

Consultation Statement: Addington Village Conservation Area Review, including Appraisal and Management Plan Supplementary Planning Document

Consultation statement prepared in accordance with Regulation 12 of the Town and Country Planning (Local Development) (England) Regulations 2012.

1. Purpose of Review

1.1 This consultation statement relates to the review of Addington Village Conservation Area. The primary outcomes of the review are:

- Production of a new Addington Village Conservation Area Appraisal and Management Plan Supplementary Planning Document (SPD).
- Review and amendment of the conservation area boundary
- Proposed inclusion of two properties within the conservation area on the council's local list of buildings of architectural or historic interest.

1.2 The review fulfils the council's statutory duty to identify the special architectural and historic interest of its conservation areas and ensure that special interest is accurately reflected by the conservation area boundary (Planning (Listed Buildings and Conservation Areas) Act 1990, section 69). It also fulfils the council's statutory requirement to develop guidelines for the future management of its conservation areas (PLBCA 1990, section 71).

1.3 The Addington Village Conservation Area Appraisal and Management Plan is formed of two parts: The Appraisal defines the principal qualities that constitute the conservation area's special character. The Management Plan provides area-specific development guidelines and potential enhancement schemes. It is a Supplementary Planning Document to the Croydon Local Plan 2018. It is intended to assist the local authority in fulfilling its statutory duty toward the designation, preservation or enhancement of conservation areas and provide clarity for planners, developers and residents in complying with policy DM18: Heritage Assets and Conservation. Through this, it is intended to improve the efficiency and robustness of the planning and appeal processes. It is also intended to assist in raising understanding of the special interest of the area and encourage owners to engage in the protection and enhancement of the area.

1.4 The review process also provided an opportunity for any buildings considered to meet the criteria for inclusion on the council's local list of buildings of architectural or historic interest to be identified. This ensures that the special local interest of these buildings is recognised appropriately through the planning process.

2. Persons/groups/bodies consulted in connection with the review and preparation of SPD

2.1 Public consultation has occurred in line with the Council's Statement of Community Involvement (SCI). Croydon Council went beyond the requirements of the SCI as detailed below.

3. How were people consulted?

3.1 Prior to formal public consultation, informal consultation was undertaken with the Addington Village Residents Association and Mid Croydon Conservation Area Advisory Panel to inform drafting of the revised Conservation Area Appraisal and Management Plan and associated proposals.

3.2 In addition, before the formal consultation process, the draft SPD went through a process of internal consultation with the Planning Service and relevant council teams including Regeneration, Parks, Highways, Assets and Croydon Museums & Archives Service.

3.3 The formal consultation process for the draft SPD adhered to the Council's adopted Statement of Community Involvement (2019) and also the statutory requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012 and Planning (Listed Buildings and Conservation Areas) Act 1990. Formal Consultation took place for six weeks between 18th April and 30th May 2019. Those consulted (as set out further below) 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.

3.4 Consultation overview

3.4.1 Publicity for consultation was undertaken via the following activities:

- Letters were sent to all addresses within the conservation area and affected by the proposed boundary amendments, as well as to addresses within Addington Village but outside the conservation area and not directly affected by the boundary amendments.
- A letter was sent to Addington Village Resident's Association.
- Emails were sent to Addington Palace Golf Club and Addington Palace inviting them to a meeting. A meeting was subsequently held with Addington Palace Golf Club on 24th April 2019.
- Emails were sent to ward councillors, councillors and to relevant council teams including Development Management, Spatial Planning, Transport, Highways, Trees, Parks, Enforcement, Regeneration, the Museums & Archives Service and Asset Management & Estates.
- Emails were sent to Croydon Conservation Area Advisory Panels and Croydon Natural History and Scientific Society.
- 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 Conservation webpages, *Your Croydon* and Croydon Council *Get Involved* websites were updated to reflect the consultation period and inform persons about the consultation events and how to make a representation.
- A press release was released.
- An advertisement in The Croydon Guardian was published on 18th April as a statutory notice.
- Fliers providing the Council website address, details of the consultation events and methods for submitting representations online were available at Access Croydon, Borough libraries, consultation events and at The Cricketer's Inn.
- Posters advertising the consultation, consultation events and where to find more information were displayed in the area, at Access Croydon and at all Borough libraries.

¹ General Data Protection Regulation (GDPR) came into force on 25th May 2018. 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.

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- Social Media posts from the Croydon Council Twitter feed and Facebook page were posted to inform readers of deadlines and events.

3.4.2 Consultation comprised of the following:

- Information was made available via a specific Addington Conservation Area Review webpage within the conservation webpages on the Council's website, from where an electronic version of the draft Addington Village Conservation Area Appraisal and Management Plan SPD was made available for download. The document was also available digitally via Croydon Council's *Get Involved* webpage.
- Hard copies of the draft SPD were available in Access Croydon and all libraries across the Borough.
- A self-guided trail leaflet was developed to highlight some of the key features of the conservation area.
- A consultation event was held at Addington Church Hall, Addington Village Road on 9th May 2019. Display Boards containing information on the consultation, copies of the draft SPD and self-guided trail leaflets were available to view between 16.00 and 20.00, during which time members of the Council's Planning Department were also on hand to answer questions. A public meeting was held at 18.30. 76 people attended the consultation event.
- The Display Boards and self-guided trail leaflets were made available to view at Croydon Central Library between 11th and 18th May 2019.
- Representations were invited via the Croydon Get Involved website, by email to the LDF inbox or through hard copy versions of the Representation Form available at the consultation events, Access Croydon, each of the Borough's libraries and for download from the website.

3.5 Statutory Consultees

3.5.1 As part of the consultation, statutory consultees and key stakeholders were invited to make a representation on the review proposals including the draft SPD. These included:

- Environment Agency
- Historic Buildings and Monuments Commission for England (Historic England)
- Natural England
- Sport England
- Greater London Authority (GLA)
- Mayor of London
- Homes England
- Highways England
- Transport for London (TfL)
- Network Rail
- Civil Aviation
- Office of Rail Regulation
- Electronic communication providers
- NHS Primary Care Trust
- National Grid
- Southern Gas Networks
- Thames Water

3.5.2 Comments received from Statutory Consultees have been detailed in Section 4 of this statement, along with Council's response.

3.5.3 The neighbouring London Borough of Bromley was also consulted.

3.6 Representations received

3.6.1 A total of 38 representations were received.

4. Comments received from Statutory Consultees and stakeholders

4.1 Historic England

4.1.1 Historic England provided the following comments on the draft SPD:

- *The draft appraisal clearly articulates the significance of the conservation area and its key components. We note the intention to remove areas of C20th development which do not contribute positively to the character and to extend the boundary to encompass Addington Palace and its associated grade II registered landscape, including a number of associated buildings including the 1829 stables. We consider the proposals to be beneficial in respect of securing a positive strategy for the historic environment and to be in conformity with policy 186 of the NPPF. We are therefore content for the council to determine the changes as proposed.*
- *We note reference to the extensive Archaeological Priority Area designation for the conservation area at 2.3 and would draw attention to Historic England's revised guidance on planning and APAs which would helpfully be referenced.*
- *The page numbers no longer follow the index.*

4.1.2 LBC appreciates Historic England's support for the appraisal and boundary changes. The latter is considered further within the section relating to boundary changes below.

4.1.3 The SPD has been revised to reference the APA guidance available on Historic England's website, and to include this within the appendix. The revised text is set out below, where additional text is denoted in red. Paragraph numbering relates to that found in the draft CAAMP for ease of cross-reference:

2.3.1 'Archaeological Priority Areas indicate a high probability of archaeological interest below ground, **of which Tier 1 indicate the highest probability and Tier 4 indicates lower probability.** Addington and Addington Park Tier 2 Archaeological Priority Area covers...'

2.3.3 '**Further information on Archaeological Priority Areas including those in Addington is available from the Greater London Archaeology Advisory Service webpages, referenced in the appendix.** Please **also** see Map 11 of this document and section 4.5 of Croydon's Conservation Area General Guidance SPD for more information.'

7.3.1 'Most of the conservation area and surrounding land is situated within an Archaeological Priority Area, **which identifies the likelihood that archaeological deposits survive below ground.** As such, archaeological investigations will likely be required for development that involves groundworks. **See section 2.3 and the appendix for further information.'**

4.1.4 The SPD index and page numbering has been reviewed.

4.2 Transport for London

4.2.1 Transport for London (TfL) have provided for following comments regarding the draft SPD and associated proposals:

- *The proposed revised southern boundary of the conservation area would incorporate a section of the London Trams corridor between Gravel Hill and Addington Village tram stops. TfL has a duty to ensure that any development plans and development decisions do not impact upon safety and performance of the London Trams network.*
- *TfL's powers under the Croydon Tramlink Act include, amongst other things, rights to undertake track works and overhead line (OLE) maintenance, as well as pruning of trees that border the tram lines. TfL is concerned that some of the proposed conservation area regulations could come into conflict with TfL's powers. This could negatively impact upon TfL's ability to safely manage and operate the section of the tram network. Key areas that could be negatively impacted are:*
 - *Ability to freely and appropriately undertake maintenance, including reactive track safety works and OLE maintenance.*
 - *Cause delay to essential tree pruning adjacent to the tramway*
 - *Para 7.3.1 of the CAAMP outlines a desire to rationalise signage within the conservation area. Whilst TfL has no specific intention to add signage, this has the potential to cause issues with legally-required signage or adjacent road safety around the tramway.*
- *In heritage terms, the narrow tramway corridor features modern signage, lights/signals and other non-heritage infrastructure, as well as being adjacent to the modern dual carriageway. This particular environment does not contribute towards the stated conservation aims, the integrity of the expanded conservation area or views. Inclusion in the conservation area would not alter these aspects.*
- *TfL requests that the southern boundary of the proposed extension to Addington Village Conservation Area be retracted slightly such that it does not incorporate the tram corridor.*
- *The northern boundary is fenced along most of its length which establishes a practical boundary for the conservation area. The western end is less evident; London Trams proposes the boundary to be 5m from the outside edge of the northernmost track rail as per the submitted sketch.*
- *TfL would welcome further discussions on the particulars of the boundary edge with the council.*

4.2.2 LBC agrees that the tram corridor itself does not contribute to the character and appearance of the conservation area and has adjusted the boundary to remove this section from the conservation area. LBC agrees that the fence line along most of this section forms an appropriate logical and legible boundary, however the proposed 5 metre buffer to the western end would not provide a sufficiently legible boundary location. The fence line largely follows the grass edge of the tram corridor which is also understood to be the edge of TfL

ownership. The boundary has been adjusted to follow this edge along the entirety of the boundary with the tram corridor, as the most logical and legible boundary position.

4.2.3 The same section of tram corridor remains within the existing registered park and garden, which already highlights the heritage interest of the area, and will form part of the setting of the conservation area.

4.2.4 The need for signage or other equipment is recognised on safety grounds and would not be restricted by conservation area status (or adjacency). Nevertheless, if there are alternative solutions that provide the same level of safety protection, LBC would welcome solutions being chosen to minimise impact on the historic and rural character of the area.

4.3 Highways England

4.3.1 Highways England provided a response that they were satisfied that the SPD and associated proposals would not materially affect the safety, reliability and/or operation of the strategic road network.

4.3.2 LBC note this response.

4.4 National Grid

4.4.1 A response on behalf of National Grid identified the following assets in the area:

- *Underground electricity cables from Rowdown substation in Bromley to Beddington substation in Sutton.*
- *No National Grid Gas Distribution's Intermediate / High Pressure apparatus, but that there may be Low Pressure / Medium Pressure pipes present in the area.*

4.4.2 The response highlighted publications available from the National Grid website:

- *A sense of place – design guidelines for development near high voltage overhead lines:*
<https://www.nationalgrid.com/sites/default/files/documents/Sense%20of%20Place%20-%20National%20Grid%20Guidance.pdf>
- *Guidelines when working near NGG assets:* <https://www.nationalgridgas.com/land-and-assets/working-near-our-assets>
- *Guidelines when working near NGETT assets:*
<https://www.nationalgridet.com/network-and-assets/working-near-our-assets>

4.4.3 LBC notes the infrastructure within the conservation area. The available guidance is noted but is not directly relevant to the SPD. No changes are proposed.

4.5 Natural England

4.5.1 Natural England confirmed that they do not have any specific comments on the conservation area review.

4.5.2 LBC note this response.

5. Comments of support

5.1 A number of representations were received expressing support for the conservation area review, its proposals and the draft Addington Village Conservation Area Appraisal and Management Plan SPD. These included:

- Praise for the quality of research, writing and illustration. The content of the SPD was considered very clear.
- The SPD was considered to provide an in depth overview of the nature and character of the area and demonstrated the writer's appreciation of the village's unique history and origins.
- The review was welcomed to ensure the conservation area is kept up to date and relevant, as an important part of securing the character and heritage of the area for future generations, although other responses didn't consider review necessary.
- Support for inclusion of Stable Lodge and the former stable block (now Addington Palace Golf Clubhouse) on the Local List, as set out further below.

6. Issues Raised & Responses

6.1 The following paragraphs provide a summary of the main issues raised and how these have been addressed. Where an amendment to the SPD has been made this is denoted by red text. Paragraph numbering relates to that found in the draft CAAMP for ease of reference.

6.2 A summary of all changes to the document is incorporated in Section 7.

6.3 Conservation Area Boundary Changes

6.3.1 Addington Palace, the stables, stable lodge, south lodge and historic parkland between Palace and village (now golf course and public park) and Roxton Gardens.

6.3.2 Representations largely supported the proposed inclusion of this area, as it forms part of the historic estate and is a beautiful and historically important mature parkland landscape of exceptional quality.

6.3.3 The inclusion of Roxton Gardens was supported in relation to the ability to protect the area around the church, but was considered inconsistent with other proposals to remove areas of modern housing (see further detail below).

6.3.4 TfL objected to inclusion of the tram corridor as identified under statutory consultees above.

6.3.5 Some representations suggested that the Palace and Parkland could otherwise form a separate conservation area, as there are no visual links between them. The village was also considered to be different to the overall boundary as it is residential and historic.

6.3.6 LBC recommends that this area is included in the conservation area as proposed, with the boundary adjusted to remove the tram corridor as described under statutory consultees above. Whilst a joint conservation area reflects the linked history of the village and Palace and Parkland, their distinct characters are appropriately reflected in the two character areas identified within the Conservation Area Appraisal and Management Plan.

6.3.7 Proposed exclusion of three areas of modern development within the village:

- **Area between Addington Village Road and Kent Gate Way, including substation, Police Station, petrol station and adjacent green space (referred to as Police Station area)**
- **63-73 (odd) and 52-54 (even) Boundary Way (referred to as Boundary Way area)**
- **80-100 (even) Addington Village Road and adjacent green space (Referred to as Addington Village Road area).**

6.3.8 Some support was received for the omission of the small area of recent housing at the top of Boundary Way, subject to the protection of surrounding trees. The representations on the whole however objected to the removal of the three areas in combination. The objections received have been grouped under the following themes:

6.3.9 Development

- Removal of the buildings would lead to their demolition
- The areas are being removed to facilitate redevelopment or the introduction of access roads.
- Exclusion will make it harder for residents to protect the character of their village, resist development as per previous planning history along Boundary Way and Addington Village Road.
- The current layout deters crime.
- The roads are too narrow to take any increase in local village traffic.
- The Petrol Station has recently invested in a costly upgrading and refurbishment.
- The area around the Police Station is a vibrant area, used for coaches, commuters and the community. These users and the police station, church, church hall, Harvester and much needed petrol station would be disrupted by development.
- The area is on the doorstep to a number of nearby communities that lack green space, focussing on developing access and education to green space over further development would have a positive impact.
- The new stable development was reconfigured by pressure put on them by the Village residents to reduce the number of units.
- There has been a history of planning refusals for development of some of the areas identified for removal.
- Erection of a phone mast at the far end of Addington Village Road was successfully fought on it being in a conservation area. This would be harder to fight in future if these houses are removed from the conservation area, likewise for the area around the Police Station.
- Sensitive redevelopment can only be guaranteed if it were still part of the conservation area. This would not preclude modern architectural designs.
- There are parts around Addington that could be built on, but these should not be at the expense of trees. Brownfield sites are always better than green space.
- The Police Station area should stay in the conservation area so that they can be improved over time.

6.3.10 Community

- The community takes pride in the area.
- The residents are part of the village.

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- Exclusion will devalue house prices.
- The community is active, with a strong residents association and community watch group with gardening, field maintenance and litter teams and work closely with the police to protect our community from crime.
- The village is up in arms about the loss of its local police station. It still operates as a response unit station but has closed to the public.
- The Village Cricket Club and St Mary's Church are helped to keep going by our contributions and the Old Forge is well used whenever we can.

6.3.11 *Village Identity*

- There is a sense of identity as a village as a whole.
- The area has a unique identity as a village unit, clearly defined and surrounded by a green buffer. Boundary Way and Addington Village Road blend seamlessly into the area.
- The area is unlike other wards in the Croydon suburbs, visitors remark that it doesn't feel like you're in the urban sprawl that a lot of Croydon has become.
- The area is not only enjoyed by residents but visitors too, including cyclists and walkers including organised historic walks, taking pleasure in the peace, greenery, trees and wildlife. These are important to physical and mental well-being and therefore clearly aids the wider population of Croydon. Because of its clear Village identity, it is well known to a wider audience.

6.3.12 *Consistency*

- There is inconsistency with other areas of neutral modern housing proposed for retention within the conservation area, particularly between 80-100 Addington Village Road and the Paddocks, and with the proposed inclusion of Roxton Gardens and the modern housing along Spout Hill.
- Removal of the Police Station area creates an illogical boundary in plan.
- The area is in the green belt. It is also an area of high flood risk so should be protected from development.
- Numbers 80-100 Addington Village Road are more sympathetic to the surrounding areas than others built prior, and after, their construction.

6.3.13 *Significance of Streetscape*

- The special interest of the area does not relate only to the buildings, but also to the streetscape.
- All houses in Addington Village Road are part of the old historic road between Croydon and Kent and therefore an integral part of the village.
- The areas form gateways / gate keepers to the village.
- It is important that the roofscape of the village can be managed as a whole
- The green space next to 80-100 Addington Village Road forms a critical natural boundary to the village
- Consistent presence of high levels of green space, grass verges and trees along the full length of the street provide integrity to the road as a whole.
- Hedge planting contributes to the old country lane look and the cottage garden appearance is required by covenants on 80-100 Addington Village Road.
- 80-100 Addington Village Road are a direct continuation of the adjacent area.

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- The dead end street layout contributes to the area.
- The Police Station is somewhat screened by trees along the street.

6.3.14 Significance of Buildings

- General
 - o The buildings do not detract from the area, or dilute it. The houses were built sympathetically and in keeping with the character of the conservation area.
 - o The houses received planning permission when the area was already designated as a conservation area and were considered to have met the criteria of being sympathetic to the village character.
 - o If the housing forms part of the setting (para 3.1.8) it strengthens the case for inclusion.
- For 80-100 Addington Village Road specifically:
 - o Disagree that the staggered building line of Addington Village Road is not characteristic of the area. It was a requirement of planning (due to the stream and to give a country lane look).
 - o 80-100 Addington Village Road are subject to stringent building specifications and restrictions to ensure they remain in keeping with the area.
 - o Brick matches that manufactured in brick kilns once operating in Addington Village.
 - o Red brick chosen to match that of the Vicarage
 - o The building alignment is in keeping with other worker's cottages along Addington Village Road with matching grass verges, hedges and trees.
 - o The roofscape of houses contributes to the character of the conservation area. It is important to protect it from the front and rear (from Kent Gate Way). Covenants restrict changes to the roofscape particularly when viewed from Kent Gateway to protect the first view of the village.
- For the Police Station area specifically:
 - o The Police Station area provides protection from the adverse impact of the busy Kent Gate Way.
 - o The Police Station and Petrol Station are functioning local amenities. The petrol station has in essence replaced the former Village Store.
- For the Boundary Way area specifically:
 - o If this area was deemed necessary to be included when the houses were built some 40 years ago, despite the lower half of Boundary Way not being in the conservation area, what has now changed. [NB note that the remainder of the road was built before the time of conservation area designation, the area proposed for removal was undeveloped at the time of designation and the only area constructed after designation]

6.3.15 Adjacency

- The areas are adjacent to important buildings/features and form part of their settings:
- The Addington Village Road area overlooks the cricket pitch and Old Vicarage.
- The open area adjacent to the Police Station is strategically important as it forms the foreground of views to the church and a continuing element of the Parkland landscape. It is also directly adjacent to the Cricketer's.
- Boundary Way is close to the Cricket Pitch and Addington House.

6.3.15 *Historic Uses*

- In relation to the Police Station area:
 - o The area was the site of the former village pond
- In relation to Addington Village Road:
 - o The village stream runs to the rear (now in a storm drain)
 - o In 1842 the area was part of Kent Meadow
 - o The land originally belonged to the vicarage / formed part of the vicarage orchard
- In relation to Boundary Way:
 - o Historically the area was orchards
 - o It is in proximity to old Chalk Pits and there are medieval Charcoal Burning Pits within Three Halfpenny Woods

6.3.19 *Trees and Green Space*

- Areas of open space to either end of Addington Village Road contribute to area's character.
- Trees and woodland contribute to the area's character.
- Flora, fauna and biodiversity are significant.
- Woods behind the end of Boundary Way and the Old Vicarage (Three Halfpenny Wood) and opposite numbers 80-100 Addington Village Road is significant in terms of wildlife, rare trees and ancient woodland.
- Contradictory to the Government's 25 year Environment Plan.
- If Boundary Way is removed, the trees should be protected by TPO.
- The large stones in the Police Station area give an historic feel [NB one representation indicates that they are vestiges of historic buildings which is incorrect].
- Open space and views are of paramount importance.
- Green space sets/enhances the tone/atmosphere of the village.
- The area should be extended to include the grass verge at the end of the road past 80-100 Addington Village Road

6.3.20 Further proposals for the conservation area boundary included 'ring fencing' the entire village by retaining the existing boundary and adding the 'neutral' houses in The Wicket and Boundary Way for consistency. It was also suggested that a representative sample of 1970s homes in The Wicket could be included.

6.3.21 LBC response: In accordance with legislation and the NPPF, the boundary of the conservation area should be based only on the special architectural and historic interest of the area. There are no current proposals for redevelopment of these areas, introduction of access roads or for demolition of the properties. The owners of the properties retain full control over them.

6.3.22 Conservation area designation relates to current character and appearance, rather than historic use. The consultation responses did not provide new information or a compelling case to alter the identification of buildings on Boundary Way and Addington Village Road as making a neutral contribution to the conservation area, or for those in the Police Station area as neutral or as detracting from the conservation area as previously identified.

6.3.23 Conservation area designation relates to architectural and historic interest rather than nature conservation or biodiversity interest. Nevertheless it is recognised that the significant levels of trees and green space contribute greatly to the rural character which forms an intrinsic part of the conservation area's special interest. Similarly, the village identity – distinct from surrounding suburban and urban development due to its rural character – contributes to the conservation area.

6.3.24 The importance of streetscapes to the character and appearance of the conservation area is however recognised. In this respect, the Police Station area and Addington Village Road area form part of the historic route at the heart of the conservation area. Whilst the buildings themselves are not historic, the building lines, inclusion of soft landscaping and grass verges contribute to the character of the conservation area. As such, it is considered appropriate for these areas to be retained within the conservation area.

6.3.25 In contrast, the streetscape on Boundary Way does not form part of an historic route nor does it display particular architectural or historic interest. The buildings on Boundary Way and its streetscape do not meet the requirements for conservation area designation and it is not possible to identify the former use of this space as an orchard. The trees and woodland areas surrounding Boundary Way are significant. This significance is best reflected through existing Tree Preservation Orders and the Metropolitan Green Belt designation. As such, it is recommended that the Boundary Way area of housing is removed from the conservation area. The presence of Tree Preservation Orders to the surrounding woodland areas will be emphasised in the Conservation Area Appraisal and Management Plan. The area of trees relating to Addington House will remain in the conservation area and are also protected by a TPO.

6.3.26 In summary, the recommended boundary amendments affecting areas of modern development in the village are:

- Retain the Addington Village Road area and the Police Station area within the conservation area.
- Remove the Boundary Way area from the conservation area, whilst emphasising the importance of surrounding trees and woodland.

6.3.27 The CAAMP SPD has been amended to reflect the amended boundary change recommendations, including changes to:

- Graphics throughout
- Introduction amended to reflect the recommended boundary
- Public Realm section amended as follows, to incorporate the west end of the Addington Village Road streetscene now proposed for retention within the conservation area: 4.2.1 ... soft, grassed verges and intermittent pavements (some set within the grass verge away from the road edge) give a sense of a rural lane, particularly **to the east and west ends of Addington Village Road...**
- Buildings that detract from the Area's Special Character section amended to reflect the Petrol Station and substation's retention within the conservation area, despite the buildings themselves detracting from the area: **5.2.6 Extensions to the Cricketer's Inn, the substation and Petrol Station are identified as having a negative impact on the character and appearance of the conservation area**, due to their scale, layout or architectural design.
- Non-Residential Modern Development section added: **5.4.19 The Police Station and Petrol Station do not have historic precedent but provide services for the village and wider area. The buildings, alongside the functional substation, do not contribute to the conservation area although the spaciousness of the area ensure they do not**

dominate. They are situated in a highly visible location at the entrance to the conservation area and in the foreground of views to the Parkland.

- Emphasis provided to the importance of green spaces / TPOs as discussed further below.

6.4 Conservation Area Name Change

6.4.1 Representations objected to the proposed name change, supporting the retention of the existing name of Addington Village Conservation Area for the following principal 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.

6.4.2 A suggested alternative name was proposed as 'Addington Village and Palace Conservation Area'.

6.4.3 LBC notes the confusion that may be caused by the proposed name change, the historic primacy of the village and its strong sense of identity. It is therefore recommended that the name of the conservation area remains as Addington Village Conservation Area. The SPD has been amended to reflect this.

6.5 Local List Proposals

6.5.1 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.

6.5.2 Few responses were received in relation to the local list proposals. Those received were supportive of their inclusion.

6.5.3 The proposed will be added to the local list, and the SPD has been amended to reflect this.

6.6 CAAMP SPD comments

6.6.1 Comments were received in relation to the draft Conservation Area Appraisal and Management Plan SPD. They are set out below alongside the Council's response in each case.

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	Comments relating to CAAMP	Council Response
	Appraisal	
6.6.2	Traffic: Apart from commuters in the very early morning, we do not have a lot of traffic in the village.	<p>The text of the CAAMP has been adjusted to reflect this as follows:</p> <p>3.1.1 'Traffic levels remain high however in the centre of the village.'</p> <p>6.1.3 'Traffic levels and Car Parking – including use by commuters in association with Addington Transport Interchange – detracts from the historic rural character of the village.'</p>
6.6.3	Village Greens: The village green is well used and cared for through close working with the council, and incorporates a new public bench and village signage. Dismissal of the space as not a true village green lacks an appreciation of how village greens were designed during the Capability Brown era. This space should not be developed.	<p>The current village green was previously the site of the village school and its current character and use is therefore relatively modern. Nevertheless, it contributes greatly to the rural character of the conservation area and the guidance in the SPD sets out that it should not be developed. The text has been adjusted to further emphasise the importance of the space as follows:</p> <p>4.1.2 The main public green space is the 'village green', located on the site of the former school, at the junction of Addington Village Road and Spout Hill. Surrounding buildings face away from the space which limit its visual perception as a traditional village green at the heart of village life. It nevertheless provides an important and well-used amenity and a sense of openness in the village centre which should be preserved and enhanced.</p> <p>9.2 'Improved design of the Village Green to encourage greater public use. Enhancements to the landscaping of the Village Green to further enable public use and enjoyment.'</p>
6.6.4	Contribution of buildings to the conservation area: The neutral status of 80-100 Addington Village Road has been removed after the public meeting.	<p>No changes were made to the draft SPD following the public meeting: the buildings remain identified as neutral.</p> <p>An error on Map 14 has been rectified to show the buildings as neutral.</p>

6.6.5	<p>Boundary Treatments: Original metal fencing runs along the edge of the cricket pitch and continues along the lane leading to the woods.</p> <p>A number of historic boundaries would benefit from repair, such as the historic metal fencing along Addington Village Road</p>	<p>Survival of metal estate railing such as that on the edge of the cricket pitch is identified in para 4.3.1.</p> <p>The text of the CAAMP has been adjusted to further identify their importance and acknowledge the condition of some historic boundaries as follows:</p> <p>6.1.1 'The Forge, and the gateway in the wall between the churchyard and Roxton Gardens, and a number of historic boundary treatments in the area would benefit from maintenance.'</p> <p>8.8.1 Historic boundary walls of varying flint and brick designs, chestnut paling and metal estate railings form part of the historic fabric of the conservation area and should be retained.</p>
6.6.6	<p>Access to Parkland and Palace Driveway: Consider adding public footpath markers marking route between Gravel Hill and Bishops Walk, and that the Bishop's Gate can be preserved.</p> <p>There are many footpaths in the area however they do not link up well. Support access through the golf course out to Spout Hill near Lion Gate to link with other paths to Shirley, the windmill and woods to north towards the London Loop. There are excellent views from the golf course only available to golfers. Open days when locals could take in the views would be welcomed.</p>	<p>The Parkland (golf course) and Palace driveway are private land. Conservation Area status does not in itself provide or enable public access to private land. The owners will be notified of the community interest raised during public consultation regarding greater access through footpaths, open days or other methods.</p>
6.6.7	<p>Access between Spout Hill and Boundary Way: Support the re-opening of access between Spout Hill and Boundary Way</p>	<p>The CAAMP identifies this as a historic route and supports the principle of its reinstatement. Conservation area status and the CAAMP SPD do not provide controls or methods to require reinstatement, as it falls outside the powers of this designation and SPD.</p> <p>Investigation has been undertaken to determine the status of the route. It is understood that it is not a public right of way and therefore the council as Highway authority does not have control over reinstatement. It is understood to be identified in the</p>

		deeds of properties along Boundary Way and thus its reinstatement would need to be pursued as a civil matter.
6.6.8	<p>Wildlife, Trees, former uses: Woods to the north and east of Boundary Way and the Old Vicarage are significant in terms of wildlife and rare trees. They used to be part of the former orchards, old chalk pits and medieval charcoal burning pits.</p> <p>The village pond was located to the west along Addington Village Road</p>	<p>Wildlife and biodiversity fall outside the direct remit of conservation area status which is concerned primarily with the historic and architectural interest of the area. Their importance is more appropriately recognised through designations such as Sites of Nature Conservation Importance, which much of Addington Palace Parkland and Three Halfpenny Wood is designated as. The special interest of the trees and woodland is also recognised through area Tree Preservation Orders.</p> <p>The contribution the natural environment, green space and trees makes to the historically rural character of the conservation area and its setting is nevertheless recognised. The text of the CAAMP has been adjusted to emphasise the importance of surrounding woodland, the presence of SNCIs and TPOs, and the protection TPOs provide.</p> <p>Conservation area designation relates to current rather than former uses. Reference has nevertheless been included to historic uses where they influence the current character or appearance of the area.</p> <p>The following amendments have been incorporated:</p> <p>4.1.3 ... The Cricket Ground is an important and well-used village recreational facility reflecting a long history of cricket in the village and is fringed by mature tree belts. Trees to the north form part of the historic grounds of Addington House and previously contained a chalk pit. They contribute to the building's special interest and setting. They also help screen views of modern development on Boundary Way and are protected by a Tree Preservation Order.</p>

		<p>4.1.10 ... Green space, vegetation and woodland surrounding the village contributes greatly to the rural character and setting of the conservation area. They retain evidence of past use such as coppicing in the woodland to the east of the village. Boundary Way is built on a former orchard and its boundaries preserve the orchard's extent. ...</p> <p>5.4.12 Lower House Farm: Lower House Farm, and farmyard and the village pond were originally located to the west and south of The Cricketer's, but no longer survive.</p> <p>7.4 TREES IN CONSERVATION AREAS</p> <p>7.4.1 Trees contribute greatly to the rural, sylvan character of Addington Village Conservation Area and its setting. Six weeks notice must be given to the Council for all proposed works to trees over 7.5cm in stem diameter within the conservation area. In addition there are also numerous Tree Preservation Orders (TPO) in place across the conservation area and within its surrounding green buffer. This provides further protection to trees. Those wishing to undertake works to a TPO tree must seek written consent from the Local Planning Authority by way of a tree works application (8 week process). Further information on trees – including how to find out if your tree has a TPO – is available from the council's website as referenced in the appendix.</p> <p>7.6 NATURE CONSERVATION</p> <p>7.6.1 Green space and woodland in and around the conservation area contribute to biodiversity and the borough's natural wildlife heritage. Addington Palace Golf Course within the conservation area, and Three Halfpenny Wood within its immediate setting are designated as Sites of Nature Conservation Importance. Falling outside the direct remit of conservation area designation,</p>
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		<p>nature conservation policy applies separately in this regard.</p> <p>Links included within Appendix 1: Croydon Council Tree web pages: www.croydon.gov.uk/environment/treesandlandscape/orders (for tree preservation orders) www.croydon.gov.uk/environment/treesandlandscape/conareas (for trees in conservation areas)</p>
6.6.9	The village residents worked hard to install the historic-style lampposts throughout the village	<p>The text has been adjusted to reference the lampposts:</p> <p>‘4.3.4 [moved to 4.2 Public Realm] The streetscape in the village is generally uncluttered due to the limited presence of street furniture. However, refuse storage to The Cricketer’s Public House is located prominently along Addington Village Road and detracts from the street scene. Historic-style lampposts set the village apart from surrounding development.</p>
6.6.10	The Harvester and its parking lot is not in keeping with the village character and it sits opposite a historic church.	The extensions to the Harvester and the parking lot are noted in the CAAMP to detract from the area.
	Management Plan	
6.6.11	Development of Neutral Buildings: Para 8.1 of the document says it is acceptable to demolish ‘neutral’ homes as well as those detracting from the area.	<p>The council’s approach to buildings identified as making a neutral contribution to the conservation area is set out in the Conservation Area General Guidance SPD, adopted in 2013.</p> <p>The guidance states (para 5.1.6) that redevelopment would “not be resisted, subject to the proposed replacement building being of a high quality design in keeping with the area’s special character”. Overall, therefore, any redevelopment would be required to preserve or enhance the conservation area. This is a high bar to meet.</p> <p>The identification of neutral buildings is undertaken purely in relation to the contribution they make to the historic and architectural interest of the</p>

		conservation area. There is no proposal to demolish these homes. It is entirely up to the owner of the property whether they wish to progress proposals for their property in future.
6.6.12	Infill development: It is also worrying that point 8.2.2 seems to open the door to infill development on back gardens.	Back garden development and infill development in the village Conservation Area will only be supported where it does not have an adverse impact on plot size, layout, significant gaps between buildings and the spacious rural character of the area. This requires the character of the conservation area to be preserved or enhanced. This will limit opportunity for infill development, however infill development would be supported in heritage terms if all of these criteria were met, alongside other planning policies.
6.6.13	Control of Incremental Change: The CAAMP points out that the buildings within the Conservation Area are still vulnerable to uncharacteristic minor developments because some of the changes do not need planning permission. Is there not a case to have more of the buildings listed or locally listed? This would give the Council more control of the iterative changes that might undermine the character of the area.	Article 4 Directions can be used to control incremental change to properties within a conservation area, and are a more effective tool for this purpose than listing or local listing. The CAAMP indicates at para 7.0.1 that the council reserves the right to serve an Article 4 Direction. A review of the conservation area is required to be undertaken before consideration can be given to serving an Article 4 Direction.
6.6.14	Addington Palace Marquee: The document clearly states that the marquee at Addington Palace is out of keeping with the host building and yet the Council has allowed it to remain in place for a number of years. This is already inconsistent with protecting the character of a listed building.	The SPD maintains the existing position that in heritage terms it is out of character with the registered park and garden, and with the setting of the listed building.
6.6.15	Energy Efficiency: It is a shame the 1960s houses were not built more eco friendly like new builds today as heating is very expensive.	Guidance on retrofitting energy efficiency measures to historic properties is set out in the <u>Conservation Area General Guidance</u> .
6.6.16	Redevelopment: Any redevelopment proposals for the Petrol Station area should be of the highest standard of architecture and landscape, and should reflect the spirit and scale of the architectural massing, forms and	The area is in use and the existing green space is of significance to the Conservation Area. Should the site come forward in future for development, it would be required to preserve or enhance the character of

	material of the key heritage buildings (brick, stone, flint, timber, render) to be found within the Conservation Area, but in a modern manner. This should be allied with tree planting and hard and soft landscape also in keeping with the quality of the expanded conservation area.	the conservation area and meet other development plan policies. The key criteria set out by the respondent is in accordance with the Management Plan Development Guidelines.
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6.7 Consultation

6.7.1 The following comments were received in relation to the consultation process.

	Comments received	Council response
6.7.2	The length of consultation was too short.	The consultation period of 6 weeks was above the statutory requirement of 4 weeks.
6.7.3	The public meeting put at a time that people couldn't make and with short notice.	<p>The public meeting was held at 6.30pm on 9th May at a location within the village. It was advertised from 18th April which gave three weeks' notice of the meeting.</p> <p>Recognising that not all everyone would be able to make any one time for a meeting, officers were available to answer questions between 4pm and 8pm. In addition, the display was made available for the following week at Croydon Central Library. An email address and phone number were also supplied.</p> <p>This goes above the statutory requirements for consultation.</p>
6.7.4	Request that comments are taken into consideration as part of the public consultation, that they are placed on the public comments section of the planning website and request an opportunity to speak at the relevant Planning Committee when the proposals are considered.	The Consultation Statement provides a summary of all consultation responses received and is published on the council's website. The revised proposals brought to Cabinet for approval followed by Council adoption are also published on the council's website. Respondents will be notified of the meetings although the Council's constitution does not provide an opportunity to speak at these meetings.

7. Amendments to SPD

7.1 The following table summarises all changes to the SPD recommended for approval, including those described above as well as minor amendments to ensure accuracy and readability:

	Section / Paragraph	Clarification / Amendment
7.1.1	Entire document	Reordering of sections / paragraphs / bullets / map and figure numbering to improve readability where necessary.
7.1.2	Entire document	Spelling and grammar errors.
7.1.3	Entire document	Additional modern and historic photographs added to improve readability
7.1.4	Entire document	Addington Conservation Area changed to Addington Village Conservation Area.
7.1.5	Introduction	Revisions to sections 1.3 (What is the status of this document), 1.4 (Community Involvement) and 1.5 (Designation Background) to reflect the recommended adoption of the SPD.
7.1.6	1.5	Deletion of Proposed Name and Boundary Amendments to reflect recommended adoption of revised boundary and retention of existing name. Associated map revised.
7.1.7	1.7	Date of Palace and Parkland corrected to 18 th century. “associated lodge buildings” added to improve clarity as to what the open setting relates to.
7.1.8	2.3	<p>Additional information to ensure clarity regarding Archaeological Priority Areas and where to find more information:</p> <p>2.3.1 Archaeological Priority Areas indicate a high probability of archaeological interest below ground, of which Tier 1 indicate the highest probability and Tier 4 indicates lower probability.</p> <p>Addington and Addington Park Tier 2 Archaeological Priority Area covers most of the village, the grounds to Addington Palace and its Parkland (see Map 11). The area has been identified due to the historic nature of the settlement at Addington and the significant archaeological interest of the designed landscape at Addington Park.</p> <p>2.3.2 The surrounding undeveloped land has a distinctive topography and retains evidence of prehistoric remains and is therefore identified as a Tier 3 Archaeological Priority Area.</p> <p>2.3.3 Further information on Archaeological Priority Areas including those in Addington is available from the Greater London Archaeology Advisory Service webpages, referenced in the appendix. Please also see Map 11 of this document and section 4.5 of Croydon’s Conservation Area General Guidance SPD for more information.</p>

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7.1.9	3.1	Deletion of text 'Traffic levels remain high however in the centre of the village' in response to representations received.
7.1.10	4.1.2	<p>Amendments to text to emphasise significance of village green:</p> <p>4.1.2 The main public green space is the 'village green', located on the site of the former school, at the junction of Addington Village Road and Spout Hill. Surrounding buildings face away from the space which limit its visual perception as a traditional village green at the heart of village life. It nevertheless provides an important and well-used amenity and a sense of openness in the village centre which should be preserved and enhanced.</p>
7.1.11	4.1.3 and 4.1.10	<p>Additional emphasis provided on the historic use, significance and protection of woodland in the grounds of Addington House:</p> <p>The Cricket Ground is an important and well-used village recreational facility reflecting a long history of cricket in the village and is fringed by mature tree belts. Trees to the north form part of the historic grounds of Addington House and previously contained a chalk pit. They contribute to the building's special interest and setting. They also help screen views of modern development on Boundary Way and are protected by a Tree Preservation Order.</p> <p>4.1.10 Green space, vegetation and woodland surrounding the village contributes greatly to the rural character and setting of the conservation area. They retain evidence of past use such as coppicing in the woodland to the east of the village. Boundary Way is built on a former orchard and its boundaries preserve the orchard's extent. These areas form an important backdrop to views and to the way the conservation area is experienced. This 'green buffer' is therefore an important part of the setting of the conservation area.</p>
7.1.12	4.2.1	<p>Clarification of the rural lane character existing to the west end of Addington Village Road:</p> <p>4.2.1 ... Soft, grassed verges and intermittent pavements (some set within the grass verge away from the road edge) give a sense of a rural lane, particularly along the eastern length to the east and west ends of Addington Village Road and along Spout Hill. ...</p>
7.1.13	4.3.4 and 4.3.5	Relocation of text to Section 4.2 (Public Realm)
7.1.14	5.2.3 and 5.2.4	Inclusion of Stable Lodge and the former stable buildings (Addington Palace Golf Clubhouse) as locally listed buildings, removal from positive unlisted buildings section.

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7.1.15	5.2.6	<p>Clarification of buildings that detract from the conservation area (now recommended to be wholly within the conservation area boundary):</p> <p>5.2.6 There are some notable extensions to buildings in the conservation area and some buildings adjacent to the conservation area that have a negative impact on its character and appearanceExtensions to the Cricketer's Inn, the substation and Petrol Station are identified as having a negative impact on the character and appearance of the conservation area, due to their scale, layout or architectural design.</p>
7.1.16	5.4.12	<p>Reference to location of the former village pond:</p> <p>5.4.12 <i>Lower House Farm</i>: Lower House Farm, and farmyard and the village pond were originally located to the west and south of The Cricketer's, but no longer survive.</p>
7.1.17	5.4.18	<p>Clarification of the relationship between modern housing, grass verges and streetscene. Addition of section on modern non-residential development:</p> <p>5.4.18 The scale and form of the buildings is in keeping with the character of the conservation area, and the buildings retain a consistent style characteristic of their age. Spaciousness is retained through front lawns and views to mature vegetation, whilst historic front boundaries and grass verges help integrate the buildings into the historic streetscenefabric. The architecture of the buildings themselves however does not contribute to the character of the area.</p> <p>MODERN NON-RESIDENTIAL DEVELOPMENT The Police Station and Petrol Station do not have historic precedent but provide services for the village and wider area. The buildings, alongside the functional substation, do not contribute to the conservation area although the spaciousness of the area ensure they do not dominate. They are situated in a highly visible location at the entrance to the conservation area and in the foreground of views to the Parkland.</p>
7.1.18	5.4.25	Reference to locally listed status of Stable Lodge.
7.1.19	5.4.26	Reference to locally listed status of stable block.
7.1.20	6.1.1	<p>Reference to the condition of a number of historic boundaries in the area:</p> <p>6.1.1 The majority of the buildings are occupied and generally in good condition. The Forge, and the gateway in the wall between the churchyard and Roxton Gardens and a</p>

		number of historic boundaries in the area would benefit from maintenance.
7.1.21	6.1.3	Deletion of reference to high traffic levels in the village.
7.1.22	7.3.1	<p>Clarification of the purpose of Archaeological Priority Area and signposting to further information:</p> <p>7.3.1 Most of the conservation area and surrounding land is situated within an Archaeological Priority Area, which identifies the likelihood that archaeological deposits survive below ground. As such, archaeological investigations will likely be required for development that involves groundworks. See section 2.3 and the appendix for further information.</p>
7.1.23	7.4	<p>Clarification of the protection of trees and tree preservation orders in the area:</p> <p>7.0 TREES IN CONSERVATION AREAS AND TREE PRESERVATION ORDERS</p> <p>7.4.1 Trees contribute greatly to the rural, sylvan character of Addington Village Conservation Area and its setting.</p> <p>Six weeks notice must be given to the Council for all proposed tree-works to trees over 7.5cm in stem diameter within the conservation area. In addition, there are also numerous Tree Preservation Orders (TPO) in place across the conservation area and within its surrounding green buffer. This provides further protection to trees. Those wishing to undertake works to a TPO tree must seek written consent from the Local Planning Authority by way of a tree works application (8 week process). Further information on trees - including how to find out if your tree has a TPO - is available from the council's website as referenced in the appendix.</p>
7.1.24	7.5and 7.6	<p>Clarification of the protection of the surrounding green buffer. Additional section identifying natural heritage importance and protection in place in the area:</p> <p>7.0 GREEN BELT</p> <p>7.5.1 The conservation area in its entirety and its surrounding green buffer is designated as Metropolitan Green Belt and consequently national and local planning policy applies in this regard.</p> <p>7.6 NATURE CONSERVATION</p> <p>7.6.1 Green space and woodland in and around the conservation area contribute to biodiversity and the borough's natural wildlife heritage. Addington Palace Golf Course within the conservation area, and Three Halfpenny Wood within its immediate setting are designated as Sites of Nature Conservation Importance. Falling outside the direct remit of conservation area designation, nature conservation policy applies</p>

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		separately in this regard.
7.1.25	8.8.1	<p>Identification of chestnut paling and metal estate railings as historic boundary treatments:</p> <p>8.8.1 Historic boundary walls of varying flint and brick designs, chestnut paling and metal estate railings form part of the historic fabric of the conservation area and should be retained.</p>
7.1.26	9.0.2	<p>Identification of the opportunity to enhance the significance and setting of archaeological assets:</p> <p>9.0.2 The Council welcomes and supports enhancement schemes which contribute to the special character and appearance of the conservation area.</p> <p>Opportunities to enhance the significance and setting of archaeological assets should also be sought.</p>
7.1.27	9.2.1	<p>Clarification that removal / redesign of non-historic porches is considered an enhancement.</p> <p>Re-worded reference to opportunities to enhance the landscaping of the village green to provide clarification:</p> <ul style="list-style-type: none"> Improved design of the Village Green to encourage greater public use. Enhancements to the landscaping of the village green to further enable public use and enjoyment.
7.1.28	9.3.2	<p>Additional enhancement opportunities identified in relation to archaeological assets:</p> <ul style="list-style-type: none"> Careful removal of undergrowth to the Bronze Age barrow in the Parkland, and consideration of ways to limit further growth to avoid damage to the monument. Consider ways to improve the legibility and setting of the former medieval manor house within the golf course, for example by recreating the near house landscape within which the house would have been set
7.1.29	Appendices	Updated contact information and weblinks as required throughout.