment in the future, investment in properties and ambition for Croydon. This was typified in the development company that had been set up to build 1,000 homes in the borough. The focus on prevention meant that families in the most need were supported. For example, as a result of the impact of Universal Credit, over 100 families were helped with 50 tenancies saved. Investment had been made in fire safety work, the redevelopment of Fairfield Halls, the Youth Zone, apprenticeships and the London Living Wage. The ground maintenance contract had been taken back in-house, meaning that staff would be paid the London Living Wage. As a result of the budget more of Croydon's spending was being kept in the borough with local firms. It was noted that the Pension Fund was no longer investing in tobacco companies.

This was in contrast to the situation under the last Conservative Administration when libraries were closed, youth work and funding of the voluntary sector was cut and monthly bin collections were proposed.

As required by the Council's Constitution, recommendations 1.1 to 1.3, as detailed in the report, were taken by a recorded vote using the electronic voting system. The remaining recommendations (1.4 to 1.10 as detailed in the report) were taken en block. As requested by the Leader and supported by ten additional Members, these remaining recommendations were taken as a poll vote using the electronic voting system.

Madam Mayor then moved to the vote on the recommendations.

The first vote was for recommendation 1.1: A **2.99%** increase in the Council Tax for Croydon Services (a level of increase Central Government had assumed in all councils' spending power calculation).

The recommendation was put to the vote. The Members who voted in favour were: Councillors Humayun Kabir, Hamida Ali, Muhammad Ali, Jamie Audsley, Jane Avis, Jeet Bains, Sue Bennett, Margaret Bird, Simon Brew, Alison Butler, Jan Buttinger, Janet Campbell, Robert Canning, Sherwan Chowdhury, Luke Clancy, Chris Clark, Pat Clouder, Stuart Collins, Mary Croos, Jason Cummings, Patsy Cummings, Nina Degrad,

Jerry Fitzpatrick, Sean Fitzsimons, Alisa Flemming, Felicity Flynn, Clive Fraser, Maria Gatland, Lynne Hale, Simon Hall, Patricia Hay-Justice, Maddie Henson, Simon Hoar, Steve Hollands, Yvette Hopley, Karen Jewitt, Bernadette Khan, Shafi Khan, Stuart King, Toni Letts, Oliver Lewis, Stephen Mann, Stuart Millson, Vidhi Mohan, Michael Neal, Tony Newman, Steve O'Connell, Ian Parker, Andrew Pelling, Jason Perry, Helen Pollard, Tim Pollard, Joy Prince, Badsha Quadir, Helen Redfern, Scott Roche, Pat Ryan, Paul Scott, Manju Shahul-Hameed, Niroshan Sirisena, Andy Stranack, Gareth Streeter, Robert Ward, David Wood, Louisa Woodley and Callton Young.

The recommendation was carried unanimously (with Councillors Bird, Hollands and Redfern voting orally).

The second vote was for recommendation 1.2: A **1.0%** increase in the Adult Social Care precept (a charge Central Government had assumed all councils would levy in its spending power calculations).

The recommendation was put to the vote. The Members who voted in favour were: Councillors Humayun Kabir, Hamida Ali, Muhammad Ali, Jamie Audsley, Jane Avis, Jeet Bains, Sue Bennett, Margaret Bird, Simon Brew, Alison Butler, Jan Buttinger, Janet Campbell, Robert Canning, Sherwan Chowdhury, Luke Clancy, Chris Clark, Pat Clouder, Stuart Collins, Mary Croos, Jason Cummings, Patsy Cummings, Nina Degrads, Jerry Fitzpatrick, Sean Fitzsimons, Alisa Flemming, Felicity Flynn, Clive Fraser, Maria Gatland, Lynne Hale, Simon Hall, Patricia Hay-Justice, Maddie Henson, Simon Hoar, Steve Hollands, Yvette Hopley, Karen Jewitt, Bernadette Khan, Shafi Khan, Stuart King, Toni Letts, Oliver Lewis, Stephen Mann, Stuart Millson, Vidhi Mohan, Michael Neal, Tony Newman, Steve O'Connell, Ian Parker, Andrew Pelling, Jason Perry, Helen Pollard, Tim Pollard, Joy Prince, Badsha Quadir, Helen Redfern, Scott Roche, Pat Ryan, Paul Scott, Manju Shahul-Hameed, Niroshan Sirisena, Andy Stranack, Gareth Streeter, Robert Ward, David Wood, Louisa Woodley and Callton Young.

The recommendation was carried unanimously (with Councillors Bird, Hollands and Redfern voting orally).

The third vote was for recommendation 1.3: The GLA increase of **8.93%**, of **which** 91% would be used for the Metropolitan Police service and 9% would be 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) it was confirmed that in accordance with s.52ZB (1) the Council Tax and GLA precept referred to above were **not excessive** in terms of the most recently issued principles and as such to note that no referendum was required. This was detailed further in section 3.5 of the report.

The recommendation was put to the vote. The Members who voted in favour were: Councillors Humayun Kabir, Hamida Ali, Muhammad Ali,

Jamie Audsley, Jane Avis, Jeet Bains, Sue Bennett, Margaret Bird, Simon Brew, Alison Butler, Jan Buttinger, Janet Campbell, Robert Canning, Sherwan Chowdhury, Luke Clancy, Chris Clark, Pat Clouder, Stuart Collins, Mary Croos, Jason Cummings, Patsy Cummings, Nina Degrads, Jerry Fitzpatrick, Sean Fitzsimons, Alisa Flemming, Felicity Flynn, Clive Fraser, Maria Gatland, Lynne Hale, Simon Hall, Patricia Hay-Justice, Maddie Henson, Simon Hoar, Steve Hollands, Yvette Hopley, Karen Jewitt, Bernadette Khan, Shafi Khan, Stuart King, Toni Letts, Oliver Lewis, Stephen Mann, Stuart Millson, Vidhi Mohan, Michael Neal, Tony Newman, Steve O'Connell, Ian Parker, Andrew Pelling, Jason Perry, Helen Pollard, Tim Pollard, Joy Prince, Badsha Quadir, Helen Redfern, Scott Roche, Pat Ryan, Paul Scott, Manju Shahul-Hameed, Niroshan Sirisena, Andy Stranack, Gareth Streeter, Robert Ward, David Wood, Louisa Woodley and Callton Young.

The recommendation was carried unanimously (with Councillors Bird, Hollands and Redfern voting orally).

The remaining recommendations (1.4 – 1.10) were taken en block.

The recommendations were put to the vote. The Members who voted in favour were: Councillors Humayun Kabir, Hamida Ali, Muhammad Ali, Jamie Audsley, Jane Avis, Jeet Bains, Sue Bennett, Margaret Bird, Simon Brew, Alison Butler, Jan Buttinger, Janet Campbell, Robert Canning, Sherwan Chowdhury, Luke Clancy, Chris Clark, Pat Clouder, Stuart Collins, Mary Croos, Jason Cummings, Patsy Cummings, Nina Degrads, Jerry Fitzpatrick, Sean Fitzsimons, Alisa Flemming, Felicity Flynn, Clive Fraser, Maria Gatland, Lynne Hale, Simon Hall, Patricia Hay-Justice, Maddie Henson, Simon Hoar, Steve Hollands, Yvette Hopley, Karen Jewitt, Bernadette Khan, Shafi Khan, Stuart King, Toni Letts, Oliver Lewis, Stephen Mann, Vidhi Mohan, Michael Neal, Tony Newman, Steve O'Connell, Ian Parker, Andrew Pelling, Jason Perry, Helen Pollard, Tim Pollard, Joy Prince, Badsha Quadir, Helen Redfern, Scott Roche, Pat Ryan, Paul Scott, Manju Shahul-Hameed, Niroshan Sirisena, Andy Stranack, Gareth Streeter, Robert Ward, David Wood, Louisa Woodley and Callton Young.

One Councillor voted against (Councillor Millson). The recommendation was carried (with Councillors Bird, Hail, Hollands and Redfern voting orally).

RESOLVED: The Members of the Council resolved to agree the following recommendations:

1. A **2.99%** increase in the Council Tax for Croydon Services (a level of increase Central Government had assumed in all councils' spending power calculation).
2. A **1.0%** increase in the Adult Social Care precept (a charge Central Government had assumed all councils would levy in its spending power calculations).

3. The GLA increase of **8.93%**, of which 91% would be used for the Metropolitan Police service and 9% would be 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) it was confirmed that in accordance with s.52ZB (1) the Council Tax and GLA precept referred to above were **not excessive** in terms of the most recently issued principles and as such to note that no referendum was required. This was detailed further in section 3.5 of the report.

4. The calculation of budget requirement and council tax as set out in Appendix D and E to the report in the agenda. Including the GLA increase this would result in a total increase of 4.88% in the overall council tax bill for Croydon.
5. The revenue budget assumptions as detailed in report 6.1 and the associated appendices :-
 - i. The programme of revenue savings and growth by department for 2019/20 (Appendix A of report 6.1).
 - ii. The Council's detailed budget book for 2019/20 (Appendix B of report 6.1).
6. The Capital Programme as set out in section 16, table 16 and 17 of report 6.1.
7. To note there are no proposed amendments to the Council's existing Council Tax Support Scheme for the financial year 2019/20.
8. The adoption of the Pay Policy statement at Appendix H of report 6.1;
9. 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 agenda report and Appendix I of report 6.1.
10. 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 report 6.1.

20/17

Recommendations of Cabinet referred to Council for decision

Madam Mayor invited Councillor Hall to move the recommendations contained in the Cabinet report relating to the Treasury Management Policy Statement, Minimum Provision Policy Statement, Minimum Provision Policy Statement, Capital Strategy and Annual Investment Strategy for 2019/20.

Councillor Hall highlighted the recommendations in the report noting that these were about the careful stewardship of the capital strategy and borrowing for a purpose.

The recommendations were seconded by Councillor Patsy Cummings, put to the vote and carried.

Madam Mayor invited Councillor Butler to move the recommendations contained in the Cabinet report relating to the Housing Asset Management Plan.

Councillor Butler proposed the recommendations in the report. It was highlighted that these were about the effective maintenance and improvement of Council homes. It was noted that residents were involved in decisions about the upkeep of properties; this was about being a good social landlord. The difficulties of managing the housing asset budget due to government intervention was emphasised. The Cabinet Member reported that there was an increased emphasis on fire safety as a result of the Grenfell Tower fire. Fuel poverty meant there was an increasing emphasis on fuel efficient solutions. The objective was to provide affordable homes in which residents could take pride. It was important that residents have a say and are heard. As a social landlord the role of the Council was more than just providing a roof; activity was being taken to address antisocial behaviour, provide play spaces, job opportunities and training.

The recommendations were seconded by Councillor Hay-Justice, put to the vote and carried.

RESOLVED: The Members of the Council resolved to agree the following recommendations:

Treasury Management Policy Statement

1. To approve the Treasury Management Statement 2019/2020 as set out in Appendix 7.1, including the following recommendations:
 - 1.1. 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 (Appendix 7.1).
 - 1.2. That for the reasons detailed in paragraph 4.14 (Appendix 7.1), opportunities for debt rescheduling were to be 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 & Resources and in conjunction with the Council's independent treasury advisers, to undertake such rescheduling only if revenue savings or additional cost avoidance could 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.
2. That delegated authority be given to the Director of Finance, Investment and

Risk (S151 Officer) in consultation with the Cabinet Member for Finance & Resources, to make any necessary decisions to protect the Council's financial position in light of market changes or investment risk exposure.

3. That the Council adopts the 2017 edition of the revised Treasury Management Code of Practice and Prudential Code issued by CIPFA in December 2017.
4. That the Council adopts the Annual Investment Strategy as set out in paragraph 4.16 and 4.17 (Appendix 7.1).
5. That the Authorised Borrowing Limits (required by Section 3 of the Local Government Act 2003) as set out in paragraph 4.18 (Appendix 7.1) and as detailed in Appendix 7.1C be as follows:

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

6. That the Council approve the Prudential Indicators as set out in Appendix 7.1C of this report.
7. 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 7.1D of the report.
8. That the Council's authorised counterparty lending list as at 31 December 2018 as set out in Appendix 7.1E of the report and the rating criteria set for inclusion onto this list be approved.
9. That the Council adopts the Capital Strategy Statement set out below in section (Appendix 7.1).

Housing Asset Management Plan (HAMP) 2019 - 28

2. The Housing Asset Management Plan 2019 – 2028 be approved and implemented.

21/17 **Exclusion of the Press and Public**

This item was not required.

The meeting ended at 8.56 pm

Signed:

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Date:

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Agenda Item 6

REPORT TO:	COUNCIL 1 April 2019
SUBJECT:	CROYDON QUESTION TIME: A) PUBLIC QUESTIONS B) LEADER AND CABINET QUESTIONS
LEAD OFFICER:	Jacqueline Harris Baker, Executive Director Resources and Monitoring Officer
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT: The business reports of the Leader and Cabinet are prepared in accordance with the Council Procedure Rules at Part 4A of the Constitution.	

1. EXECUTIVE SUMMARY

- 1.1 This report outlines the process for:
- public questions; and
 - questions to the Leader and Cabinet from Councillors.

2. BACKGROUND

- 2.1 Part 4A of the Constitution details the process that allows for the Leader and Cabinet Members to take oral questions. Question Time is split into two parts; public questions and Councillors' questions to the Leader and Cabinet.

Public Questions

- 2.2 Public questions can be asked of the Leader or Cabinet Members on issues of policy at the Meeting as set out within the Constitution Part 4A, Sections 3.16 – 3.20. Any questions of a purely factual or of a detailed nature that cannot be answered on the evening shall be noted and shall receive a written response within three weeks following the meeting. The responses shall be published on the Council's website.
- 2.3 Public Questions shall only be taken at Ordinary Council meetings and shall be allocated a total time of 30 minutes. This timeframe shall include both the questions and responses by the relevant Cabinet Members or Leader.
- 2.4 The Mayor has absolute discretion to decline to allow any question to be dealt with under this procedure on the grounds that it addresses matters that would be inappropriate to consider at the meeting, including where the questions being asked are repetitive or have already been addressed.

- 2.5 Questions shall be dealt with in the order in which members of the public seated in the public gallery are invited by the Mayor to address the Leader or Cabinet Member. Members of the public invited to put their questions will also be permitted to ask a single supplementary question but shall do so only if called upon by the Mayor to do so as this may be subject to time constraints.
- 2.6 The Mayor may also accept questions from Members of the Public submitted by email to the designated email address by 12noon on the Friday prior to an ordinary Council meeting. The Mayor will put questions received by email to the relevant Cabinet Member and, where a number of questions are received on the same subject, the Mayor may put a summary of those questions instead.

Leader and Cabinet Questions:

- 2.7 This item is to enable Members to ask questions of the Leader and Cabinet on issues of policy. Any questions of a purely factual or of a detailed nature that cannot be answered on the evening shall be noted and shall receive a written response within three weeks following the meeting. The responses shall be published on the Council’s website.
- 2.8 Questions which relate to a current planning or licensing matter or any matter relating to an individual or entity in respect of which that individual or entity has a right of recourse to a review or right of appeal conferred by or under any enactment shall not be permitted. In addition, questions shall not be received or responded to where they pertain to anticipated or ongoing litigation, conciliation or mediation or any employment or personnel related issues or disputes.
- 2.9 The Leader shall be the first to respond to questions under this item and the total time allocated to questions by Members to, and responses from the Leader, shall be 15 minutes. The first two minutes of the Leader’s 15 minute slot may be used by the Leader to make any announcements.
- 2.10 Cabinet Members, divided up into three ‘pools’ of three Members each, shall thereafter respond to questions by other Members of the Council. The total time allocated to each ‘pool’ of Cabinet Members shall be 30 minutes. The three Cabinet Members shall each be permitted to use two minutes of this 30 minute slot to make announcements.
- 2.11 The ‘pools’ for this meeting will be as follows:

Pool 1

Name	Portfolio
Oliver Lewis	Cabinet Member for Culture, Leisure & Sport
Alisa Flemming	Cabinet Member for Children, Young People & Learning
Jane Avis	Cabinet Member for Families, Health & Social Care

Pool 2

Name	Portfolio
Alison Butler	Deputy Leader and Cabinet Member for Homes & Gateway Services
Hamida Ali	Cabinet Member for Safer Croydon & Communities
Manju Shahul-Hameed	Cabinet Member for Economy & Jobs

Pool 3

Name	Portfolio
Stuart Collins	Deputy Leader and Cabinet Member for Clean, Green Croydon
Stuart King/Paul Scott (job share)	Cabinet Member for Environment, Transport & Regeneration
Simon Hall	Cabinet Member for Finance & Resources

- 2.12 Representatives of political groups may give advance notice to the Council Solicitor by 12noon on the Friday preceding an ordinary Council Meeting, the names of the first two Members of their respective political group that they wish the Mayor to call to ask a question of each Member of the Cabinet, including the Leader of the Council.
- 2.13 After those Members have been called, the Mayor will call Members that indicate they have a question, with a presumption of inviting questions from as many different Members as possible. Each Member asking a question will also be allowed to ask a supplementary question.

3. Cabinet Member Bulletins

- 3.1 The Leader of the Council and Cabinet Members may submit bulletins to be included in the Council agenda papers for this item. Bulletins may summarise the business undertaken by a Cabinet Member since the last ordinary meeting of the Council. The bulletins can be found at Appendix 1.

CONTACT OFFICER: Annette Wiles
Senior Democratic Services and Governance Officer
Council & Regulatory
Ext 64877

APPENDICES: Leader and Cabinet Member Bulletins

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Leader of the Council Cabinet Member Bulletin Councillor Tony Newman April 2019

News

TERRORIST ATROCITY - NEW ZEALAND

The attack in Christchurch was an absolute tragedy; I have written to the Prime Minister of New Zealand, Jacinda Ardern, on behalf of the people of Croydon to express our deepest sympathies for all those affected.



I was proud to stand in solidarity with Cllr Bernadette Khan our Mayor, Councillors, Steve Reed MP, the Borough Police Commander alongside our Muslim community this week in Mosques across Croydon to send one simple message, "You will never divide us and we will always celebrate our diversity together."

LOCAL GOVERNMENT CHRONICLE AWARDS

To be nominated in five categories was a very clear statement of the ground-breaking and innovative work our Council is doing. To be the only Council in the country that then won two of these prestigious awards was truly a remarkable but fully deserved success.



Croydon was first nationally for Campaign of the year for 'Choose Your Future" and also first for our Health and Well Being Croydon Alliance approach that is ensuring the needs of local residents are at the forefront of all we and the NHS are doing. These awards and all the others shortlisted truly recognise the contribution of our hardworking and dedicated staff.

AMBITIOUS FOR CROYDON



Leader of the Council Cabinet Member Bulletin Councillor Tony Newman April 2019

SADIQ VISITS CROYDON



It was great to welcome the Mayor of London, Sadiq Khan, to look at the innovative work of our Family Justice Centre tackling the hate crime that is domestic violence. Sadiq also recently joined Andrew Brown and the team at the BME forum along with Cllrs Hamida Ali, David Wood and Steve Reed MP to listen to the views of some of our amazing young people regarding the challenges of London's ongoing serious youth violence emergency. We've also had visits and discussions with the Deputy Mayors from City Hall, Sophie Linden on crime, Rasheed Agrawal on business, Shirley Rodriguez on sustainability.

BLACK HISTORY MONTH 2019 LAUNCH

It was inspiring to hear speeches from so many young people at the launch and equally powerful to listen to the contributions from Cllr Alisa Fleming, Patsy Cummings, Janet Campbell and David Wood. We should take pride that with the Council working with partners, Black History Month is going from strength to strength and has become a one of the Council's key event priorities.



AMBITIOUS FOR CROYDON



Leader of the Council Cabinet Member Bulletin Councillor Tony Newman April 2019

Leader's Diary for March

Launch of Croydon Business Awards

SLP Leader's Board

C40 Divest/Invest Forum

London Councils Leader's Committee

Cabinet Members/CEO Away Day

Black History Theme Launch event

LGC Awards

New Chief Executive of BHLive visit

One Croydon Workshop – Input into Alliance between the CCG and NHS

Local Strategic Partnership Board Meeting

Inspire Welcome

Norbury By-election

Cllr Tony Newman

Leader of the Council

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Homes & Gateway Services

Cabinet Member Bulletin

Deputy Leader, Alison Butler

April 2019

Latest News

New housing for young Croydon care leavers

Over the last eighteen months Croydon Council's Gateway Services has been working with Andrews Charitable Trust and CAYSH on an exciting new initiative to create a new housing and support opportunity for care leavers.

Last year Andrews Charitable Trust (ACT) chose to invest in buying and leasing a new property to CAYSH, a specialist young people's organisation commissioned by the council to support young people aged 18-25 who are leaving the council's care services.

The £500,000 investment has allowed ACT to buy a three-bedroom house in Purley, which will become home to three care leavers who are ready for this final step to independence. CAYSH will provide employment-focused support, while the council's Gateway service will also help the residents to improve their independence, maximise their job prospects and avoid debt.

[Andrews Charitable Trust](#), which has already invested in similar housing in Sutton and Bristol, owns the nationwide estate agency Andrews Property Group, and [CAYSH](#) is a London-based outreach charity that works to help young people avoid homelessness.

The council has almost 800 care leavers whom it supports into accommodation, from providing references to finding an approved landlord and help into work or training. This can also involve offering a month's rent in advance and deposit to get care leavers into appropriate accommodation, and help finding them furniture.

This very generous charitable investment will provide 3 care leavers the opportunity to take that first step to independence.

All Ages

The AAFSC (All Ages Family Safety Challenge) is an inter-generational community engagement project, run by the Community Development team and London Fire Brigade's Crossfire educational team. The challenge is designed to improve the safety of Croydon's households through a programme of interactive community-based training workshop session heats, covering Water, Fire, Internet and Road Safety and includes advice on First Aid, ASB and Healthy Lifestyles.

Homes & Gateway Services

Cabinet Member Bulletin

Deputy Leader, Alison Butler

April 2019

It is a great opportunity to bring together communities of all ages from right across the borough.

Typically, three training workshops, lasting about an hour each are delivered to each of the groups in our communities.

During this year's programme (2018/19), the London Fire Brigade and London Ambulance Service delivered 91 workshops, with over 3000 people from 70 different teams attending their local All Ages FSC heats.

The Finals and awards ceremony, held on Wed 20 Feb 2019, and taking over most of the upper level of the Town Hall, celebrated the 7th successive year of the programme with 12 participating teams** and this year, the organisers were particularly pleased to see the additional needs teams almost sweeping the board in winning 3 of the 4 top prizes.

Finals participating teams:

Coulsdon Centre
Coulsdon Blazers
Longheath Youth Club
Mighty Men of Valour
Monks Hill Youth Club
Pathfinders
17th Purley Cubs
The Clarks
The Moose Family
Waddon Youth Centre &
We are Family

Homes & Gateway Services Cabinet Member Bulletin Deputy Leader, Alison Butler April 2019



Homes & Gateway Services Cabinet Member Bulletin Deputy Leader, Alison Butler April 2019

Community-Led Housing

The pilot process agreed by cabinet in January is progressing well, and we are contacting residents neighbouring the first two council-owned sites that have been earmarked for community-led housing development. We hope to publicly announce these sites soon. The council have now held their first community-led housing workshop at the Croydon Art Store in the Whitgift Centre, where residents and representatives of community groups could find out more about the programme. I was pleased to open the event, and Zohra Chiheb from the council's regeneration team provided more detail on the council's proposals. Lev Kerimol from the London Community-Led Housing Hub provided guidance about project governance, professional advice and financing. Attendees also heard from Gordon O'Connor-Read, a resident member of RUSS, a Community Land Trust developing 33 new homes on a site in Lewisham.

This is an exciting opportunity for Croydon and I look forward to seeing it progressing.



Homes & Gateway Services

Cabinet Member Bulletin

Deputy Leader, Alison Butler

April 2019

Celebrating 100 years of Council Homes

Are you, a member of your family or friends, tenants of a Croydon council home, or did you grow up in one? Maybe, you remember visiting your Nan or Grandad in theirs?

Croydon council is very keen to mark 100 years of council homes since the 1919 Housing Act heralded a huge council house building programme across the country, including around 25,000 built in Croydon. As part of the celebration, the council wants people's stories, films and other memorabilia for an interactive exhibition at the Croydon Clocktower in August. Housing officers and Museum of Croydon staff are also compiling items from photographs to rent books and providing their own stories.

The 1919 Housing Act heralded a huge council house building programme across the country in the decades since, including around 25,000 built in Croydon. This nationwide expansion included early replacements for slum dwellings and households bombed out during the Second World War, as well as major new estates to meet growing post-war demand.

The first council homes built in the borough after the Act was passed were in Godstone Road (1920), Woodside (1921) and Norbury (1921), with key groups being rehoused including ex-servicemen, First World War widows and a growing commercial class such as clerks, postal workers and tram conductors. After the Second World War, the new estate at New Addington was begun in 1948, and Croydon's first high-rise blocks were built in 1957 in Lodge Lane and Violet Lane. From New Addington to Norbury, many thousands of families have benefitted from council homes in Croydon, and our event is about marking this significant contribution to our communities. I hope as many people as possible dig out their memorabilia and let us know so we can include it in this summer's exhibition.

To find out more and to provide contributions, contact residentinvolvement@croydon.gov.uk or call 020 8726 6100 extension 47350.

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Clean Green Croydon Cabinet Member Bulletin Councillor Stuart Collins April 2019

Street Cleansing Monitoring

I'm very proud of the work being done by officers in the Environmental Services section to ensure the streets of the borough meet the required standards. Each month, the Contract Monitoring Team undertake around 200 inspections around the borough jointly with our contractor to assess the standard of sweep. Streets are assessed against the nationally recognised NI195 standards and graded accordingly. The contractual requirement is that roads are swept to a grade A at the time of sweep and maintained to a grade B at all other times – pictures of what these grades look like in practice are shown below. Any failure to adhere to these standards is taken up with our contractor there and then, and arrangements are made for rectification.

This small but extremely hard working team are a true credit to the Council, but with over 700 miles of road in the borough, they cannot cover every street – we need everybody to play their part. Please help to keep the borough tidy by reporting streets issues as and when they arise via the Don't Mess With Croydon App. Reporting in this way the fastest way of getting these issues resolved and ensures we have accurate records of where problems exist. Upon receipt of these reports, the contractor is tasked with rectifying the issue within a set time. For example, for removal of fly-tips or residential streets that are not being swept to standard, this timeframe is one working day. So don't delay, download the app today so your streets issues can be dealt with as quickly as possible.

GRADE A – no litter or refuse



GRADE B – predominantly free of litter and refuse except for some small items



NI195 – Litter Grade A



NI195 – Litter Grade B+





Clean Green Croydon Cabinet Member Bulletin Councillor Stuart Collins April 2019

Enforcement Update

Our neighbourhood safety officers have been busy working all across the borough and prosecuting those committing environmental crimes to ensure that Croydon can remain Clean and Green. Over the past month they had 2 successful seizures made from perfume sellers operating in North End. In addition we have identified a derelict location from which they are operating and are in the process of issuing a CPNW to the owners. This will require them to secure and board up the premises and monitor going forward.

The NSO's have undertaken a joint operation carried out with the police and partners to identify street drinkers and beggars within the town centre. This is leading into further joint working which aims to identify individuals who are the victim of organised crime and those that head up such operations.

The teams are carrying out regular monitoring of several fly tipping hotspots such as London Road, St James Road and Alexandra Place (amongst others). Covert and overt operations planned to catch individuals responsible and working with contractors and local residents to find long term solutions.

Patrols in London Road

NSO's will be undertaking regular Hi visibility Patrols along the length of the London Road for the foreseeable future responding to a variety of issues that affect residents and businesses along this busy thoroughfare. They will be making strenuous efforts to engage with the resident and business community and so I would urge you that when you see these officers please make the effort to approach them if you have any issues or complaints regarding the area or just to say hello if that suits. They are our eyes and ears and are there to support you as a community.

Community Payback Meeting

Last month myself and the Director of Public Realm met with the Community Payback Manager from probation services to discuss future partnership working for probation services and Veolia. This will enable the Council to work with the community payback team to ensure that those prosecuted for environmental crimes within Croydon will be carrying out their community payback with Veolia and to perform environmental roles within the communities where their crimes were committed, rather than where they may reside. I am pleased that we are continuing to build the Don't Mess with Croydon campaign and getting people to take pride in the local area.



Budget

The budget was approved at Council on March 4.

Since then, a lot of work has been done to ensure budget readiness, including detailed sessions led by myself with relevant cabinet members and officers to review plans and look at risks and opportunities.

This will be ongoing work. Clearly, as set out in the budget papers, there are considerable pressures on services, especially demand-led services, so vigilance is required.

Asset Investment Strategy

The investments made are performing as planned.

We have had a significant number of opportunities offered to us. However, we are clear that we will not pursue investments that do not meet the criteria set.

We are strengthening the team around the assets, to make sure existing investments are tightly managed and new opportunities assessed on a timely basis.

Medium Term Financial Strategy

We continue to review this. The main uncertainty regards how local government funding from central government will work post-2020. We have made robust submissions to the government consultation on this. We will continue to lobby, both as an individual council and with others, through London Councils and the Local Government Association, on this.

It should be noted that, as well as the main funding for the Council, there are issues/pressures relating to:

- Dedicated Schools Grant, notably High Needs block
- Public Health funding
- Unaccompanied Asylum Seeking Children
- Impact of cuts to/ inadequate government funding of partners' funding, notably the NHS and the Police.

We continue to lobby on all these areas.



Insourcing of Services

I am very pleased to report the successful insourcing of grounds maintenance. I can confirm that all the staff are now paid London Living Wage (LLW), whereas some 40% were not being paid LLW with IdVerde.

We are currently recruiting enforcement agents, as part of implementing our decision to move to collecting all in-borough debt to an in-house service.

We are in the process of bringing in all SEN minibus transport in-house, over the next three years, with a phasing that matches the requirements of the schools and pupils concerned. There are a number of other services that we are assessing using our strengthened 'make or buy' approach.

One Croydon Alliance

The award-winning partnership is continuing to have a very favourable effect on those currently covered by the scope of the service. We are seeing considerably improved outcomes for residents and seeing clear financial benefits for the health & social care economy.

We are now in discussions with partners to ensure that the longer term risk share model is in place and looking at what other services we want to now develop.

Croydon Digital Services

Under the leadership of Neil Williams, our Chief Digital Officer, we are seeing the transformation of our IT department into Croydon Digital Services. This will have benefits across the Council and for residents.

This includes, significantly, the move away from the over-arching Capita contract, including some insourcing, which will enable us to provide an enhanced and more flexible service.

Moving away from big outsource contracts

The move away from Capita represents another move away from having big outsource contracts, where we lose visibility and control of key services and their strategic direction.

This is another stage, after:

- moving away from Interserve for Facilities Management, which meant we had no material exposure to their recent financial difficulties
- bringing the library services back in-house after Carillion's failure



Finance and Resources

Cabinet Member Bulletin

Councillor Simon Hall

April 2019

MyResources

This is the new platform for finance, HR and procurement. A huge amount of work has been done by the project team and officers across the Council to ensure that this delivers the information, processes and platforms the Council needs.

We are on track to deliver this, with payroll parallel running taking place from this month as part of that checking.

Pension Fund

I am pleased to report that there have been further investments with the London Collective Investment Vehicle, as part of the drive to use their negotiating power with fund managers, as they are negotiating for the 33 London local authorities.

In making our choice of new investments, we are demanding very high level of ESG (Environmental, Social and Governance).

As part of taking the fund forward, we will be seeking to strengthen this further and increase the diversification of the fund.

The Full Council decision regarding the transfer of the Council's interests in the Croydon Affordable Homes properties is being implemented. The value of these assets will be included in the Pension Fund's balance sheet and assessed at every triennial valuation of the Pension Fund by the Scheme actuaries, so that there is full transparency and any variations recognised in the Council's cash contributions to the Fund. The pensioners' interests are fully protected, through the value of the assets of the Fund and through the council guarantee that exists.

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Culture, Leisure and Sport Cabinet Member Bulletin Councillor Oliver Lewis April 2019

Latest News

Libraries

Libraries investment

The Labour manifesto set out our ambitions to invest in our libraries and turn them into modern and attractive facilities for our residents. I am pleased to announce that from 1 April 2019, the libraries book fund will increase by 9%. In addition, Croydon Council has taken the decision to join the London Libraries Consortium, which will enable our readers to access a much wider range of book titles and online resources than they are currently able to.

Realising the potential of women:

Our libraries have partnered with Yuliana Topalzy from My Out Space, one of Maserati's 100 most inspiring entrepreneurs, to "realise the potential of women," particularly those with children, by supporting them with digital skills, financial advice and support into work or business. Central, Norbury and Thornton Heath Libraries each hosted Yuliana's International Women's Day celebrations in early March, a marketplace event for women to access support and develop their skills for employment or self-employment.

SPINE festival: Stronger Minds

SPINE festival is a partnership between London Libraries and Apples and Snakes, England's leading Spoken Word organisation. The festival celebrates creativity and community in libraries across London.



As part of the festival, our libraries hosted a wellbeing fair for teens on Saturday 9th March 12 -4pm at Central Library: Stronger Minds was a free creative fair aimed at empowering young people to talk about their wellbeing and express themselves about the issues they face. The range of partners involved included Rap Therapy, Well Versed Ink, Oasis, Reaching Higher Youth Charity, Imagine Independence, Croydon Music and Arts, Off the Record, NHS Young People's sexual health service, Lives Not Knives, Young People Insight and Good Wolf People theatre company.



Culture, Leisure and Sport Cabinet Member Bulletin Councillor Oliver Lewis April 2019



The SPINE-commissioned spoken word production, *Crowded*, was performed by three exciting young poet-performers: Desree Gumbs-Carty, Laura Rae and Slam the Poet, telling the story of ordinary young people whose anxiety, depression and desire leads to harmful and destructive behaviours.

The library's range of "Shelf Help" books, providing 13 to 18 year olds with expert endorsed advice and information about anxiety, stress, bullying, exams, and more were promoted during the SPINE Festival in all our libraries across Croydon.

<https://readingagency.org.uk/news/media/shelf-help-the-books-helping-british-teens-turn-the-page-on-mental-health.html>

Cityread

Sofia Khan is Not Obligated by Ayisha Malik and published by Bonnier Zaffre is unveiled as 2019's Cityread book. Croydon readers will be treated to a visit from this year's author, Ayisha Malik, on 10th May (6.00-7.00pm) at Ashburton Library.



The month-long Cityread celebration of reading, focusing on one book, and helps Londoners discover and celebrate their city through its stories. During this eighth annual festival, our ambition is to turn Croydon into one massive, interactive book group.

Museum

A collection of paintings and photographs of local residents is being showcased in Croydon Arts Collection's 'Croydonians' exhibition, running until 20th April. Items include portraits of an Addington blacksmith and his wife, a Mayor and celebrities from the past and present.

In the Croydon Museum there is an exhibition commemorating the end of the First World War, featuring untold stories for our citizens and their experience of peace, protest and conflict. Work has started on a Heritage Lottery Funded Project entitled Home Front led by Digital Drama and working in partnership with LB Merton. This will capture WW2 stories, especially on events during 1939 such as evacuation and



Culture, Leisure and Sport Cabinet Member Bulletin Councillor Oliver Lewis April 2019

create a new soundtrack over existing WW2 local film. We hope to showcase this as part of a Clocktower Late on 6 September 2019.

Museum staff are developing an exhibition celebrating 100 years of social housing in partnership with Housing colleagues. Work is underway to interview and archive stories of social housing from residents and staff.

Culture

Talawa comes to Croydon

Talawa Theatre Company is to take up residence within the redeveloped Fairfield Halls in Croydon, giving the UK's primary Black theatre company a 200 seat studio and offices. This will be the first time since 1995 that Talawa's headquarters will feature an on-site performance space. The new space, opening to the public on 16 September 2019, will operate as a central hub for Black artists, develop a community outreach programme, and allow the company to create, develop and premiere new work.

We are absolutely delighted to welcome Talawa and incredibly proud that they have chosen Croydon as their new home. Their vision and ambition in changing the face of theatre, attracting diverse audiences and creating platforms for the work of Black artists, is internationally renowned, and we are excited by the conversations we have already had with them about the potential for them being based here. Our multi-million pound investment transforms Fairfield Halls into world-class arts centre, putting culture at the heart of our regeneration and creating a wealth of new opportunities for our communities to access the arts. Talawa recognise and share our ambition, and we very much look forward to working with them as we make this become a reality.

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Families, Health and Social Care Cabinet Member Bulletin Councillor Jane Avis April 2019

Welcome to my April Bulletin, I am delighted and so proud that the One Croydon Alliance, formed of the council, local NHS and Age UK, won the Health and Social Care category at the Local Government Chronicle (LGC) awards ceremony on March 13.



The One Croydon Alliance is a great example of what's possible through partnership working, it brings together the council, Croydon Clinical Commissioning Group, Croydon Health Services NHS Trust, Croydon GP Collaborative, South London and Maudsley NHS Foundation Trust, and Age UK Croydon to deliver an integrated health and social care system that puts our residents first.

Its success is something we continue to look to, and learn from, as we deliver services in our local communities – well done to everyone involved.

Dementia awareness roadshows in Croydon



We are making great progress for Croydon to be a fully inclusive dementia-friendly borough.

Throughout March, the Croydon Dementia Action Alliance hosted its first dementia awareness roadshows. Information sessions took place at Croydon Town Hall and Purley Fire Station and there will be one on Monday 25th March at Thornton Heath leisure centre from 1pm to 2pm.

People came to the free drop-in sessions to learn more about what they can do if they see someone who may be struggling or appear confused out in the community, in a shop or on public transport and when to be patient in a queue.

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They were also made aware of the Herbert Protocol, a national scheme by the Metropolitan Police and other agencies for quick interventions when vulnerable people go missing.

More roadshow events are planned in Croydon for Dementia Action Week 20th – 26th May and during the autumn.

Find out more - <http://news.croydon.gov.uk/dementia-roadshows-get-people-thinking-about-how-to-be-considerate-in-their-communities/>

Dementia friendly cinema

We have also started showing free dementia friendly films at Croydon's David Lean Cinema.

This is a great example of how local businesses, health services, public transport and other venues can make small changes to welcome people with dementia and those who care for them.



People with the condition often have to give up the things they love due to inaccessible and unsupportive environments.

The David Lean cinema will be screening popular musicals on the first Tuesday of the month throughout the year. The lights are left on low, there are no adverts or trailers and the audience is allowed to move around or even sing along to any musical numbers if they would like to.

The screenings aim to be a fun and inclusive experience to enable people living with dementia, their families and carers to attend the cinema in a safe and welcoming environment.

The first dementia friendly film was Viva Las Vegas (1964), starring Elvis Presley and Ann-Margret. The last film in the series will be a pre-Christmas show in December of A Christmas Carol (1951), starring Alastair Sim, where all the family are welcome, including the grandchildren.

For more information and bookings visit www.davidleancinema.org.uk/dementia-friendly-screenings/

Changes within adult social care

We know that there are more people than ever before in need of services from Adult Social Care. Within health, wellbeing and adults we are making changes to ensure staff are in the right place at the right time to meet our resident's needs.

It has been evidenced by Councils across England that when we provide good information, advice and guidance the first time someone contacts us for assistance, that we can support people to remain independent for longer. We have restructured our 'front door' into a multidisciplinary team including mental health, occupational therapy, domestic violence, health and well-being assessors & officers, social workers, advice and early help leads and Gateway colleagues. Using a holistic approach the team look at the whole person, not just the presenting issue.

The team will be applying Community Led Support principles providing timely access to relevant information, connecting people to local services and networks within their communities and helping to prevent their problems get worse. The team will also ensure that, if people need wider health wellbeing and adults statutory services they receive them.

We are also, in line with the Council agenda, moving towards locality working. Our first area to change is the Older People service who have moved from North, South and Reviewing, to work in the following areas that are aligned to existing Integrated Community Networks (ICNs):

- New Addington
- East Croydon
- Woodside & Shirley
- Mayday
- Thornton Heath
- Purley
- Along with a team based at Croydon University Hospital

I will be keeping you updated with future changes via this bulletin.

New shopping bus service for the over 60s in Thornton Heath



Councillor Patsy Cummings and I went along to the first shopping bus trip to Sainsbury's in Purley Way on Monday 11th March.

Croydon Council is piloting the service in Thornton Heath to support the health and wellbeing of residents over 60 years and tackle isolation and loneliness among this age group.

The Croydon BME Forum is managing the door-to-door service. For £3 per trip, residents who need help with their shopping can be picked up from their home and receive return transport to Sainsbury's supermarket in Purley Way. Volunteers will be on-hand to accompany them around the shop, if this is requested.

People will also have the opportunity to sit down for a chat over a cup of tea or coffee and be informed about other local activities they can participate in.

Advance bookings are required for a seat on the shopping bus. To reserve a space, contact Anna D'Agostino, at Croydon BME Forum – Email: anna@bmeforum.org or telephone, 020 8684 3719.



Read more here <http://news.croydon.gov.uk/get-on-board-the-new-shopping-bus-for-over-60s-in-thornton-heath/>

Telemedicine Service for a number of Residential Care & Nursing Homes in Croydon



We are always looking for technological solutions that can enrich our resident's lives, ensuring they are safe and looked after in the best way.

The management team in Health, Wellbeing and Adults have been meeting with Neil Williams, our Chief Digital Officer, to look at ways we can utilise technology to support our staff and residents.

An example is One Croydon, the local health and care partnership between NHS organisations, Croydon Council and Age UK Croydon, who are offering a Telemedicine Service to a number of Residential Care & Nursing Homes in Croydon. The service will be provided on a fully funded basis and we anticipate it will extend our local capacity and deliver benefits across our local system.

The Immedicare Care Home Telemedicine Service is provided as a joint venture between Airedale NHS Foundation Trust and Involve Visual Collaboration Ltd.

The service has been operational since 2011 and is currently supporting several hundred Residential Care & Nursing Homes throughout the UK.

Key elements of the service are:

- Secure high definition video links, established between our local Care Homes and the Airedale Digital Care Hub, which is based in Airedale General Hospital.
- 24/7 clinical assessment & support service, provided by an experienced team of nurses and therapists.
- Onward referral when appropriate and clinical engagement with local services in Croydon.
- Documentation of assessments and referrals, copied to the local Primary Care Electronic Patient Record.
- Fully managed service, with a comprehensive technical support wrap.

Aims of the Immedicare Telemedicine Service in Care Homes are:

- To support and promote the wellbeing of Care Home residents.
- To support effective local pathways, enabling early intervention and support for Care Home residents, especially those at increased risk of attendance at the emergency department or acute admission to hospital.
- To reduce calls for ambulances.
- To reduce conveyances to the emergency department.
- To reduce unplanned hospital admissions.
- To help manage increasing demand for primary and secondary care resources.
- Prevent unnecessary disruption for Care Home residents.
- To enhance effective joint working between those services providing support in the community to ensure smooth transition between services and optimum use of the resources available.

Through good engagement with local services, the Immedicare Telemedicine Service has been shown to reduce ambulance conveyances, attendances at the local emergency department, unplanned hospital admissions and GP visits.

Over 60% of the cases managed by the Digital Care Hub require no onward referral. In over 90% of cases the care home resident is able to remain in their place of residence.

Tackling health inequalities in Croydon

Croydon's Health and Wellbeing Board has recently published a new Health and Wellbeing Strategy that aims to create the best conditions for residents to live longer, healthier lives from housing and employment to health and social care services.



The strategy focuses on eight key areas to improve health and wellbeing, and reduce inequalities for everyone living in Croydon.

The Health and Wellbeing board includes representatives from Croydon Council, Croydon Health Services, Croydon Clinical Commissioning Group, Healthwatch Croydon and South London and Maudsley NHS Trust. Croydon Voluntary Action represents the community and voluntary sector on the board.

To deliver the strategy outcomes, the Board will also follow up actions from the health and care plan event that took place last year. The event was attended by a cross-section of residents, including young people and health and social care professionals. They discussed how to improve services in this area to better meet residents' needs. The final health and care plan will be published in the summer.

Read more about the new Health and Wellbeing Strategy here
<http://news.croydon.gov.uk/health-inequalities-in-croydon-tackled-in-new-plan/>

Watch our short film of the health and care event here
<https://www.youtube.com/watch?v=Crg5k-rMges&feature=youtu.be>

I hope you find this bulletin interesting, if you would like to contact me about anything, please do so on:

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Safer Croydon and Communities

Cabinet Member Bulletin

Councillor Hamida Ali

April 2019

Safer Croydon

Mayor of London visits Drive Programme at the Family Justice Centre

The Mayor of London, Sadiq Khan, visited Croydon FJC on 27 February to see how the borough is leading the way with its work to tackle serious violent crime.

The Mayor is funding the Drive programme, which Croydon is piloting for London. Drive aims to help stop high risk perpetrators of domestic abuse re-offending and to ensure the safety of survivors and their families.

The FJC provides services for those experiencing domestic abuse, and the Drive programme sits alongside its survivor services.



<http://news.croydon.gov.uk/croydons-anti-dv-work-credited-by-london-mayor/>

Mayor of London visits Croydon BME Forum

The Mayor of London, Sadiq Khan, visited Croydon BME Forum on 5 March which he has funded through the Mayor's Office for Policing and Crime (MOPAC) Community Seed Fund to support community activity to tackle knife crime. Croydon BME Forum's project works to support and enable the work of 5 community organisations to support and grow their capacity and sustainability – Another Night of

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Sisterhood (ANOS), Jam Total Sport, Lions Society, Music Relief Foundation and Rising Stars Support. During their visit, the Mayor and the new Director of his new Violence Reduction Unit, Lib Peck, saw some of the work of Jam Total Sport first hand and spoke with young people on their views of knife crime and its effects on our communities.



Trading Standards – Leading nationally to pilot online test purchasing

Croydon Trading Standards are leading on a nationwide project carrying out online test purchase of knives by a person aged under 18. To date we've carried out 60 online test purchase attempts with 26 knives having been successfully purchased. All cases where a knife has been received are progressing with further investigations and potential legal action. These findings reveal a clear issue of knives being available for purchase online with many retailers failing to carry out basic checks before sending out the knives. These retailers are breaking the law and putting our communities at risk. Our officers and the young volunteers participating in this project are doing an amazing job and I will be pushing for tough action against these retailers.

We also continue to carry out physical test purchasing of under-age sales of knives with Croydon retailers. Since November 2018 approximately 100 test purchases have been made with 2 knives successfully purchased – which is 2 too many and it is troubling that any retailer in Croydon would sell knives illegally. The defendant in one of these cases is awaiting sentencing after pleading guilty to the offence and one case is being prepared for future action. The councils trading standards team offers free training to retailers in Croydon relating to age-restricted products.

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Safer Croydon and Communities

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Croydon publishes leading thematic review

Croydon's Children's Safeguarding Board published a detailed review of the experiences of 60 vulnerable young people – designed to inform how all agencies in Croydon respond to children and young people most in need in our communities.

The Vulnerable Adolescents Review – published [here](#) – was commissioned in summer 2017 following the tragic deaths of three young people in less than a month, with the aim of understanding the factors that led to such devastating consequences.

This review not only offers Croydon important insight on how we can improve our collective response to safeguard the children in our communities who need our protection most, it also offers every area in the country a useful resource as the issues it raises will be as relevant there as here.



<http://news.croydon.gov.uk/croydon-reviews-the-lives-of-60-vulnerable-adolescents/>



Safer Croydon and Communities

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Communities

Voluntary and Community Sector Strategy

In March the Cabinet approved a new Voluntary & Community Sector Strategy which sets out how we as a Council want to work with and support the sector. Croydon benefits from a strong voluntary and community sector, and the strategy was developed with the engagement and contributions from over 200 survey responses and over 120 people attending events between December and February.

The strategy will provide a framework for our financial and wider support for the voluntary and community sector, including informing the recommissioning of the Community Fund later this year. Further engagement events are planned with the sector during April and May to ensure we provide the right support through the bidding process.

Equality Annual Report

Cabinet in March also received the annual equality report. The report sets out our progress against the authority's equality objectives as part of the council's Opportunity and Fairness Policy. The report provides updates on our activities, as well as presenting the latest data on equalities, community and workforce profile and where further action is needed to reduce inequality.

- Significant achievements include:
- Improving employment opportunities for disabled people
- Promoting equality of access to education through tailored programmes to meet the needs of under represented communities
- Reducing digital exclusion in Croydon
- Celebrating Croydon's diversity and heritage through supporting annual events such as Croydon Mela and PrideFest.



Safer Croydon and Communities Cabinet Member Bulletin Councillor Hamida Ali April 2019

Black History Month 2019 – Theme Launch

On 18 March, the Mayor hosted an event at Croydon Town Hall to launch the theme for this year's Black History Month, which is 'Rid the Stigma'. 2019 will be our sixth year celebrating Black History Month, and it has been great to see these events go from strength to strength.

The launch event was organised by the Croydon BME Forum, with support from the Mayor's Office and Communities Team. Speakers included Cllrs David Wood, Alisa Flemming, Patsy Cummings, Janet Campbell, Andrew Brown from the Croydon BME and education Consultant David Okoro.



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Economy and Jobs Cabinet Member Bulletin Councillor Manju Shahul-Hameed April 2019

Latest News

Deputy Mayor for Business Rajesh Agrawal Visits Croydon



Croydon has been hailed as a 'centre for innovation and enterprise' by the Deputy Mayor of London for Business after an event held on the 27th February, marking the achievements of Croydon's small and medium enterprises (SMEs) over the past year.

The special event marked the anniversary of Croydon's year for business focussing on the hard work of the entrepreneurial community and the support Croydon Council offers them.

London's Deputy Mayor for Business, Rajesh Agrawal, toured some of the borough's most successful businesses including the TMRW hub and Boxpark.

He met members of the Croydon Good Employer Network, a scheme encouraging business to pay a living wage while supporting Croydon's economic community, and spoke to an audience of SMEs at a special lunch hosted by Croydon College.

Rajesh Agrawal, Deputy Mayor for Business said: "Croydon's business community is a centre for innovation and enterprise, demonstrating the huge impact that small businesses can make to a borough. It was fantastic to meet so many business owners today and see first-hand how they are contributing to the local economy."

Other speakers at the lunch included Andrew Bauer, Chairman of the Small Business Commission, who updated businesses on the work of the Councils on the recommendations from the Small Business Commission which looks at opportunities and barriers to growth facing Croydon's SMEs.

The business community, and particularly our SMEs are the bedrock of our communities and we will continue to do all we can to support them and help them grow.



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Croydon is open for business and the last twelve months have seen major successes including setting up the Croydon Means Business Forum and a business school offering free start-up advice for residents.

Croydon Creative Campus – Partnership with London South Bank University

A new partnership between Croydon Council and London Southbank University (LSBU) has been revealed as the next exciting step in the borough's regeneration, as the town centre further develops as a centre of business, culture and learning.

Announced on Tuesday 12th March 2019, the partnership could see LSBU establish a centre for further education in the heart of the town centre – a move which would significantly increase learning and training opportunities for residents of all ages, particularly the borough's 93,000 under 18s.

It would also provide a significant boost to the borough's economy, enhancing the skills of the local workforce, forging links with local businesses and building on the success of the council Choose your Future apprenticeships campaign.

LSBU's business incubation facility houses 90 businesses and is ranked among the top 15 university-run incubators in the world, while its employer-supported learning framework has made it a leading UK university for graduate employment. Nearly 89 per cent of graduates are in professional graduate-level jobs or further study six months after graduation.

The new partnership is the first step in the council's ambition to develop the Croydon Creative Campus, which would see the town centre develop as a global centre of further education.

National Apprenticeship Week Event - Choose day Tuesday

The Croydon Work's partnership (Croydon College, Croydon College and Job Centre Plus) hosted Chooseday Tuesday on Tuesday 5th March at Croydon College in celebration of National Apprenticeship Week, there were 3 parts of the day aimed at students, businesses and local residents designed to promote apprenticeships.





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Over the course of 2 hours, 190 students attended and 17 employers participated with interactive stands across a variety of industries. This was an opportunity for Colleges to come down and meet local employers to understand more about the different industries and pathways available through an apprenticeship scheme. This was a perfect opportunity for students who are considering alternative routes besides college and university to see what's out there.

Business Networking Lunch



This part of the day was targeted at both small and large businesses considering taking on apprentices or interested in learning about the support available. With over 120 business representatives present the council announced 2 exciting schemes:

100 Apprentices in 100 Days: A campaign to recruit 100 apprentices in 100 days across the various employers in the borough, the council led on this by pledging to recruit 20 and a number of other businesses also pledged bringing the total to 51 pledges on the first day it was announced!

Croydon's Apprenticeship Academy: A virtual partnership of providers, businesses and the council was announced. This academy will offer

free recruitment and easy access to a high-quality training and support network. As part of this academy, the council will cover 100% of the apprenticeship training costs for small businesses.

Public Exhibition

Moving away from the traditional recruitment fair the aim was to allow resident to explore different organisations and get a feel of what working in that sector would be like. There were 18 employers exhibiting including Network Rail, London Fire Brigade, HMRC, Surrey Police and Wates construction.

Over 200 local residents attended this part of the day from potential apprentices to parents and guardians looking to find out more about apprenticeships, overall feedback was amazing





Economy and Jobs Cabinet Member Bulletin Councillor Manju Shahul-Hameed April 2019

with many residents citing they were unaware of the different opportunities available.

Thornton Heath CSCS Card Course

In line with the council Gateway North Project and the new localities based model, Croydon Works have been delivering a number of outreach and training courses at community centres and libraries. Based on the feedback from residents and partners there was a clear need for some more construction training in Thornton Heath, so Croydon Works is delivering a series of CSCS Card Training courses at Thornton Heath Library. The first course kicked off on Monday 4th March with a cohort of 10 local residents, it's a 3 day courses where candidates will obtain a CSCS card allowing them to work on construction sites across Croydon. Upon completion of the course Croydon Works will work with the learners and the local developers to secure jobs for those who complete the course. This is the first of a series of sector specific courses in the area with plans to deliver training in Construction, Logistics, Customer Service and Hospitality.

Digital Services

The Digital service is at the heart of many high profile projects including the LBC Libraries Transformation – this is a transformation of the entire libraries landscape across the entire borough. As part of this, in order to meet the technology aims that have been set out, an ambitious programme of digital transformation is planned. The main elements of which are:

- a. Procure a new Library Management System (LMS) in line with the London Libraries Consortium
- b. Migration of the entire library service back onto the council supported network and support contract
- c. Improve Wi-Fi and networking in libraries - to include connectivity of personal devices and Wi-Fi printing
- d. Refresh the Public Network PCs – and provide other devices e.g. tablets
- e. Refresh of staff devices to include mobile technology
- f. Install conference standard audio/visual equipment in appropriate meeting rooms
- g. Create Digital Zones in all libraries for local resident

The service is also involved in Social values and Digital inclusion work - starting with a project to roll out Full Fibre Broadband across the borough, primarily focused at the Social Housing, but also to be rolled out simultaneously to all residents; as well as engagement from the CDS with regard to Digital Inclusion training for our residents & rolling out a programme of activity in this area.



Children, Young People and Learning Cabinet Member Bulletin Councillor Alisa Flemming April 2019

LATEST NEWS

Children’s Improvement Journey - Ofsted confirm we are making progress in children’s social care

As mentioned in my last bulletin Ofsted Inspectors were on site 19/20 February for their 5 Monitoring Visit. The official letter setting out progress to date was published on 14 March – please see link to the letter published on 14 March.

<https://files.api.ofsted.gov.uk/v1/file/50062794>

I am proud of the commitment of officers and front line staff whose hard work is starting to make a measurable difference. Under Rob and Nick’s leadership staff are working hard to consolidate and build on the progress that has been recognised by inspectors.



Contact Officer; Kerry.crichlow@croydon.gov.uk



Children, Young People and Learning Cabinet Member Bulletin Councillor Alisa Flemming April 2019

School Admissions: National Secondary Offer Day – 1 March 2019

1 March 2019 marked an important day for parents who had children transferring to secondary school in September 2019.

This year, the School Admissions Team processed 4728 on-time applications for Croydon residents which represent a 3% increase from last year. Despite the increase, 63% of applicants (2,976 pupils) were offered a space at their first preference school; this is up by 1% from last year. This means that nearly two thirds of secondary school pupils in Croydon have been offered a place at their first preference school for the September 2019 intake.

Parents had until 15 March to accept or decline their offer and after this date any declined places were reallocated to applicants who are on the waiting list for their most preferred schools. This will be another opportunity for parents to receive a higher preference school and the School Admissions Team will continue to improve on any offer that was originally made until 31 August 2019.

Contact Officer; Shelley.davies@croydon.gov.uk

Youth Engagement: The Good Citizenship Awards



The Good Citizenship Awards (GCA) is an annual project run by the Youth



Engagement Team in primary schools across Croydon. The project is specifically aimed at Year 6 pupils. The awards celebrate the positive contribution that young people make to their schools, peer groups, families and communities. It aims to build the confidence of those students taking part and support resilience throughout the next part of their academic journey. The team work together with schools to identify year 6 students that may need support with their transition to secondary schools, recognise and reward the personal and social development of young people as they take an active role in their communities. The team deliver an interactive assembly about being a 'Good Citizen' and award winners are invited to a final ceremony with the Mayor where they receive a medal and certificate. There is also



Children, Young People and Learning Cabinet Member Bulletin Councillor Alisa Flemming April 2019

an opportunity for schools to receive the GCA School Shield for work in supporting good citizenship in any wider school projects.

So far this year 20 schools have registered to take part.

Any schools wishing to book an interactive assembly for March should email Karen.morgan@croydon.gov.uk



Croydon Foster Carers Dinner and Awards

I have just made this up as obviously the event hasn't happened yet!!!

Please feel free to amend

I was delighted to attend the Croydon Foster Carers Dinner and Awards ceremony on Friday 15 March. The event began with a reception where the Mayor, Leader, Cabinet Members, Senior Officers and Foster Carers were entertained by a performance from the BRIT School. It was a pleasure to open the celebration and following more performances and a superb meal the awards and certificates were presented. There were 6 categories; 10 year Certificates; 20 year Awards, Retirement Award, Commitment Award, Staff Nomination and Child's Nomination. I was honoured to present the Commitment Award to Martin Williams who you may remember received an MBE in January 2018 in recognition for his services to children and he is an active member of our Corporate Parenting Panel.

The evening finished with a lively disco enjoyed by all. I hope that this will be an annual event.

Croydon Music and Arts

Giving Children and Young People a Voice through the Arts

Working with the council's culture team and a consortium of partners Croydon has been successful in winning a large scale bid from the Arts Council's Youth Performance Partnership Fund. This is a grant of £1m over a 3 year period and there have been 5 such awards nationally with one in each of the regions – we are the successful bid from London.

We have an excellent range of partners in the consortium that has come together to build this bid. Its aim is to engage young people in the performing arts, largely theatre, and to focus on young people who are not currently engaging in the arts. Our partners include Fairfield Halls, Talawa Theatre Company, Savvy Theatre Company, the Brit School, Legacy Youth Zone, Oasis Academy Ryelands and Meridian High School.



Children, Young People and Learning Cabinet Member Bulletin Councillor Alisa Flemming April 2019

The programme will include work across all Croydon schools, some out of school programmes in three neighbourhoods, South Norwood, New Addington and Thornton Heath and bringing together activity in Fairfield.

At the heart of our bid is helping children and young people to “develop and discover their interests and talents” (a quote from the new Ofsted framework), to engage parents and carers in supporting their children through “recognition of the importance of culture and identity for families and young people” (one of the key priorities for Croydon’s violence reduction unit), and to provide many of the protective factors for children and young people’s mental health (which are detailed in the DfE guidance for schools in November 2018).

Plans also include providing pathways for young people into the creative industries in collaboration with Croydon’s new Cultural Enterprise Zone.

Providing a platform for young artists at The Ends Festival

Croydon Music and Arts is working with Metropolis and Live Nation to curate a Youth Stage at The Ends Festival, from 31 May to 2 June in Lloyd Park. The festival’s ethos is to create opportunities for the local area and celebrate the diversity, culture and talent of Croydon.

We are recruiting young musicians from around Croydon to perform on a smaller stage which will run alongside the main stage across the festival. Performers will be given slots in between the main stage artists and will showcase a range of styles and genres.

We aim to platform and celebrate the best of Croydon’s emerging young talent as this new festival lands in our borough.

CALAT Apprenticeships

CALAT is powering ahead with its Apprenticeships programme with the following opportunities either completed or with people in place:

- 6 Teaching Assistant apprenticeships in Croydon Schools- includes upskilling existing staff and a new job created.
- 8 completed apprentices in Business Administration and Customer Service for Croydon Council- all new jobs created.
- 13 apprentices currently on programme for Croydon Council- mostly all new jobs created and 1 upskilling existing staff.
- 13 L3 and L5 Leadership and Management apprenticeships for existing staff.
- Recruitment sessions for the next cohort of CPD Apprenticeships to Croydon Council staff are underway, with new starts in May and October 2019.



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2019 Celebration of Achievement

Following on from the success of last year's event, nominations have opened for the 2019 Celebration of Achievement awards taking place on June 18th. We are hoping to achieve the same success as 2018 where learners and staff really came together to celebrate their achievements and the service.

David Lean Cinema

CALAT has produced an advert which is now live and played before screenings at the David Lean cinema, the ad can be viewed on YouTube via the following link:
<https://www.youtube.com/watch?v=i3jPwBgApto>

CALAT collaborative AEB bid with London Learning Consortium and Sutton College

CALAT successfully contributed to London Learning Consortium's GLA bid for funding between 2019/20 – 2023/24. If the bid to the GLA is successful CALAT will receive £80,000 per academic year to deliver programmes to progress Family Learning adults onto mainstream accredited programmes as well as ALDD learners onto employment pathways and into employment. We should have confirmation in April 2019.

CALAT Curriculum planning 2019/20

CALAT had a really productive 2019/20 curriculum planning day on 4 March 2019. The main focus of the day was to ensure that the Curriculum offer for 2019/20 meets the needs of our residents and the priorities in the Skills for Londoners strategy and South London and Croydon borough strategies.

The 2019/20 curriculum offer includes a focus on improving CALAT's blended learning/distance learning offer for maths and English, Languages as well as to support the delivery of Apprenticeships.

For adult learners with learning difficulties or disabilities (ALDD) - the service will be introducing a new English accredited course which will focus on Debating skills and History, a new Maths course which will explore International cookery to develop learners maths skills and a Creativity Community learning course which is entitled Mind, Body and Soul which focusses on mindfulness and healthy living. All of the above enhances the current successful curriculum provision which continues to meet the needs of Croydon's residents and address skills gaps. CALAT 2019/20 brochures and enrolment will be launched on Monday 17 June 2019.

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REPORT TO:	COUNCIL 1 April 2019
SUBJECT:	RECOMMENDATIONS OF CABINET REFERRED TO THE COUNCIL FOR DECISION
LEAD OFFICER:	Jacqueline Harris Baker, Executive Director of Resources and Monitoring Officer
WARDS:	ALL
CORPORATE PRIORITY/POLICY CONTEXT:	
The Recommendations of Cabinet referred to the Council for decision report is prepared in accordance with the Council Procedure Rules at Part 4A of the Constitution.	

1. RECOMMENDATIONS FROM CABINET HELD ON 25 March 2019

Subject to decision at the Cabinet meeting to be held on 25 March 2019, Council is expected to be asked to approve the following recommendations:

Adoption of Supplementary Planning Document 2 – Suburban Design Guide

- 1.1. The adoption of the Suburban Design Guide - Supplementary Planning Document (SPD2) in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012; and
- 1.2. Delegation 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. The recommendations of Cabinet referred to the Council for decision report comprises of matters of business formally undertaken by the Leader and Cabinet as well as Committees since the last ordinary meeting of the Council that require Full Council approval.

3. BACKGROUND

- 3.1. Part 4A of the Constitution requires that Cabinet and Committees include any recommendations that it has made to Council within this report.
- 3.2. These rules do not apply to any recommendations contained in the Annual Report of the Scrutiny and Overview Committee.
- 3.3. The Leader or Chair of the Committee making the recommendation may

exercise a right to introduce the recommendation; in so doing the Leader or Chair of the Committee shall speak for a maximum of 3 minutes.

- 3.4. The recommendation shall be seconded without any further speakers and if not deferred for debate shall immediately be put to the vote.
- 3.5. Any Member supported by a seconder, may ask that a recommendation be deferred for debate and the recommendation shall immediately stand deferred.
- 3.6. In the event that any Cabinet or Committee recommendations have not been reached when the time limit for the meeting has expired, those recommendations shall immediately be put to the vote without further debate.
- 3.7. Attached at **Appendix 1** is the **covering report** to be considered at the **Cabinet** meeting to be held on 25 March 2019. The relevant appendices to this report are also included. These are **Appendix 1A** (Consultation Statement: Suburban Design Guide Supplementary Planning Document) and **Appendix 1B** (Suburban Design Guide: Supplementary Planning Document).

CONTACT OFFICER: Annette Wiles,
Senior Democratic Services and Governance Officer –
Council & Regulatory
Ext. 64877

APPENDIX 1: Cabinet Covering Report: Suburban Design Guide -
Supplementary Planning Document (SPD2) – Adoption

APPENDIX 1A: Consultation Statement: Suburban Design Guide
Supplementary Planning Document Long-term debt profile

APPENDIX 1B: Suburban Design Guide: Supplementary Planning
Document

BACKGROUND DOCUMENTS: Equality Assessment Parts 1 & 2

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.

CONTACT OFFICER: Steve Dennington, Head of Spatial Planning
(ext 64973)

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.	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. <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>
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.	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. <i>Amendment to Section 1.2 Table: Updated to '25 homes', reflecting the draft London Plan.</i>
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. <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: <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. <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	<p>Representation noted that the guidance allows for bigger buildings but Section 2.8 advocates being of a similar density and massing.</p>	<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	<p>Representations questioned whether schemes are required to provide daylight and sunlight testing.</p>	<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	<p>Representations requested clarification on the guidance within Paragraph 2.9.17 on what is meant by 'where acceptable separation distances cannot be achieved'.</p>	<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	<p>Representations commented that Paragraph 2.9.8 is difficult to understand.</p>	<p><i>Amendment to include additional diagram – Figure 2.9e</i></p>
7.4.21	<p>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>	<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>		
	Comments received	Council response
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

	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.	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. 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.
7.4.59	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.	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.
7.4.60	Representations questioned whether charging points for e-bikes is a policy requirement.	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.
7.4.61	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.	The Croydon Local Plan was consulted on and examined prior to adoption. This facilitates development to ensure sufficient delivery of housing. 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.
7.4.62	Representations noted that more weight needs to be given to density (as prescribed by the London Plan Density Matrix).	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.
7.4.63	Representations questioned whether sufficient flexibility will be given by Council officers when applying the three approaches prescribed in	The 3 broad approaches have been defined to allow for architectural innovation and creativity whilst emphasising the importance of character and need to

	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.

Chapter 3: Responses that result in amendments		
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	Representations noted the need for less planning terminology and more appropriate language for the general public.	<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	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><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	During consultation it was questioned whether allowing a 'seamless' approach was appropriate for two-storey side extensions.	<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:

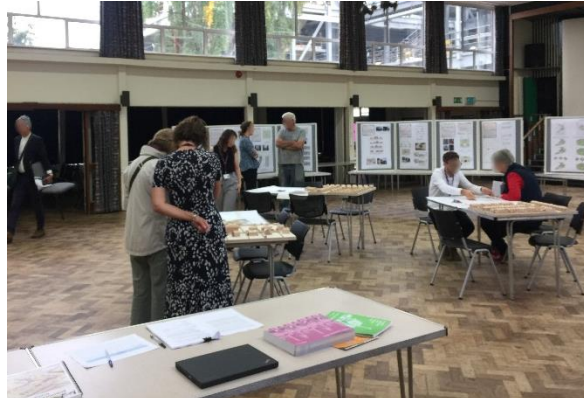
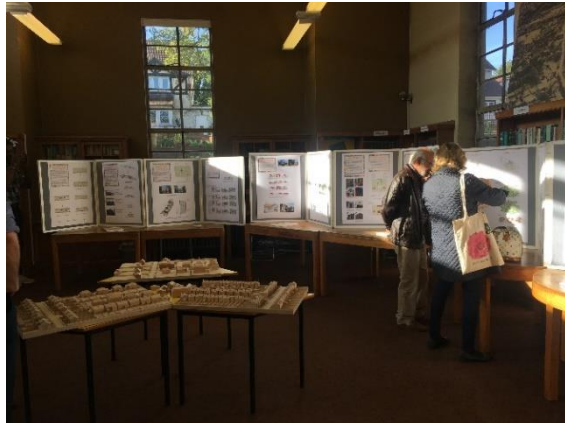
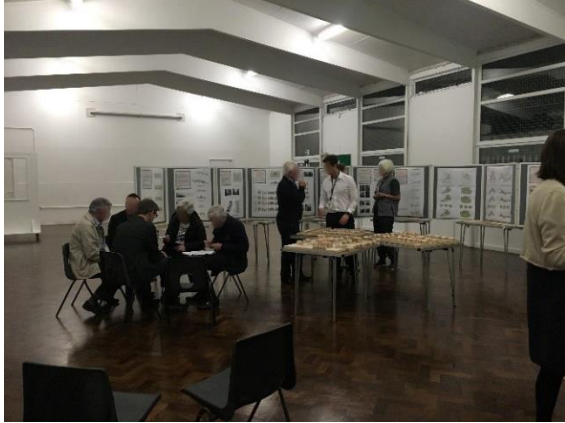
- Provide further clarification to the guidance where it has been deemed necessary
- Edits to phrasing, spelling & grammar
- Edits to images

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/>

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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.

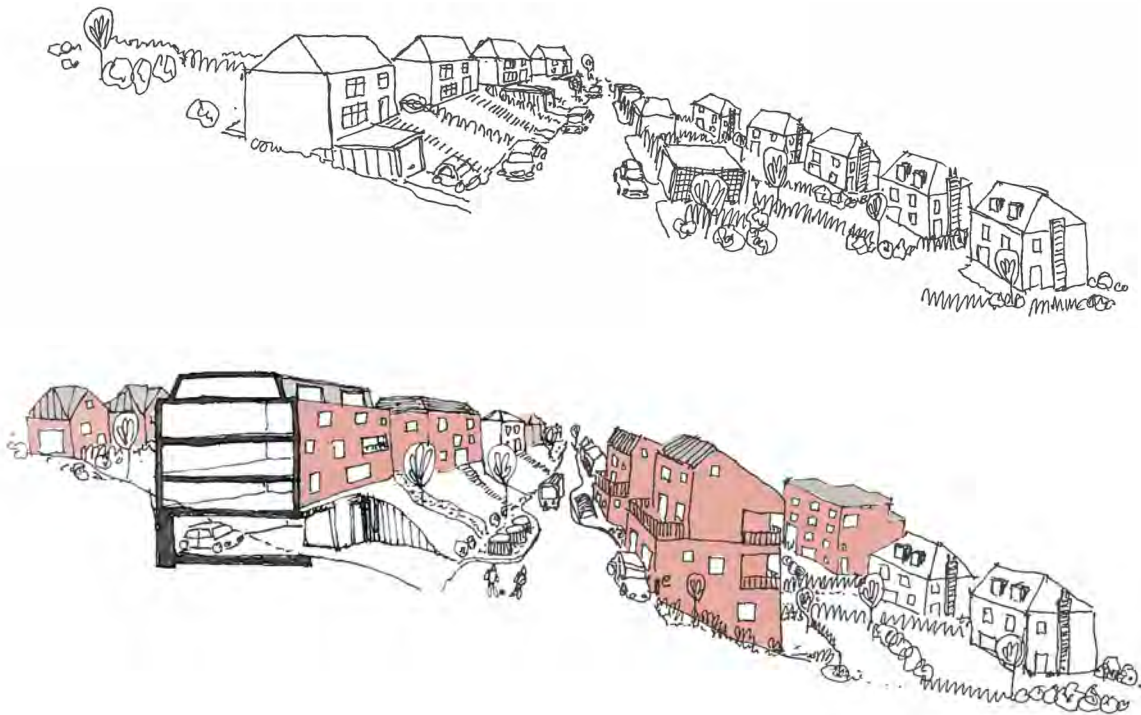


Figure 1.2a: Before and after - Possible development within an Area of Focussed Intensification



Figure 1.2b: Before and after - Suburban Residential Development

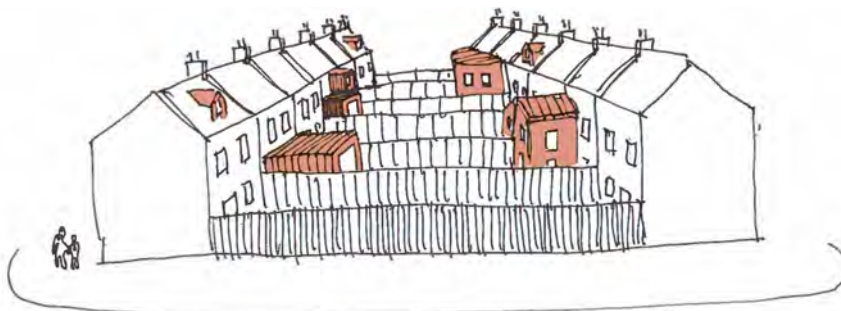
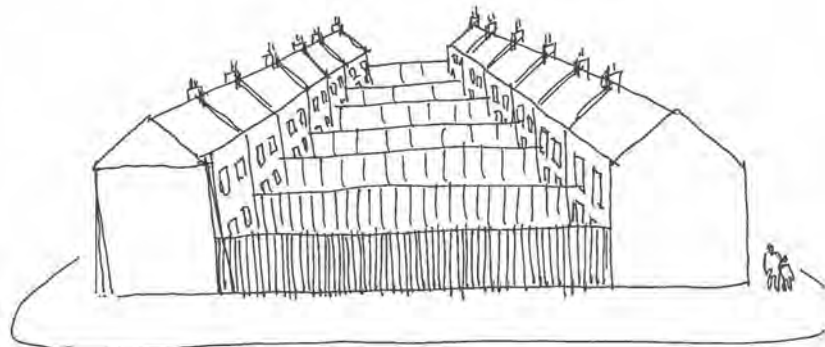


Figure 1.2c: Before and after - Residential Extensions & Alterations

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.*

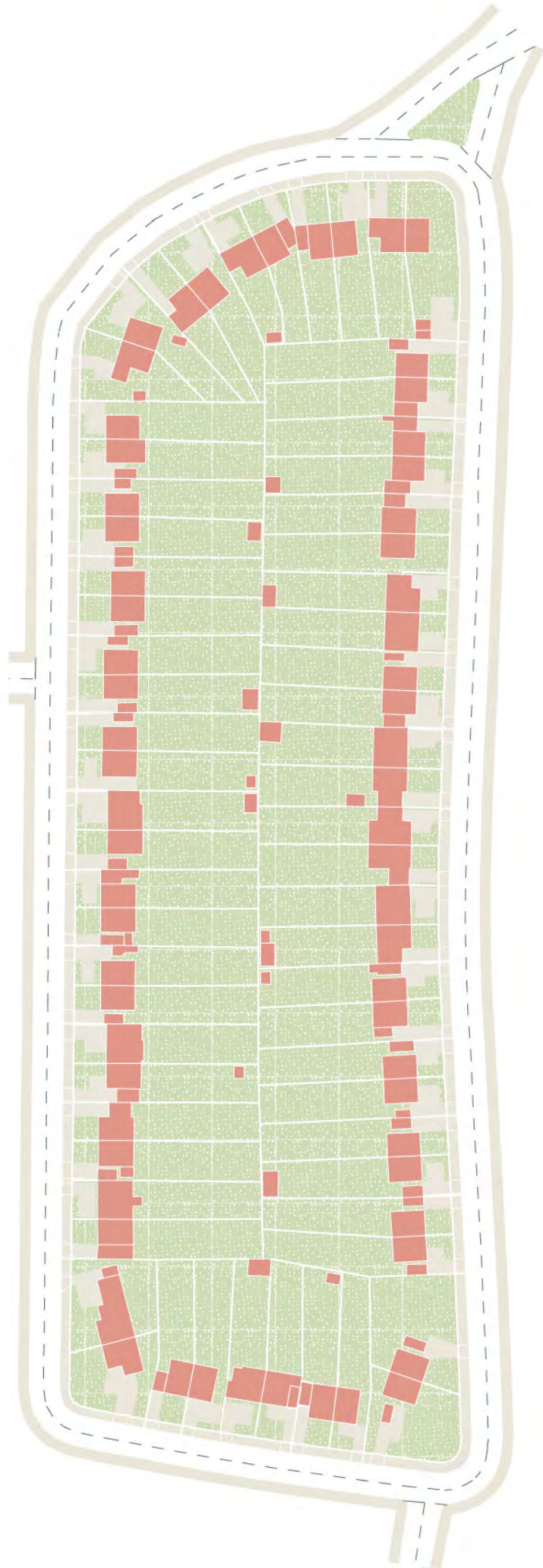
They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed’. Further detail in relation to the expected evolution or change in character of different areas is set out in Table 6.4 of the Local 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

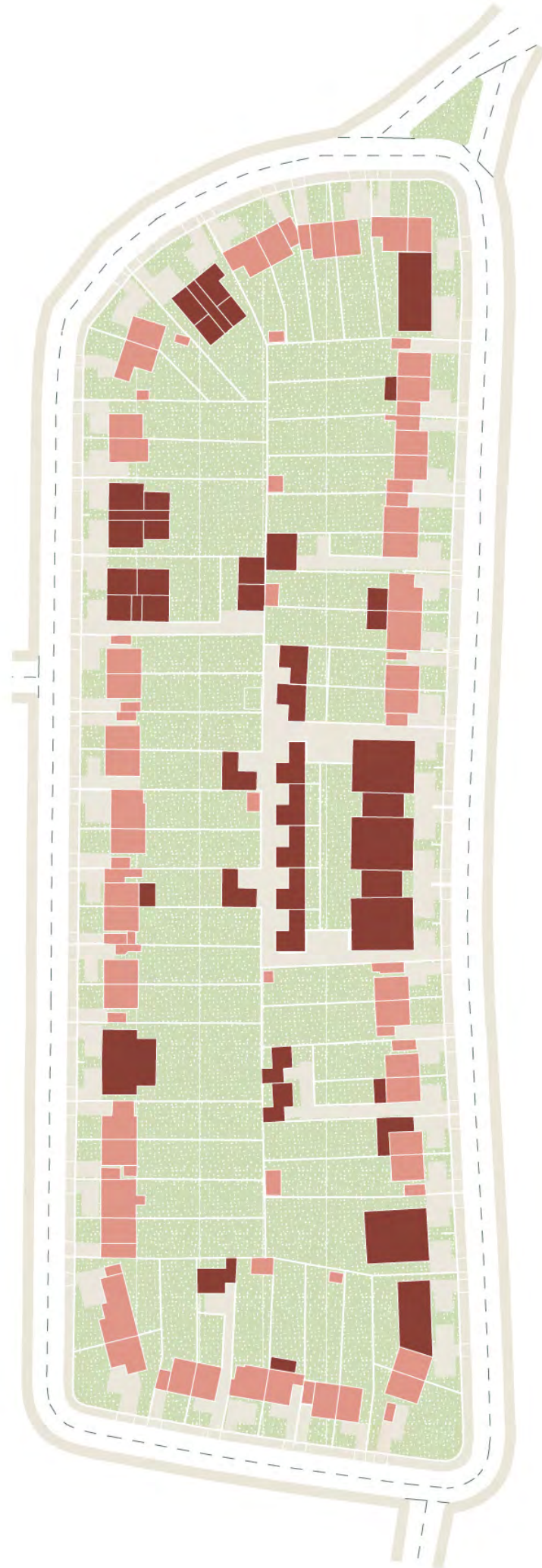



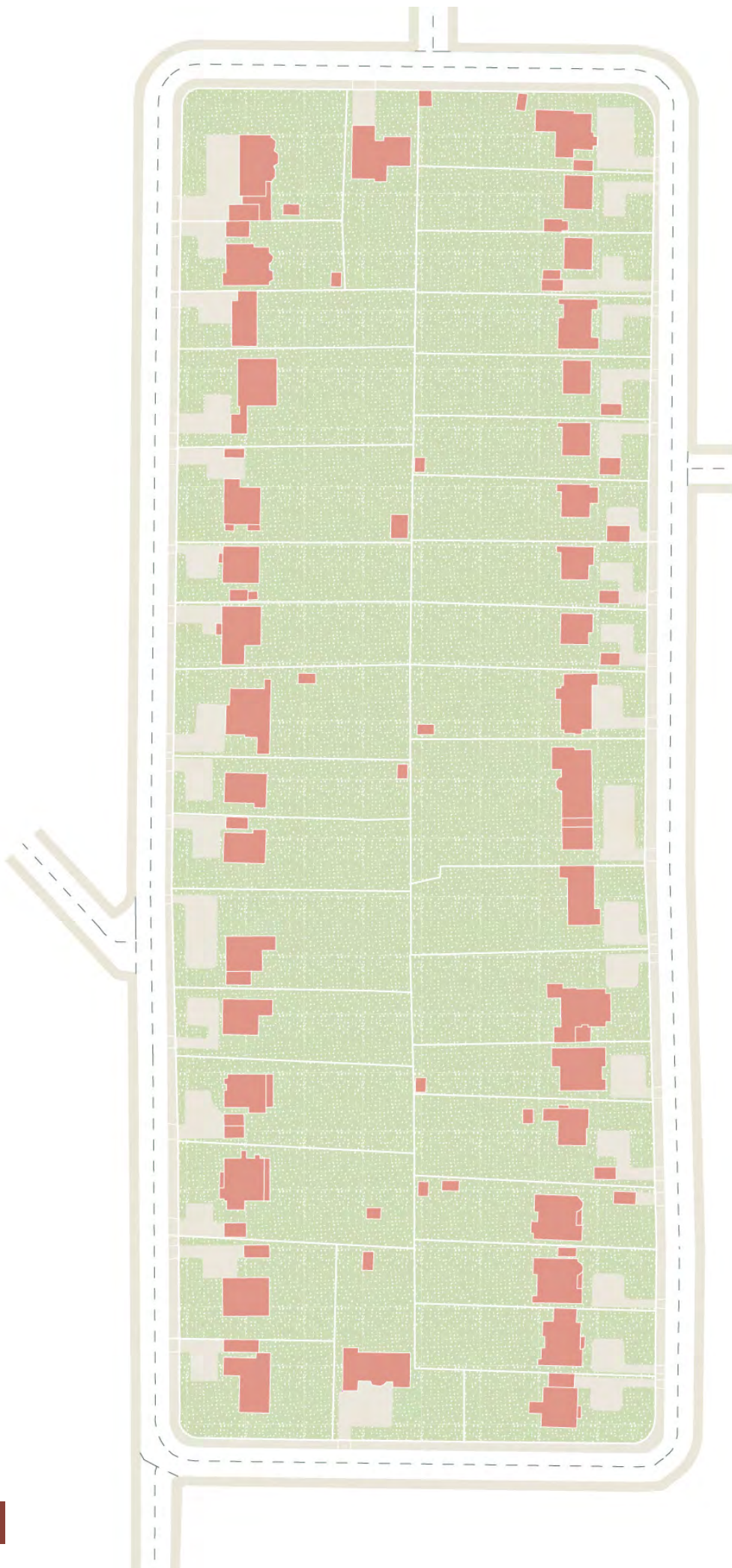


Figure 1.3a: Evolution of streets with semi-detached homes

Key

-  Existing Houses
-  Existing back lands (including garages)
-  New Homes



2018






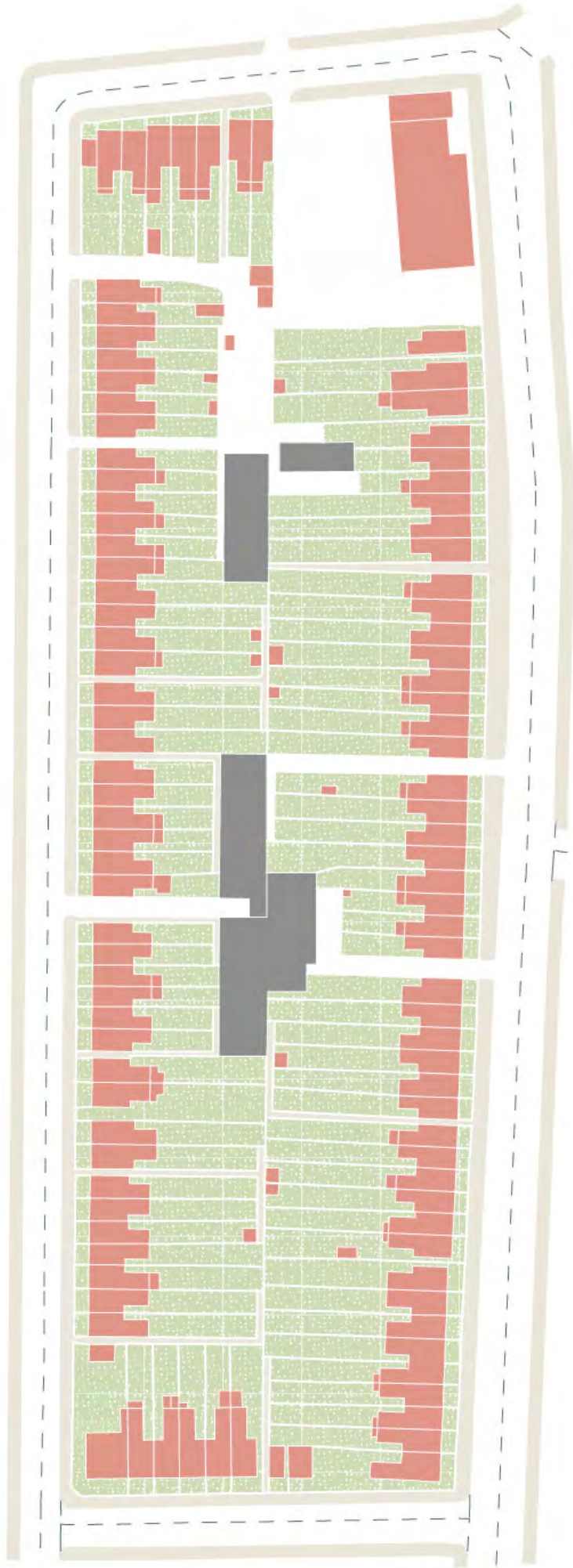
→ 2036



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>.

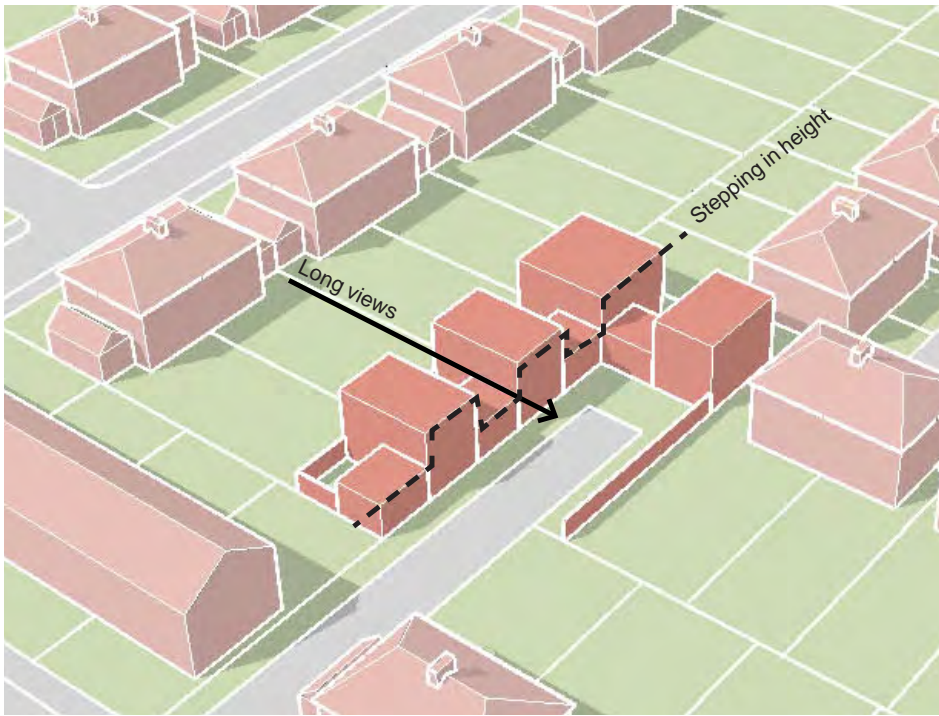


Figure 1.4a: A diagram indicating how site constraints and opportunities might inform the development of the design. The proposal has introduced a stepping form as per guidance Section 2.13.



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.

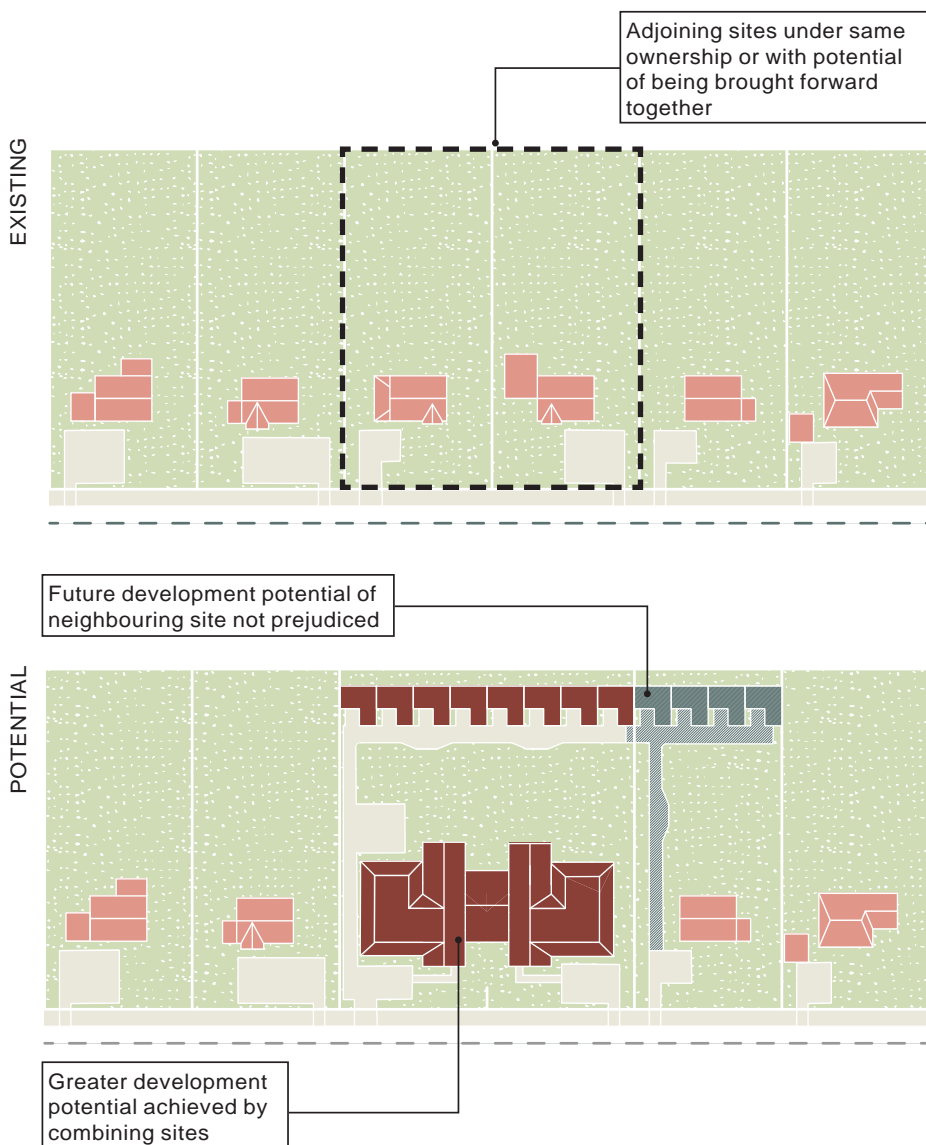


Figure 2.4a - Combining adjoining sites to provide greater development potential

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.

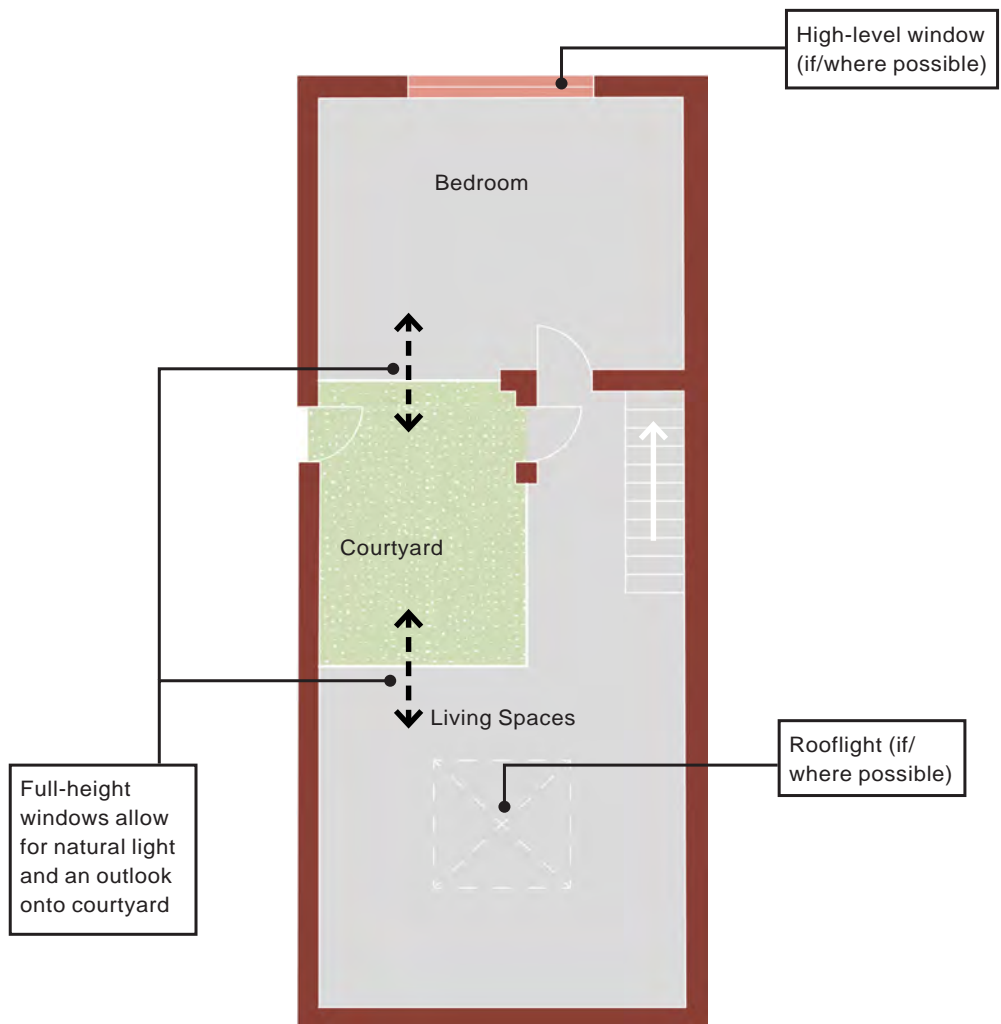


Figure 2.9a: Diagram illustrating solutions to access natural light on a constrained site that limits externally facing windows.



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.

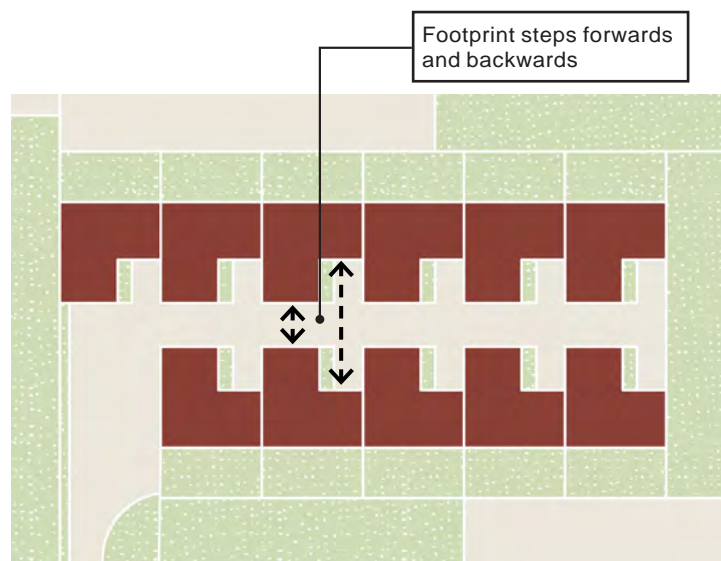


Figure 2.9e: Stepping of massing to achieve acceptable front to front separation distances at intervals, as per guidance Paragraph 2.9.8.

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.

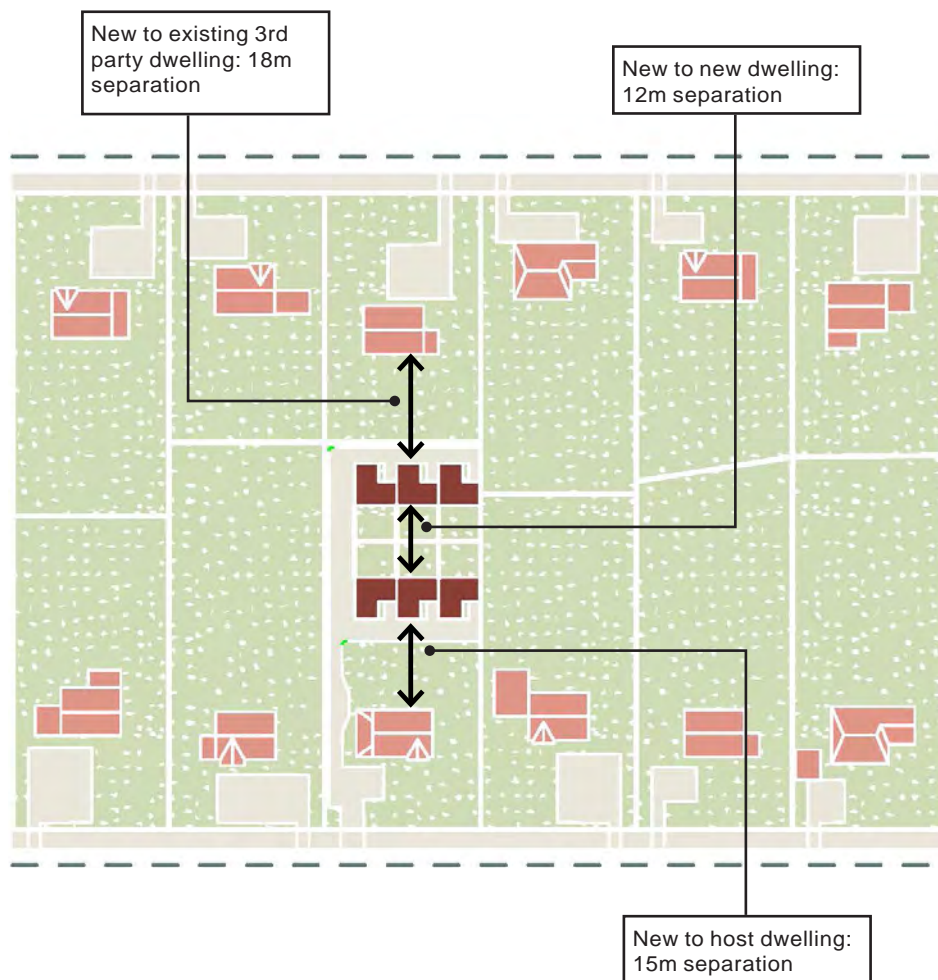


Figure 2.9f: Overlooking distances concerning solely new development reflects the establishment of a new condition associated with new residences, rather than a loss of existing amenity through a new development

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.

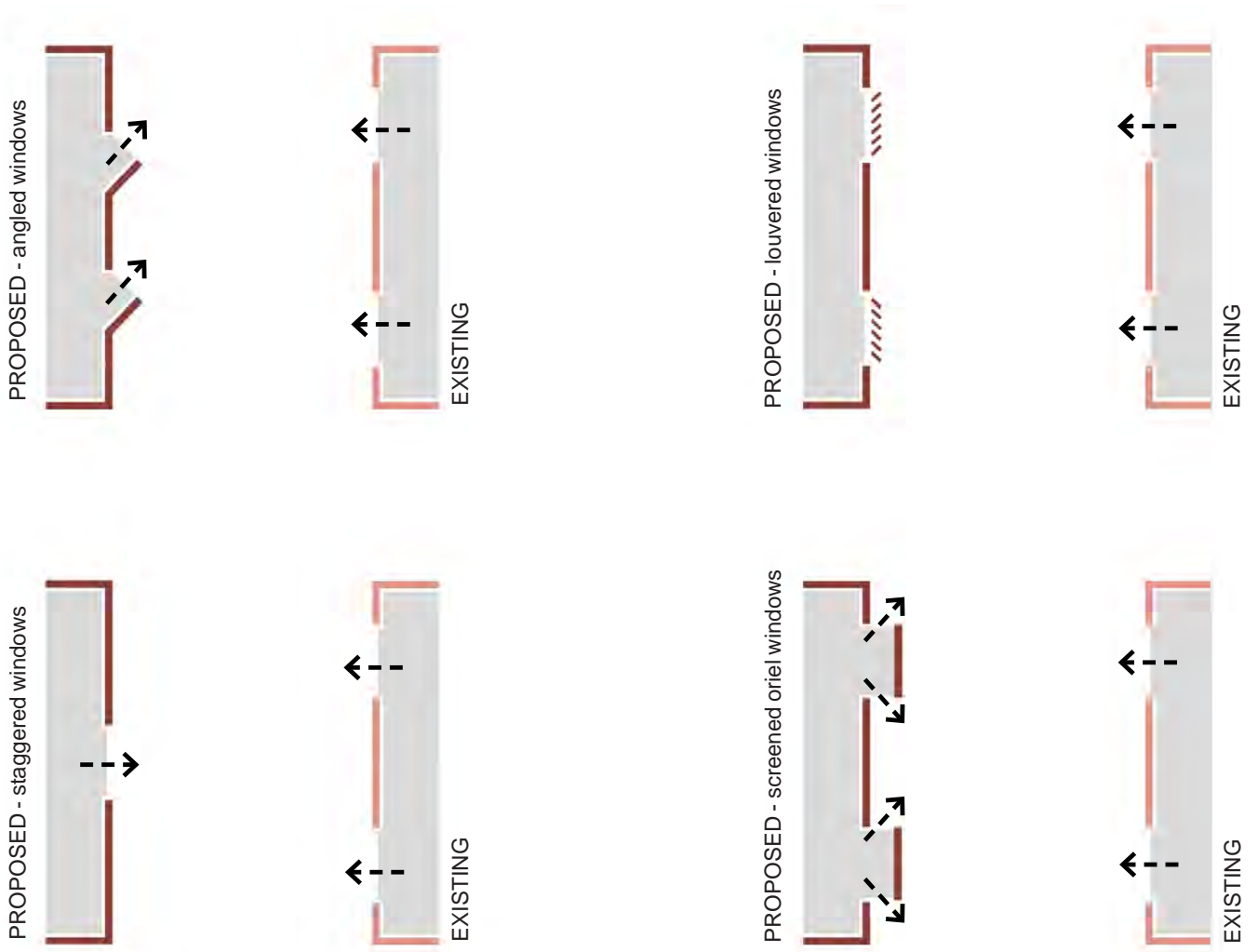


Figure 2.9g: Methods for resolving overlooking where necessitated by reduced separation distances.



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.

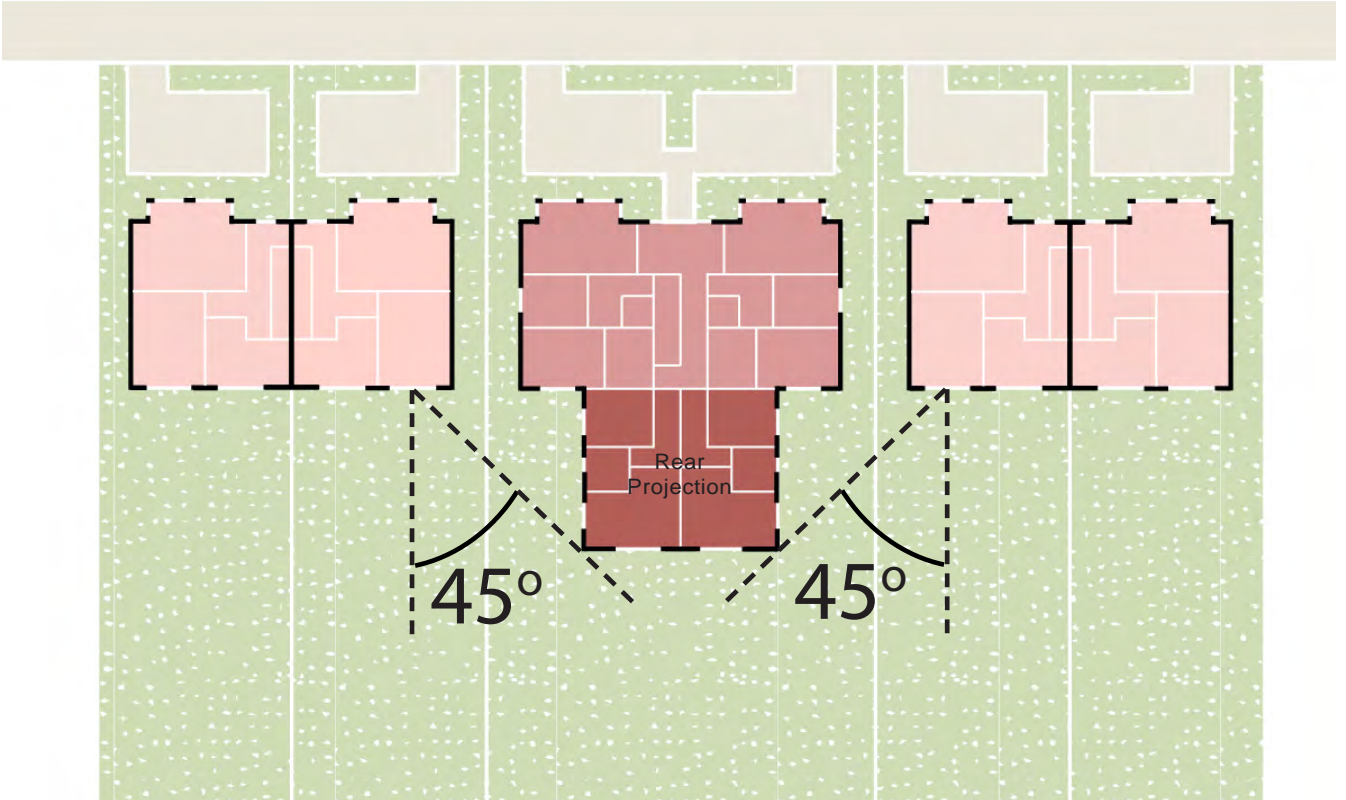


Figure 2.11b: Depth of projection no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

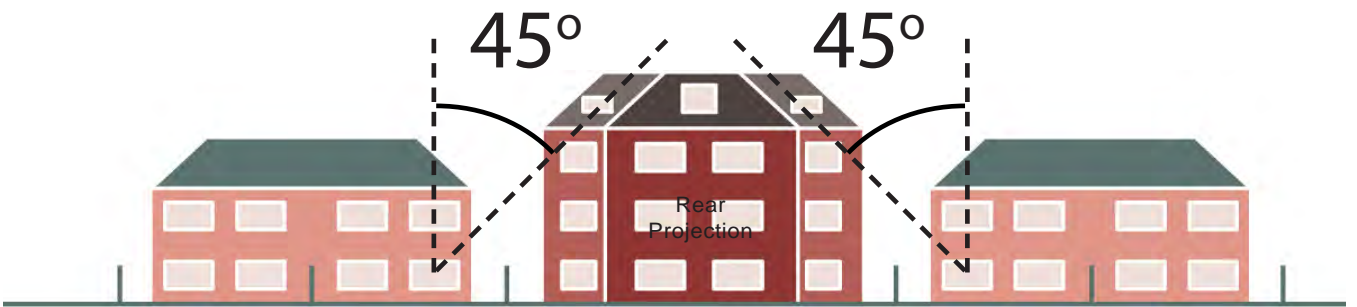


Figure 2.11c: Height of projection beyond the rear of neighbouring properties is no greater than 45 degrees as measured from the middle of the window of the closest ground floor habitable room on the rear wall of the main neighbouring property on both sides.

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.

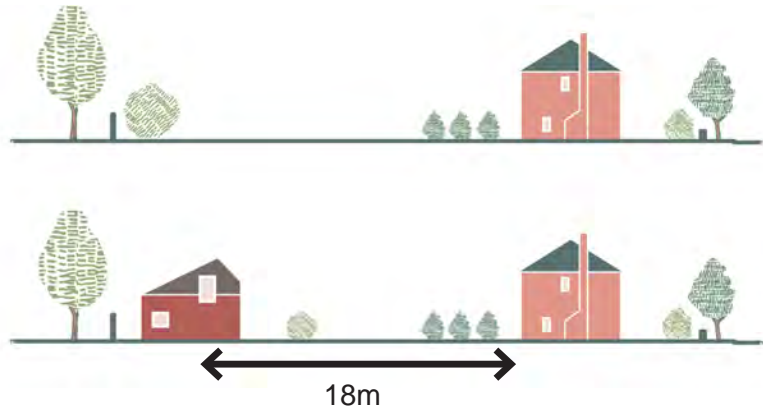


Figure 2.12a: Height of rear garden development is lower than the neighbouring dwelling where any part of the development is within 18m of the rear wall of the neighbouring property, however accommodation is provided in the roof space.

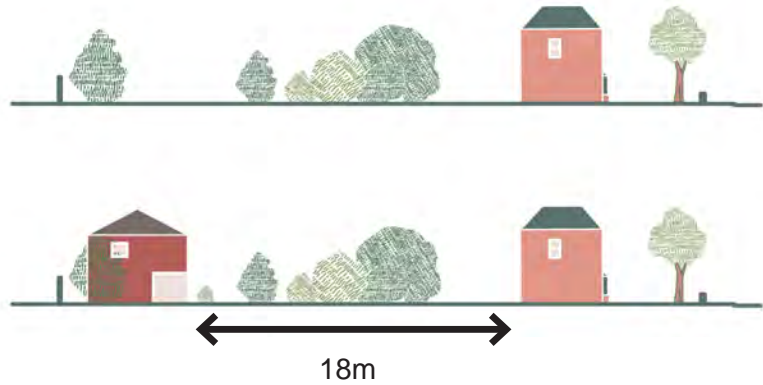


Figure 2.12b: Height of rear garden development may be equivalent to that of the neighbouring property where no part of the development is within 18m of the rear wall of the neighbouring property.



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).

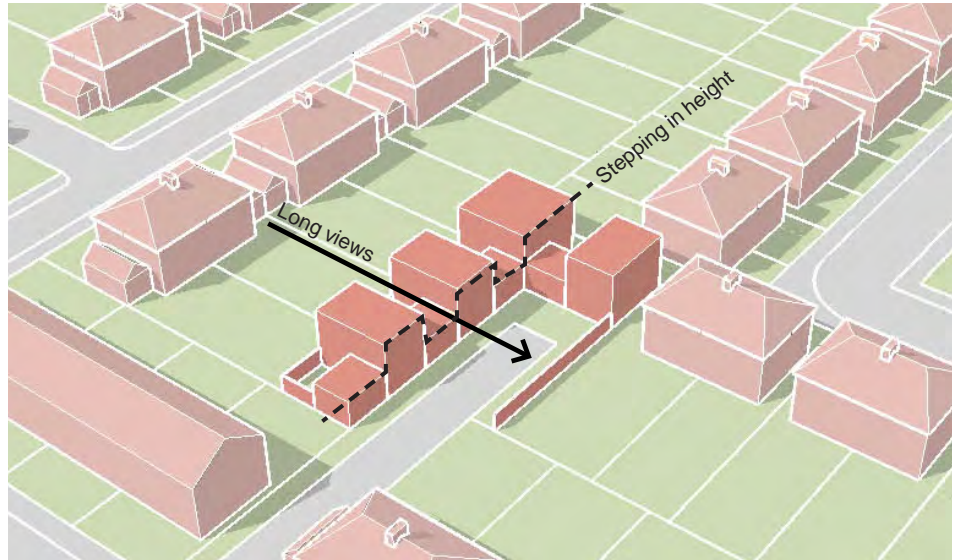


Figure 2.13a: Proposal for a back land site - height stepped to maintain sense of openness in neighbouring gardens and within the development itself.



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.

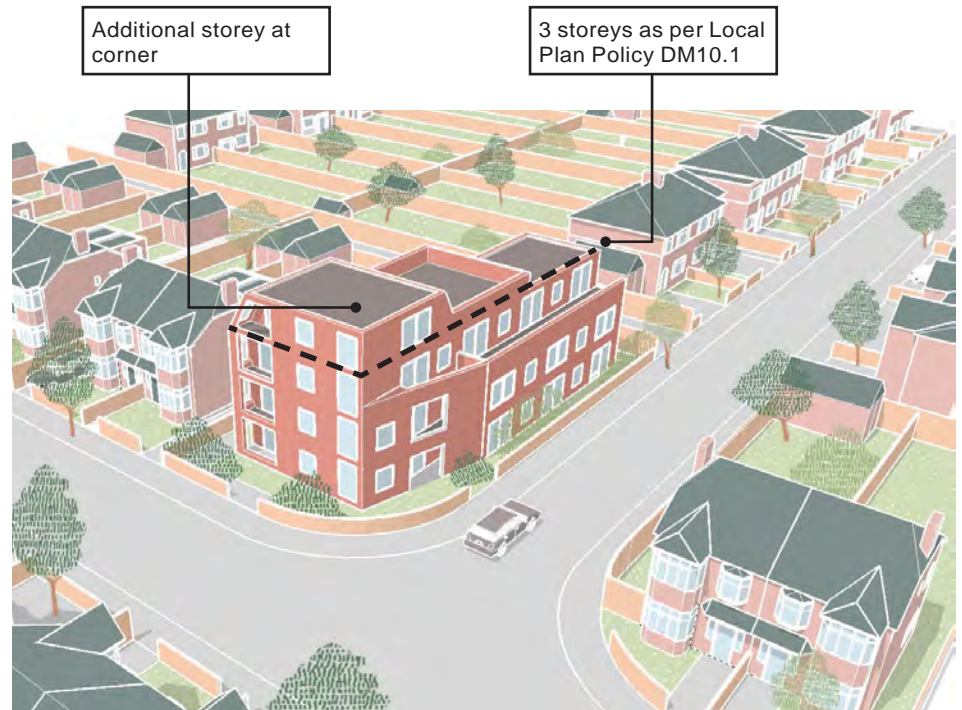


Figure 2.14a Additional height on corner plot

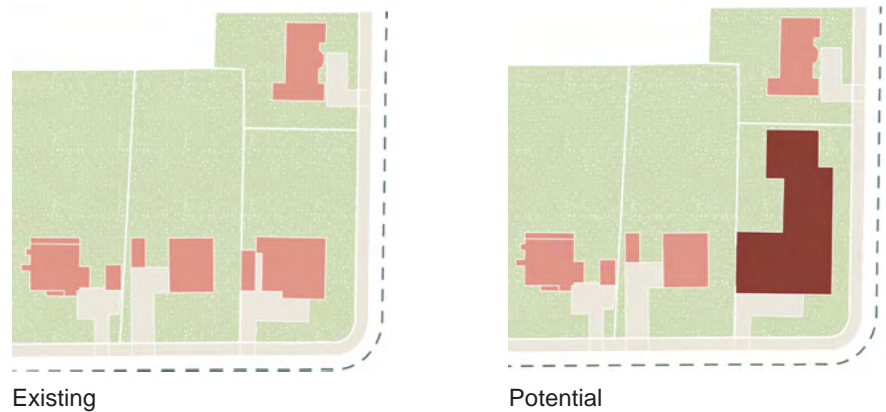


Figure 2.14b: Additional depth on corner plot with stepping of building footprint on a corner plot, responding to the position of neighbouring front elevations.

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.

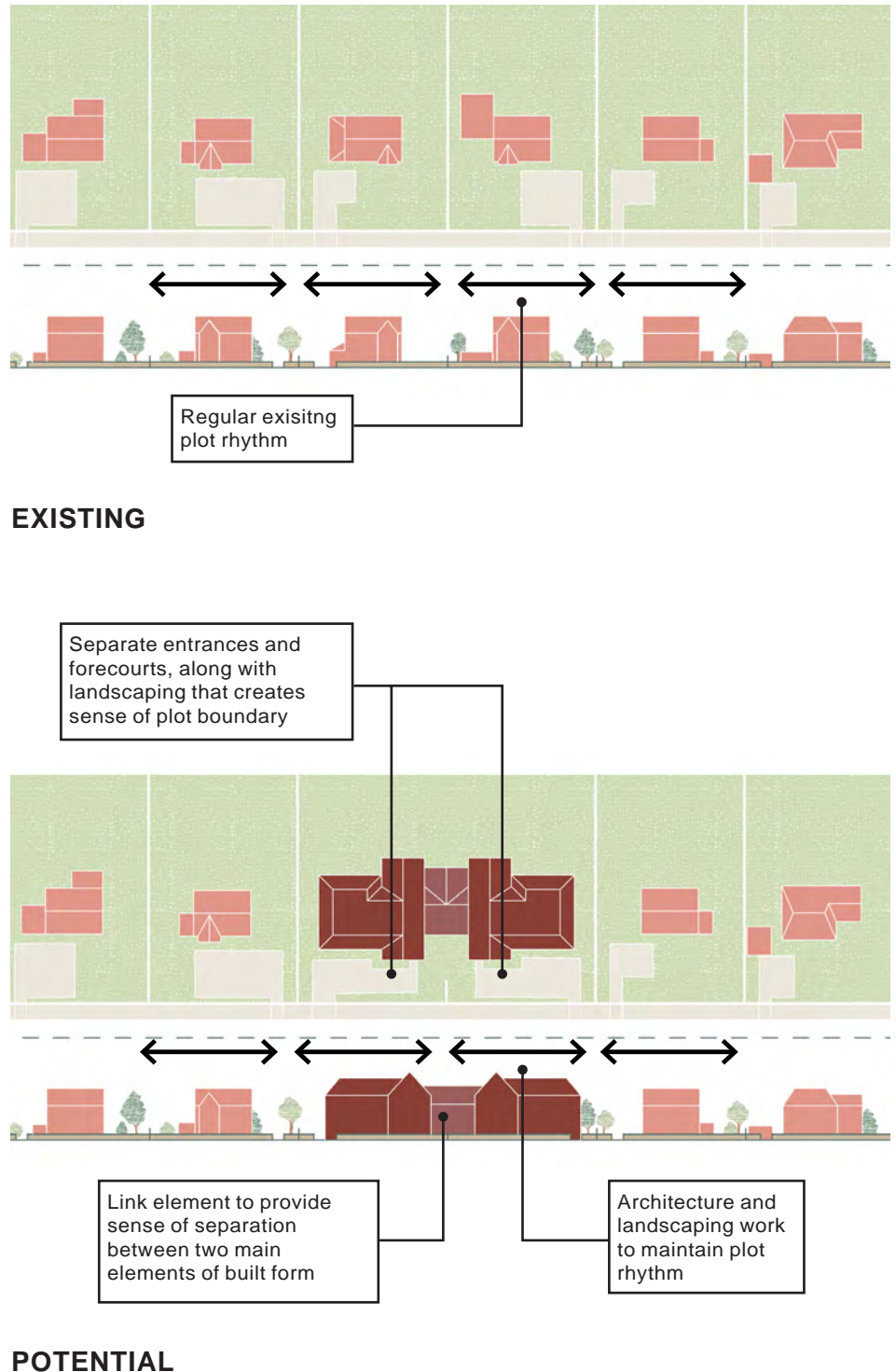


Figure 2.15a: Maintaining sense of original development pattern through massing and site layout.

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).

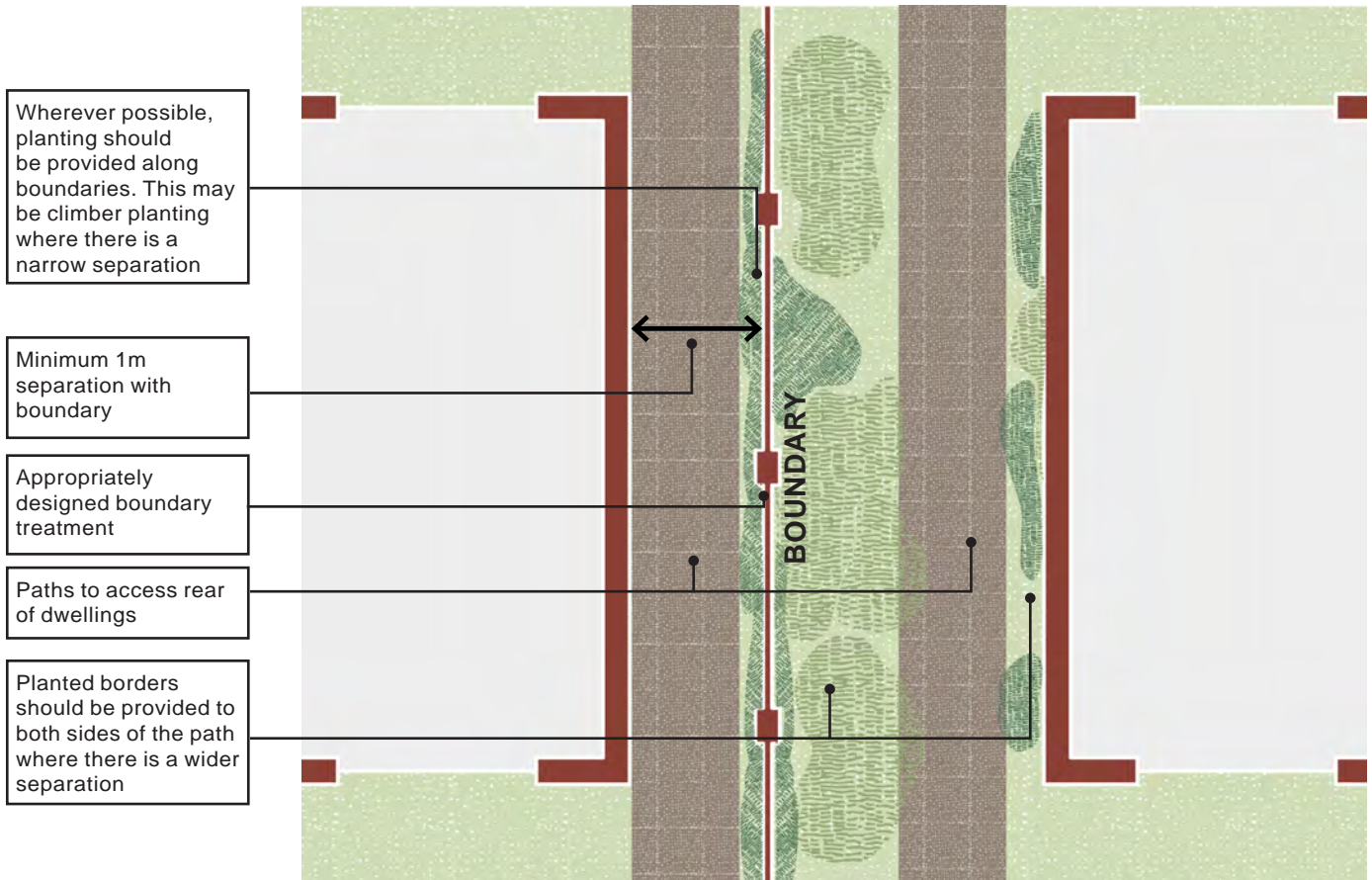


Figure 2.16a: Relationship with boundary.

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.

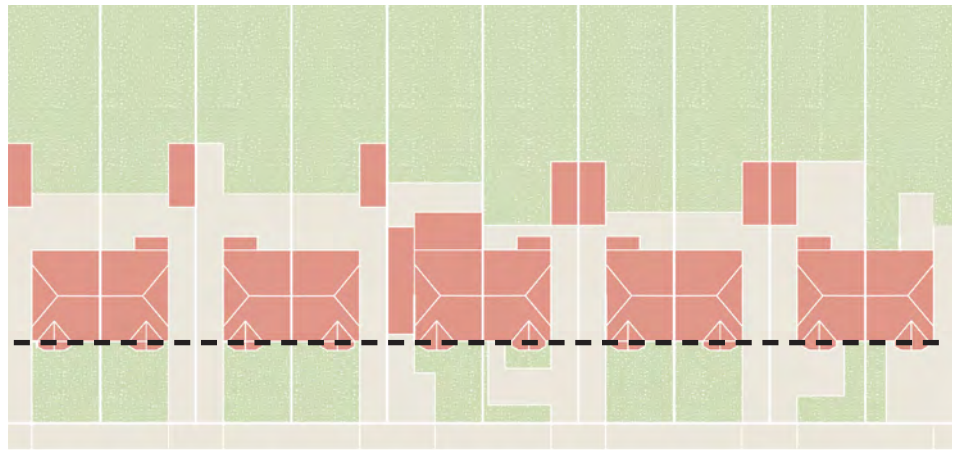


Figure 2.17a: A consistent building line facing the street

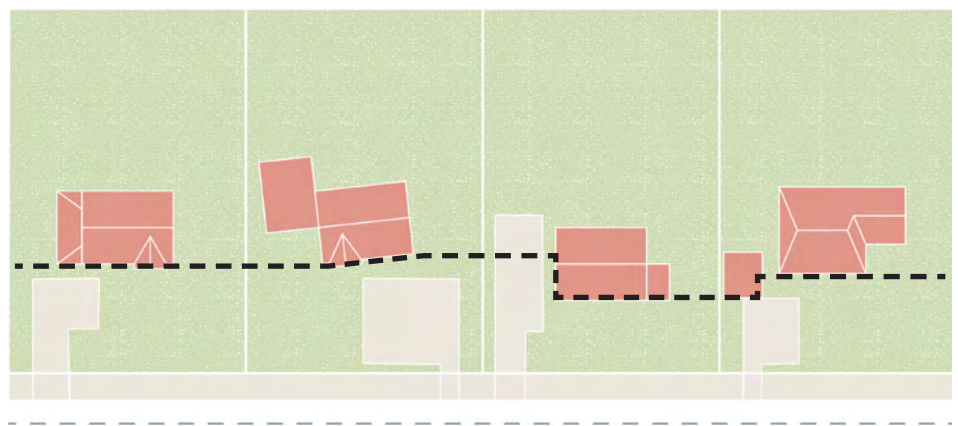


Figure 2.17b: An inconsistent building line facing the street

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,

- would be attractive and not overbearing; and
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 MATA Architects 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

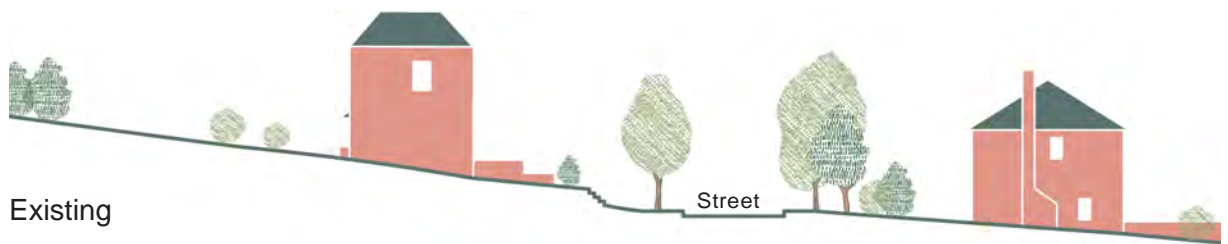
the front of a development, would not be intrusive on the streetscene. Where necessary, this may require railings to be screened with planting;

- 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

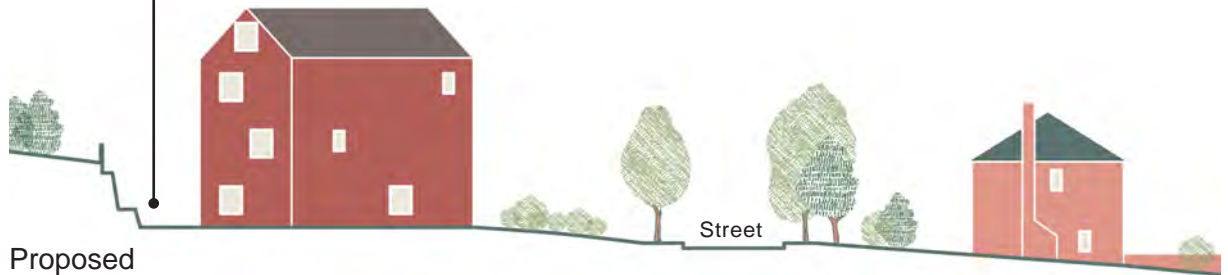
development will generally be acceptable where they are well laid out and have sufficient access to natural light and are designed to respond to the existing character of basement or lower-ground floor development in the area.

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

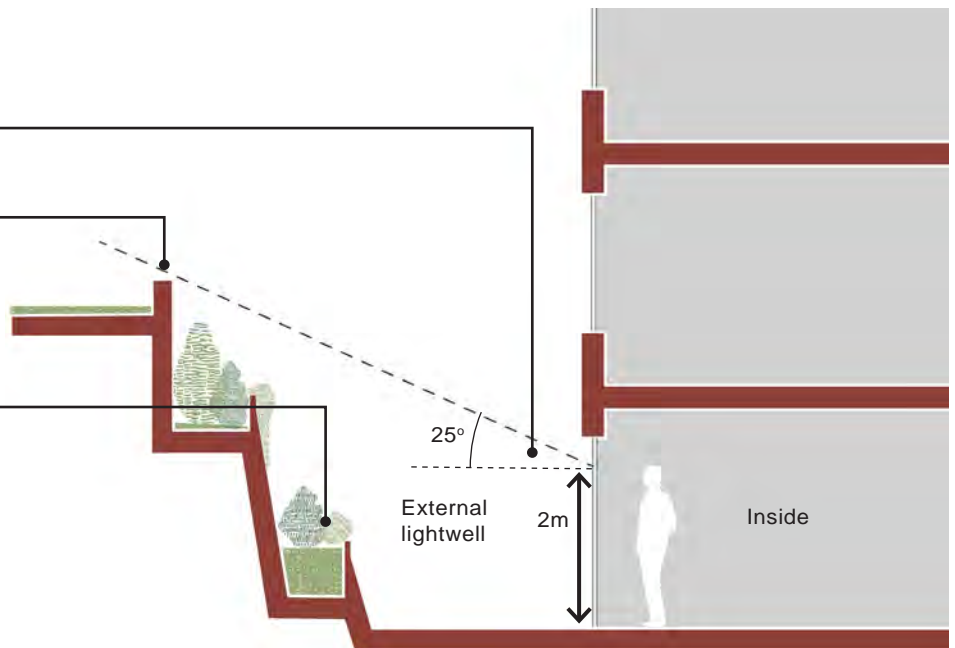


Figure 2.20c: Section showing the design guidance for creating a light well for a basement or lower-ground floor.



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

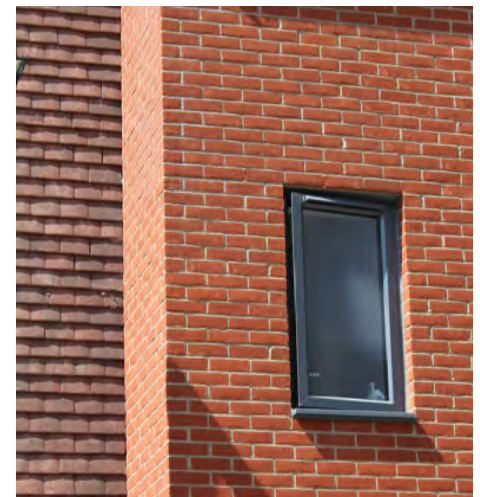


Figure 2.23d

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

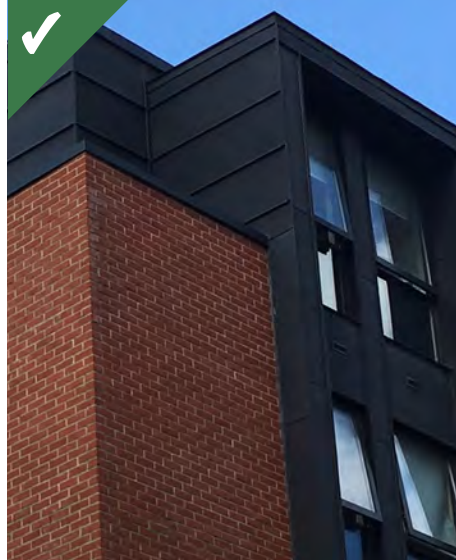


Figure 2.23f



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.

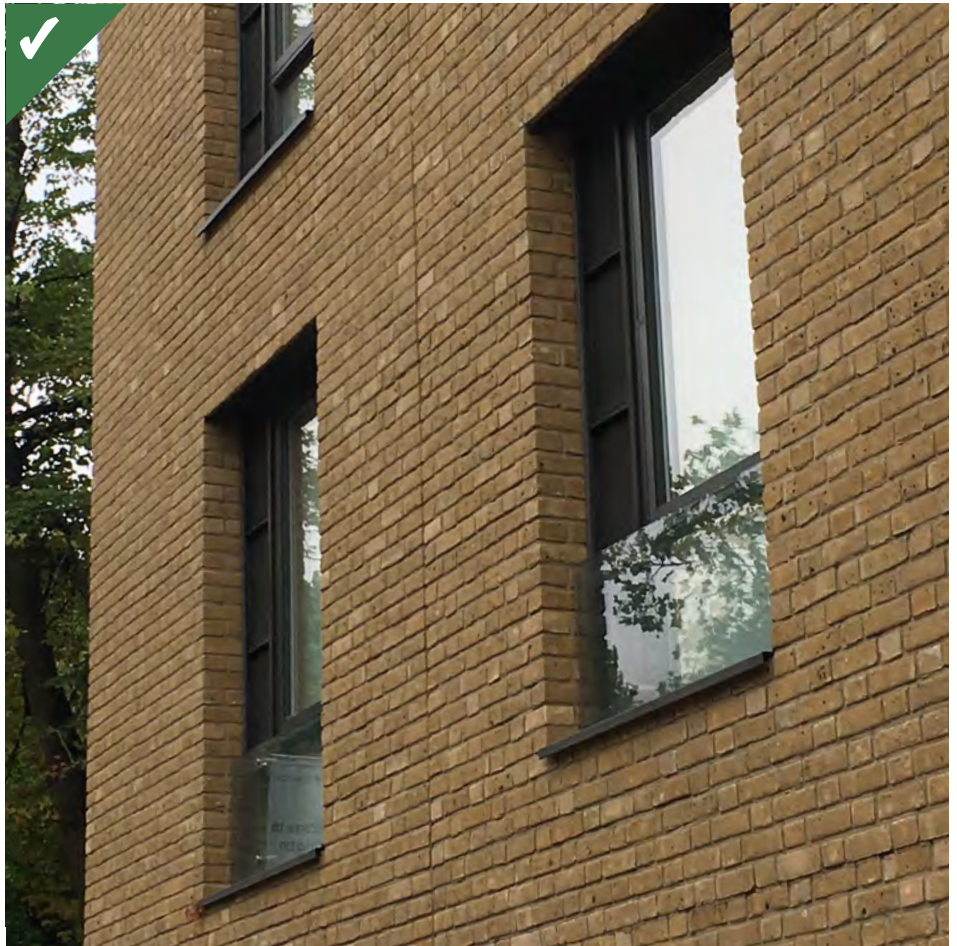


Figure 2.25a: Deep reveals provide a sense of solidness that can add appeal to façades.



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.

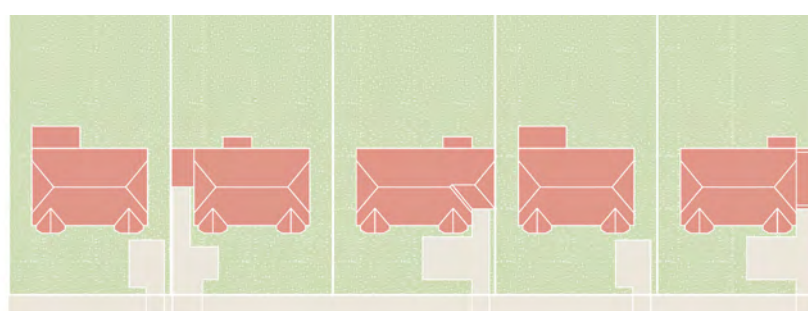
2.28.4 Where subdivision would be visible from the street, proposals should ensure that where there is a consistent pattern of forecourts, driveways and/or boundaries:

- 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.

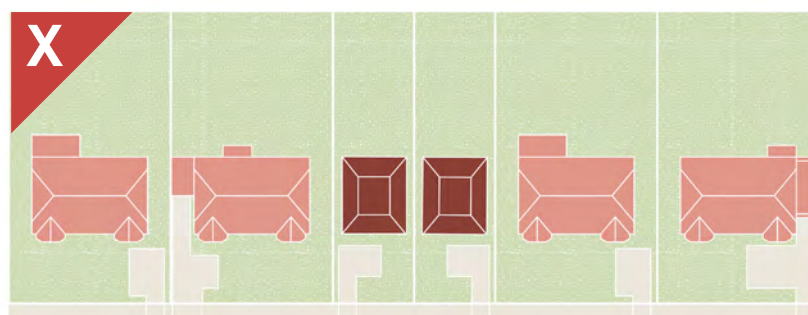
2.28.5 Subdivision will only be acceptable where it doesn't limit the provision of a larger development or the delivery of family homes.



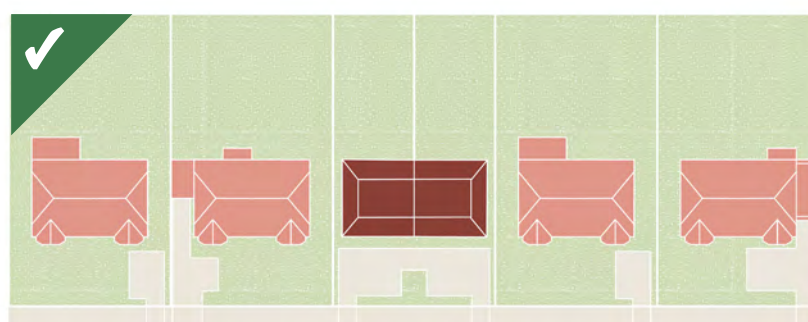
Figure 2.28a: Successful subdivision to provide two new homes, with one to the rear of the plot.



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.

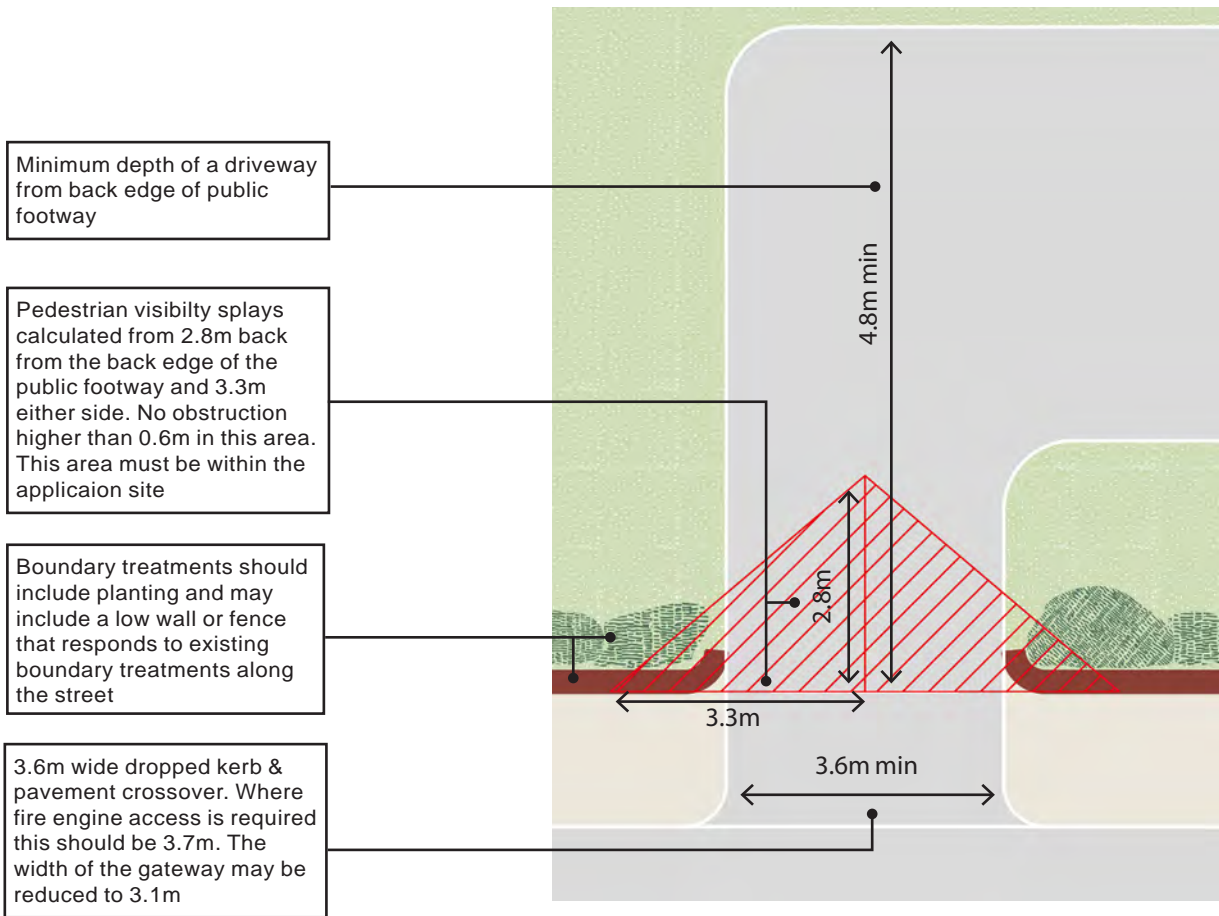


Figure 2.29e: Requirements for entrances and boundary treatments.

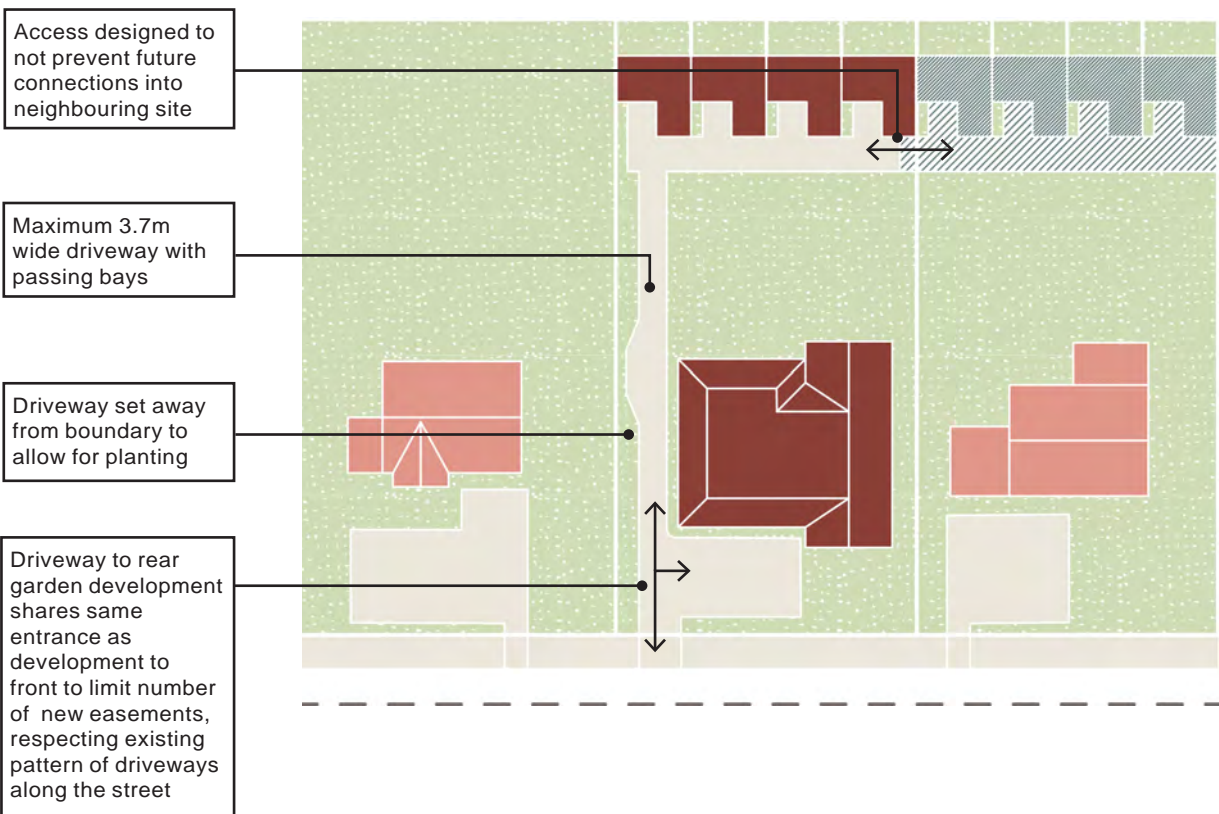


Figure 2.29f: Optimal layout of driveway for redevelopment of a detached home and for to access rear garden development.

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>

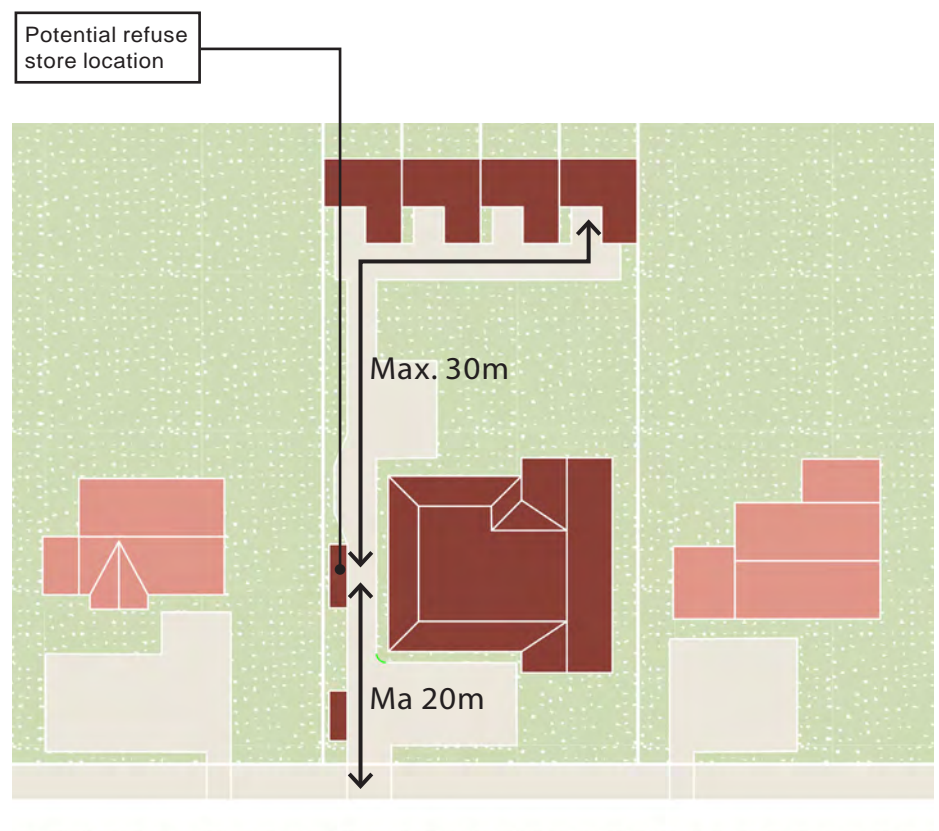


Figure 2.29g: Suitable location of bin stores on sites with limited access for refuse lorries.

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

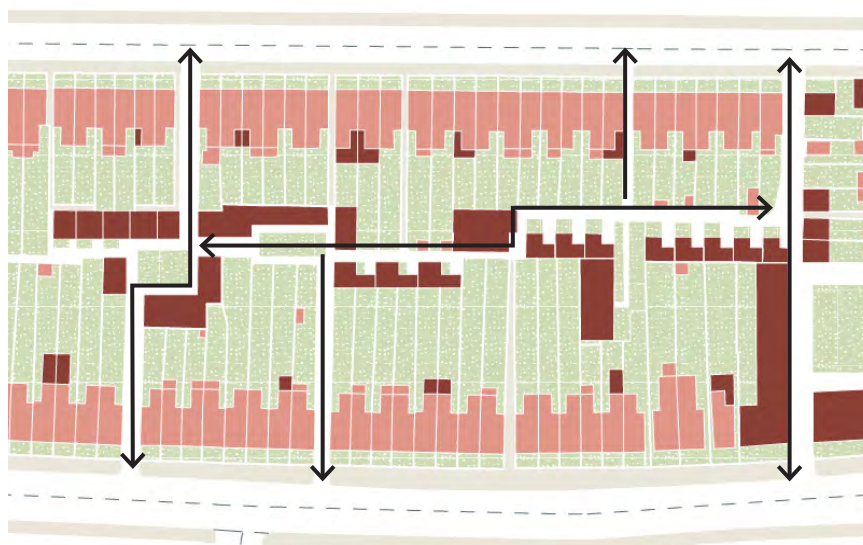


Figure 2.29j: New connections created through suburban block after a series of back land developments

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.



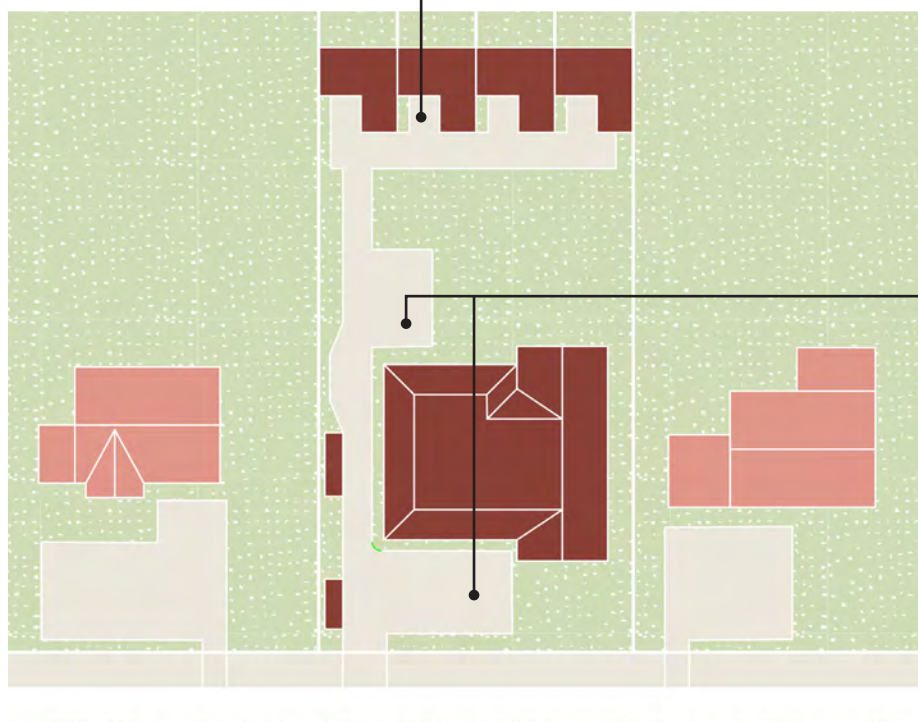
Figure 2.30c: Bays of parking separated by planting.

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.trafficsurveys.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;

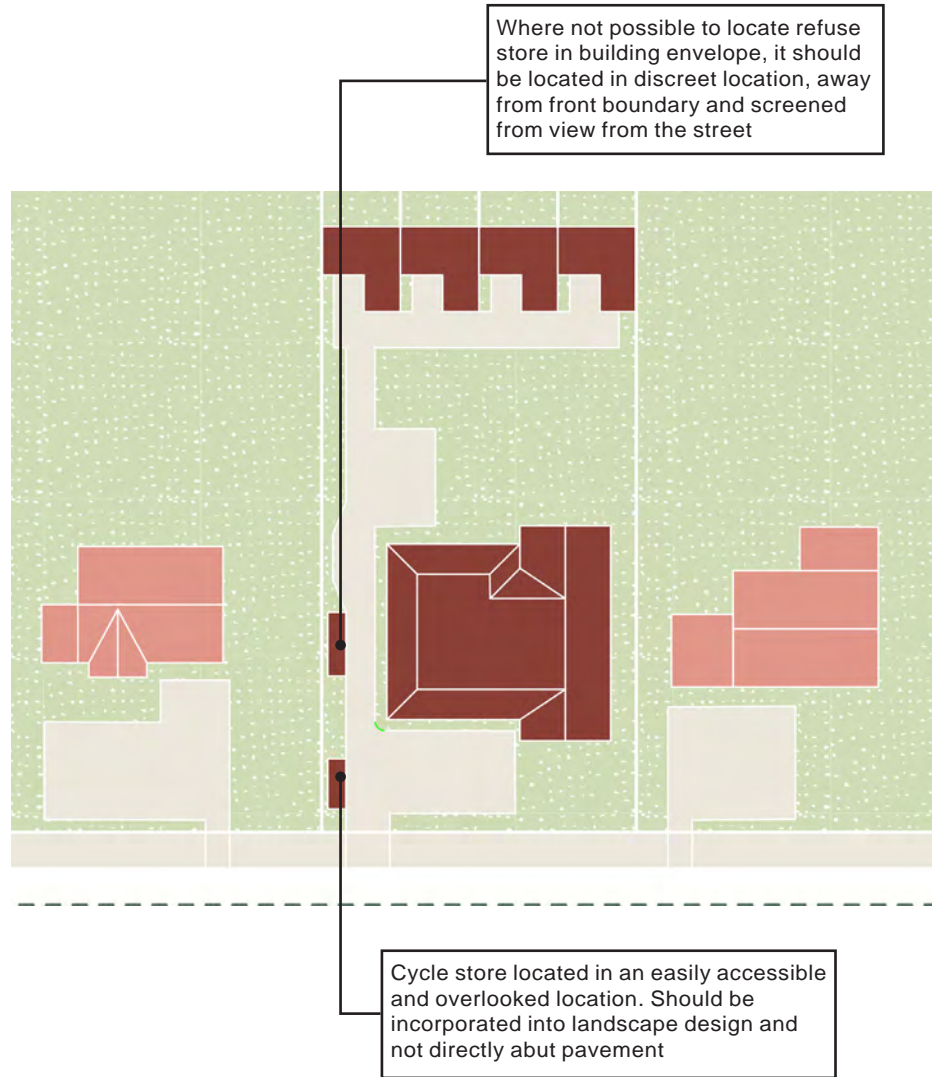


Figure 2.31a: Indicative refuse and cycle storage locations.

- 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.

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.

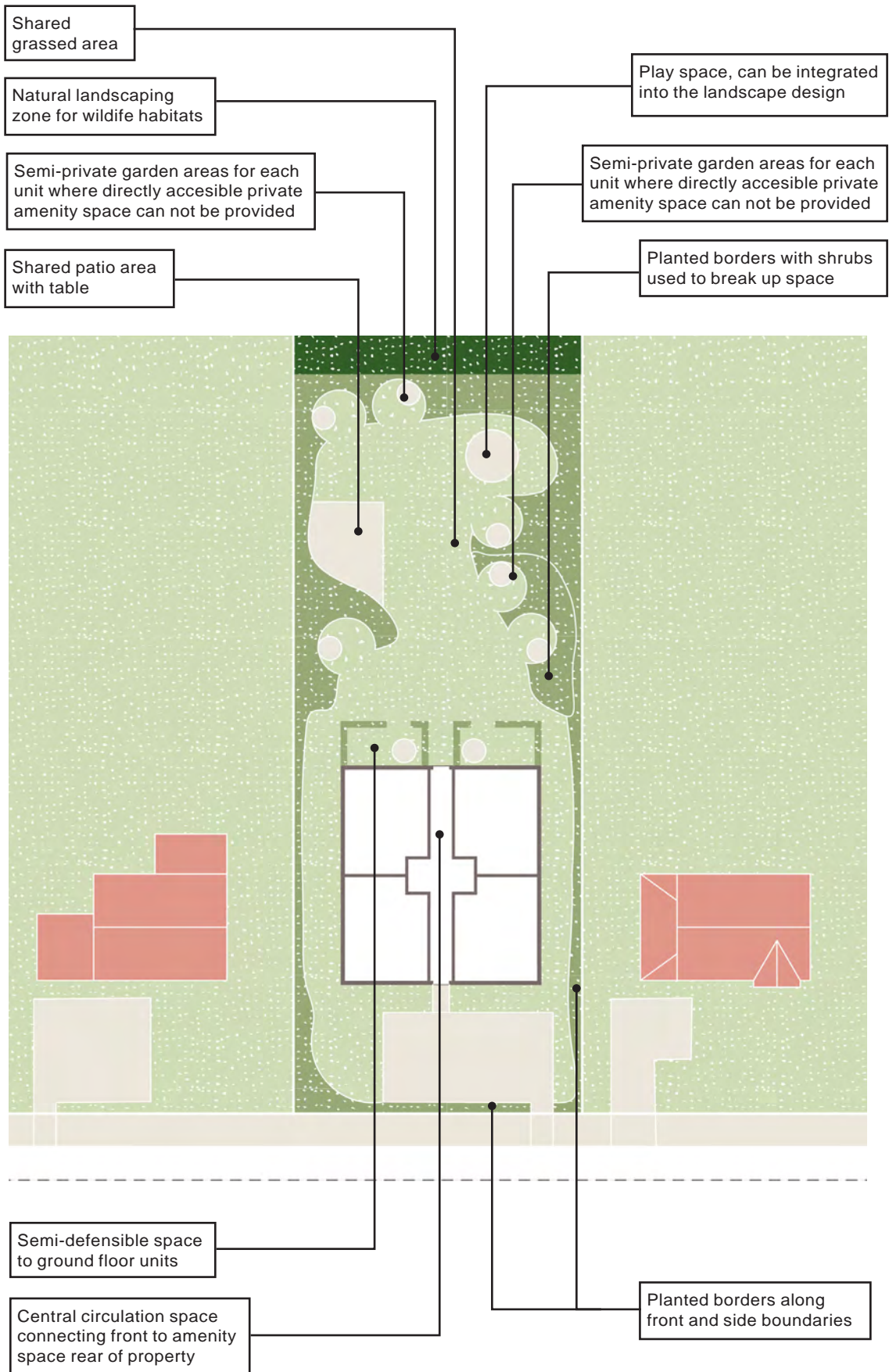


Figure 2.34a: Diagram for a typical shared amenity space layout

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 reinterprets 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

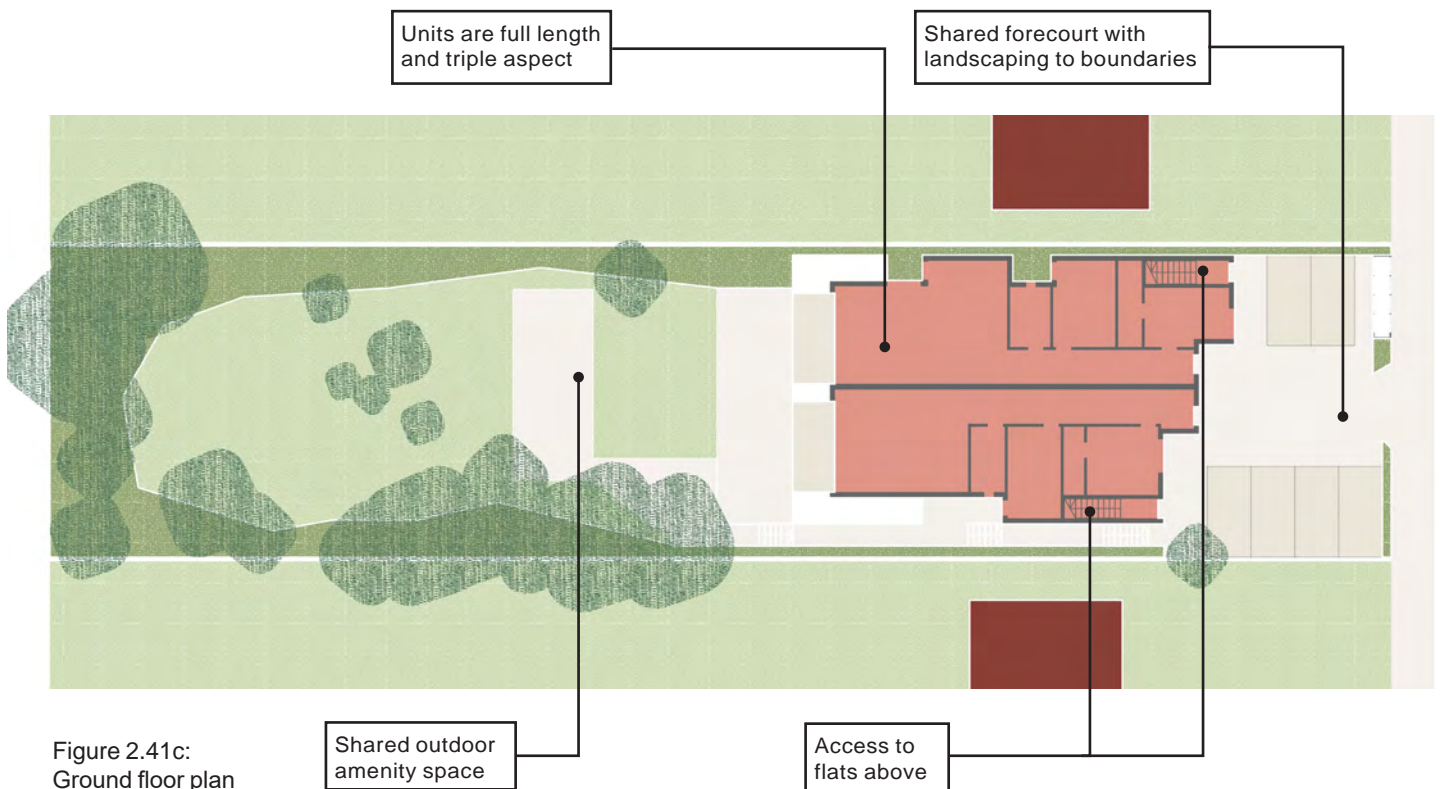


Figure 2.41c:
Ground floor plan

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.

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 2.42a



Figure 2.42b

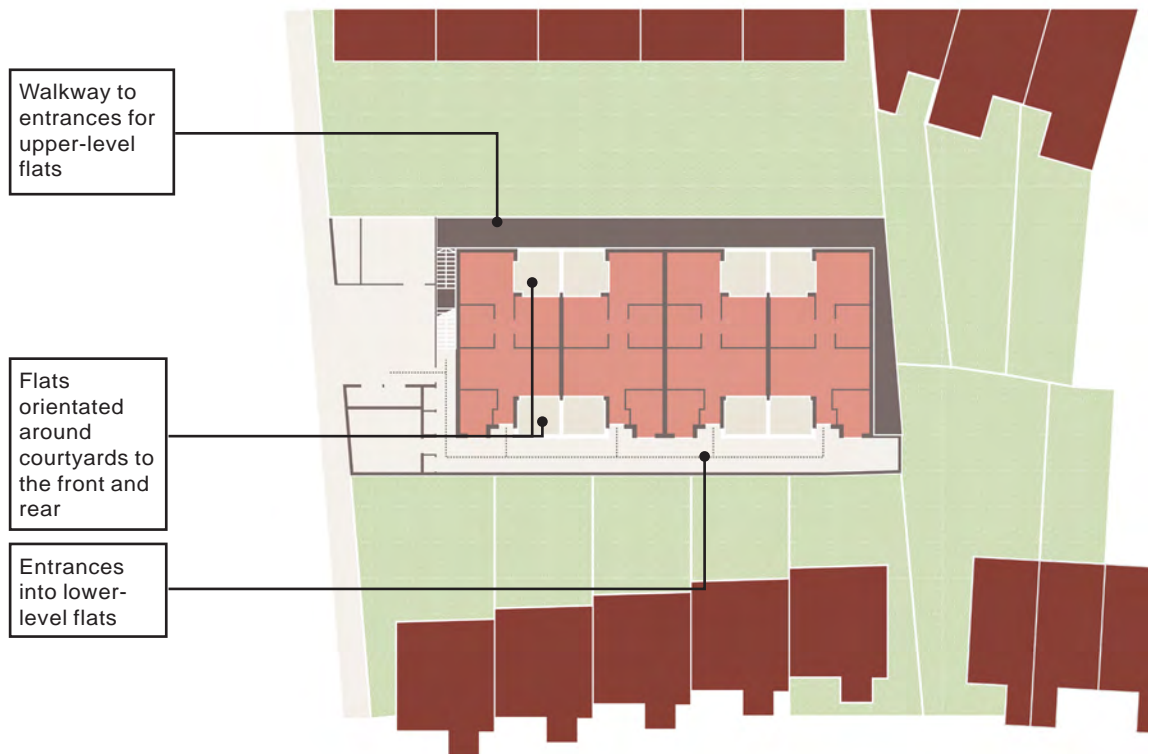


Figure 2.42c: Lower-level plan

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

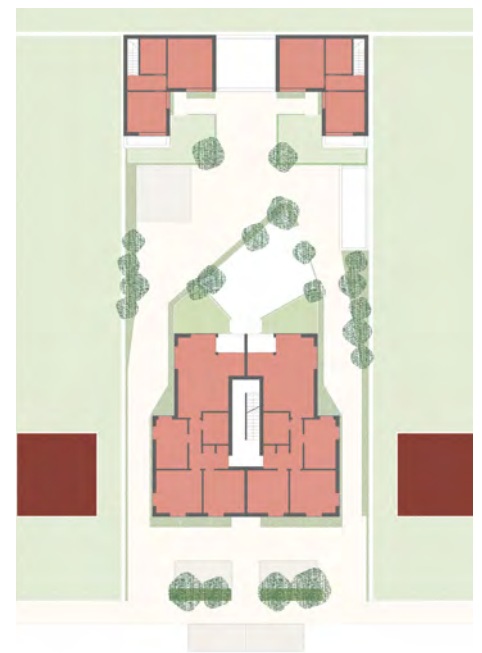


Figure 2.43c: First floor plan

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 block. 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 a bus, and a street with a double-decker bus. A semi-transparent white box with orange text is overlaid in the upper half of the image.

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.

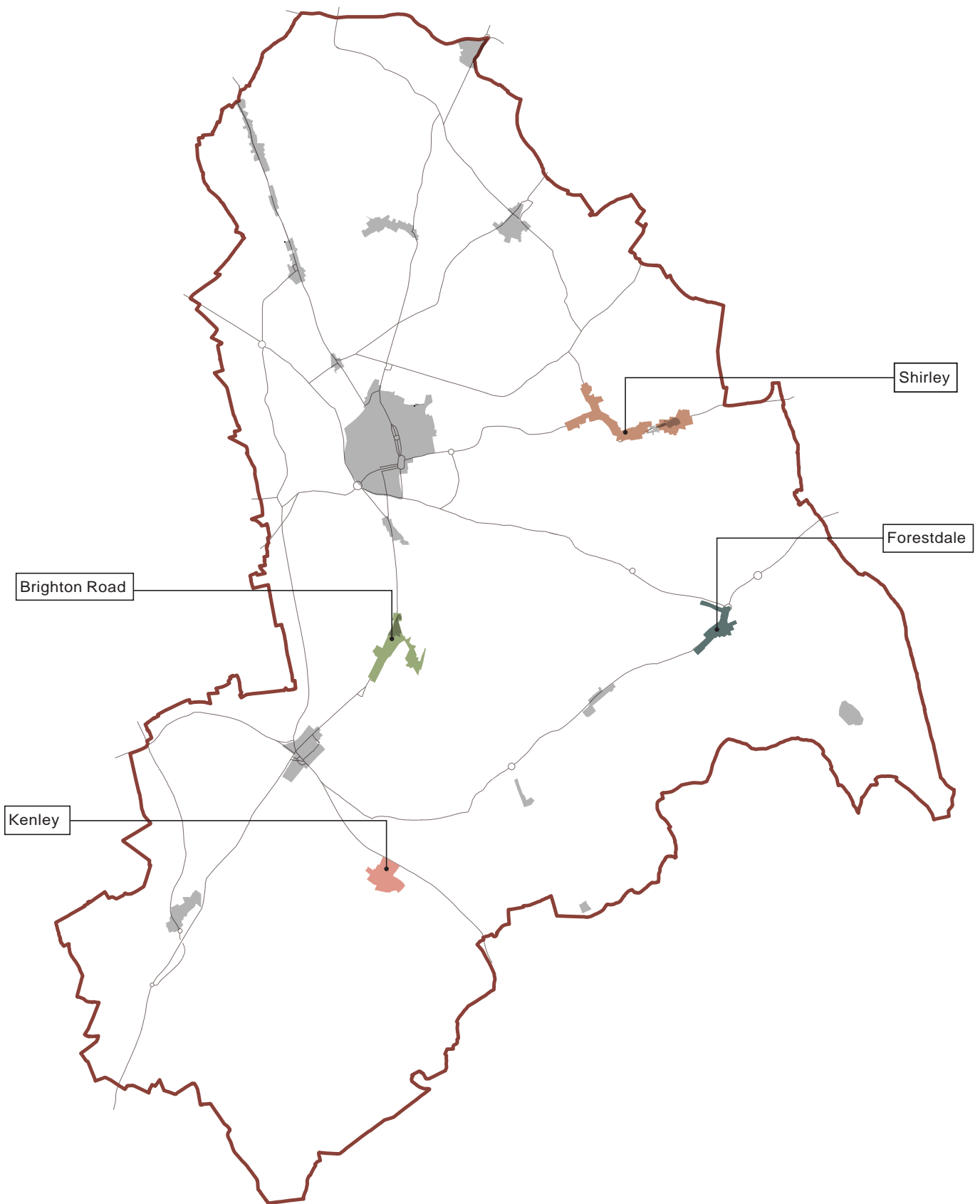


Figure 3.1a: Map of Croydon with Areas of Focussed Intensification highlighted and the Croydon Metropolitan Centre, District Centres and Local Centres shaded in grey which are all expected to accommodate intensification, along with Neighbourhood Centres where they have sufficient capacity for growth, 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

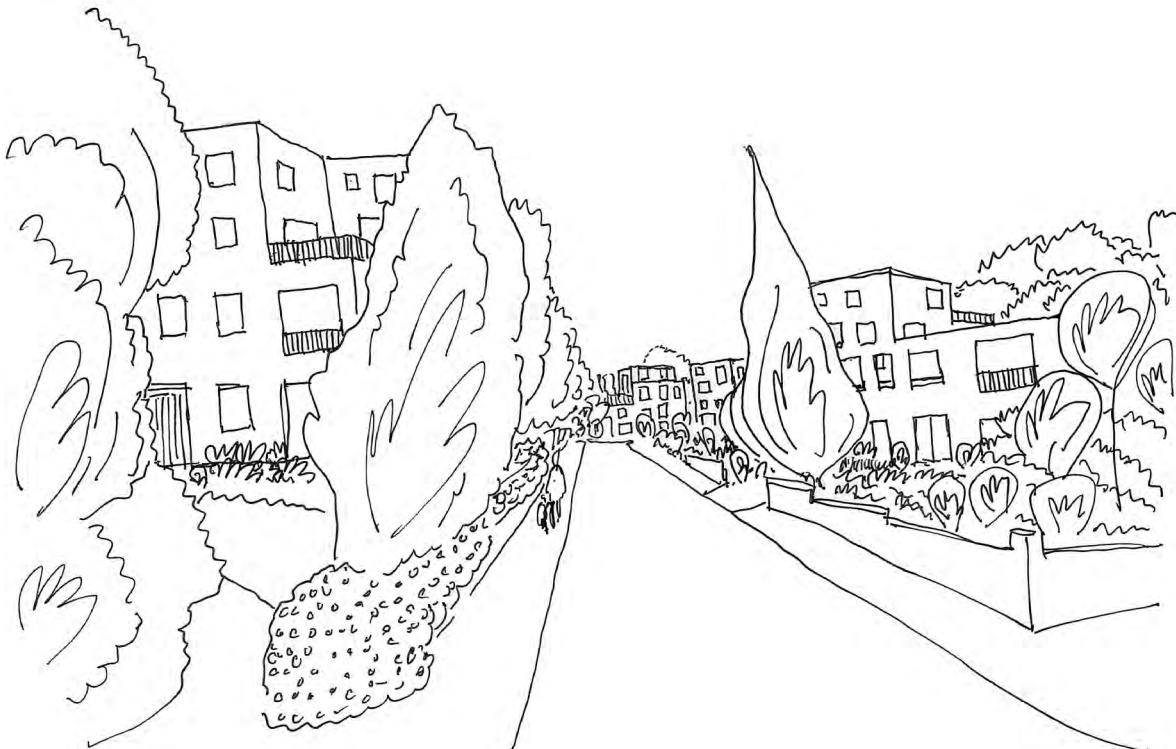


Figure 3.2d: **2036** - Redevelopment provides flats and townhouses set in generous gardens. The leafy character of the street is retained.

EVOLUTION OF AN ARTERIAL ROAD IN AN AREA OF FOCUSED 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

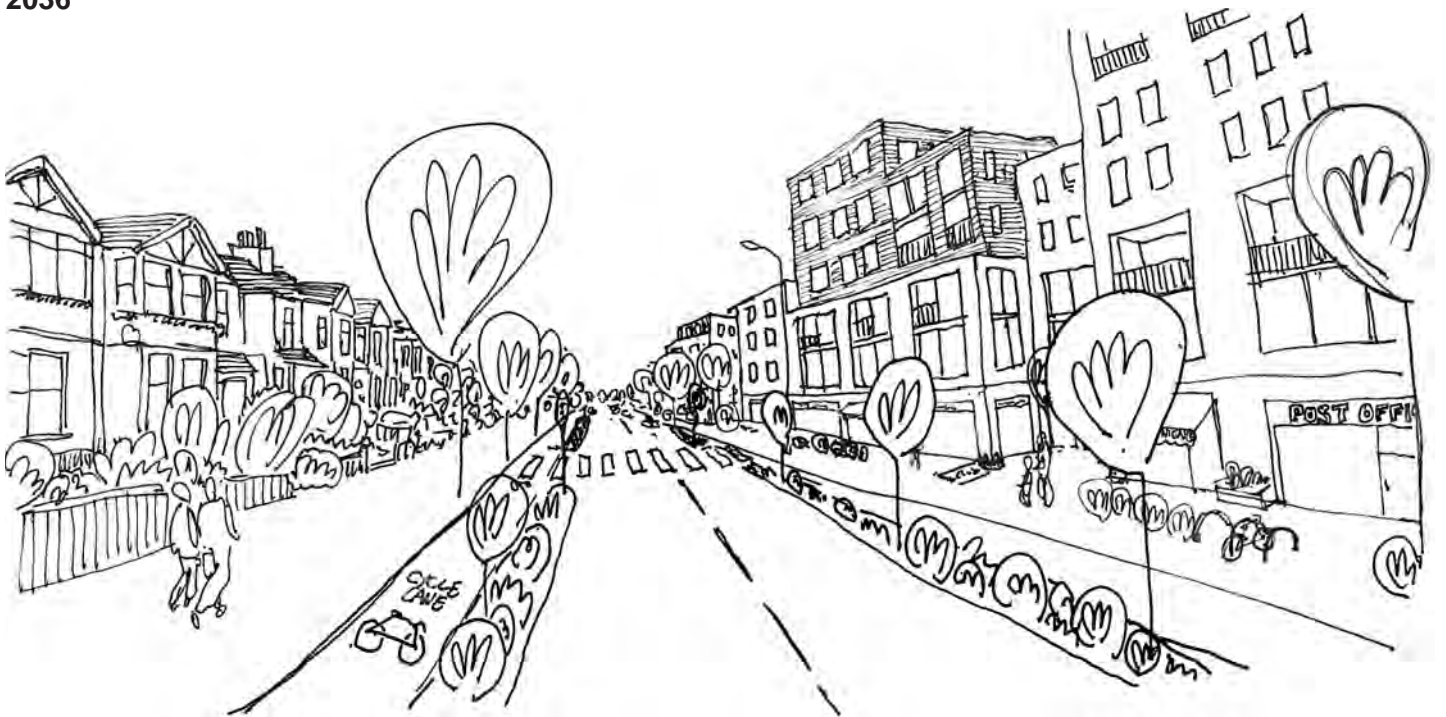


Figure 3.2f: **2036** - New developments of additional height provide an active road frontage, giving it a human scale and reducing the dominance of the road. Through interventions by the Council, or where relevant TfL, the thoroughfare is maintained but adjusted to provide public realm improvements 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.

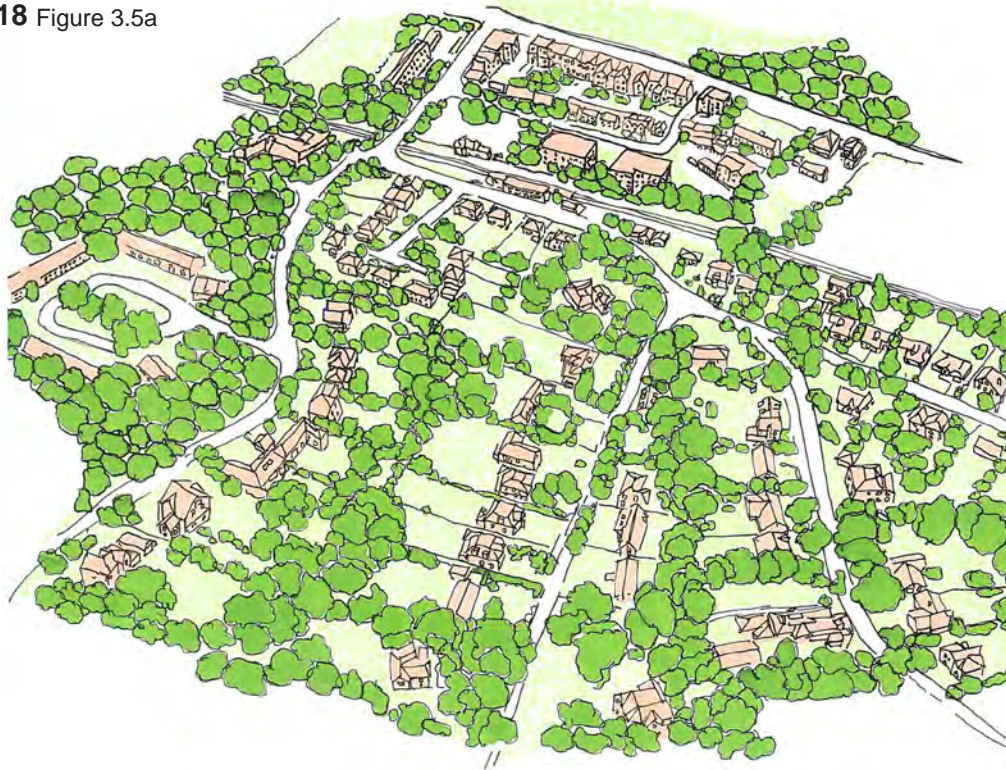


Figure 3.4d: Map with boundary of Kenley Intensification Area (As designated in the Croydon Local Plan)

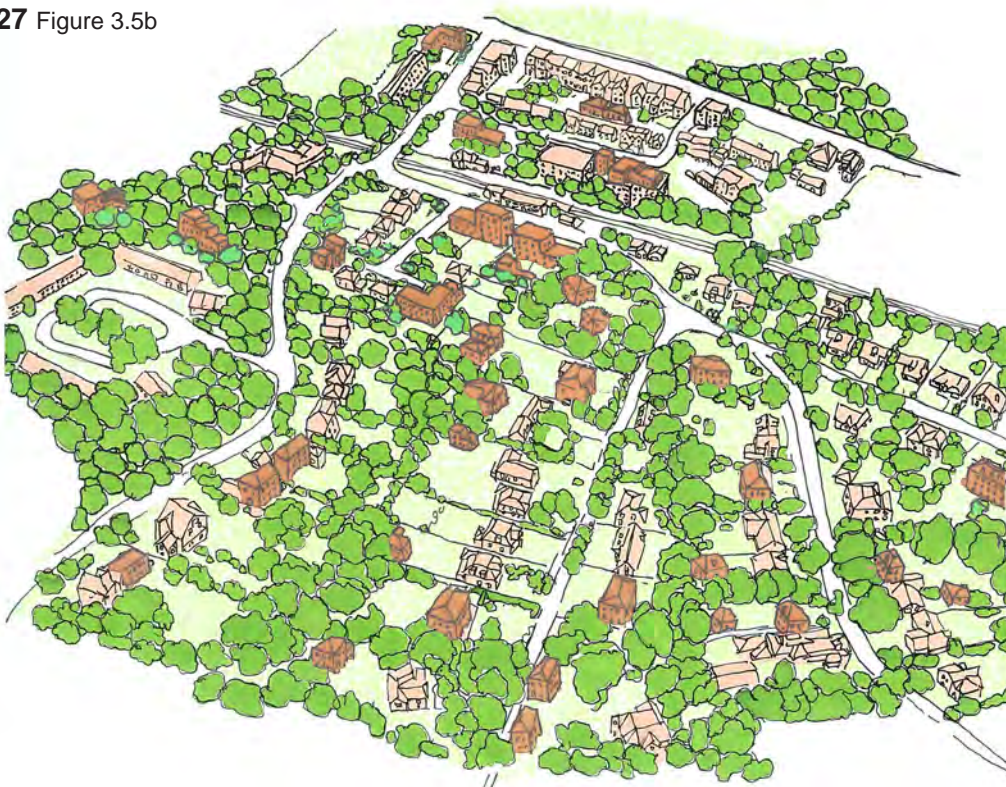
3.5 POTENTIAL DEVELOPMENT SCENARIO (KENLEY)

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.

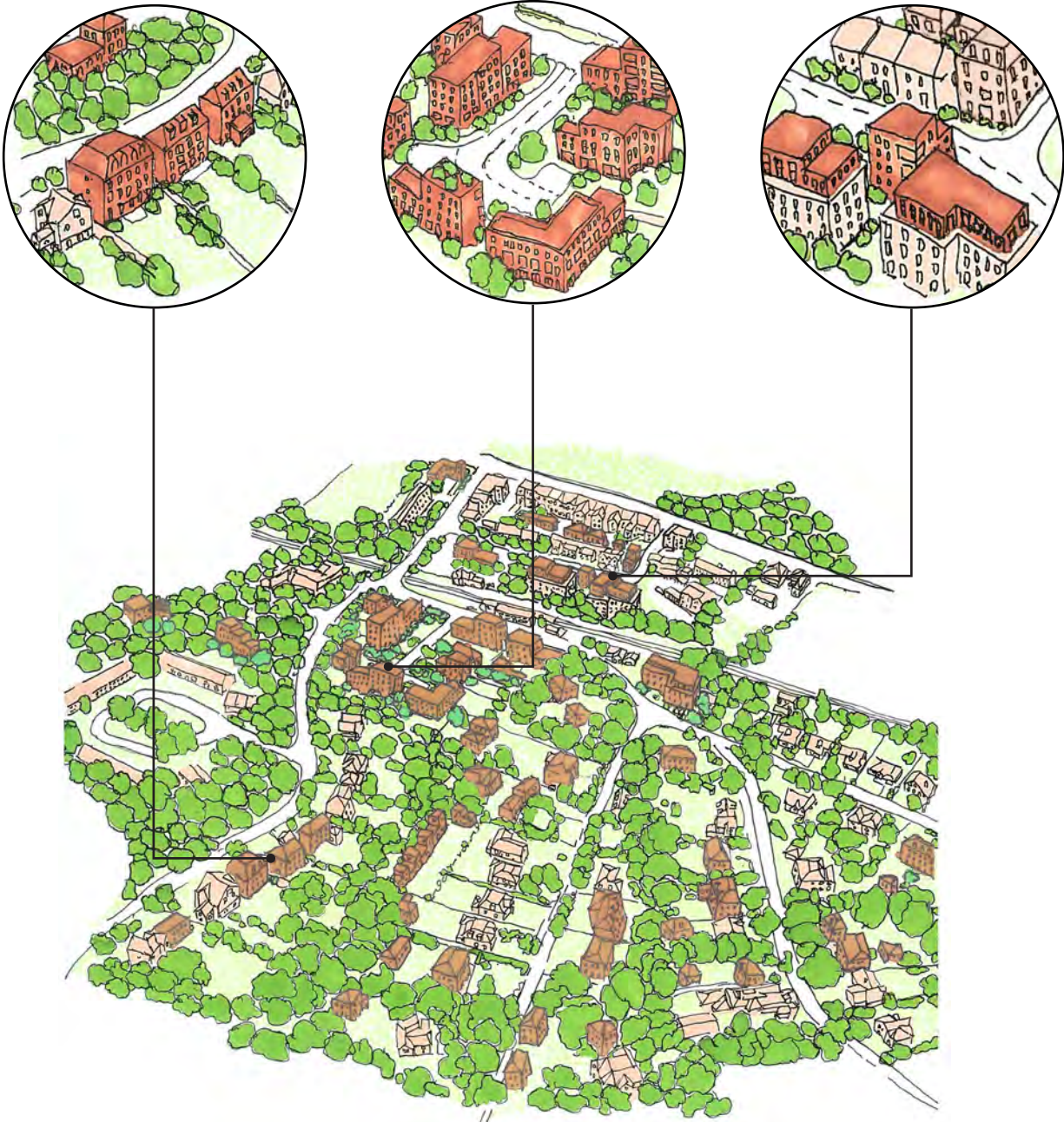
2018 Figure 3.5a



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 garage, 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.

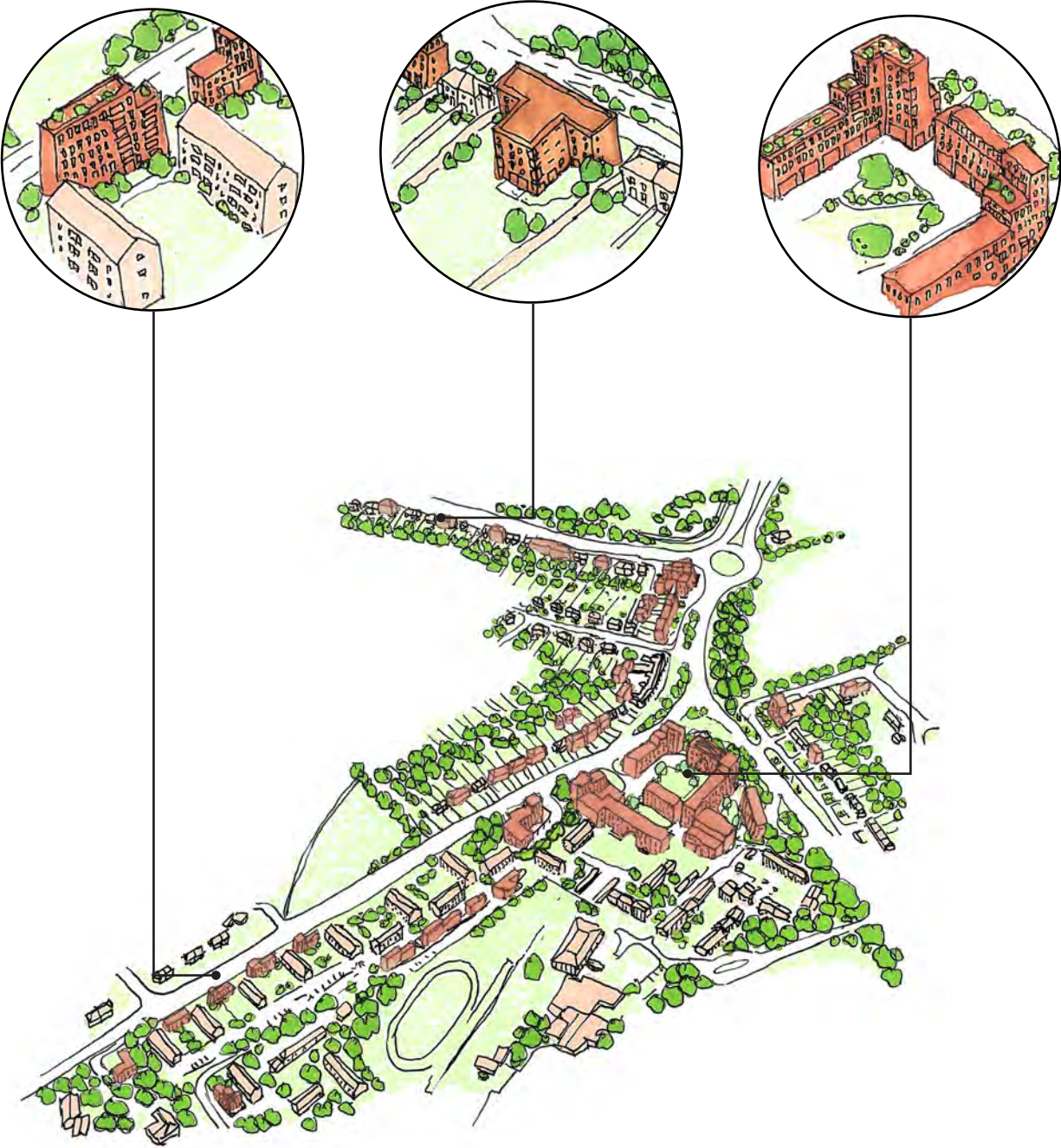
2018 Figure 3.9a



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



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.

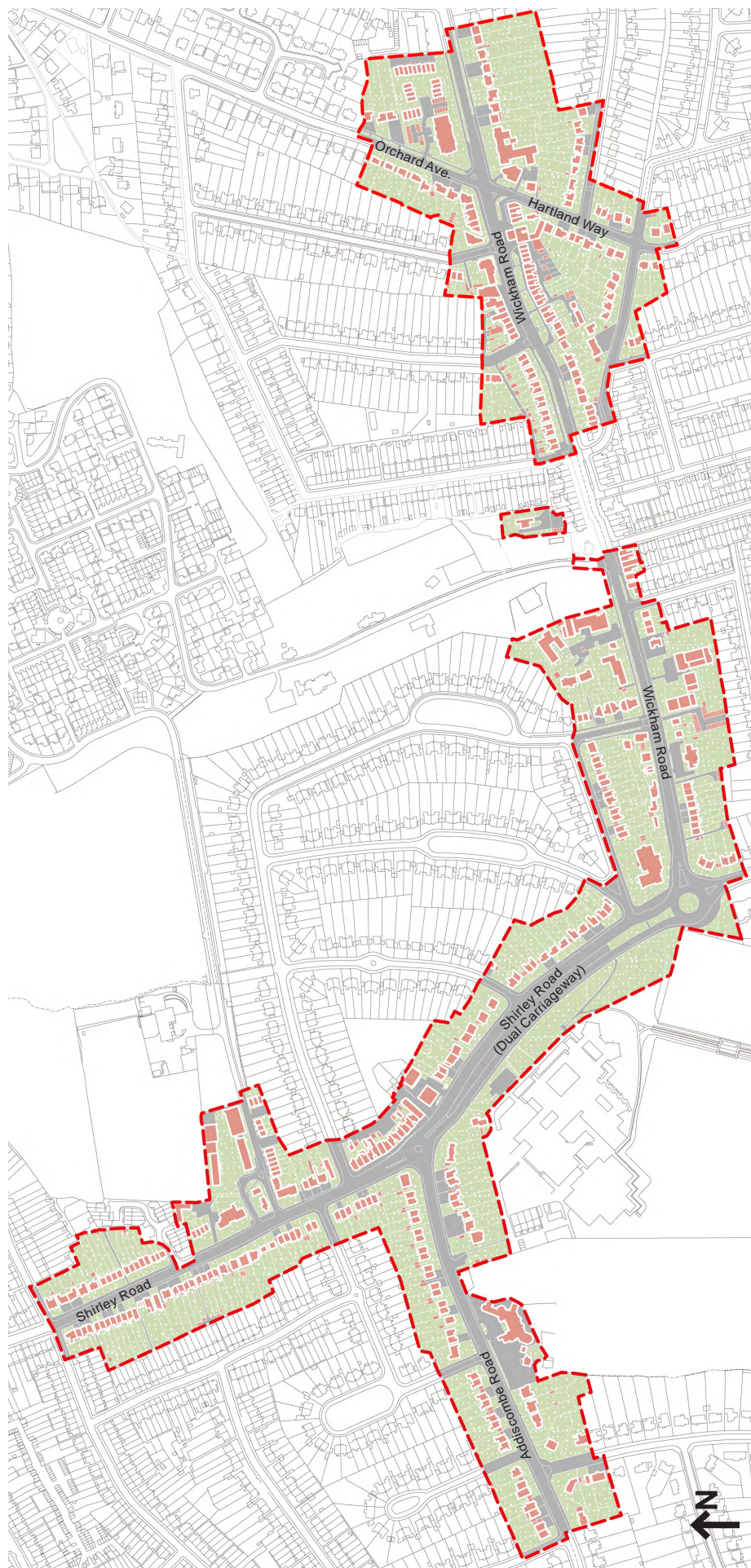


Figure 3.16c: Map with boundary of Shirley Intensification Area (As designated in the Croydon Local Plan)

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:

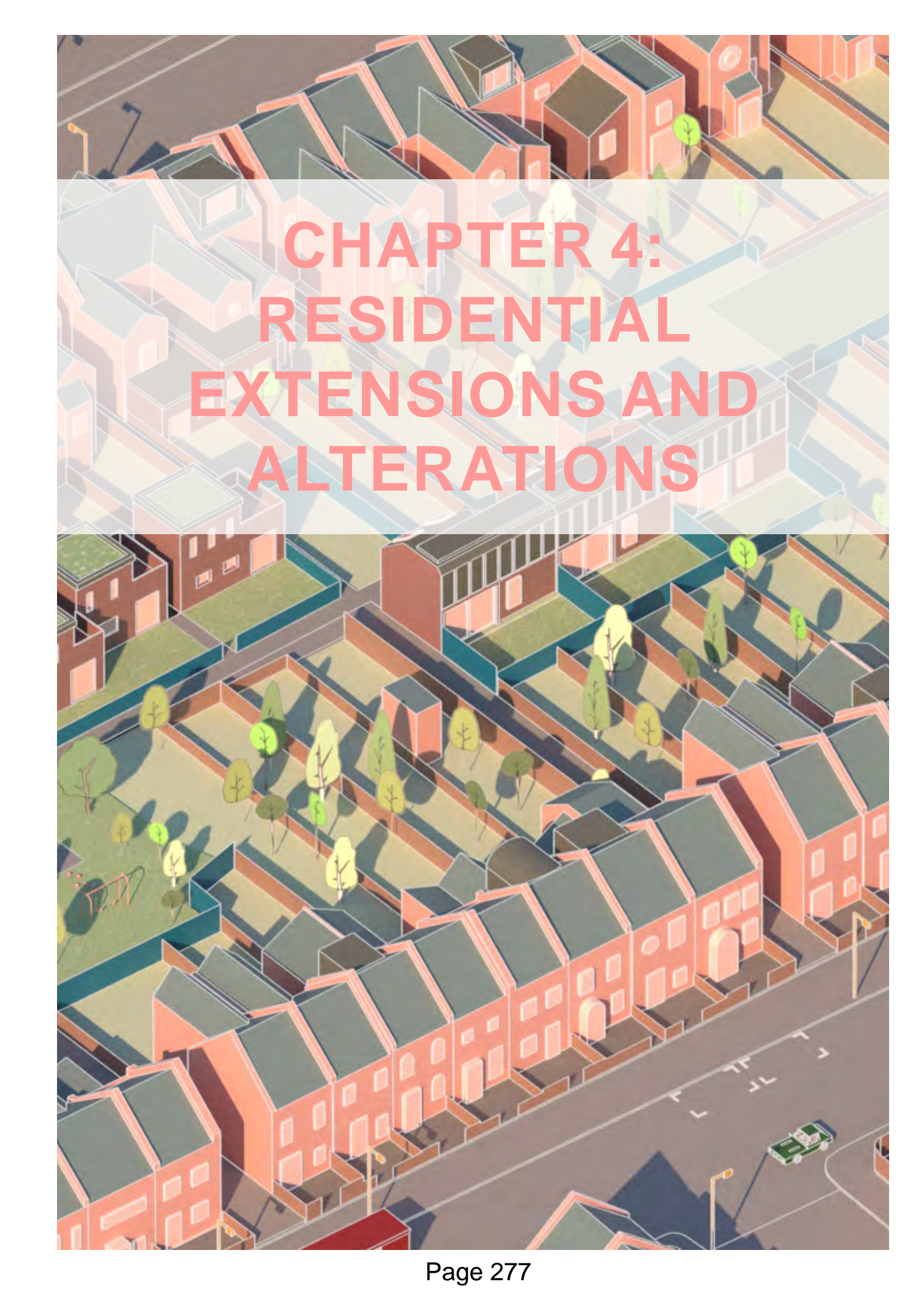
- Larger sites provide opportunities to revise infrastructure provisions to create new mixed-use development potential and increase density.
- Where existing spaces allow, there may be opportunity for infill development.

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 scene is dominated by red brick buildings with dark grey roofs. The buildings are arranged in a grid-like pattern, with some featuring gabled roofs and others with flat roofs. Green spaces, including lawns and small trees, are interspersed between the buildings. A street with a white car is visible in the lower right corner. The overall style is clean and modern, with a focus on architectural details and urban planning.

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 footprint than 3.5m (Refer to Figure 4.11b).

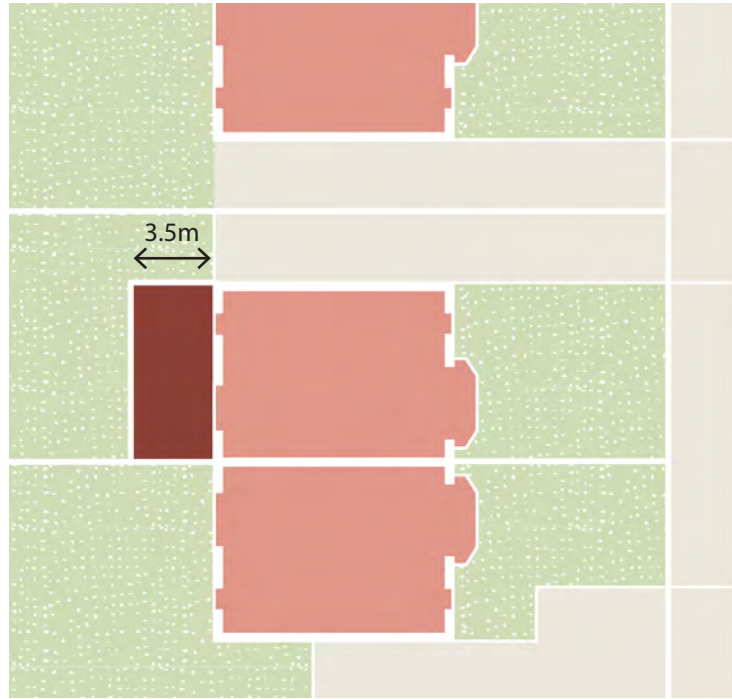


Figure 4.11a: An extension to a terraced house that is no more than 3.5m deep



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).

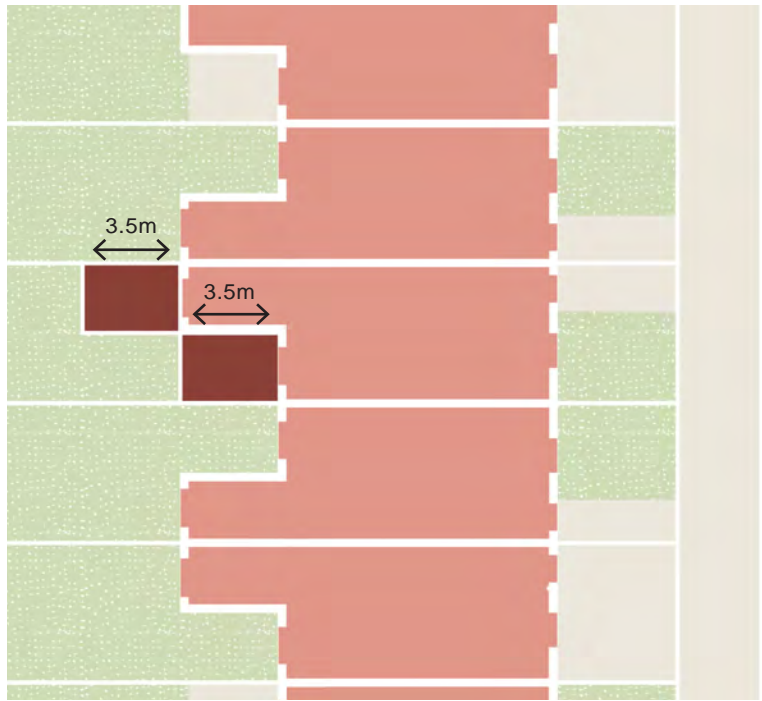


Figure 4.11c: A dog-legged extension where there is an existing outrigger.



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).

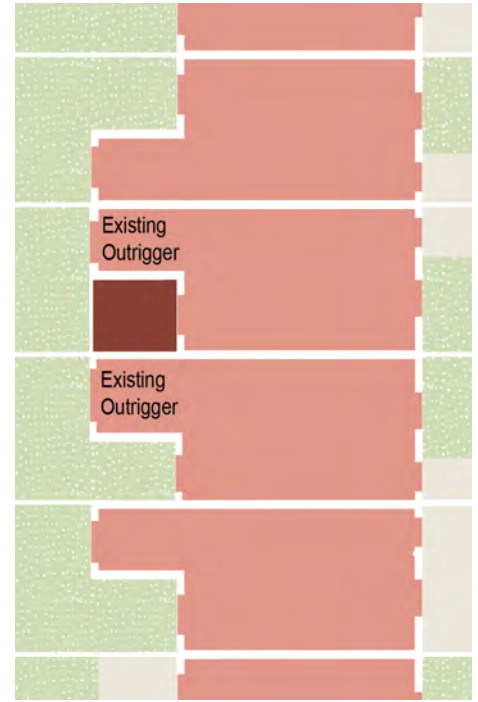


Figure 4.16b: Example of where a two-storey rear extension may be acceptable where it would be infilling between existing extensions / outriggers and would not result in no additional impact on neighbouring amenity.

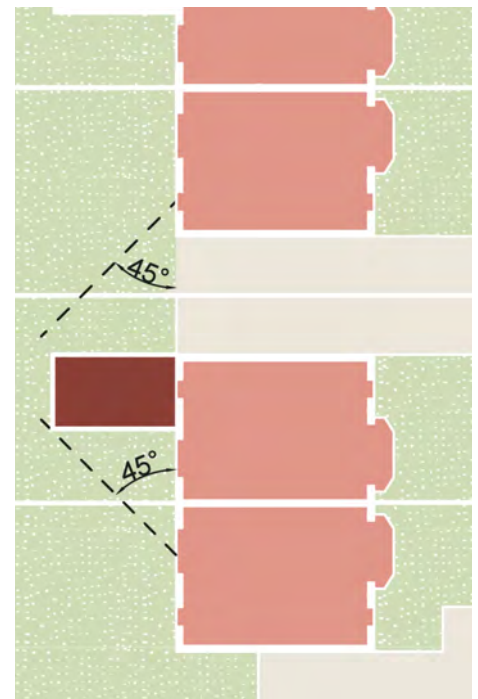


Figure 4.16c: A two-storey extension to a semi-detached house set away from the directly adjoining neighbour.



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).

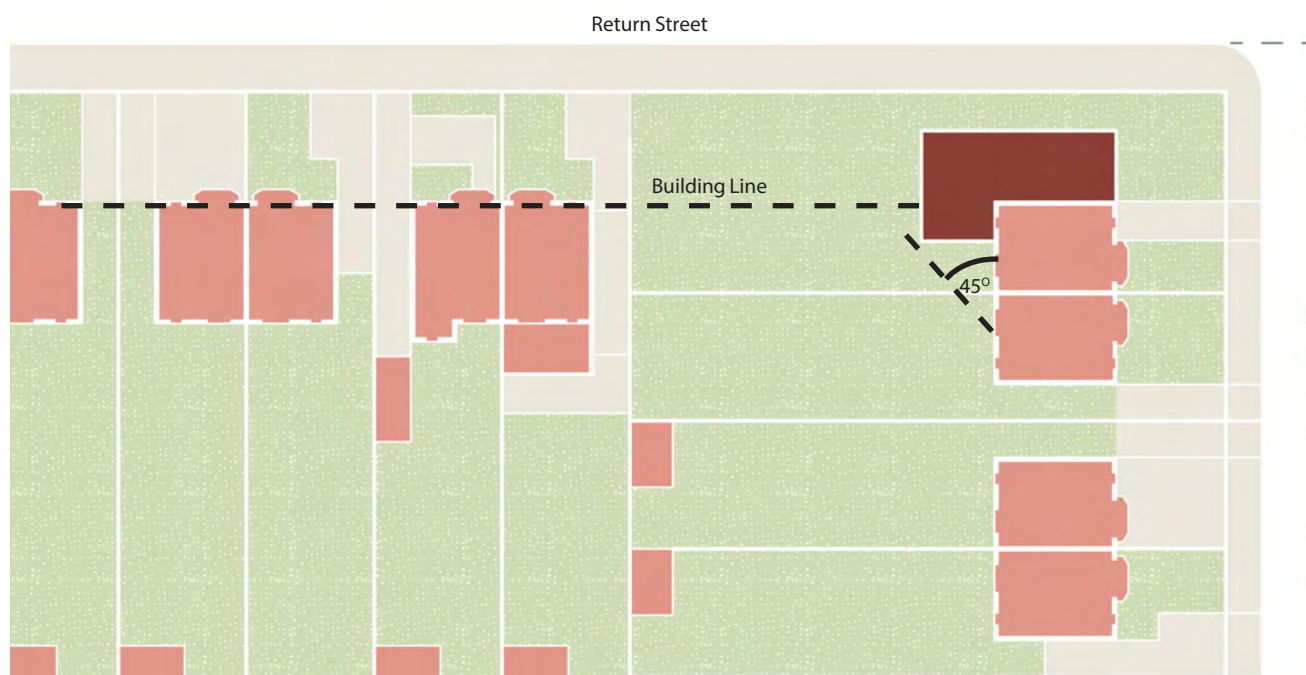


Figure 4.20a: A plan of an acceptable corner plot extension

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

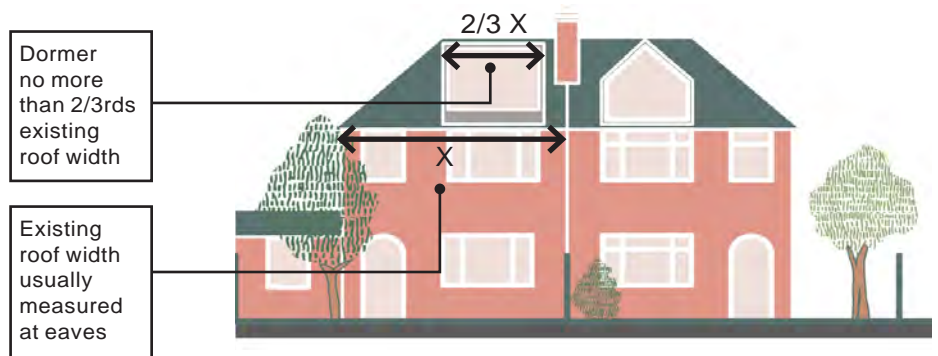


Figure 4.21a: Dormers on a semi-detached or detached house, no more than two thirds the width of the existing roof, and set in from the edge of a hipped roof (or a gable end).



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

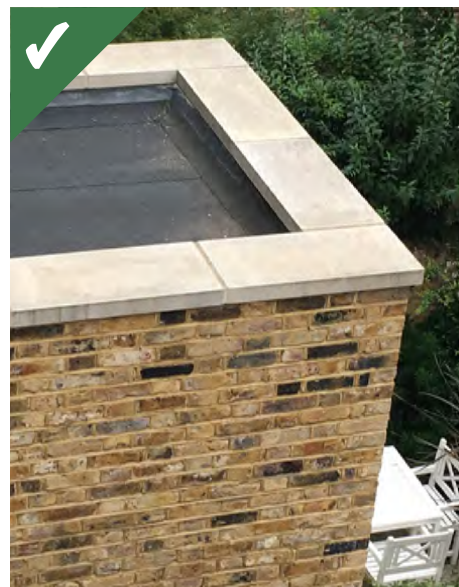


Figure 4.24a: A parapet can be used on a flat roof to remove the need for gutters, creating a less cluttered appearance.

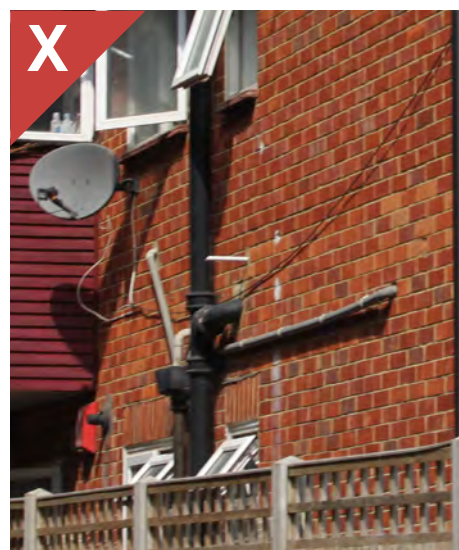


Figure 4.24b: Poorly considered pipework on a side extension, visible from the street.



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.

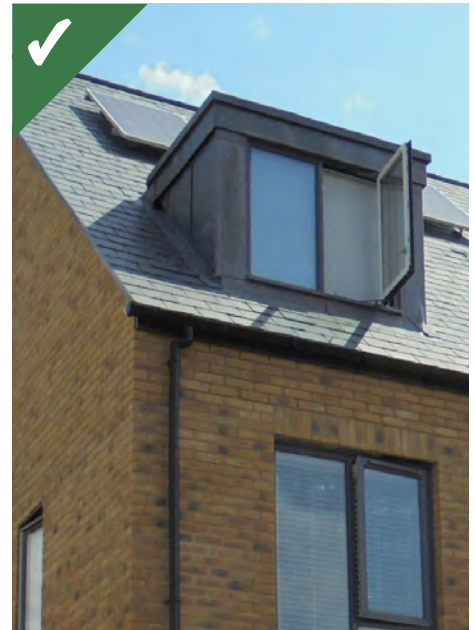


Figure 4.25b: An example of well-designed dormer window, set in from the edges of the roof, with a simple frame that does not draw the attention of the eye.

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.

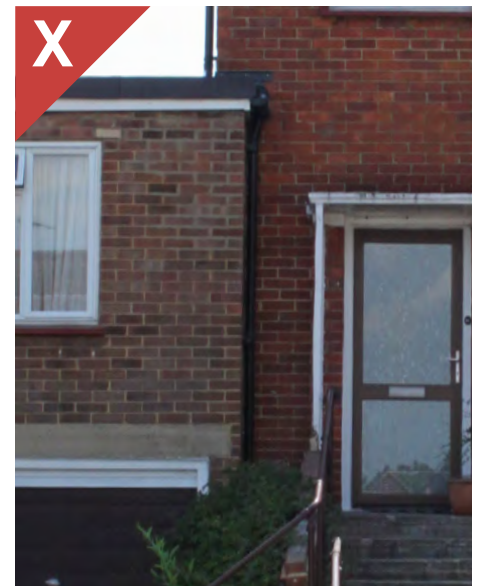


Figure 4.26b: An example of a side extension that attempts to match the existing brick work but fails to do so.



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.

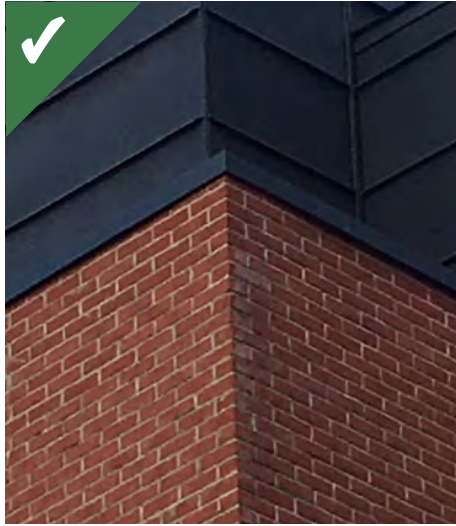


Figure 4.27a: Standing seam metal and brick.

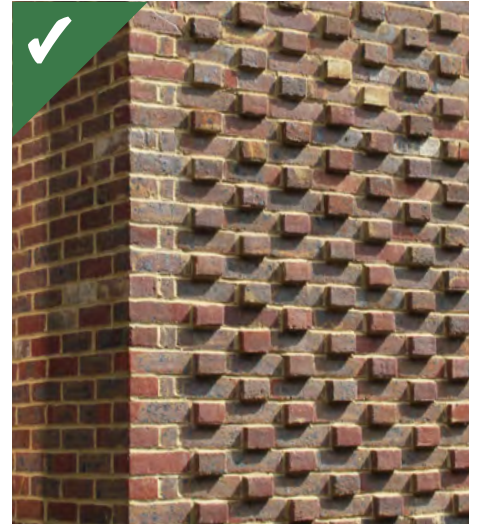


Figure 4.27d: Patterned brickwork.



Figure 4.27b: Crafted wooden shingles.



Figure 4.27e: Stepped courses of brickwork.

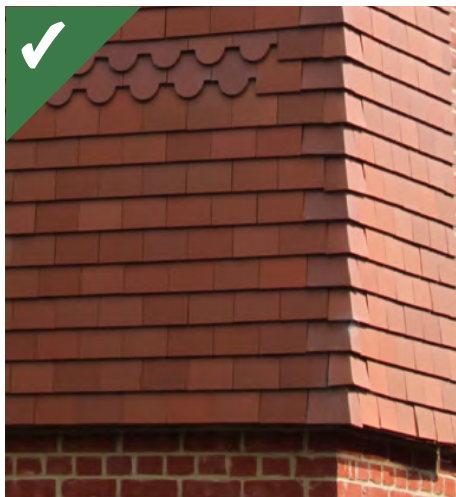


Figure 4.27c: Hung tiles, including decorative tiles.

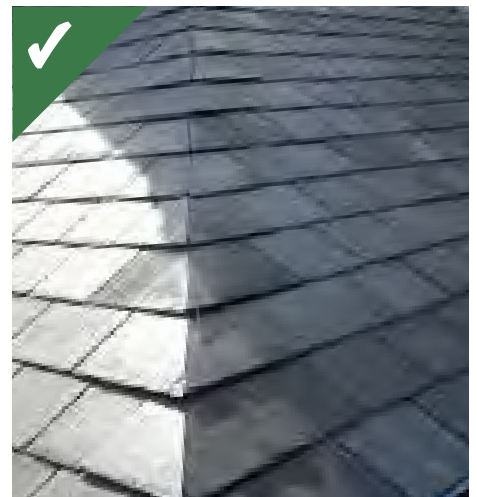


Figure 4.27f: Slate tiles.

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 providing 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.

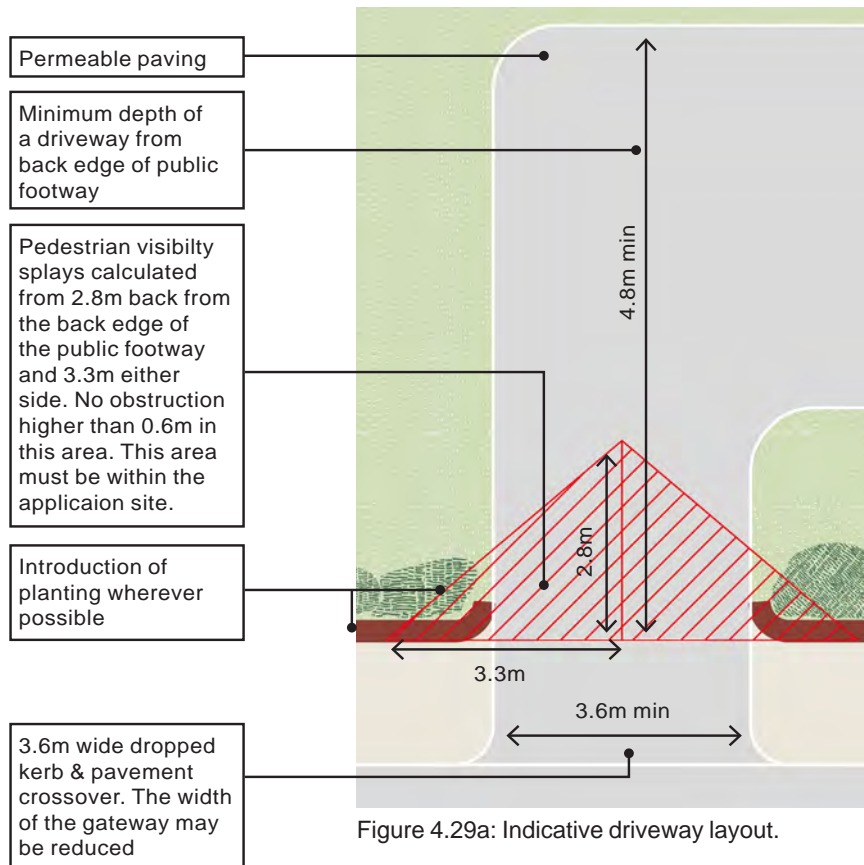


Figure 4.29a: Indicative driveway layout.

- 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.

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- 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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Croydon Council

Equality Analysis Form

Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

A partial review of the Croydon Local Plan: Strategic Policies with changes to the following policies:

SP2- Homes
SP3- Employment
SP4- Urban Design and Local Character
SP5- Community Facilities
SP6- Environment and Climate Change
SP7-Green Grid
SP8- Transport and Communication

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

The Croydon Local Plan: Strategic Policies was adopted in April 2013. A partial review of the Strategic Policies is required to take account of the Further Alterations to the London Plan (FALP). The FALP has increased Croydon’s housing requirement from 1,330 homes per annum to 1,435 homes per annum. As a result, a review of policy SP2: Homes is required to take account of updated evidence on the need for homes, affordable housing and additional pitches for the gypsy and traveller community. Changes are

proposed to SP3, SP4 and SP5 in light of updated evidence on employment site designations, a move from Local Areas of Special Character to Local Heritage Areas and the protection given to community facilities. Changes to SP6: Environment Climate Change have been made in light of the FALP and National Housing Standards. Changes to SP7 include amendments to Green Grid designations from Metropolitan Green Belt to Metropolitan Open Land, additions to the Metropolitan Green Belt, and De-designation of Metropolitan Open Land in Shirley Oaks as it does not meet the criteria for designation. Changes to SP8: Transport and Communication are in light of planned transport infrastructure projects and improvements.

1.1.3 What stage is your change at now?

See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

The Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) was consulted on from 6 November 2015 to 18 December 2015, post Cabinet on 21 September 2015. The draft Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) takes into consideration the responses to the November 2015 consultation on the Strategic Policies – Partial Review.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

The wider community, including residents, visitors, developers and those who work within the borough of Croydon.

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

The partial review of the Croydon Local Plan: Strategic Policies Partial Review will result in an up to date Local Plan. It will ensure the borough addresses its housing need, provides local employment opportunities, provides community facilities and improves accessibility through planned transport and infrastructure projects, and has its green space correctly designated to enable its protection from inappropriate development.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes, equalities issues relate to:

- Ensuring access to affordable housing and reducing deprivation, homelessness and overcrowding.
- Creating and protecting local education and employment opportunities which can be accessed by all residents.
- Ensuring the provision and protection of community facilities and associated local services which are accessible to all residents.

- Ensuring the continued protection of Croydon's open spaces that service the local community and Metropolitan Open Land, and that they are accessible to all.

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?

You can find out from the Equality Strategy <http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes, the proposed change relates to a service area where there are already local equality indicators. It relates to a number of strategic priorities in the council's Equality and Inclusion Policy as listed below:

- Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion
- Encourage local people to be independent and resilience by providing responsive and accessible services offering excellent customer care

1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	<p>Meeting Croydon's housing need should increase the number of Lifetime Homes and the number of homes which are wheelchair accessible.</p> <p>Planned infrastructure projects and improved public transport will offer greater access to employment opportunities, local services and community facilities.</p>	<p>Population projections show a significant growth in the number of households with disabilities over the lifetime of the Plan. Excluding care homes from the community facilities definition will mean care homes are no longer protected from redevelopment for other uses. While there is currently an oversupply of residential care houses, there is a potential risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future.</p>
Race/ Ethnicity	<p>Black ethnic minority groups have a requirement for larger homes and are more likely to live in overcrowded housing. They are also less likely to be owner occupiers. Meeting Croydon's housing need should reduce the number of families in overcrowded homes, increase the number of houses with three or more bedrooms and provide a greater amount of affordable housing.</p> <p>The partial review responds to updated evidence for additional pitches to provide for Gypsy and Traveller accommodation. The changes will ensure the Plan addresses the needs of gypsies and travellers in future site allocations.</p>	N/A
Gender	<p>Lower wages and part-time work mean women can have difficulty in</p>	N/A

	<p>accessing affordable housing with more reliance on social housing. Increased requirements for affordable housing, particularly social rent, can improve women's access to suitable housing. Single parents also often rely on social housing and are less likely to be owner occupiers and live in overcrowded housing. Meeting Croydon's housing need is likely to reduce the number of families living in overcrowded housing.</p> <p>As women often have responsibility for domestic work and parental care, they are more likely to work closer to home and/or in part-time employment. Protecting existing office stock in the Opportunity Area and protecting industrial and employment uses offers local employment opportunities. The designation of Neighbourhood Centres and the focus on the provision of community facilities can assist in balancing women's role in domestic work and paid employment.</p> <p>Women are less likely to have access to a car and rely more on public transport. Planned infrastructure projects and improved public transport offer greater access to employment opportunities, local services and community facilities.</p>	
Transgender	N/A	N/A
Age	<p>Young people often have difficulty in accessing housing due to lower incomes and difficulties in securing mortgages. Meeting Croydon's housing need and increasing the number of affordable homes and starter homes will give young people more opportunities to access suitable housing and live independently.</p> <p>Protecting existing office stock in the Opportunity Area and protecting industrial and employment uses offers local education, skills training and employment opportunities for young people.</p> <p>Single pensioners have a high demand for affordable housing, particularly social rent. Meeting Croydon's housing need and increasing the amount of affordable</p>	<p>Older people have requirements for specialised types of housing. While there is currently an oversupply of residential care houses, removing them from the definition of community facility would mean that they are no longer protected from redevelopment for other uses. There is a potential risk that removing this protection means the supply of residential care houses may not meet increasing demand for people with disabilities in future.</p>

	<p>housing will mean older people have access to suitable housing. It will also increase the number of Lifetime Homes.</p> <p>An increase in the housing stock available would increase choice, and may help encourage downsizing of housing types for older generations, freeing up larger homes for young families.</p> <p>Planned infrastructure projects and improved public transport offer greater access to employment opportunities, local services and community facilities for older people and young people who are less likely to have access to private transport.</p>	
Religion /Belief	The identification and designation of Neighbourhood Centres offers greater opportunities for the provision of community facilities. This will improve access to facilities for faith groups.	N/A
Sexual Orientation	The identification and designation of Neighbourhood Centres offers greater opportunities for the provision of community facilities. This will improve access to facilities for sexual orientation groups.	N/A
Social inclusion issues	An increase in affordable housing and a requirement for a mix of housing by type and tenure offers opportunities for all groups to access suitable housing, particularly young people, women, single parents and older people. Protecting offices and industrial and employment uses ensures that local employment, education, and skills training is available in the borough for all groups.	N/A
Community Cohesion Issues	An increase in affordable housing requirements in residential development increases community cohesion by creating mixed communities, and enhancing social interaction between different ethnicities, religion, gender, race and other protected groups. Residents from different groups would also have increased access to a variety of housing options which are suitable for their diverse needs. The designation of neighbourhood centres and the opportunity for a greater provision of community facilities offers different groups and communities access to the same local facilities and services.	N/A

	Further, the protection of public houses as community facilities retains and expands the opportunities for more local community facilities, social interaction and cohesion.	
Delivering Social Value	The proposed changes to the Croydon Local Plan: Strategic Policies delivers social value by ensuring the borough meets its housing need. This provides social benefits such as improving health and wellbeing through reduced overcrowding and ensuring that all residents have access to suitable housing. It provides economic benefits by protecting the borough's employment uses to ensure local employment, education and skills training opportunities. An improvement to public transport offers social and environmental benefits by improving access to services for all groups and also reducing car use in the borough, improving air quality, thus health and wellbeing.	N/A

1.2.6	In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?
	For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation.

In 2011 the borough ranked as the 14th least deprived borough in London (out of 33 authorities). Deprivation levels, however, differ greatly, with greater concentrations in the north of the borough and in the places of Addington and an area of Shirley. The Victorian and Edwardian areas of the borough suffer from deprivation as do some of the inter and post-war local authority built housing estates. In general the south and east of the borough incorporate some of the least deprived areas of London. Due to differences in characteristics and the inequalities that exist in each area, the changes to the strategic policies may impact some geographic areas more than others. In general, the changes need to benefit all residents across the borough by reducing social, economic and environmental deprivation, consider measures to reduce unemployment, improve skills and education, community and environmental conditions and renew housing.

The implementation of policy SP2: Homes, in particular the equality and inclusion outcomes relating to access to affordable housing, is dependent on a range of factors including local housing market conditions, viability of development sites, as well as rent setting and restructuring for social housing, and incomes.

In the Croydon Local Plan: Strategic Policies, "affordable housing" is defined as:

Affordable housing is housing that is provided to meet the housing needs of households whose needs are not met by the private market. It can either be social rented housing, affordable rented housing or intermediate affordable housing.

Social rented housing is rented housing owned and managed by local authorities and registered providers of social housing, for which guideline target rents are determined through the national rent regime, and which is made available to eligible households nominated by the Council.

Affordable rented housing is rented housing provided by registered providers of social housing which is similar to social rented housing except that it is outside the national rent regime, but is subject to other rent

controls that require it to be offered to eligible households at a rent of up to 80 per cent of local market rents.

Intermediate affordable housing is housing at prices and rents above those of social rent but below market price or rents, and which meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices and include provisions for the home to be retained for future eligible households or for any subsidy to be recycled for alternative affordable housing provision. These can include shared equity and shared ownership homes for sale, and intermediate rent, but does not include affordable rented housing.

1.2.7 Would your proposed change affect any protected groups more significantly than non-protected groups?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....

Yes, while there is currently an oversupply of residential care houses, removing them from the definition of community facility would mean that residential care houses are no longer protected from redevelopment for other uses. There is a potential risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future.

1.2.8 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do not?

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes, the proposed changes to the Strategic Policies are likely to help the Council in advancing equality of opportunity by ensuring that all residents in the borough have access to suitable, adequate and affordable housing, local employment, local services and community facilities. The provision of additional pitches for gypsies and travellers is considered to be targeted work undertaken to address the needs of an ethnic minority group who has faced historic disadvantage, in part, by means of lack of opportunities and/or provision for appropriate facilities. The change would assist Council to advance equality by providing them with facilities to meet their needs, and by reducing instances of camping in unauthorised areas.

1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

Don't know, unsure whether any of the proposed changes to the strategic policies are likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation of those groups which share a protected characteristic. However, identifying site location criteria for additional sites for gypsy and traveller pitches (that are not allocated) may ultimately allow sites to come forward in future and

may reduce some unlawful encampment, which assists Council to eliminate unlawful discrimination and may assist with social cohesion.

1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes, the proposed changes will help the Council in fostering good relations between people who belong to any protected groups and those who do not by facilitating a diverse mix of communities with housing of different types, size and tenure and ensuring that all residents have access to suitable community facilities and local services. However, recent consultation highlighted that many are adverse to a growth in housing of different types, size and tenure in their community, in particular the provision of accommodation for gypsies and travellers.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	
Yes, further equality analysis is required	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	<p>Further equality analysis is required of the Croydon Local Plan: Strategic Policies - Partial Review as it has been identified that some of the changes will impact on groups which share a protected characteristic. The impact of some of the changes is also not known. A full equality analysis will take place in early 2016 to accompany the Proposed Submission version of the Croydon Local Plan: Strategic Policies Partial Review.</p>

Decision	Guidance	Response
Officers that must approve this decision	Name and position	Date
Report author	Dominique Barnett (Project Officer) Jaimee Semmens (Project Officer)	27/08/2015 (updated 8/6/2016)
Director	Heather Cheesborough (Director of Planning & Strategic Transport)	16/06/2016

1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

Name of Officer	David Claydon	
Date received by Officer	06/06/2016	Please send an acknowledgement
Should a full equality analysis be carried out?	Yes. It has been identified that some of the changes will impact on groups which share a protected characteristic. A full analysis needs to be undertaken to assess the impact and take mitigating actions where required.	Note the reasons for your decision

Stage 2 Use of evidence and consultation to identify and analyse the impact of the change

Use of data, research and consultation to identify and analyse the probable Impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1	<p>Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.</p> <p>This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.</p>
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The following documents and data have been used to help inform this Equality Analysis:

DOCUMENTS REVIEWED

Croydon's Community Strategy 2016-2021

The overall aim of the Community Strategy is to deliver the benefits of growth and regeneration to local

people and ensure that no one is left behind. The strategy brings together the outcomes and priorities of the main partner agencies in Croydon and focuses on developing Croydon into:

- A great place to learn, work and live, where Council will deliver new jobs and new homes for its residents, enable its local economy to grow, develop an exciting cultural offer and evening economy, in a safe and pleasant environment.
- A place of opportunity for everyone, where Council will tackle poverty and deprivation, prevent homelessness, and support children, families and individuals to achieve their full potential and live a long healthy life.
- A place with a vibrant and connected community and voluntary sector, where we will enable and empower our communities to connect and collaborate in developing community-led responses to the many challenges we face.

The Strategy was developed in consultation and engagement with Council's themed partnerships, and through the Croydon congress which brings together key stakeholders twice a year to discuss important emerging issues. The consultation findings were informed by a wide range of data presented in the borough profile that helped Council to understand how the borough is changing and the challenges and opportunities these changes present.

Two key themes that inform the Strategy which are relevant to the Equality Analysis of the Croydon Local Plan: Strategic Policies (Partial Review) are:

- Finding homes for all: support for tenants; promoting lodging; maximising use of land, more tenure options in New Addington and Fieldway; social impact bonds to tackle homelessness.
- Supporting residents towards better times: supporting small businesses; improving work experience and job opportunities; supporting long term sick and disabled people return to work; reducing debt and increasing financial security; and encouraging more childcare options.

The Strategic Objectives of the Croydon Local Plan: Strategic Policies (Partial Review) are consistent with the priorities and key themes of the Strategy, in particular:

Strategic Objective 3: *"Provide a choice of housing for people at all stages of life"*

Strategic Objective 4: *"To reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions"*.

Strategic Objective 7: *"Conserve and create spaces and buildings that foster safe, healthy and cohesive communities"*.

Croydon's Equality Policy (2016-2020)

The Equality Policy 2016-20 sets out the Council's commitment to equality and its ambition to create a stronger, fairer borough where no community is held back. The policy is supported by the new equality objectives set out in the Opportunity and Fairness Plan 2016-2020 that sets out the statutory equality objectives in line with the specific duties in Regulations made under the Equality Act 2010. Both documents aim to create a place where people share a sense of belonging, are united by a sense of shared values and are able to lead fulfilling lives through access to fair and equal opportunities and life chances.

The proposed equality objectives for 2016-20 focus on tackling disadvantage and differences in outcomes in relation to service access and delivery, satisfaction with services, opportunities for employment and community trust and confidence that certain groups of people face due to their socio-economic circumstances. In particular to:

- Increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market
- 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
- Reduce the rate of child poverty especially in the six most deprived wards
- 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
- Increase the percentage of domestic violence sanctions
- Increase the reporting and detection of the child sexual offences monitored
- Reduce the number of young people who enter the youth justice system
- Reduce social isolation among disabled people and older people

- Improve the proportion of people from different backgrounds who get on well together
- Reduce differences in life expectancy between communities

The above objectives have been considered in the Equality Analysis set out in in Section 2.2.

DATA REVIEWED

A summary of the demographic situation for each of the groups with a protected characteristic is provided below. This provides a starting point for the analysis of likely impacts of the Croydon Local Plan: Strategic Policies Partial Review on these groups. Data used includes the 2011 Census, statistics sourced from the Strategic Partnership Croydon – Borough Profile 2015, Annual Population Survey April 2012-2013, the Department for Work and Pensions, the Department of Health, Transport for London (Technical Notes) as well as data sourced from the Croydon Observatory.

Evidence supporting the Croydon Local Plan: Strategic Policies Partial Review has also been reviewed. Relevant data sourced from evidence documents (e.g. Strategic Housing Market Assessment (2015), Croydon Gypsy and Traveller Accommodation Needs Assessment (2013)) is also included in the summaries below.

Croydon population and deprivation

- Croydon's population is growing. The borough is home to 380,700 people and is expected to reach 465,600 in 2041.
- According to the 2011 Census, 60.1% of all Croydon households were owner occupied, 22.1% were private rented or rent free households and 17.8% were households living in social housing. These proportions are identical to those seen across the Outer London boroughs. Across London as a whole, owner occupation is lower, with the rental (social and private) considerably higher.
- Croydon has the largest number of housing stock compared to other London boroughs, but its social housing stock is smaller than many other London boroughs. Social housing in Croydon is mainly concentrated in the north and the eastern edge of the borough. According to the 2011 Census, the wards of Fieldway and New Addington had the highest proportions of social housing (council homes and other) with 60.6% and 42.2%.
- The percentage of 1 bedroom properties in Croydon is 17%, 29% having two bedrooms, 37% have 3 bedrooms, 13% have 4 bedrooms, and 4% have 5 or more bedrooms. These figures are similar to those seen across the outer boroughs¹, but they show a greater proportion of 1 and 2 bedroom properties than the national average and fewer larger properties.
- In 2013, overall 72% of residents agreed that their local area is a place where people from different backgrounds get on well together, while 69% strongly feel that they belong to their local neighbourhood. Residents in the south (the more affluent areas) are more likely to say they get on with the people in their community and are satisfied with where they live, while those living in the north of the borough (in higher areas of deprivation) are least likely to agree.
- Between 2010 and 2015, Croydon became relatively more deprived compared to other local authorities in England between 2010 and 2015.
- In 2015, Croydon was the 19th most deprived district authority in the country for barriers to housing and services.
- In 2015, Croydon was within the bottom third (220th most deprived authority out of 336 district authorities) for the education, skills and training domain.
- Between 2001 and 2011 the 4 northern wards of Waddon, Broad Green, Selhurst and Norbury saw an increase in population of more than 19% whereas Selsdon and Ballards in the south saw a slight decrease of 1.4%. Deprivation levels in the different wards differ greatly however, in general, greater population increase has been experienced in the areas with greater concentrations of deprivation. In general the south and east of the borough incorporate some of the least deprived areas of London.
- Overall, life expectancy is increasing but the life expectancy gap between the most deprived areas in Croydon and the least deprived is 9.5 years for men and 5.8 years for women. There are significant differences in preventable deaths between the most and least deprived areas in

¹ The definition of Outer London boroughs taken from Census 2011 includes: Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Croydon, Ealing, Enfield, Greenwich, Harrow, Havering, Hillingdon, Hounslow, Kingston upon Thames, Merton, Redbridge, Richmond upon Thames, Sutton, Waltham Forest.

Croydon, with circulatory diseases, cancers and respiratory diseases causing the majority of deaths in deprived areas. Many of these diseases are related to unhealthy lifestyles and socio-economic circumstances such as child poverty.

- In 2015, the proportion of people claiming job seekers allowance in Croydon was above the regional and national averages.
- In 2015, Croydon remained one of the most affordable areas to live in London both to buy and to rent. However, the number of homeless households in temporary accommodation remains high, and the number of homeless acceptances remains high.
- The number of homeless people varies across the borough. Fieldway has the highest number of homeless people, whilst the northern wards of Selhurst, Waddon and South Norwood each have in excess of 130 homeless people. The southern wards of Selsdon and Ballards, Coulsdon West, Sanderstead and Kenley have the lowest number of homeless people in the borough.

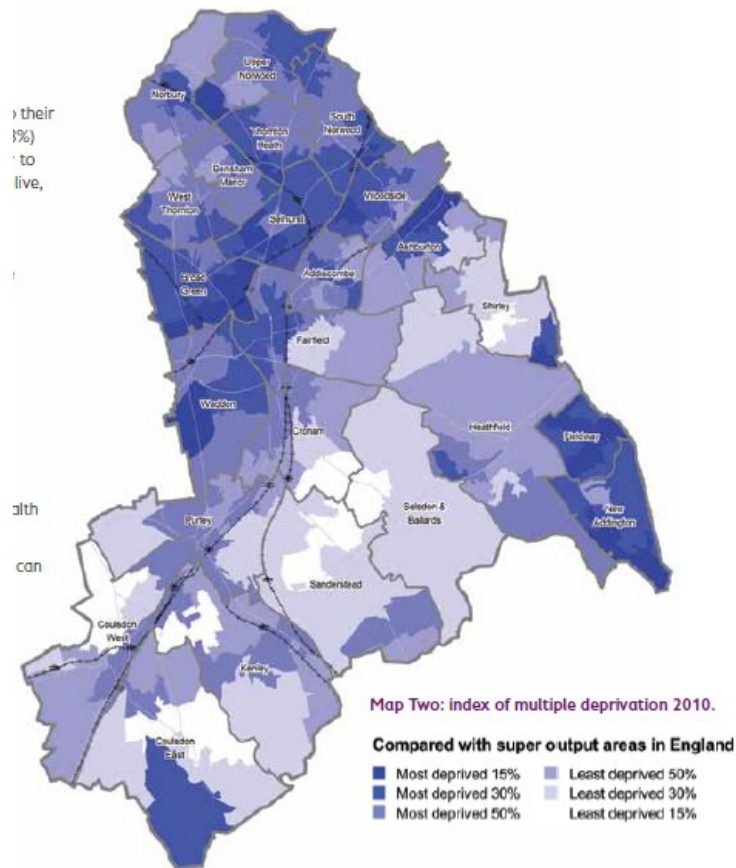


Figure 1 Index of multiple deprivation 2010

Disability

- Across Croydon in 2011 some 22.8% of households contained someone with a long term health problem or disability, which is lower than the equivalent figure for England and in line with the London average.
- Within Croydon in 2011, 22,493 people had their day-to-day activities limited a lot by a long-term health problem or disability, whilst 28,134 had their day-to-day activities limited a little. As shown in Figure 2 the proportion of people whose day-to-day activities were limited to some extent increased with age. For example some 79% of people aged 85 and over have a long term health problem or disability.

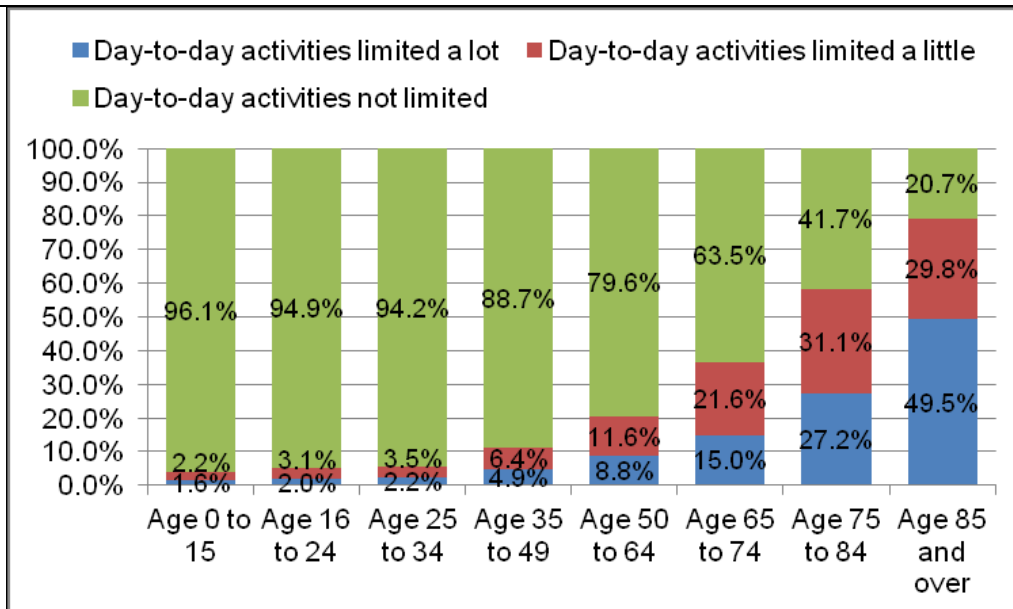


Figure 2 Proportion of people whose day-to-day activities were limited by a long-term health problem or disability

- In 2015, 4.1% of the Croydon population received a disability living allowance (slightly higher than London, of which 3.85% of the whole population received a disability living allowance).
- In 2015, 0.41% of the Croydon population received the incapacity benefit for being out of work as a result of poor health or disability (consistent with London, of which 0.42% of the population were incapacity benefit claimants). Within Croyden, 96.52% of incapacity benefit claimants had received it for 5 years or more.
- In 2010, 4,061 people (per 100,000 of population) within Croydon were supported to live independently through social services (all ages). This has significantly increased since 2005 when 1,971 people (per 100,000 of population) were supported to live independently through social services.
- In 2009, the majority of social care clients in Croydon had a physical disability (7,150). 2,210 had a mental health problem, 965 had a learning disability, 70 had a substance misuse problem and 120 received social care for other reasons.
- It is estimated that the number of people with a long term health problem or disability will increase by around 25,600 (a 47% increase) from 2013 to 2036. Most of this increase is expected to be in age groups aged 65 and over.
- Disability and long term health issues can have a number of social exclusion implications, people with long term illness or disability can face exclusion from the labour market and may require significant support to meet their social care needs.
- Disability, mental and physical ill-health can severely impact on the quality of life of those suffering from it and those immediately around them. It is also closely associated with deprivation. Some people have chaotic and complex needs that can expose them to greater risks of increased experience of mental health problems as well as drug and alcohol use.

Race/ethnicity

- Croydon's population is very diverse. Croydon's communities speak more than 100 different languages and 45% of the population are from a black or minority ethnic (BME) background, higher than the national average. As shown in Figure 5, the younger population is more diverse than the older population in Croydon.

Race/ethnicity - Black or minority ethnic communities

- Croydon has one of the fastest growing BME communities in London. Between 2001 and 2011, there was a notable increase in the BME population (65%) compared to a 19% decrease in the white (British/Irish) population.
- Although the overall percentage of residents from BME communities in Waddon, Ashburton, New Addington and Kenley are still much lower than the Croydon average, the number of residents from BME communities in these areas more than doubled between 2001 and 2011.
- Black or minority Ethnic (BME) households, as a group, are quite often found to have distinct

characteristics in terms of their housing needs, or may be disadvantaged in some way. Figure 3 indicates that all BME groups (with the exception of Asian) are significantly less likely to be owner-occupiers (no mortgage) and all groups are far more likely to live in private rented accommodation.

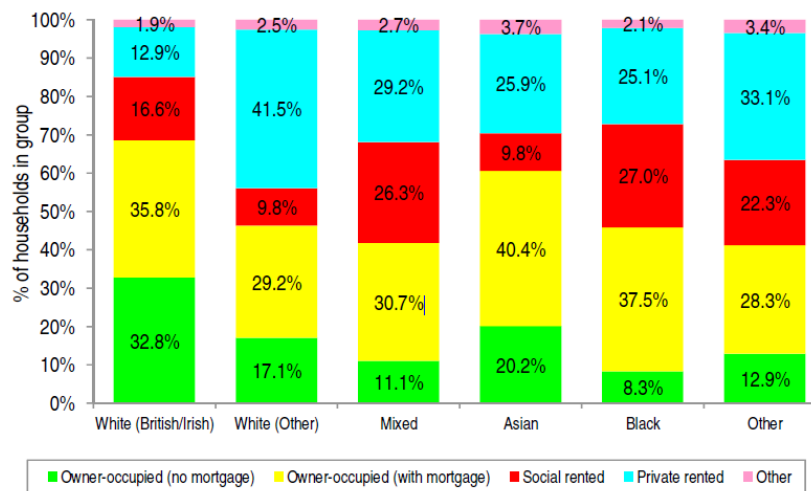


Figure 3 Tenure by ethnic group – Croydon (2011)

- BME groups are also more likely to be over-crowded (i.e. have a negative occupancy rating) than White (British) households. Census data suggests that around 16% of Asian households are overcrowded, along with 15% of the black group - this compares with only 5% of the White (British) group. Levels of under-occupancy amongst BME communities are generally low (see Figure 4).

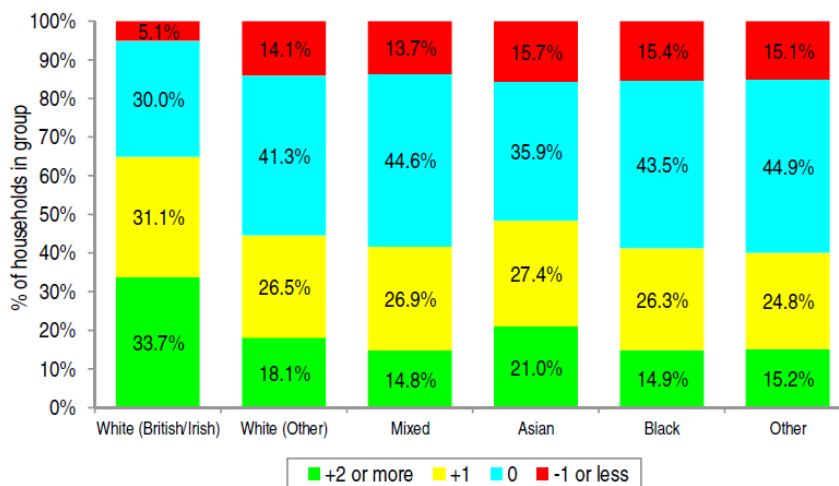


Figure 4 Occupancy rating by ethnic group (2011)

- A disproportionately high percentage of homeless people are from the black community in every age group. Overall, 5 in 10 homeless people are from the black community, 3 in 10 are from the white community and 1 in 10 is from the Asian community.
- There is a noticeably lower proportion (69%) of pupils from black ethnic backgrounds achieving level 4 education in reading, writing or maths in Croydon, compared to 78% and 77% in London and England respectively. Whilst attainment has stayed the same or improved for other ethnic groups, the proportion of pupils from a black background achieving this level has fallen slightly, from 72% in 2012 to 69% in 2014.

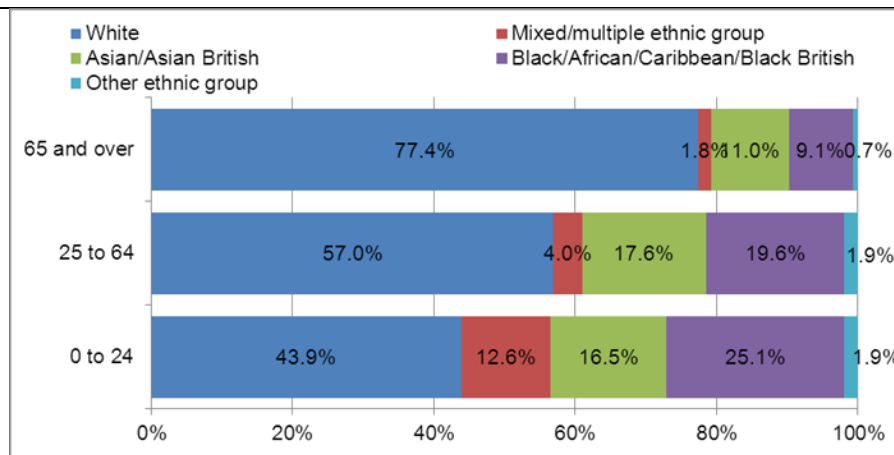


Figure 5 Ethnic Group by Age (2011)

Race/ethnicity - Gypsy and Traveller groups

- There are a range of gypsy and traveller groups found within Croydon, including English gypsies, Irish travellers, New Travellers and Travelling Showpeople across different tenure types.
- London contains one of the smallest numbers of caravans of any English region. When the population of London is taken into account, the density of caravans is the lowest in England at 11 per 100,000 settled population, compared to 36 for England.
- When adjusted for population, Croydon's caravan count is one of the lowest in south London, and is very low compared to some neighbouring local authorities such as Sevenoaks and Tandridge. However, this should be considered in the context of Croydon's dense urban character and that most open space within the borough is protected.
- Within England, approximately one fifth of gypsies and travellers reside in unauthorised development or encampments, primarily due to inadequate permanent and transit/emergency site provision by housing authorities.
- As stated in the Croydon Gypsy and Traveller Accommodation Needs Assessment (2013), between 2012 and 2013 in the Croydon area, there were persistent numbers of unauthorised caravan days, some due to the movements of a small number of families, and others due to Irish Traveller families who desire permanent accommodation within Croydon.
- A stakeholder consultation session was conducted in April 2013 with local authority officers involved with gypsy and traveller issues, and a survey was undertaken with gypsies and travellers in Croydon. This survey determined a preference for small, privately owned permanent/residential sites, which tend to have fewer inter-family tensions and would be easier to manage compared to larger sites.
- As at 2013, there were 19 existing residential pitches within Croydon. Based on calculations set out in the Croydon Gypsy and Traveller Accommodation Needs Assessment (2013), over 20 years, there is a need for an additional 49 residential pitches, 1 emergency stopping place, and no travelling showpeople yards. However, as only 79% of the need for bricks and mortar housing will be met within the urban area within the borough, only 79% of the need for Gypsy and Traveller pitches can be met (representing approximately 36 new pitches).

Sex/Gender

- In 2011, the Croydon population was made up of 51.5% females and 48.5% males. The age and gender profile in Croydon (see Figure 6) is similar to that of London, except that the proportion of males and females aged 20-29 and 30-34 in Croydon is approximately 3% lower than that of London.
- In 2011 within Croydon, 49.95% of males (aged 16-74) were full time employees, compared to 34.70% of females. 6.65% of males (aged 16-74) were part time employees compared to 18.16% of females.
- In 2011 within Croydon, a higher percentage of females aged 16-74 were unemployed to look after home or family (8.94%) compared to 0.89% of males.
- Of all single parents in Croydon in 2011, 91.05% were females, compared to 8.95% males. This is generally consistent with London (92.45% and 7.55 respectively).
- In 2011, the mean weekly earnings for residents of Croydon was £560 for males, compared to £466

for females.

- In London general, car ownership is higher amongst men than women (46% compared to 34%). This gap is higher in lower income households.
- Based on the Croydon local housing management system, as at 31 March 2015, there was a gender bias in the people approaching the council for social housing assistance, with 83% being females and 17% being males. The statistics record the gender of the applicant so these figures are slightly distorted by the fact that it is more common for the women in households to approach the council for assistance.

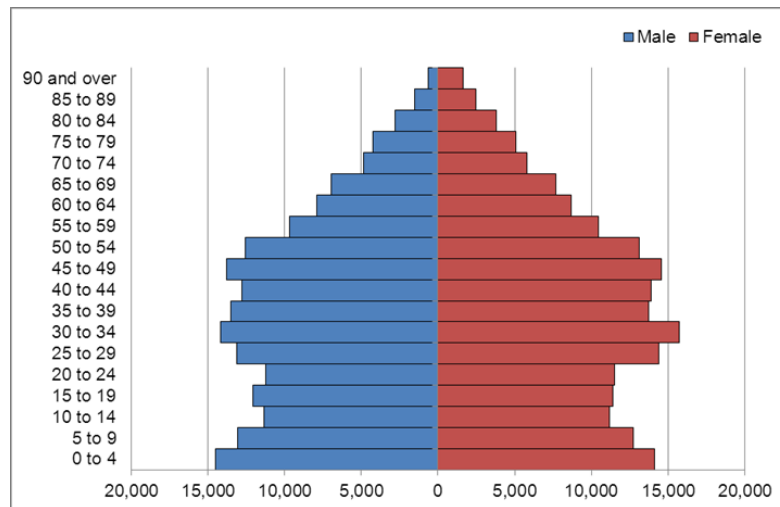


Figure 6 Age and gender profile in Croydon (2015)

Sex/Gender – Gender Variance

- Data on the gender identity of the population is not routinely captured. There are some estimates of the proportion of the population who experience gender variance, those who experience a different gender to the sex assigned to them at birth. This condition is thought to begin before birth and can be experienced to different degrees. The Gender Identity and Research Society has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender.

Age

- Croydon has the largest population of young people in London (approximately 84,000) than any other London borough with 20.8% of the population aged 0-15, compared with 19.2% for London and 19.1% for England.
- As shown in Figure 6 there is a large population of younger children and working age adults in Croydon. The borough has a lower proportion of people in their 20s and 30s, but a higher proportion of people aged 45 and under 18, meaning that the borough has a greater representation of middle aged families with children than Inner London boroughs, for example.
- The proportion of older adults, aged 65 and over, in Croydon is much lower than the national average, although the demographic will change as the current younger population ages (further discussed below).

Age - Children²

- The number of families in Croydon (defined as any household which contains at least one dependent child), in 2011 totaled 51,100 accounting for 35% of households – a notably higher figure than seen across both London and England.
- When compared with other areas, the proportion of lone parent households is notable (11.6%), compared to 7.1% in London and 8.5% in England (2011) (see Figure 7).
- There are some considerable differences in the tenure of households with dependent children – lone parents have a very high proportion living in the social rented sector and also private rented accommodation. Only around 22% of lone parent households are owner-occupiers compared with

² Note: Age as covered by the Equality Act 2010 does not protect young people under the age of 18, although they are protected under other protected characteristics. Reference to this group has been included under Age in this Equalities Analysis, however, in order to make it easier to understand the link between Local Plan: Strategic Policies and young people.

70% of married couples with children (see Figure 8).

- Overcrowding is five times more likely to occur in houses with children compared to other houses. In total, some 20% of all households with dependent children are overcrowded, including 22% of lone parent households.
- Croydon has the highest number of looked after children of any London boroughs, due to the high numbers of unaccompanied asylum seeking children (UASC) looked after by the borough. The number of UASC looked after in Croydon fluctuates over time and is influenced by international events. In 2015 there were more UASC looked after in Croydon than children indigenous to the borough.
- In 2012, approximately 21% of children in Croydon were estimated to be living in poverty, compared to 23% in the London area and 19.5% in England. A child is classified as living in poverty if they live in families in receipt of out of work benefits or in receipt of in-work tax credits where their reported income is less than 60% of median income.
- In 2011, approximately 6.75% of children in Croydon were living in households where no adult was in paid work, which is high compared to 5.6% in London and 4.25% in England.

Household Type	Croydon		London	England
	Number	%	%	%
Married couple	22,469	15.5%	15.3%	15.0%
Cohabiting couple	5,034	3.5%	4.0%	2.8%
Lone parent	16,821	11.6%	7.1%	8.5%
Other households	6,729	4.6%	2.6%	4.6%
All other households (no dependent children)	93,957	64.8%	70.9%	69.1%
Total	145,010	100.0%	100.0%	100.0%
Total with dependent children	51,053	35.2%	29.1%	30.9%

Figure 7 Households with dependent children (2011)

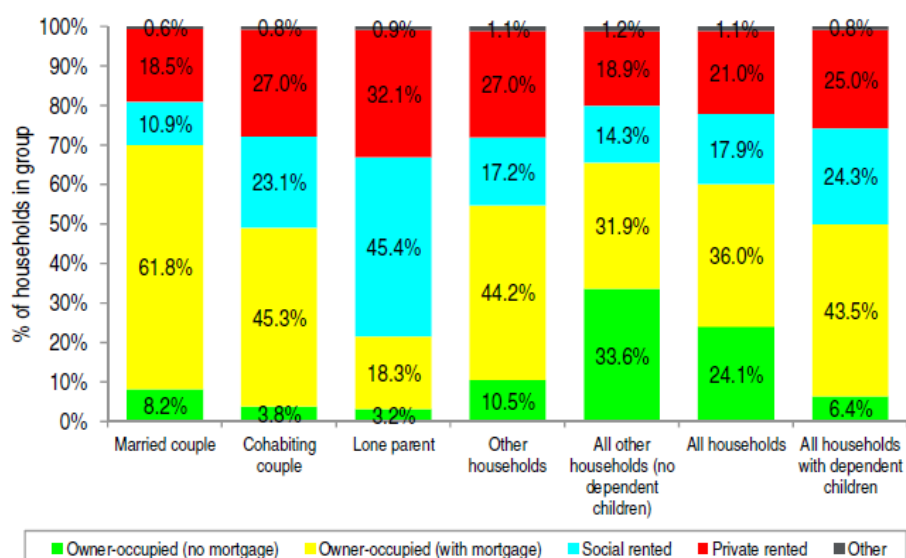


Figure 8 Tenure of households with dependent children - Croydon (2011)

Age – Young People

- In 2013 there were around 31,000 households headed by someone aged under 35. This is set to increase to around 36,200 over the period from 2013 to 2036.
- As well as households headed by a younger person there will be others living as part of another household (typically with parents). Figure 9 shows the number of households in the Borough with non-dependent children. In total, some 11% of households (15,400) contain non-dependent children. This may to some degree highlight the difficulties faced by young people in accessing housing. Young people may be less likely to be eligible for social housing, have lower household incomes and have difficulty in accessing the owner-occupied sector due to mortgage constraints and deposit requirements. All of these factors contribute to the current trend for young people moving in with or continuing to live with parents.

- Considering households that are headed by a younger person (less than 35 years of age), very few younger households are owner-occupiers with a particular reliance on the private rented sector and to a lesser degree, social rented housing (Figure 10).

Household Type	Croydon		London	England
	Number	%	%	%
Married couple	8,292	5.7%	5.6%	4.8%
Cohabiting couple	724	0.5%	0.5%	0.4%
Lone parent	6,339	4.4%	3.5%	4.1%
All other households	129,655	89.4%	90.4%	90.7%
Total	145,010	100.0%	100.0%	100.0%
Total with non-dependent children	15,355	10.6%	9.6%	9.3%

Figure 9 Households with non-dependent children (2011)

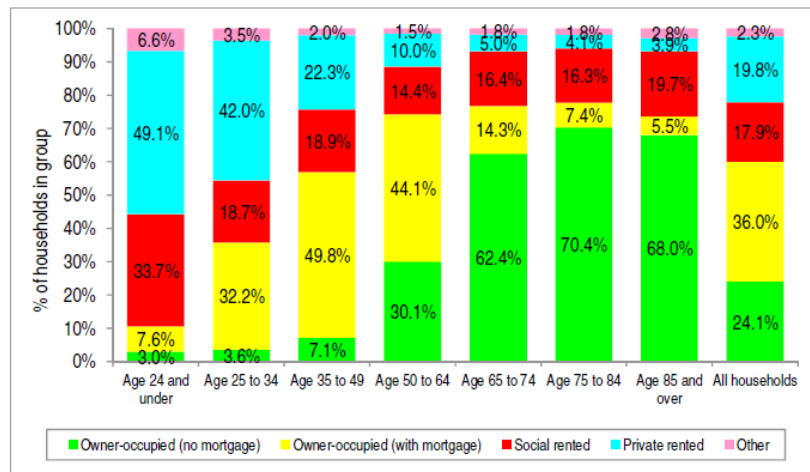


Figure 10 Tenure by age of household reference persons (2011)

Age - Older People

- While Croydon is the “youngest” borough, the population is also aging – it is anticipated that by 2026, Croydon will have almost 40,000 people over 65, and some 6,500 over 85.
- Croydon (in line with other areas) is expected to see a notable increase in the population of older people; the total number of people aged 55 and over expected to increase by 63% over the next 23 years (Figure 11).

Age group	Croydon	London	England
Under 55	11.9%	17.0%	5.0%
55-64	42.9%	48.6%	11.0%
65-74	72.1%	64.1%	38.0%
75-84	71.4%	60.7%	58.1%
85+	121.2%	115.1%	143.2%
Total	23.4%	25.7%	14.9%
Total 55+	63.1%	60.6%	39.8%

Figure 11 Projected change in population of older people (2013 to 2036) (Source: ONS 2012 based SNPP and demographic projections)

- Many of Croydon’s older population live independent lives, but some experience disability as they age. There is a need to recognise and provide for the various facilities, services and organisations that support older people, which should ideally be close to where they live, and which would encourage independency as well as fulfilled lives.
- In 2011, 15% of houses were comprised entirely of people aged 65 and over. 9.7% were occupied by a single pensioner and 5.4% were occupied by 2 or more pensioners.
- Given that the number of older people is expected to increase in the future and that the number of single person households is expected to increase, this would suggest (if occupancy patterns remain

the same) that there will be a notable demand for affordable housing from the aging population. That said, there is a high proportion of older person households who are outright owners (with significant equity – see Figure 12), which may mean that market solutions will also be required to meet their needs.

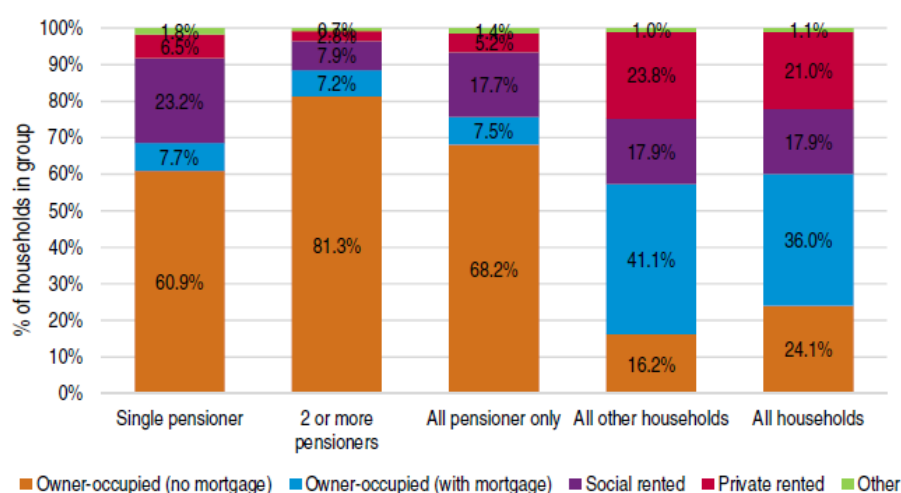


Figure 12 Tenure of older person households - Croydon (2011)

- The illnesses/disabilities associated with many older people are expected to increase significantly in the future, although this would be expected given the increasing population. In particular there is projected to be a large rise in the number of people with dementia (up 99%) along with an 88% increase in the number with mobility problems (see Figure 13).

	Type of illness/disability	2013	2036	Change	% increase
Main analysis (2,437 dpa)	Dementia	3,292	6,551	3,259	99.0%
	Mobility problems	8,653	16,306	7,653	88.4%
Alternative analysis (1,807 dpa)	Dementia	3,331	6,422	3,092	92.8%
	Mobility problems	8,710	15,551	6,841	78.5%
Alternative analysis (1,435 dpa)	Dementia	3,331	6,315	2,985	89.6%
	Mobility problems	8,710	15,283	6,572	75.5%

Figure 13 Estimated population change for range of health issues (2013 to 2036) (Source: Data from POPPI and demographic projections)

- Taking into account an aging population and availability of residential care homes in 2015, it is anticipated that by 2020, there will be demand for 619 bed spaces, and by 2030, there will be demand for 828 bed spaces. In 2015 there was 1,754 bed spaces available, meaning that there is an over-provision of care homes, residential homes and nursing homes, which is more than sufficient to provide for the aging Croydon population.
- However, given the anticipated increase in disability and health problems amongst older people, there is likely to be increased demand for specialist housing. In particular, the Strategic Housing Market Assessment (2015) estimates³ that a total of 2,285 specialist (extra care) houses will be required by 2036 (equating to approximately 99 per annum, or 4% of total additional housing units).
- In Croydon in 2015, 17% of older people (over 60 years) were income deprived. This was the 100th highest score out of the 326 district authorities in England, putting Croydon in the top third most deprived areas. The majority of income deprived older people are concentrated in the northern areas of the borough.
- In 2015, 14.29% of the Croydon pensionable age population were attendance allowance claimants (consistent with London, of which 14.24% of pensionable age population were attendance

³ Based on a range of assumptions, to be treated as indicative.

allowance claimants).

Pregnancy/Maternity

- The number of live births in Croydon rose dramatically from just over 5,200 a year in 2009 to around 5,900 a year in 2012. Latest figures for 2013 record around 5,500 births supporting predictions that the birth rate will return to previous levels.
- The increase in birth rate has varied across the borough. Fairfield ward saw an increase from 235 live births in 2009 to 329 live births in 2013. Meanwhile in Fieldway ward the number live births fell from 222 to 169.
- Croydon has a higher proportion of mothers who were born outside of the UK (51.6%) compared to the national average (27.3%). Although there are variations between groups overall, non-UK born mothers have a higher total fertility rate than UK born mothers (2.19 compared to 1.79 nationally).

Sexual orientation

- Sexual orientation was not captured by the 2011 Census. The ONS produce regional estimates of the percentage of the population who identify themselves as gay, lesbian or bisexual. Across London it is estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual, higher than the national average of 1.6%.
- Applying the London percentage to Croydon results in an estimated 9,800 people who would have identified themselves as gay, lesbian or bisexual.

Religion/belief

- Just over half the respondents to the 2011 Census in Croydon stated that they were Christian. About 1 in 5 stated that they had no religion. Significantly, 7.6% respondents did not state their religion.

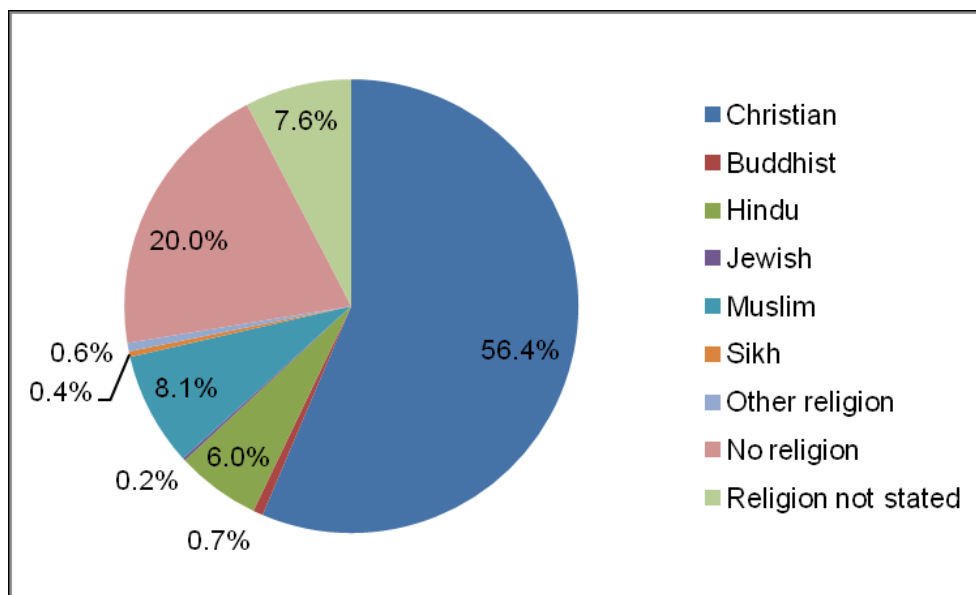


Figure 14 Religion of Croydon residents

CONSULTATION

The Croydon Local Plan: Strategic Policies-Partial Review (Preferred and Alternative Options) was consulted on from 6 November to 18 December 2015. Posters were displayed in the libraries and copies of the documents made available. The consultation was also publicised on the Council's website, and on Facebook and Twitter, the latter daily reminding the public about the dates and locations of the consultation. It was also included in the Council's weekly email alert and its e-bulletin "Your Croydon". A new platform of social media called Street Life also posted the same post as the Facebook page onto their webpage. Six separate joint drop in events were held for the Croydon Local Plan: Strategic Policies – Partial Review at various locations and times throughout the borough. A total of 831 people signed in at the events.

At the end of the consultation period 295 individual people and organisations made representations on the Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options). The draft Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) takes into consideration the responses to the November 2015 consultation on the Strategic Policies – Partial Review. Some of the key changes made as a result of consultation were:

- Policy SP2.4 revised to be reflect the evidence of the Local Plan viability report. The policy has been made clearer on types of affordable housing that will be provided on site, and new fixed lower 30% minimum requirement based on a development viability assessment; introduction of review mechanisms outside Croydon Opportunity Area if minimum requirement is not met but still with a requirement for some affordable housing on site;
- Policy SP2:4 revised from 75:25 ratio to 60:40 ratio between affordable rent and intermediate with starter homes explicitly referred to as an intermediate product. The proposed higher ratio was unlikely to be deliverable without significant grant for the affordable rent, which is unlikely to be available.
- New town area near East Croydon is to be designated as a Local Heritage Area.
- The proposed Local Green Space at Shirley Oaks is proposed to be extended to include the area of the allotments as it meets sufficient criteria for designation as Local Green Space.

On 24 November 2015, a Community Facilities and Equalities Workshop was held between Croydon planning and housing officers, Croydon Community Partnership, and approximately 30 representatives from the travelers community. Although the workshop was specific to the Croydon Local Plan: Detailed Policies, those that are relevant to the Croydon Local Plan: Strategic Policies – Partial review, the comments from the traveler community of most relevance are summarised as follows:

- Support for provision for additional pitches for gypsy and traveler accommodation.
- Suggestion to accommodate five more pitches at the Laytham’s way site (existing site 19)
- Care homes are still a community use and should be protected like any other community use.
- Many churches have underused facilities and a flexible approach toward letting these premises out for commercial use would be beneficial
- Support for community uses and flexibility where they are needed.

The draft Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) takes into consideration the responses from this workshop.

2.2 Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.

Group’s with a “Protected characteristic” and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
Disability People with specific disabilities such as learning disabilities, hearing impairment, blind/visually impaired, mental health and well-	The increased housing target to meet housing need, alongside amendments to the affordable housing policy (to increase the percentage of all new homes to be either affordable rented homes, homes for social rent) is likely to provide a greater choice of housing options for people with disabilities, including the anticipated demand for 4% of new homes	While there is currently an oversupply of residential care houses, the change to remove care homes from the definition of community facility (previously protected from redevelopment by policy), there is a potential risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future. However, the Strategic Housing Market Assessmentnotes	Croydon Observatory Census (2011) Strategic Housing Market Assessment (2015)

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
being, etc.	<p>to be specialist (extra care) homes.</p> <p>An increase in affordable housing and mixture of housing options would benefit people with disabilities who are disadvantaged in the housing market, including those on disability living allowances, incapacity benefits and/or unable to obtain employment. The provision for a mix of housing options would encourage independence and the ability for people with disabilities to improve quality of life, and lead fulfilling lives.</p> <p>Retaining policies for all homes to lifetime standards and 10% as wheelchair accessible homes enhances the chances of someone being able to remain in their home if their circumstances change, which enhances independence and resilience.</p>	<p>that there is currently a significant supply of residential care housing.</p> <p>Further, over the past few years there has generally been a move away from providing sheltered and residential care housing towards extra-care housing, with an estimated demand for 4% of new homes to be specialist (extra care) homes to 2036. Development of extra care housing is generally provided for as a dwelling unit and would be generally supported by the changes to Policy SP2: Homes. Further, many extra care housing schemes are provided by the borough therefore council will monitor supply/demand accordingly, separate to the Croydon Local Plan: Strategic Policies - Partial Review.</p>	
<p>Race/ethnicity</p> <p>Black and Minority Ethnic (BME) groups Refugee Communities Gypsy and Traveller communities White Minority Groups</p>	<p>The increased housing target to meet housing need, alongside amendments to the affordable housing policy (to increase the percentage of all new homes to be either affordable rented homes, homes for social rent) is likely to provide a greater choice of housing options for ethnic minorities, and may potentially assist in reducing the high percentage of homeless people in general (including the disproportionate percentage of homeless people from the black community).</p> <p>An increase in affordable housing and mixture of housing options would benefit ethnic minorities who are disadvantaged in the housing market, particularly black or</p>	<p>Reduction in strategic target for 60% of new homes to have 3 or more bedrooms to 50% slightly reduces the aspiration for larger homes in the borough and may not provide housing stock that can address overcrowding issues, resulting in a disadvantage in the housing market for the BME community who are more likely to live in overcrowded houses. However, it is also recognised that 3 bedroom houses are less likely to be delivered according to the current market model. By reducing the target to 50%, the number of individual homes may still be increased albeit with less of these being 3 bedroom homes in the first few years of implementation of the Local Plan Strategic Policies.</p> <p>Recent consultation highlighted</p>	<p>Croydon Observatory</p> <p>Census 2011 data</p> <p>Strategic Housing Market Assessment (2015)</p> <p>Croydon Gypsies and Travellers Needs Assessment (2013)</p> <p>Representations on the November 2015 consultation on the Croydon Local Plan:</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>minority ethnic communities who are significantly less likely to be owner-occupiers, more reliant on private rented accommodation, and more likely to be over-crowded.</p> <p>An increase in the housing stock available would increase choice, and may help encourage downsizing of housing types for older generations, freeing up larger homes for young families.</p> <p>Increasing housing options may mean that ethnic minorities have better quality living environments, and improved access to health, education, and support services, which may assist in improving attainment levels.</p> <p>The allocation of additional gypsy and traveler's pitches, as well as criteria for proposals for additional future sites would meet the needs of Croydon's gypsy and traveler community, by providing appropriate accommodation, and better access to appropriate services, including employment, education, skills training, and health facilities. It would reduce unlawful encampment, discrimination, victimisation and displacement, and would increase opportunities for participation in community events, which in turn, over time, may reduce racial harassment from settled members of community.</p> <p>Provision for a mix of housing types, greater percentage of affordable housing for new developments, and additional gypsy and traveller pitches may</p>	<p>that many residents are adverse to a growth in housing of different types, size and tenure in their community, in particular the provision of accommodation for gypsies and travelers. This indicates that gypsies and travelers may be excluded from the settled community, and may be subject to harassment, discrimination and victimisation.</p>	<p>Strategic Policies (Partial Review)</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>lead to diverse neighbourhoods, increasing the value of diversity in the community and facilitating positive relationships between people from different ethnic backgrounds.</p> <p>The advantages of the changes to SP3-SP8 applicable to the wider community would also apply to this group; the changes are likely to result in increased employment, education and skills training opportunities, better infrastructure, transport, community facilities, protection of green spaces and quality of the built environment.</p>		
<p>Sex (Gender)</p> <p>Women Men Female headed households etc. Gender identity (transitioning or transgendered people)</p>	<p>Women are more likely to have lower incomes than men, more likely to be in part time employment or unemployed to look after home or family, and generally have more responsibility for domestic work. Women are also more likely to approach the council for social housing assistance. Women also are significantly more likely to be sole parents (91% of sole parents within Croydon are women), of whom a very high proportion living in the social renting sector and private rented accommodation. Therefore the increased housing target to meet housing need, alongside amendments to the affordable housing policy (to increase the percentage of all new homes to be either affordable rented homes, homes for social rent) is likely to advance equal opportunities and provide choice of housing options for women who are disadvantaged in the housing market. In turn, this would enable sole mothers to more effectively fulfil their caring responsibilities for dependents.</p>	N/A	<p>Croydon Observatory</p> <p>Census 2011 data</p> <p>Strategic Housing Market Assessment (2015)</p> <p>Transport for London, Roads Task Force – Technical Note 12.</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>Protecting existing office stock in the Opportunity Area and protecting industrial and employment uses offers local employment opportunities. The designation of Neighbourhood Centres and the focus on the provision of community facilities is likely to assist in balancing women's role in domestic work and paid employment.</p> <p>Those that are gender variant are likely to also be represented through one or more other protected characteristics, meaning that benefits will be experienced by this group in more subtle ways.</p> <p>The advantages of the changes to SP3-SP8 applicable to the wider community would also apply to this group; the changes are likely to result in increased access to employment, skills training and education opportunities, better infrastructure, transport, protection of green spaces and quality of the built environment.</p> <p>Car ownership is higher amongst men than women, with a greater gap in lower income households. Therefore, women are less likely to have access to a car and rely more on public transport. Planned infrastructure projects and improved public transport would provide greater access to employment opportunities, local services and community facilities.</p>		
<p>Age</p> <p>Older people People over state retirement age Younger people (16-21 year olds)</p>	<p>21% of children in Croydon are living in poverty. A large proportion of houses in Croydon (35%) contain at least one dependent child, 20% of which are over-crowded. In addition, there is a notable proportion of</p>	<p>While there is currently an oversupply of residential care houses, the change to remove care homes from the definition of community facility (previously protected from redevelopment by policy), means there is a potential</p>	<p>Croydon Observatory Census 2011 data Strategic</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
<p>Children (including unaccompanied asylum seeking children)</p>	<p>lone parent households compared to other areas. Lone parent households and houses with dependent children are more likely to be living in the social or public renting sector, therefore the increased housing target to meet housing need, alongside amendments to the affordable housing policy (to increase the percentage of all new homes to be either affordable rented homes, homes for social rent) is likely to advance equal opportunities, provide affordable choice of housing options, reasonable quality of housing in the private sector, and associated improved access to education, skills training, services, and quality of life for disadvantaged children.</p> <p>In addition, Croydon has a high number of asylum seeking children looked after by the borough who would benefit from additional social housing.</p> <p>The provision for affordable housing would also assist in tackling the difficulties for young people to access housing (due to lower incomes and difficulties in securing mortgages), and increase the potential to access suitable housing, become owner-occupiers and to live independently.</p> <p>Protecting existing office stock in the Opportunity Area and protecting industrial and employment uses offers local employment, and education and skills training opportunities for people of all ages.</p> <p>Croydon is expecting a notable increase in the population of</p>	<p>risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future. This is a potential disadvantage due to the projected large rise in the number of people with dementia or mobility problems (99% and 88% respectively). However, the Strategic Housing Market Assessment (2015) notes that there is currently a significant supply of residential care housing. Further, over the past few years there has generally been a move away from providing sheltered and residential care housing towards extra-care housing, with an estimated demand for 4% of new homes to be specialist (extra care) homes to 2036. Development of extra care housing is generally provided for as a dwelling unit and would be generally supported by the changes to Policy SP2: Homes. In addition, typically the greatest support needs for the aging population are alterations to properties (such as to bathrooms, showers and toilets, provision of emergency alarms or help maintaining homes). Many of these can be resolved in situ through adaptations to existing properties and would not be affected by the changes to Policy SP2: Homes.</p>	<p>Housing Market Assessment (2015)</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>older people with an aging population. The housing policy to achieve a mix of housing is likely to achieve a good mix of housing for older people (those who need affordable housing as well as those who are outright owner-occupiers). This enables older people to exercise choice and control over housing options, encouraging independence and enabling fulfilling lives.</p> <p>An increase in the housing stock available would increase choice, and may help encourage downsizing of housing types for older generations, freeing up larger homes for young families.</p> <p>The advantages of the changes to SP3-SP8 applicable to the wider community would also apply to children, young people, and older people as the changes are likely to result in increased employment, education and skills training opportunities, better infrastructure, social services, transport, protection of green spaces and quality of the built environment.</p>		
<p>Sexual orientation</p> <p>Gay Lesbian Bisexual People</p>	<p>The advantages of the changes to SP2-SP8 applicable to the wider community would also apply to the approximate 2.6% proportion of the Croydon population who identify themselves as gay, lesbian or bisexual. The changes are likely to result in increased employment, education and skills training opportunities, better infrastructure, social services, community facilities, transport and quality of the built environment. In particular, sexual orientation groups would</p>	N/A	Croydon Observatory

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	benefit from improved access to facilities.		
Religion or belief Member of faith/religious groups such as Christian's, muslims, Hindus, Sikhs, Jews etc. Non-believers	56% of the Croydon population is Christian, 8.1% Muslim and 6% Hindu. The identification and designation of Neighbourhood Centres offers greater opportunities for the provision of community facilities to support people from different faiths/religion. This will improve access to facilities for faith groups.	N/A	Croydon Observatory
Pregnancy and Maternity	The advantages of the changes to SP2-SP8 applicable to the wider community would also apply to this protected characteristic. Pregnant women and parents would benefit from access to suitable housing, education, skills training opportunities, better infrastructure, social services, community facilities (e.g. childcare services), transport and quality of the built environment.	N/A	Croydon Observatory
Community cohesion issues	<p>The changes to increase affordable housing requirements would result in more diverse communities in terms of cultures, religions or beliefs, ethnicities and social backgrounds by ensuring that there are "clusters" of affordable housing and a mix of housing types, size and tenure integrated into new development.</p> <p>The provision of additional pitches for gypsies and travellers may improve community cohesion by promoting good relations between gypsies and travellers and settles communities, increasing awareness and understanding of gypsy and traveller needs, culture and</p>	Recent consultation highlighted that many residents are adverse to a growth in housing of different types, size and tenure in their community, in particular the provision of accommodation for gypsies and travelers. This indicates that gypsies and travelers may be excluded from the settled community, and may be subject to harassment, discrimination and victimisation. However the provision of sites for gypsies and travelers may reduce the number of unauthorized encampments and thereby reduce tensions with the settled community.	Community Strategy 2016-2021 Representations on the November 2015 consultation on the Croydon Local Plan: Strategic Policies (Partial Review)

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>lifestyle.</p> <p>All residents can benefit from enhanced meaningful interaction from those with different backgrounds, including greater inter-faith engagement and interactions between young and older people, or people from different ethnic backgrounds (those who belong to a protected characteristic and those who do not). When people from different backgrounds get on well together, there is a greater sense of community cohesion.</p> <p>Residents from different groups would also have increased access to a variety of housing options which are suitable for their diverse needs, which would support vulnerable or disadvantaged people by enhancing their opportunities to lead fulfilling lives, have a sense of belonging, and a united sense of shared values. Providing a choice of housing for people at all stages of life, would facilitate a reduction in social, economic and environmental deprivation, and is likely to assist in creating more cohesive communities and increase in community sense of belonging and satisfaction with the local area.</p> <p>The designation of neighbourhood centres and the opportunity for a greater provision of community facilities offers different groups and communities access to the same local facilities and services. Further, the protection of public houses as community facilities retains and expands the opportunities for more local</p>		

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	community facilities, social interaction and cohesion.		
Delivering social value	<p>The proposed changes to the Croydon Local Plan: Strategic Policies delivers social value by enabling the borough to provide for its housing need. This provides social benefits such as improving health and wellbeing through ensuring that all residents have access to suitable housing through all stages of life, including vulnerable people and protected groups, and reducing the amount of homeless households in temporary accommodation. The policy changes are targeted at addressing the needs of groups who have inadequate housing, and will assist to reduce deprivation, in particular where it is spatially concentrated.</p> <p>Lifetime homes standards encourage flexibility and adaptability to support the changing needs of individuals and families at different stages of life.</p> <p>The Local Plan provides economic benefits by protecting the borough's employment uses to ensure local employment, education and skills training opportunities. An improvement to public transport offers social and environmental benefits by improving access to services for all groups and also reducing car use in the borough.</p>	N/A	

2.3	Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?
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Please read the corporate public consultation guidelines before you begin:
<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

No.

2.4 **If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.**

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required.

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

Stage 3 Improvement plan

Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

3.1 **Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.**

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action
Race/ethnicity Black and Minority Ethnic (BME) groups Refugee Communities Gypsy and Traveller communities White Minority	Reduction in strategic target for 60% of new homes to have 3 or more bedrooms to 50% slightly reduces the aspiration for larger homes in the borough and may not provide housing stock that can address overcrowding issues, particularly for the	<ul style="list-style-type: none"> Croydon Monitoring Report to assess effectiveness of the Croydon Local Plan: Strategic Policies. 	Head of Spatial Planning Service	N/A

Groups	BME community.			
Race/ethnicity Gypsy and Traveller communities	Recent consultation highlighted that many residents are adverse to a growth in housing of different types, size and tenure in their community, in particular the provision of accommodation for gypsies and travellers. This indicates that gypsies and travellers may be excluded from the settled community, and may be subject to harassment, discrimination and victimisation.	<ul style="list-style-type: none"> As new gypsy sites are allocated and occupied, organise workshops between gypsy and traveller communities and affected residents to promote good relations, and increase awareness and understanding of gypsy and traveller needs, culture and lifestyle. Through promotion and education initiatives, generate knowledge and understanding of hate crime and incidents, and encouraging gypsy and traveller communities to report them. 	Head of Tenancy and Caretaking	N/A
Age and Disability Older people and others with disabilities in need of specialist (extra care) homes.	While there is currently an oversupply of residential care houses, the change to remove care homes from the definition of community facility (previously protected from redevelopment by policy), means there is a potential risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future. This is a potential disadvantage due to the projected large rise in the number of people with dementia or mobility problems (99% and 88% respectively). However, the Strategic Housing Market Assessment (2015) notes that there is currently a significant supply of residential care	<ul style="list-style-type: none"> Croydon Monitoring Report to assess effectiveness of the Croydon Local Plan: Strategic Policies. If demand for residential care homes or specialist care homes exceeds supply, then consider methods to encourage and develop council or privately-funded residential care homes or specialist care homes. Consult tenants on proposals for converting existing sheltered provision into extra care housing which will better cater to them 	Head of Spatial Planning Service Senior Joint Commissioner – Supported Housing Senior Joint Commissioner – Supported Housing	N/A

	housing. Further, over the past few years there has generally been a move away from providing sheltered and residential care housing towards extra-care housing, with an estimated demand for 4% of new homes to be specialist (extra care) homes to 2036. Development of extra care housing is generally provided for as a dwelling unit and would be generally supported by the changes to Policy SP2: Homes.	as they grow older.		
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3.2 How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?

To be completed following the publication period and post examination by Planning Inspectorate. The report to Council for adoption for the Croydon Local Plan: Strategic Policies – Partial Review would include the Equalities Analysis conclusions with actions identified for relevant heads of service.

3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?

The publication period on the Croydon Local Plan: Strategic Policies – Partial Review and associated documents, including the Equalities Analysis, will occur between 5 September and 17 October 2016. The consultation will provide people with an opportunity to comment on the overall ‘soundness’ of the Local Plan Strategic Policies, namely that they are ‘justified’, ‘effective’, and consistent with national and London Plan policy, and meet local needs. In addition, people may comment on the Equalities Analysis provided that any comments are related to a specific policy.

Section 4 Decision on the proposed change

4.1 Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?

Decision	Definition	Yes / No
We will not make any major amendments to the proposed change because it already includes all appropriate actions.	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	Yes
We will adjust the proposed change.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	No

We will continue with the proposed change as planned because it will be within the law.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.	Yes
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	No

4.2 Does this equality analysis have to be considered at a scheduled meeting?
If so, please give the name and date of the meeting.

A summary of the equality analysis will be included in the report which has been prepared for the cabinet meeting on the Croydon Local Plan: Strategic Policies – Partial Review (Proposed submission) (11 July 2016). The Equality Analysis can be made available to any cabinet members.

4.3 When and where will this equality analysis be published?

An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.

The publication period on the Croydon Local Plan: Strategic Policies – Partial Review and associated documents, including the Equalities Analysis, will occur between 5 September and 17 October 2016. Copies of documents will be made available at local libraries and on the Council website, Facebook and Twitter, the latter reminding the public about the dates and locations of publication period.

The consultation will provide people with an opportunity to comment on the overall ‘soundness’ of the Local Plan Strategic Policies, namely that they are ‘justified’, ‘effective’, and consistent with national and London Plan policy, and meet local needs. In addition, people may comment on the Equalities Analysis provided that any comments are related to a specific policy.

The next stage in preparing the Croydon Local Plan: Strategic Policies- Partial Review is to publish the Proposed Submission draft for comment with all comments to be sent to the Planning Inspectorate for consideration by an independent planning inspector at an Examination in Public. This report is seeking endorsement to publish the Croydon Local Plan: Strategic Policies- Partial Review (Proposed Submission) report for comment. This will fulfil the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council’s adopted Statement of Community Involvement 2012. The publication is not a consultation as the Council is not able to make changes to the Local Plan following publication. Any proposed changes will be considered by the independent planning inspector. The Council is however able to recommend main modifications to the planning inspector. Any main modifications arising from the publication of the Proposed Submission report will be presented to Council with the report seeking approval to submit the Croydon Local Plan: Strategic Policies- Partial Review to the Secretary of State.

4.4 When will you update this equality analysis?

Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not

The equality analysis considers the recommended changes to Croydon Local Plan: Strategies Policies (Proposed Submission) for submission, in response to the November-December 2015 consultation. If any of those changes are implemented prior to publication in September 2016, the equalities analysis can be updated to track equality impacts as it progresses.

4.5 Please seek formal sign of the decision from Director for this equality analysis?
 This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-to-date.

Officers that must approve this decision	Name and position	Date
Head of Service / Lead on equality analysis	Steve Dennington, Interim Head of Spatial Planning	14/06/2016
Director	Heather Cheesbrough (Director of Planning & Strategic Transport)	15/06/2016

Email this completed form to equalityandinclusion@croydon.gov.uk, together with an email trail showing that the director is satisfied with it.

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Croydon Council Equality Analysis Form

Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1 Analysing the proposed change

1.1.1	What is the name of the change?
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DM1: Housing Choice for Sustainable Communities

DM2: Development on Garden Land.

DM3: Residential Care and Nursing Homes.

1.1.2	Why are you carrying out this change?
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Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM1-3: Review of local plan policy; inclusive part of the Croydon Local Plan: Detailed Policies and Proposals.

1.1.3	What stage is your change at now? See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.
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DM1-3: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1	Who are your internal and external stakeholders? For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.
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DM1-3: Wider Community, Council Staff, Members.

1.2.2	What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?
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DM1: Optimising the supply of new housing. Sustain strong, successful and thriving communities. Improve health and well-being through decent homes and neighbourhoods.
DM2: Optimising the supply of new housing, by permitting development within an existing garden or curtilage.
DM3: Regulating the development of residential care and nursing homes in Croydon to meet the need for the services provided by the home in supporting with the care of the residents of Croydon.

1.2.3	Does your proposed change relate to a service area where there are known or potential equalities issues? Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)
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Yes: There are a number of inequalities in relation to housing regarding overcrowding, under provision of affordable housing which tend to affect some protected and vulnerable groups more than others

1.2.4	<p>Does your proposed change relate to a service area where there are already local or national equality indicators?</p> <p>You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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Yes. The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objectives listed below:

- Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion and in particular 'Work in partnership to provide a diverse supply of decent homes and a range of housing services that meet the lifetime needs of individuals and families and make for sustainable and thriving communities'. Encourage local people to be independent and resilience by providing responsive and accessible services offering excellent customer care and in particular 'Explore opportunities for integrated community-based health and social care services that are preventative and support people to live independently'.

1.2.5	<p>Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"</p>
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Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	<p>DM1: This policy is likely to have a positive impact on protected groups see 1.2.3 above.</p> <p>DM2&3: These policies are likely to have a positive impact on this group.</p> <p>DM3: The provision of additional Care / Nursing homes is likely to have a positive impact on this group.</p>	<p>DM1-3: These policies are unlikely to have any significant negative impact on this group.</p>
Race/ Ethnicity	<p>DM1: This policy is likely to have a positive impact on protected groups see 1.2.3 above.</p> <p>DM2-3: These policies are unlikely to have any significant positive impact on this group.</p>	<p>DM1-3: These policies are unlikely to have any significant negative impact on this group.</p>
Gender	<p>DM1-3: These policies are unlikely to have any positive impact on this group.</p>	<p>DM1-3: These policies are unlikely to have any significant negative impact on this group.</p>
Transgender	<p>DM1-3: These policies are unlikely to have any positive impact on this group.</p>	<p>DM1-3: These policies are unlikely to have any significant negative impact on this group.</p>
Age	<p>DM1&2: These policies are likely to have any positive impact on this group.</p> <p>DM3: The provision of additional Care / Nursing homes is likely to</p>	<p>DM1-3: These policies are unlikely to have any significant negative impact on this group.</p>

	have a positive impact on this group.	
Religion /Belief	DM1-3: These policies are unlikely to have any positive impact on this group.	DM1-3: These policies are unlikely to have any significant negative impact on this group.
Sexual Orientation	DM1-3: These policies are unlikely to have any significant positive impact on this group.	DM1-3: These policies are unlikely to have any significant negative impact on this group.
Social inclusion issues	DM1: The construction of three bedroom homes will provide extra housing choice for Croydon communities DM2: The permitting of development on curtilage and gardens will provide extra housing choice for the community. DM3: This policy is likely to have a positive impact on this group - will create new care sector employment opportunities in the area.	DM1: Three bedroomed homes may be of disadvantage to single, smaller households and those on lower incomes as they may be considered as unaffordable. DM2 &DM3: These policies are unlikely have any significant negative impact on this group.
Community Cohesion Issues	DM1: The construction of three bedroom homes will provide a housing solution that is suitable for a broad cross section of the community with diverse backgrounds. DM2: The permitting of development on curtilage or gardens will play a key part in providing new homes. DM3: The provision of extra residential care and nursing homes will create new care sector employment opportunities in the area.	DM1: Three bedroom homes may not be suitable and may exclude some within the community. DM2: Most properties with the required amount of curtilage or garden space will be bigger properties in more affluent areas. Homes built on these sites will only be affordable for the more affluent members of the community. DM3: The demand for such residential care / nursing homes could outweigh the number of specialist staff there are willing to locate / relocate to the area for work unless these homes are willing to provide full training / apprenticeships to their staff.
Delivering Social Value	DM1&2: This policy is unlikely to have a positive impact on this group. DM3: The provision of extra residential care / nursing homes will bring positive economic, social change to the area, by providing employment, skills and training to the area.	DM1-3: These policies are unlikely have any significant negative impact on this group.

1.2.6	In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider? For example, geographical / area based issues, strengths or weaknesses in partnership
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working, programme planning or policy implementation

DM1: NO
DM2: NO
DM3: NO

1.2.7 **Would your proposed change affect any protected groups more significantly than non-protected groups?**

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....

DM1: YES. Changes may affect some protected groups more significantly, see 1.2.3 above.
DM2: NO. Any changes would affect protected and non-protected groups equally.
DM3: YES. Permission to develop residential care/nursing homes will affect the protected groups of Age and Disability as care provision in the borough will have a direct effect on the essential services that these groups rely upon.

1.2.8 **As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?**

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM1: Don't Know. The proposed change is likely to help the Council in advancing equality of opportunity between people who belong to any protected groups and those who do as the construction of three bedroom homes will provide a housing solution that is suitable for a broad cross section of the community with diverse backgrounds.

DM2: No. This policy should not help or hinder any groups with a protected characteristic.

DM3: Yes. The proposed change is likely to help the Council in advancing equality of opportunity between people who belong to any protected groups and those who do. This policy will help those that rely on residential care services when there is sufficient need in the borough for additional services to be provided.

1.2.9	<p>As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?</p> <p><i>In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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DM1: Yes - the proposed change likely to help the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic as it will provide a housing solution that is suitable for a broad cross section of the community with diverse backgrounds

DM2: Don't Know. Not sure if the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

DM3: Yes. The proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic. This policy will help those that rely on residential care services when there is sufficient need in the borough for additional services to be provided.

1.2.10	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?</p> <p><i>In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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DM1-3: YES. This policy should help the Council in fostering good relations between people who belong to any protected groups and those who do not as it will result in an increase in integration.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
<p>No, further equality analysis is not required</p>	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	<p>DM1&3: A full analysis is not required as the policies will not have any adverse impact on protected groups in comparison to non-protected groups.</p> <p>DM2: No further equality analysis is required as the policy itself does not exclude any of the protected groups. There may however be an eventual affordability issue arising when new homes have been developed.</p>

1.1 Analysing the proposed change

1.1.1	What is the name of the change?
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<p>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres. Policy DM5: Development in Neighbourhood Centres. Policy DM6: Development in Shopping Parades. Policy DM7: Development in Restaurant Quarter Parades. Policy DM8: Development in edge of centre and out of centre locations. Policy DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial locations</p>

1.1.2	<p>Why are you carrying out this change? Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.</p>
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<p>DM4-9: Review of local plan policy; inclusive part of the Croydon Local Plan: Detailed Policies and Proposals.</p>
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1.1.3	<p>What stage is your change at now? See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.</p>
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<p>DM4 – DM9: Preferred and Alternative Options stage of Croydon Local Plan, Detailed Policies and Proposals.</p>
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Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1	Who are your internal and external stakeholders? For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.
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DM4-DM9: Wider Community, Council Staff, Members.

1.2.2	What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?
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Policy DM4: Development & Enhancement of Croydon Metropolitan Centre, District and Local Centres.
Policy DM5: Development and enhancement of Neighbourhood Centres.
Policy DM6: Development and enhancement of Shopping Parades.
Policy DM7: Development and enhancement of Restaurant Quarter Parades.
Policy DM8: Development and enhancement of edge of centre and out of centre locations.
Policy DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations.

1.2.3	Does your proposed change relate to a service area where there are known or potential equalities issues? Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)
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DM4: NO: New developments will not be permitted if they result a net loss in ground floor area.
DM5: NO: This policy seeks to maintain and enhance neighbourhood centres.
DM6: NO: This policy seeks to maintain and enhance the viability of local shopping parades.
DM7: NO: This policy seeks to maintain and enhance the viability of the boroughs Restaurant Quarters.
DM8: NO: This policy seeks to maintain and enhance the viability of the edge of town and out of town centres.
DM9: NO: This policy encourages the redevelopment of warehousing premises in strategic, separated and integrated industrial locations.
The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4	<p>Does your proposed change relate to a service area where there are already local or national equality indicators?</p> <p>You can find out from the Equality Strategy (http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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Yes: The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objective: Foster good community relations and cohesion by getting to know our diverse communities and understand their needs and in particular: 'Promote civic pride and a sense of belonging across Croydon by providing opportunities for people to come together and share meaningful interaction'.

1.2.5	<p>Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”</p>
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Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	<p>DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services.</p> <p>DM9: This policy is unlikely to have any significant positive or negative impact on this group.</p>	<p>DM4-9: These policies are unlikely to have any significant negative impact on this group.</p>
Race/ Ethnicity	<p>DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services.</p> <p>DM9: This policy is unlikely to have any significant positive or negative impact on this group.</p>	<p>DM4-9: These policies are unlikely to have any significant negative impact on this group.</p>
Gender	<p>DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services.</p> <p>DM9: This policy is unlikely to have any significant positive or negative impact on this group.</p>	<p>DM4-9: These policies are unlikely to have any significant negative impact on this group.</p>
Transgender	<p>DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services</p> <p>DM9: This policy is unlikely to have any significant positive or negative impact on this group.</p>	<p>DM4-9: These policies are unlikely to have any significant negative impact on this group.</p>
Age	<p>DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services</p> <p>DM9: This policy is unlikely to have</p>	<p>DM4-9: These policies are unlikely to have any significant negative impact on this group.</p>

	any significant positive or negative impact on this group.	
Religion /Belief	DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services. DM9: This policy is unlikely to have any significant positive or negative impact on this group.	DM4-9: These policies are unlikely to have any significant negative impact on this group.
Sexual Orientation	DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services DM9: This policy is unlikely to have any significant positive or negative impact on this group.	DM4-9: These policies are unlikely to have any significant negative impact on this group.
Social inclusion issues	DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services DM9: These policies are unlikely to have any significant positive impact on this group.	DM4-9: These policies are unlikely to have any significant negative impact on this group.
Community Cohesion Issues	DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services DM9: This policy is unlikely to have any significant positive on this group.	DM4-9: These policies are unlikely to have any significant negative impact on this group.
Delivering Social Value	DM4-8: Maintained and viable centres benefit this group as they provide more convenient access to essential goods and services DM9: This policy is unlikely to have any significant positive or negative impact on this group.	DM4-9: These policies are unlikely to have any significant negative impact on this group.

1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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DM4-9: NO

1.2.7	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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DM4-9: NO. Any changes would affect protected and non-protected groups equally.

1.2.8 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM4-9: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM4-9: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM4-9: Don't Know: Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	DM4-9: No further equality analysis is required as the policies do not have any likely significant impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

DM10: Design and Character
 DM11: Shop front design and security
 DM12: Advertisement Hoardings
 DM13: Refuse & Recycling
 DM14: Public Art
 DM15: Tall & Large Buildings
 DM16: Views & Landmarks
 DM17: Heritage Assets & Conservation

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM 10-17: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3 What stage is your change at now?

See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM10-17: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1	Who are your internal and external stakeholders? For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.
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DM10-17: Wider Community, Council Staff, Members.

1.2.2	What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?
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DM10: To ensure that development enhances and sensitively responds to the predominant built form improving the quality of the boroughs: public, private and semi-public spaces that reinforce local character, creating a high quality built environment, with an emphasis on cohesive design and management of landscape and a sensitive approach to architectural lighting.

DM11: To ensure that shop fronts are attractive, secure and of high quality design and remain flexible for future developments.

DM12: To ensure that advertisement hoarding positively contributes to the character and appearance of new and existing streets.

DM13: To ensure that refuse and recycling facilities are integrated in to the overall design of the borough.

DM14: To enhance and express local character.

DM15: To ensure that tall and large buildings respect and enhance the local character of the area.

DM16: Consideration given to impact of new development on local designated views and landmarks.

DM17: To preserve and enhance the character, appearance and setting of heritage assets in the borough.

1.2.3	Does your proposed change relate to a service area where there are known or potential equalities issues? Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)
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DM10: NO: This policy will affect all new built environment and landscaping, but will not affect any of the protected groups specifically.

DM11: NO: This policy will affect all shop frontages in the borough, but will not affect any of the protected groups specifically

DM12: NO: This policy is only applicable to advertisement hoardings.

DM13: NO: This policy will affect the collection of refuse and recycling in the borough, but

will not affect any of the protected groups specifically.

DM14: NO: This policy is only applicable to public art.

DM15: NO: This policy relates to the potential construction of new tall buildings in the borough.

DM16: NO: This policy only relates to designated views and landmarks.

DM17: NO: This policy only relates to applicable to the heritage assets in the borough.

The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?

You can find out from the Equality Strategy (<http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

No: These policies do not relate to a service area where there are already local or national equality indicators.

1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	<p>DM10: This policy will help ensure that public places, private and semi-public spaces are designed to be more accessible by this group.</p> <p>DM11: This policy will help ensure shop fronts are accessible</p> <p>DM12, 14, 16 & 17: These policies are unlikely to have any significant positive impact on this group.</p> <p>DM13: This policy could improve ease of access to refuse and recycling facilities for this group.</p> <p>DM15: Provides accessible space to all.</p>	<p>DM10-17: These policies are unlikely to have any significant negative impact on this group.</p>
Race/ Ethnicity	<p>DM10-17: These policies are unlikely to have a significant positive impact on this group.</p>	<p>DM10-17: These policies are unlikely have any significant negative impact on this group.</p>
Gender	<p>DM10-17: These policies are unlikely to have a positive impact on this group.</p>	<p>DM10-17: These policies are unlikely have any significant negative impact on this group.</p>
Transgender	<p>DM10-17: These policies are unlikely to have a positive impact on this group.</p>	<p>DM10-17: These policies are unlikely have any significant negative impact on this group.</p>
Age	<p>DM10-17: These policies are</p>	<p>DM10-17: These policies are</p>

	unlikely to have a positive impact on this group.	unlikely have any significant negative impact on this group.
Religion /Belief	DM10-17: These policies are unlikely to have a positive impact on this group.	DM10-17: These policies are unlikely have any significant negative impact on this group.
Sexual Orientation	DM10-17: These policies are unlikely to have a positive impact on this group.	DM10-17: These policies are unlikely have any significant negative impact on this group.
Social inclusion issues	DM10-17: These policies are unlikely to have a positive impact on this group.	DM10-17: These policies are unlikely have any significant negative impact on this group.
Community Cohesion Issues	<p>DM10: Better designed spaces could offer more opportunity for individuals to meet other members of the community.</p> <p>DM11: Better designed shop frontages will encourage the community to use their local shops.</p> <p>DM12, 13, 15, 16 & 17: These policies are unlikely to have any significant positive impact on this group.</p> <p>DM14: Public Art can potentially be used as an opportunity to bring the community together.</p>	DM10-17: These policies are unlikely have any significant negative impact on this group.
Delivering Social Value	<p>DM10, 12, 16: These policies are unlikely to have any significant positive impact on this group.</p> <p>DM11: Better designed shop frontages could attract new business to the area, creating employment.</p> <p>DM13: Ease of access to enhanced refuse and recycling collection facilities could improve the cleanliness of the borough.</p> <p>DM14: Public art can enhance the attractiveness of the area and bring the community together.</p> <p>DM15: New tall buildings especially those of commercial use can bring extra employment and economic benefit to the borough.</p> <p>DM17: Preservation of heritage assets can attract visitors to the area and be of benefit to the local economy.</p>	DM10-17: These policies are unlikely have any significant negative impact on this group.

1.2.6	In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?
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For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

DM10-17: NO.

1.2.7 Would your proposed change affect any protected groups more significantly than non-protected groups?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....

DM10-17: NO. Any changes would affect protected and non-protected groups equally.

1.2.8 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM10-17: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM10-17: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?</p> <p><i>In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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DM10-17: Don't Know: Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	DM10-17: No Further equality analysis is required as these policies do not have a significant impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1	What is the name of the change?
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**DM18: Providing and protecting community facilities
DM19: Protecting Public Houses
DM20: Cemeteries and Burial Grounds.**

1.1.2	<p>Why are you carrying out this change? Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.</p>
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DM18-20: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3 What stage is your change at now?

See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM18-20: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM18-20: Wider Community, Council Staff, Members & Community Groups.

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

DM18: To ensure that a network of community facilities providing essential public services are provided and protected consistently throughout the borough.

DM19: To ensure public houses are afforded protection in order to serve a local need

DM20: To support applications for cemeteries and burial grounds.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response
If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

DM18-20: The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?

You can find out from the Equality Strategy (<http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objectives listed below: Improve empowerment and participation by strengthening partnership work with community, faith and voluntary sectors, in particular:

Encourage community cohesion and partnership by facilitating a greater community response to tough issues as a way of changing attitudes and behaviours in the workplace and wider community.

Create accessible and inclusive ways for people, including staff, to participate in council, community and civic life.

Ensure that the communications the Council produces meet the needs and preferences of individuals and can be accessed by our diverse communities.

Encourage partners from all sectors to be inclusive and accessible by working in partnership local people to remove the barriers that prevent them from participating in community and civic life.

1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	DM18&19: These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult	DM18-20: These policies are unlikely to have a significant negative impact on this group.
Race/ Ethnicity	DM18&19: These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult	DM18-20: These policies are unlikely to have a significant negative impact on this group.
Gender	DM18&19: These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group. DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult	DM18-20: These policies are unlikely to have a significant negative impact on this group.
Transgender	DM18&19: These policies will	DM18-20: These policies are

	<p>protect essential community facilities, public houses and services that may be easier to access for individuals in this group.</p> <p>DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult</p>	<p>unlikely to have a significant negative impact on this group.</p>
Age	<p>DM18&19: These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group.</p> <p>DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult</p>	<p>DM18-20: These policies are unlikely to have a significant negative impact on this group.</p>
Religion /Belief	<p>DM18&19: These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group.</p> <p>DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult</p>	<p>DM18-20: These policies are unlikely to have a significant negative impact on this group.</p>
Sexual Orientation	<p>DM18&19: These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group.</p> <p>DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult</p>	<p>DM18-20: These policies are unlikely to have a significant negative impact on this group.</p>
Social inclusion issues	<p>DM18&19: These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group.</p> <p>DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult</p>	<p>DM18-20: These policies are unlikely to have a significant negative impact on this group.</p>
Community Cohesion Issues	<p>DM18&19: These policies will protect essential community facilities, public houses and services that may be easier to access for individuals in this group.</p> <p>DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult</p>	<p>DM18-20: These policies are unlikely to have a significant negative impact on this group.</p>

Delivering Social Value	<p>DM18&19: Community facilities, services and pubs provide a service in the area and employment.</p> <p>DM20: This policy is likely to have a positive impact especially on groups that may find the application process more difficult</p>	<p>DM18-20: These policies are unlikely to have a significant negative impact on this group.</p>
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1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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DM18-20: NO.

1.2.7	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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DM18-20: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?</p> <p><i>In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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DM18-20: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	<p>As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?</p> <p><i>In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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DM18-20: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?</p> <p><i>In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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DM18-20: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report</p>	DM18&19: Community facilities, public houses and public services could potentially have an impact on residents of the borough but is unlikely to affect

Decision	Guidance	Response
	used in decision making, such as a Cabinet report	protected groups more significantly than non-protected groups. DM20: No Further equality analysis is required as the policy itself does have any adverse impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1	What is the name of the change?
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DM21: Sustainable Design and Construction DM22: Land Contamination DM23: Sustainable Drainage Systems & Reducing Flood Risk
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1.1.2	Why are you carrying out this change? Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.
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DM21-23: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3	What stage is your change at now? See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.
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DM21-23: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1	Who are your internal and external stakeholders? For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.
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DM21-23: Wider Community, Council Staff, Members.

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

DM21: This policy will promote high standards of development and construction throughout the borough.

DM22: This policy advises how development proposals on contaminated land should be progressed.

DM23: This policy ensures that the impact caused by flooding in the borough is minimised by controlling development in areas of higher flood risk and sustainable drainage provided.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?
Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response
If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

DM21-23. NO. These policies relate to the quality of the construction of potential new developments in the borough.

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?
You can find out from the Equality Strategy (<http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes: The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objective:

Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion, in particular: Work in partnership to provide a diverse supply of decent homes and a range of housing services that meet the lifetime needs of individuals and families and make for sustainable and thriving communities.

1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.
Race/ Ethnicity	DM21-23: These policies are likely to have a positive impact on this	DM21-23: These policies are unlikely to have a significant

	group.	negative impact on this group.
Gender	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.
Transgender	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.
Age	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.
Delivering Social Value	DM21-23: These policies are likely to have a positive impact on this group.	DM21-23: These policies are unlikely to have a significant negative impact on this group.

1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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DM21-23: NO

1.2.7	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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DM21-23: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?</p> <p><i>In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.</i></p>
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Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM21-23: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM21-23: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic.

1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM21-23: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	DM21-23: No Further equality analysis is required as the policy does not have any adverse impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1	What is the name of the change?
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DM24: Metropolitan Green Belt, Metropolitan Open Land & Local Green Spaces DM25: Biodiversity DM26: Trees
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1.1.2	Why are you carrying out this change? Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.
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DM24-26: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3	What stage is your change at now? See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.
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DM24-26: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.
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Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.
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1.2 Who could be affected by the change and how

1.2.1	Who are your internal and external stakeholders? For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.
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DM24-26: Wider Community, Council Staff, Members.
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1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

DM24: This policy assists the protection of the boroughs metropolitan green belt, metropolitan open land and local green spaces.
DM25: This policy ensures that biodiversity across the borough is enhanced and improves access to nature.
DM26: This policy protects and enhances the boroughs trees, woodlands, trees and hedgerows.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?
 Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response
 If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

DM24: NO. This policy assists the protection of metropolitan green belt and open spaces
DM25: NO. This policy seeks to improve access to nature and biodiversity across the borough.
DM26: NO. This policy protects and enhances the boroughs woodlands, trees and hedgerows.
 The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?
 You can find out from the Equality Strategy (<http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

No: The proposed change does not relate to a service area where there are already equality indicators.

1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	DM24-26: These policies are likely to have a positive impact on this group.	DM24-26: These policies are unlikely to have a significant negative impact on this group.
Race/ Ethnicity	DM24-26: These policies are likely to have a positive impact on this group.	DM24-26: These policies are unlikely to have a significant negative impact on this group.
Gender	DM24-26: These policies are likely	DM24-26: These policies are

	to have a positive impact on this group.	unlikely to have a significant negative impact on this group.
Transgender	DM24-26: These policies are likely to have a positive impact on this group.	DM24-26: These policies are unlikely to have a significant negative impact on this group.
Age	DM24-26: These policies are likely to have a positive impact on this group.	DM24-26: These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	DM24-26: These policies are likely to have a positive impact on this group.	DM24-26: These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	DM24-DM26: These policies are likely to have a positive impact on this group	DM24-26: These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	DM24-26: These policies are likely to have a positive impact on this group.	DM24-26: These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	DM24-26: These policies are likely to have a positive impact on this group.	DM24-26: These policies are unlikely to have a significant negative impact on this group.
Delivering Social Value	DM24-26: These policies are likely to have a positive impact on this group.	DM24-26: These policies are unlikely to have a significant negative impact on this group.

1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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DM24-26: NO.

1.2.7	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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DM24-26: DON'T KNOW. May affect some protected groups more significantly than others.

1.2.8	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?</p> <p><i>In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your</p>
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response

DM24-26: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

DM24-26: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

DM24-26: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	DM24-26: No Further equality analysis is required as the policy does not have any adverse impact on protected groups compared to non-protected groups

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

DM27: Promoting sustainable travel and reducing congestion
DM28: Car & Cycle Parking in New Development
DM29: Temporary Car Parks
DM30: Telecommunications

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM27-30: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3 What stage is your change at now?

See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM27-30: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM27-30: Wider Community, Council Staff, Members.

1.2.2	What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?
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DM27: To encourage the use of sustainable transport across the borough and reduce the impact of traffic congestion.

DM28: To promote sustainable growth, reduce the impact of car parking and to ensure that car parking provision does not impede public transport, emergency services, pedestrians or cyclists. To provide an adequate level of car-parking.

DM29: To enhance a sense of place and improving the character of an area, permission will only be granted for temporary uses other than temporary car parks.

DM30: To protect the metropolitan green belt by regulating the construction of telephone masts.

1.2.3	<p>Does your proposed change relate to a service area where there are known or potential equalities issues?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (http://www.croydonobservatory.org/)</p>
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DM27: NO. This policy encourages the use of sustainable transport across the borough.

DM28: NO. This policy aims to reduce the impact of car parking and to ensure that the provision does not impede public transport, emergency services, pedestrians or cyclists.

DM29: NO. This policy sets to improve the character of the area by granting temporary uses other than car parks.

DM30: NO. This policy protects the metropolitan greenbelt by regulating the construction of telephone masts.



The proposed changes do not relate to service areas where there are known or potential equalities issues.

1.2.4	<p>Does your proposed change relate to a service area where there are already local or national equality indicators?</p> <p>You can find out from the Equality Strategy (http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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No: The proposed change does not relate to a service area where there are already equality indicators.

1.2.5	<p>Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”</p>
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Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 	Likely Disadvantage 
Disability	DM27-29: Greater emphasis on	DM27-29: This policy could see the

	<p>sustainable transport including public transport is likely to provide better accessibility to town, district and neighbourhood centres for this group.</p> <p>DM30: This policy is unlikely to have a significant positive impact on this group.</p>	<p>reduction in car parking spaces which could have a negative impact on this group.</p> <p>DM30: This policy is unlikely to have a significant negative impact on this group.</p>
Race/ Ethnicity	DM27-30: These policies are likely to have a positive impact on this group.	DM27-30: These policies are unlikely to have a significant negative impact on this group.
Gender	DM27-30: These policies are likely to have a positive impact on this group.	DM27-30: These policies are unlikely to have a significant negative impact on this group.
Transgender	DM27-30: These policies are likely to have a positive impact on this group.	DM27-30: These policies are unlikely to have a significant negative impact on this group.
Age	<p>DM27-29: More sustainable transport will increase access to town, district and neighbourhood centres increasing mobility to individuals who because of age (young or old) do not drive.</p> <p>DM30: This policy is likely to have a positive impact on this group.</p>	DM27-30: These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	DM27-30: These policies are likely to have a positive impact on this group.	DM27-30: These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	DM27-30: These policies are likely to have a positive impact on this group.	DM27-30: These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	DM27-30: These policies will encourage more sustainable transportation and therefore drive social interaction with using more sustainable transport methods.	DM27-30: These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	DM27-30: This policy will encourage more sustainable transportation and therefore drive social interaction with using more sustainable transport methods.	DM27-30: These policies are unlikely to have a significant negative impact on this group.
Delivering Social Value	<p>DM27-29: Increased mobility due to improved access to sustainable transport in the borough will make it easier for people to access different parts of the borough for work and leisure purposes which will help employment and grow the local economy.</p> <p>DM30: Better telecommunications is likely to have a positive impact in delivering social value</p>	DM27-30: These policies are unlikely to have a significant negative impact on this group.

1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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DM:27-30: NO

1.2.7	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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DM27-30: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?</p> <p><i>In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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DM27-30: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	<p>As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?</p> <p><i>In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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DM27-30: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?</p> <p><i>In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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DM27-30: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	DM27-30: No Further equality analysis is required as the policies do not have any adverse impact on protected groups compared to non-protected groups.

1.1 Analysing the proposed change

1.1.1	What is the name of the change?
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- DM31: Positive Character of the Places of Croydon**
- DM32: Addington**
- DM33: Addiscombe**
- DM34: Broad Green & Selhurst**
- DM35: Coulsdon**
- DM36: Croydon Opportunity Area**
- DM37: Crystal Palace and Upper Norwood**
- DM38: Kenley and Old Coulsdon**
- DM39: Norbury**
- DM40: Purley**
- DM41: Sanderstead**

DM42: Selsdon
DM43: Shirley
DM44: South Croydon
DM45: South Norwood & Woodside
DM46: Thornton Heath
DM47: Waddon

1.1.2 Why are you carrying out this change?
Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

DM31-47: Inclusive part of the Croydon Local Plan 2015 Local Review.

1.1.3 What stage is your change at now?
See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

DM31-47: Preferred and Alternatives Options stage of Croydon Local Plan, Detailed Policies and Proposals.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?
For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

DM31-47: Wider Community, Council Staff, Members.

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

DM31: To ensure that Council's aspirations and objectives for each of Croydon's 16 Places is clearly reflected in the built environment proposals and complement and enhance the positive character types identified in each of the 16 places.

DM32: To ensure that the characteristics of New Addington are respected and enhanced.

DM33: To ensure that the characteristics of Addiscombe are respected and enhanced.

DM34: To ensure that the characteristics of Broad Green and Selhurst are respected and enhanced

DM35: To ensure that the characteristics of Coulsdon are respected and enhanced.

DM36: To enable development opportunities; including public realm improvements, to be undertaken in a cohesive and coordinated manner a Croydon Opportunity Area Planning Framework complemented by for Fairfield, Mid Croydon, West Croydon, East Croydon and Old Town have been adopted.

DM37: Within Crystal Palace and Upper Norwood allocate sites for development.

DM38: Within Kenley and Old Coulsdon allocate sites for development.

DM39: To ensure that the characteristics of Broad Green and Selhurst are respected and enhanced.

DM40: To ensure that the characteristics of Purley are respected and enhanced.

DM41: To ensure that the characteristics of Sanderstead are respected and enhanced.

DM42: To enhance the character of Selsdon.

DM43: To retain the distinct characteristics and qualities of Shirley.

DM44: To strike a balance between enhancing the character of South Croydon and facilitating growth.

DM45: To facilitate growth and strengthen the edge of South Norwood and Woodside.

DM46: To strengthen and enhance the character, and enabling growth in Thornton Heath.

DM47: To enable development opportunities in Waddon in a coordinated and cohesive manner.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?
 Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response
 If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

YES - There are a number of equalities issued in relation to housing, for example overcrowding and lack of affordable housing which tend to affect some protected and vulnerable groups more than others.

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?
 You can find out from the Equality Strategy (<http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes: The proposed change relates to a service area where there are already equality indicators. It links to the equality and inclusion policy objective: Foster good community relations and cohesion by getting to know our diverse communities and understand their needs and in particular: 'Promote civic pride and a sense of belonging across Croydon by providing opportunities for people to come together and share meaningful interaction'.

1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Race/ Ethnicity	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Gender	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Transgender	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Age	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Religion /Belief	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Sexual Orientation	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Social inclusion issues	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Community Cohesion Issues	DM31-47: These policies are likely to have a positive impact on this group.	DM31-47: These policies are unlikely to have a significant negative impact on this group.
Delivering Social Value	DM31-47: These policies are designed to protect, strengthen and enhance the characteristics of the 16 designated places of Croydon.	DM31-47: These policies are unlikely to have a significant negative impact on this group.

1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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DM31-47:NO

1.2.7	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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DM31-47: NO. Any changes would affect protected and non-protected groups equally.

1.2.8	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?</p> <p><i>In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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DM31-47: YES. It is considered that the proposed changes are likely to help people with a protected characteristic.

1.2.9	<p>As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?</p> <p><i>In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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DM31-47: NO. The proposed changes are unlikely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic

1.2.10	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?</p> <p><i>In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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DM31-47: Don't Know. Not sure if proposed change is likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>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 is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	DM31-47: No Further equality analysis is required as the policies do not have any adverse impact on protected groups compared to non-protected groups
Yes, further equality analysis is required	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	
Officers that must approve this decision	Name and position	Date
Report author	Alexander Ross / Bartlett Intern.	22/07/2015
Director		

1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

Name of Officer		
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Date received by Officer		Please send an acknowledgement
Should a full equality analysis be carried out?		Note the reasons for your decision

Stage 2 Use of evidence and consultation to identify and analyse the impact of the change

Use of data, research and consultation to identify and analyse the probable Impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1	<p>Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.</p> <p>This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.</p>
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2.2	<p>Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.</p>
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Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source

2.3 Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?

Please read the corporate public consultation guidelines before you begin:
<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

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2.4 If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

Stage 3 Improvement plan

Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

3.1 Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action

3.2 How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?

3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?

Section 4 Decision on the proposed change

4.1 Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?

Decision	Definition	Yes / No
We will not make any major amendments to the proposed change because it already includes all appropriate actions.	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	
We will adjust the proposed change.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better	

	advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	
We will continue with the proposed change as planned because it will be within the law.	<p>We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change.</p> <p>However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.</p>	
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	

4.2	Does this equality analysis have to be considered at a scheduled meeting? If so, please give the name and date of the meeting.
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