

For General Release

REPORT TO:	CABINET 16 December 2019
SUBJECT:	Addington Village Conservation Area Review - Adoption
LEAD OFFICER:	Shifa Mustafa – Executive Director of Place Heather Cheesbrough - Director of Planning and Strategic Transport
CABINET MEMBER:	Councillor Paul Scott and Councillor Stuart King - Cabinet Member for Environment, Transport & Regeneration (Job Share)
WARDS:	Selsdon and Addington Village Ward

CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON

The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”) directs that a Local Planning Authority should, from time to time, review those parts of their area designated as conservation areas, and designate any parts or further parts which are of special architectural or historic interest (section 69).

Furthermore, as a Local Planning Authority, the Act places the following statutory duties in relation to conservation areas upon the Council:

- From time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas (section 71)
- In the exercise of planning functions special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area (section 72)

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 sustainable growth, whilst preserving and enhancing the borough’s historic environment.

Addington Village Conservation Area Appraisal and Management Plan (CAAMP) relates particularly to Local Plan Strategic Objective 5:

Ensure that high quality new development both integrates, respects and enhances the borough’s natural environment and built heritage.

FINANCIAL IMPACT

The financial implications of adopting the Addington Village CAAMP can be funded through the existing Spatial Planning Service budget.

FORWARD PLAN KEY DECISION REFERENCE NO.: Not a Key Decision

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

1. RECOMMENDATIONS

That Cabinet recommends that Council:

- 1.1 Approve changes to the Addington Village Conservation Area boundary as set out in this report;
- 1.2 Adopt the Addington Village Conservation Area Appraisal and Management Plan (CAAMP) as a Supplementary Planning Document;
- 1.3 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 Addington Village CAAMP; and
- 1.4 Include the former Stables (Addington Palace Golf Clubhouse) and Stable Lodge on the Council's local list of buildings of special architectural or historic interest.

2. EXECUTIVE SUMMARY

- 2.1. The purpose of this report is to seek Cabinet approval to recommend to Council the adoption of proposals resulting from the recent review of Addington Village Conservation Area. The review fulfils requirements set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, Planning Policy and Historic England advice for Local Planning Authorities to consider and review designation of areas of architectural and historic interest, identify their special character and outline how these characteristics can be managed for the future.
- 2.2. Historic research and detailed assessment of the area was undertaken to inform the review and produce draft proposals. Public consultation was undertaken on the draft proposals in April – May 2019. The proposals have been revised following consultation and are now recommended for adoption. The revised proposals recommended for adoption are set out in detail in the appended Consultation Statement (appendix 1), and summarised as follows:
 - **Conservation Area Name Change:** the proposal to change the name to Addington Conservation Area was not supported at consultation and is not recommended for adoption. The existing conservation area name is therefore retained.
 - **Boundary Inclusions:** Inclusion of Addington Palace, the former Stables, Stable Lodge, South Lodge, historic parkland between the Palace and village (now golf course and public park) and Roxton Gardens was generally supported by the consultation. TfL objected to the inclusion of the tramline. It is recommended that this proposal is approved with an adjusted boundary which excludes the tramline.
 - **Boundary Exclusions:** Three areas of modern development within the village were identified for exclusion from the conservation area. The

proposals have been reviewed in light of consultation responses. It is recommended that numbers 80-100 (even) Addington Village Road and the area between Addington Village Road and Kent Gate Way including the substation, Police station, petrol station and adjacent green spaces are retained within the conservation area. Although the buildings do not contribute directly to the special interest of the conservation area, the landscaping, trees and layout nevertheless do contribute to the streetscape and rural character of the area. It is recommended that 63-73 (odd) and 52-54 (even) Boundary Way are removed from the conservation area. The buildings and streetscape do not contribute to the special interest of the conservation area. The surrounding trees are appropriately protected through Tree Preservation Orders and as part of the wider rural setting of the conservation area.

- **Local List Inclusions:** Support was received for inclusion of the former Stables (Addington Palace Golf Clubhouse) and Stable Lodge on the Council's local list of historic buildings. This proposal is recommended for approval.
- **Conservation Area Appraisal and Management Plan Supplementary Planning Document:** This guidance document identifies the special interest of the conservation area and provides guidance on its future management. The text and graphics have been updated to reflect the changes above and to incorporate corrections and additional information provided by consultation responses. The revised document is recommended for adoption.

3. DETAIL

Background to Review

- 3.1. A conservation area is an area of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance. Conservation areas, like statutory listed buildings, are 'designated heritage assets', of national historic or architectural significance.
- 3.2. The council has a statutory duty to consider designation of areas of architectural and historic interest as conservation areas and to review those areas from time to time. This is reinforced by paragraph 186 of the NPPF (updated February 2019) which states "When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest".
- 3.3. The Council also has a statutory duty to identify the special interest of a conservation area and develop guidelines for its future management. In order to fulfil this duty and provide an evidence-based approach promoted by planning policy, Historic England recommends that every conservation area has its own Conservation Area Appraisal and Management Plan (CAAMP) (see background document 1).

- 3.4. To accord with these requirements, Croydon Council commenced a review of conservation areas in the borough in 2013. At the start of the review, general planning guidance that applies to all Conservation Areas in Croydon - the Conservation Area General Guidance SPD (CAGG) – was produced and adopted at full Council in April 2013 and is appended as background document 2. Each individual conservation area is now in the process of being reviewed, with a Conservation Area Appraisal and Management Plan (CAAMP) produced to give supplementary detail and guidance particular to each specific conservation area. Addington Village Conservation Area is the 16th such area to be reviewed.
- 3.5. A CAAMP is formed of two parts: The Appraisal defines the principle qualities that constitute the conservation area's special character and identifies its current condition and threats. The Management Plan addresses the issues raised in the Appraisal and provides area-specific development guidelines to supplement those provided in Croydon's Conservation Area General Guidance (CAGG).
- 3.6. While development in the borough is managed by the policies set out in the Croydon Local Plan 2018 and London Plan, the CAAMP is anticipated to assist local authority officers in making decisions on planning applications, whilst assisting owners and developers in identifying opportunities to preserve and enhance the special interest of the conservation area. It is supported by Policy DM18 of the Croydon Local Plan 2018 which states " All proposals for development must have regard to the development principles in the Conservation Area General Guidance Supplementary Planning Document and Conservation Area Appraisal and Management Plan Supplementary Planning Documents or equivalent."
- 3.7. The CAAMP is recommended for adoption as an Supplementary Planning Document (as defined by the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012) to give it weight as a material planning consideration when determining planning applications. Once adopted, Addington Village CAAMP will supersede the existing Conservation Area Statement which was issued in 1996.
- 3.8. Planning policy and Historic England guidance (see background document 3) also encourages Local Authorities to identify heritage assets of special local interest. To meet this need, the Council holds a Local List of Buildings of Historic or Architectural Importance. Further detail is provided in the associated Local List Supplementary Planning Document, appended as background document 4 to this report. The Croydon Local Plan 2018 sets out the criteria for inclusion on this list as satisfying two of the following criteria: authenticity; architectural significance; historical significance; technical significance; and townscape value. The review of Addington Village Conservation Area provided an opportunity to determine whether any buildings within the area met the criteria for inclusion on the Local List.

4. ADDINGTON VILLAGE CONSERVATION AREA REVIEW & PUBLIC CONSULTATION

- 4.1. The review of the conservation area included extensive historic research and on site assessment. In order to accurately reflect and manage the special architectural and historic interest of the area, the review identified the following proposals:
- Change to the name of the conservation area
 - Amendments to the conservation area boundary
 - Proposed inclusion of 2 properties on the Local List.
 - Draft Conservation Area Appraisal and Management Plan
- 4.2. The proposals were subject to public consultation between 18 April and 30 May 2019. The public consultation was undertaken in line with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's Statement of Community Involvement (2018). A well-attended public meeting was held, in accordance with section 71 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Full details of the public consultation carried out is detailed in the appended Consultation Statement (Appendix 1).
- 4.3. 38 responses to the public consultation were received. These have been considered in full and have resulted in a number of changes to the proposals. The Council's full response and recommended proposals are detailed in the appended Consultation Statement, and summarised below.

Conservation Area Name

- 4.4. To reflect the proposed inclusion of Addington Palace and Parkland, it was originally proposed to re-name the existing Addington Village Conservation Area as Addington Conservation Area.
- 4.5. This proposal was not supported at public consultation for the following reasons:
- It retains historical connection of the area.
 - It differentiates this area from the greater Addington area and from New Addington, avoiding confusion.
 - It describes perfectly the unique situation of the village being within a large and heavily populated London Borough.
 - The village is older than the Palace, dating back to at least the Domesday period, whilst the Palace was added to the village in the 18th century. The village should therefore take precedence.
 - It reflects the area's strong sense of identity as a village.
 - It is reflected in the village signage and road name.
- 4.6. A suggested alternative name was proposed as 'Addington Village and Palace Conservation Area'.
- 4.7. As a result of the consultation, it is not proposed to change the name of the conservation area due to the confusion that may be caused by the proposed name change, the historic primacy of the village and its strong sense of identity.

The existing name of Addington Village Conservation Area is therefore to be retained.

Boundary Amendments

- 4.8. The review proposed inclusion of Addington Palace, the former Stables, Stable Lodge, South Lodge, historic parkland between the Palace and village (now golf course and public park) and Roxton Gardens within the conservation area, to reflect the historic and architectural significance of this area and its intrinsic historic links with Addington Village.
- 4.9. Whilst the principle of inclusion of this area was supported by consultation responses, TfL objected to the inclusion of the tramline as the character of the tramline does not contribute to the conservation area. TfL were also concerned that the designation may impact their operation. Whilst it is not considered the conservation area designation would hinder the tram operation, it is recognised that the tram corridor itself does not contribute to the special architectural or historic interest of the area.
- 4.10. It is recommended that Addington Palace, the former Stables, Stable Lodge, South Lodge, historic parkland between the Palace and village (now golf course and public park) and Roxton Gardens are included within the conservation area with an adjusted boundary which excludes the tramline.
- 4.11. Three areas of modern development within the village were identified for exclusion from the conservation area, as the buildings did not contribute to the character and appearance of the conservation area and therefore were considered to dilute its special interest:
- 80-100 (even) Addington Village Road and adjacent green space,
 - Area between Addington Village Road and Kent Gate Way, including substation, Police station, petrol station and adjacent green space, and
 - 63-73 (odd) and 52-54 (even) Boundary Way.
- 4.12. A number of objections were received to these proposals based around the following themes:
- Development
 - Community
 - Village Identity
 - Consistency
 - Significance of Streetscape
 - Significance of Buildings
 - Adjacency
 - Historic Uses
 - Trees and Green Space
- 4.13. The proposals have been revised in light of the content of the consultation responses and investigation of existing tree protection in the area.
- 4.14. It is recommended that numbers 80-100 (even) Addington Village Road and adjacent green space, and the area between Addington Village Road and Kent Gate Way including the substation, Police station, petrol station and adjacent green space are retained within the conservation area. Although the buildings

do not contribute directly to the special interest of the conservation area, the landscaping, trees and overall layout do nevertheless contribute to the streetscape and rural character of the area.

- 4.15. It is recommended that 63-73 (odd) and 52-54 (even) Boundary Way are removed from the conservation area. The buildings and streetscape do not contribute to the special interest of the conservation area. The surrounding trees are appropriately protected through Tree Preservation Orders and as part of the wider rural setting of the conservation area. The text of the Conservation Area Appraisal and Management Plan has been updated to emphasise the tree protection in place in this area.
- 4.16. A map of the proposed conservation area boundary showing the proposed boundary amendments recommended for approval is appended to this report at Appendix 2.

Local List Inclusions

- 4.17. The Stables (Addington Palace Golf Clubhouse) and Stable Lodge were both built as part of Archbishop Howley's c.1829 improvements and expansion of the Addington Palace estate. They were both identified to meet the local list criteria for historic interest, architectural interest and authenticity, and therefore proposed for inclusion on the local list.
- 4.18. As part of the response to consultation, support was received for inclusion of the Stables (Addington Palace Golf Clubhouse) and Stable Lodge on the council's local list of historic buildings. This proposal is recommended for approval.
- 4.19. A map of the two buildings recommended for inclusion on the local list is appended to this report at Appendix 3.

Conservation Area Appraisal and Management Plan Supplementary Planning Document

- 4.20. This guidance document identifies the special interest of the conservation area and provides guidance on its future management. A number of consultation responses provided additional information, corrections and clarifications relating to the text of the document. The text and graphics have been updated to reflect the changes above and consultation responses as set out in detail in the Consultation Statement (Appendix 1). Amendments to the text shown as tracked changes are appended at Appendix 4. The revised Conservation Area Appraisal and Management Plan recommended for adoption is included at Appendix 5.

5. PRE-DECISION SCRUTINY

- 5.1 This item did not go to a Scrutiny meeting.

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

6.1 Revenue and Capital consequences of report recommendations

Resource and officers time required to update records and notify stakeholders of the adopted proposals will be met from the existing Spatial Planning Service budget. There will be a low level of printing costs, not exceeding £500. These will be met from existing revenue budgets, so there is no requirement for additional funding.

The effect of the decision

6.2 Risks

There are no significant risks arising directly from this report.

6.3 Options

If the recommendations of the Addington Village Conservation Area Review are not brought forward, the council would not be meeting its statutory requirement to review its conservation areas from time to time, and to formulate proposals for their management. An alternative review and management plan would need to be formulated. Whilst Addington Village Conservation Area does not have an up-to-date boundary and CAAMP, the benefits outlined above will not be realised and the deterioration of the fabric and the erosion of the special character of the conservation area is likely to continue. If the local list proposals are not brought forward, the special architectural and historic interest of these buildings will not be recognised within the planning process and in future changes to the building. Both proposals should lead to greater engagement with the community in relation to their understanding of the historic environment.

6.4 Future savings/efficiencies

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 service.

Approved by Lisa Taylor, Director of Finance, Investment and Risk

7. LEGAL CONSIDERATIONS

7.1 The Director of Law and Governance comments that the process for the adoption of a Supplementary Planning Document is detailed in the Town and Country Planning (Local Planning) (England) Regulations 2012, particularly regulations 14 and 35. Officers are satisfied that this process has been followed. It is therefore within the authority of Cabinet to recommend the adoption of the Supplementary Planning Document to Full Council as set out in the recommendations.

Approved by Sean Murphy, Director of Law and Governance and Deputy Monitoring Officer

8. HUMAN RESOURCES IMPACT

- 8.1 There are no Human Resource implications arising from this report. If any should arise these will be managed under the Council's policies and procedures.
- 8.2 Approved by Jennifer Sankar, Head of HR, Place and Gateway, Strategy and Engagement on behalf of Sue Moorman, Director of Human Resources.

9. EQUALITIES IMPACT

- 9.1 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 scoping exercise, which assessed the Plans' impact on equalities and identified that a full Equalities Assessment was necessary for the Proposed Submission stage. The full Equalities Assessment 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 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.

Approved by Yvonne Okiyo, Equalities Manager, Policy and Partnerships

10. ENVIRONMENTAL IMPACT

- 10.1 A Sustainability Appraisal (SA) was prepared for the Croydon Local Plan 2018. Given that Addington Village CAAMP 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).
- 10.2 The Environmental Agency, Natural England and Historic England were consulted on the need for a SA / SEA of the CAAMP. All three statutory consultees confirmed that the production and adoption of Addington Village CAAMP is unlikely to have any significant environmental impacts and therefore a full SA/SEA is not required.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no known direct crime and disorder impacts arising from the recommendations of this report.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 To comply with the council's statutory obligations with regard to conservation areas and to facilitate the preservation and enhancement of Addington Village Conservation Area and of the proposed locally listed buildings.

13. OPTIONS CONSIDERED AND REJECTED

- 13.1 The other option would be to not adopt the CAAMP or include the proposed buildings on the Local List. In relation to the CAAMP, this would mean that the Council would not be meeting its statutory obligations, as outlined above. There would be no document to guide development in Addington Village Conservation Area. Applications would need to be determined on the basis of existing planning policy and guidance which is not considered to be sufficiently detailed or area-specific. It would likely lead to additional resource requirements for pre-planning application enquiries, applications and an increase in appeals. The special character of the conservation area would not be robustly recognised and would continue to be eroded through poorly-considered development and incremental change.
- 13.2 Not including the proposed buildings on the Local List would mean their historic and architectural interest would not be recognised in the planning process, not provide clarity to owners of this special interest. This could result in additional resource requirements for future planning enquiries, applications and appeals.

14. DATA PROTECTION IMPLICATIONS

14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

YES

The public consultation has included collation of names, addresses and email addresses for respondents to the consultation.

14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

YES – Appended at Appendix 6

The Director of Planning and Strategic Transport comments that the collation of personal data as part of the public consultation will be used to keep the respondents informed of conservation area review progress and will be deleted following the JR period following adoption. Those respondents who have indicated they wish to be kept informed will be added to the LDF Database. No personal data will be further disseminated. This is in line with the Planning Service Privacy Notice: <https://www.croydon.gov.uk/democracy/data-protection-freedom-information/privacy-notices/planning-privacy-notice> and required by the Town and Country Planning (Local Planning) (England) Regulations 2012.

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APPENDICES TO THIS REPORT:

Appendix 1 – Consultation Statement

Appendix 2 – Recommended Conservation Area Boundary Amendments

Appendix 3 – Recommended Local List Inclusions

Appendix 4 – Recommended amendments to the text of the draft Addington Village Conservation Area Appraisal and Management Plan

Appendix 5 – Recommended Addington Village Conservation Area Appraisal and Management Plan

Appendix 6 – Data Protection Impact Assessment

BACKGROUND PAPERS:

1. Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/heag040-conservation-area-designation-appraisal-and-management/>
2. Croydon Council Conservation Area General Guidance Supplementary Planning Document <https://www.croydon.gov.uk/sites/default/files/articles/downloads/appendix1-cagg.pdf>
3. Historic England Advice Note 7: Local Heritage Listing <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>
4. Croydon Council Local List of Buildings of Architectural or Historic Significance Supplementary Planning Document <https://www.croydon.gov.uk/planningandregeneration/framework/conservation/buildings>