

REPORT TO:	CABINET 6 December 2021 COUNCIL 13 December 2021
SUBJECT:	Croydon Local Plan Review – publication of the Proposed Submission draft
LEAD OFFICER:	Sarah Hayward – Acting Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Heather Cheesbrough – Director of Planning and Sustainable Regeneration
CABINET MEMBER:	Councillor Lewis Cabinet Member for Culture and Regeneration
WARDS:	All
<p>CORPORATE PRIORITY</p> <p>The vision set out in the introductory section of the document is provided from the Corporate Plan for Croydon 2018-2022. Relevant sections to planning of ‘what does success look like’ and ‘what will we do’ have been identified and also provided within this vision section. Going forward, this will allow future planning policies to align with the Corporate Plan vision and actions.</p> <p>Given the engagement the Directorate of Planning and Sustainable Regeneration and Spatial Planning has had with the Corporate Renewal Plan, it is considered objectives remain consistent and aligned.</p>	
<p>FINANCIAL IMPACT</p> <p>The Local Plan Review will be funded in full by the dedicated Local Plan reserve budget. The proposed submission stage costs fall within this overall reserve budget.</p>	
<p>FORWARD PLAN KEY DECISION REFERENCE NO: 4721CAB</p> <p>The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee</p>	

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

1. RECOMMENDATIONS

The Council is recommended to

- 1.1 Approve the submission of the Proposed Submission draft of the Croydon Local Plan review (Appendix 1) to the Secretary of State following the conclusion of the statutory 6-week publication period in accordance with Section 20(1) of the Planning and Compulsory Purchase Act 2004;
- 1.2 Delegate the agreement of any Main Modifications required by the appointed Planning Inspector to make the Croydon Local Plan Review sound to the Cabinet Member for Culture and Regeneration, in consultation with the Director of Planning and Sustainable Regeneration;
- 1.3 Delegate the publication of any Main Modifications required by the appointed Planning Inspector for formal consultation to the Cabinet Member for Culture and Regeneration, in consultation with the Director of Planning and Sustainable Regeneration; and
- 1.4 Delegate minor modifications and factual corrections (that are not required to make the draft Croydon Local Plan Review sound) to the Director of Planning and Sustainable Regeneration in consultation with the Cabinet Member for Culture and Regeneration.

The Cabinet is recommended to

- 1.5 Approve the publication of the Proposed Submission draft of the Croydon Local Plan review (Appendix 1) its associated additional Sustainability Appraisals (Appendix 2) and updated additional supporting evidence for six weeks for representations to be made upon it, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012;
- 1.6 Approve that the Proposed Submission draft of the Croydon Local Plan be recommended to Full Council for submission to the Secretary of State upon conclusion of the statutory 6-week publication period; and
- 1.7 Delegate minor and/or factual changes to the Proposed Submission draft of the Croydon Local Plan including the Policies Map, prior to publication to the Director of the Director of Planning and Sustainable Regeneration in consultation with the Cabinet Member for Culture and Regeneration.

2 EXECUTIVE SUMMARY

- 2.1 The purpose of this report is to seek Cabinet approval to publish the Proposed Submission draft of the Croydon Local Plan Review prior to submission to the Secretary of State. Preparation of the proposed content of the Local Plan

Review is required under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

- 2.2 A key aim of the Local Plan Review is to address the need for Croydon to help deliver more high quality housing and affordable housing whilst developing vibrant places to live, work, visit and socialise. Croydon has a housing target of approximately 42,000 new homes between 2019 and 2039. Three spatial strategies were set out in the Local Plan Review Issues and Options consultation which ran from the 1 November 2019 to 20 January 2020. Following this consultation, the Local Plan Review sets out the proposed strategy for addressing the causes of climate change associated with planning and directing growth across the borough, contributing to meeting housing need and supporting economic growth, especially taking account of the impact of the Covid 19 pandemic.
- 2.3 As this is a partial review of the Croydon Local Plan, this document is an edited version of the Croydon Local Plan 2018 rather than a rewritten new document and will be presented in both a clean and tracked change version (Appendix 1) for publication. It is important to have the tracked changed version so that it is clear that only those parts indicated as changed are subject to the review and subsequently able to be commented upon. This document also includes three additional strategic transformation areas for Purley Way, North End Quarter and Brighton Main Line and East Croydon Transformation Corridor. It also covers proposed policy updates, using existing and as appropriate updated evidence for each thematic policy area including housing, affordable housing, housing design, urban design, heritage and local character, employment, retail, community facilities – health and education, community facilities – social infrastructure, environment and climate change, green grid, transport and parking.
- 2.4 The 16 Places of Croydon will change depending on their local character, their accessibility to services and public transport, their heritage status and the ability to deliver growth with commensurate physical and social infrastructure to mitigate growth. The strategy set out in the proposed submission document details, the vision for these areas, as well as the proposed growth scenario.

3 DETAIL

3.1 Current position

- 3.1.1 Croydon needs to review the existing Croydon Local Plan 2018 to rise to the challenges facing the borough and its communities over the next 20 years, and ensure general conformity with the London Plan (March 2021). Planning is critical to ensuring that Croydon meets the needs of all its residents, businesses and visitors in a sustainable manner. This Local Plan review sets out how Croydon might contribute to meeting its own housing needs, including the need for affordable homes; whilst tackling the causes of climate change in the borough, supporting economic growth and ensuring it is developing vibrant places for people to live, work and visit.

- 3.1.2 A The Council's Strategic Housing Market Assessment (SHMA) (updated November 2019) has calculated that there is a need for 46,040 new homes in the borough between 2019 and 2039. Since then the London Plan has been adopted (March 2021). Policy H1 of the London Plan has set a 10 year housing target of 20,790 dwellings between 2019-2029 i.e. over a 10 year period. This equates to a total of 41,580 dwellings during a 20 year time frame for the Local Plan Review (2019-2039). The Local Plan Review sets out a strategy to accommodate circa 42,000 homes 2019 – 2039, taking account of the capacity constraints in the borough. The SHMA and the Council's strategic approach to housing has been used to inform the amended policies to deliver the additional housing reflecting evidenced local needs.
- 3.1.3 The Croydon Local Plan Review – proposed submission draft document covers the following sections:
- Strategic Option
 - Three strategic transformation areas
 - Thematic Policy Areas (including strategic and development management policies)
 - Place Specific Policies

3.2 Strategic Option

- 3.2.1 The Local Plan review sets out the proposed spatial strategy, sites and planning policies necessary to meet the needs of the borough, over the period from 2019 to 2039. During the Issues and Options consultation stage three strategic spatial options were set out. Each of the three options proposed a proportion of homes to be built in each of the boroughs 16 places based on differing criteria. Following the consultation, a strategy which closely resembles option 2, of the Issues and Options consultation is recommended to be taken forward. The delivery of this strategy is detailed in the Proposed Submission draft of the Croydon Local Plan and will be adopted following an examination of the plan by a Secretary of State appointed independent planning inspector.
- 3.2.2 The approach put forward is considered to be an environmentally and socially sustainable option as evidenced by the Local Plan Review's updated Sustainability Appraisal suite of documents. The strategy builds upon that in the adopted Local Plan 2018 where development is directed to three strategic areas or methods; in the Croydon Opportunity area, existing and additional site allocations / existing permissions across the Borough and windfall sites. To deliver additional growth as set out in the London Plan 2021 there is a strategic level of development focused on the Purley Way which is proposed to accommodate up to 7,515 homes over the plan period through a radical vision and plan led approach to the redevelopment of the area with high density mixed use, residential and commercial/retail developments; whilst respecting the borough's most valued and protected commercial locations. A draft Purley Way Masterplan Supplementary Planning Document has been prepared in tandem with the Local Plan review.
- 3.2.3 No Green Belt release is proposed to accommodate the London Plan housing target or infrastructure provision.

3.2.4 Under the proposed submission Local Plan the following homes by Place (2019-2039) are proposed through windfall sites and site allocations:

These figures will be updated at submission

<u>Place</u>	<u>Total</u>
Addington	568
Addiscombe	647
Broad Green & Selhurst	587
Coulsdon	2160
Croydon Opportunity Area	9753
Crystal Palace & Upper Norwood	382
Kenley and Old Coulsdon	725
Norbury	225
Purley	5735
Purley Way	7515
Sanderstead	885
Selsdon	633
Shirley	278
South Croydon	474
South Norwood & Woodside	331
Thornton Heath	1063
Waddon	413

3.3 Policy Areas

3.3.1 Following the feedback from the issues and options consultation each of the policy areas have been reviewed and amended. As this is a partial review Development Management policies have only been amended where necessary as a result of strategic policy change, the London Plan, the National Planning Policy Framework (NPPF) or monitoring of the 2018 Local Plan. The review uses existing and where appropriate new evidence as well as other documents for information such as the Infrastructure Delivery Plan, the latter is an example of documents that are ‘living’ technical documents and may evolve up to the submission of the Local Plan. The Evidence Base and the Sustainability Appraisals both old and new should be read as a whole as background documents to the review process. Where appropriate the following policy areas state and draw upon where new evidence has informed the review. Only the changes made to the Croydon Local Plan 2018 can be commented up and not the whole Local Plan. The following amendments support the delivery of the strategy, update the plan consistent with the NPPF and London Plan and address environmental and climate change issues.

Urban Design and Character

3.3.2 Places will change in the plan period depending on their local character, their accessibility to services and public transport, their ability to respect the significance of heritage assets and the ability to deliver commensurate physical and social infrastructure to mitigate growth. To respond to policy D3 and H2 of the London Plan on incremental densification, there are areas identified in the

borough that can support sustainable housing growth. These identified areas comprise Areas of Focussed Intensification (there are four of these in the Local Plan 2018) and Moderate Intensification Areas and will have a planned level of growth that will feed into the housing target for each particular Place. These areas are defined in the London Plan as follows:

- Areas of Focussed Intensification are within 800m of town centres, a train station or a tram stop or with a PTAL of 3 or above, where a step change of character to higher density forms of development will take place.
- Moderate Intensification area would apply to areas with inconsistent character where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good.

3.3.3 In terms of changes to the Local Plan, additional Areas of Focussed Intensification which accord with the criteria in the London Plan have been identified together with new areas identified for “moderate intensification”. These are all now included within the Proposed Submission Local Plan and are set out in the table below:

Moderate Intensification Areas	Areas of Focussed Intensification
Addiscombe	Environs of Brighton Road (Sanderstead Road) Town Centre
Waddon	Environs of Coulsdon Town Centre
Selsdon	Environs of Purley Town Centre/Reedham station
Purley North	Forestdale Centre
Purley East	London Road, Thornton Heath
Purley/Coulsdon	
Purley/Kenley	
Kenley Station	
South Croydon/Sanderstead	
Coulsdon Station South	

3.3.4 Shirley Local Centre currently identified as an Area for “Focussed Intensification” has been removed from the plan.

3.3.5 In addition to the above, the Local Plan has been amended to allow for evolution and gentle diversification that will be supported across all other residential areas, which are located further away from public transport and centres.

3.3.6 Conservation Areas and local heritage areas would remain conserved as they are excluded from the identified areas of growth. Also, three strategic transformation areas identified in the proposed plan for large scale redevelopment would not come under the intensification areas.

3.3.7 The tall buildings policy has been reviewed and minor amendments have been made to the wording to reflect London Plan Policy D9.

Environment and Climate Change

3.3.8 Croydon Council declared a Climate Change Emergency in July 2019 and established a target for the Council to become carbon neutral by 2030. Climate change is a global issue with many local impacts, such as flooding events. Croydon is the 4th most susceptible town in the UK for surface water flooding.

3.3.9 Following the recommendations of the Council's Climate Change Commission and anticipated Climate Change Action Plan, the following changes have been made to the Environment and Climate chapter of the Local Plan in order to create positive change in support of the Climate Emergency:

- Policy has been updated to reflect the New London Plan, this includes new targets for carbon and construction, air quality neutral requirement, as well as 'Be Seen' as part of energy hierarchy;
- Policy has been updated to reflect changes to the NPPF, including, the change to paragraph 154 to reflect current government policy on national technical standards;
- Additional Policy has been provided to promote the Circular economy;
- Embed climate adaptation and carbon reduction actions.

Green Grid:

3.3.10 One third of Croydon is green space, made up of a mixture of Green Belt, Metropolitan Open Land, recreation / sports grounds and other open spaces. There is an increasing pressure on these green spaces from population growth and the fragmentation of the green grid.

3.3.11 To support the borough's climate change objectives and deliver the proposed strategy the Green Grid changes cover the following:

- Delivering solutions to address the Climate change emergency through the Green Grid;
- Enhanced sustainability and green travel options;
- Integrating the Green and Blue grid, restoring the value and optimisation of the boroughs water bodies;
- Proving additional detail on expansion and delivery of the Green Grid network;
- Enabling additional tree planting, ecology and net increase in biodiversity;
- New policies on new publicly accessible open spaces and urban greening factor (UGF); and
- Identifying local green spaces (referred as Very important Community green spaces in the plan) based on the evidence received from the wider community.

Housing (including affordable housing and housing design)

3.3.12 The Strategic Housing Market Assessment commissioned from GL Hearn to support the Local Plan Review identifies that Croydon's population is gradually getting older and household sizes are getting smaller. Furthermore, open market housing (both private rented and for sale) is getting less and less affordable for many households in the borough. The Strategic Housing Market Assessment has calculated that 2,254 affordable rented homes a year would be needed in Croydon to meet the need of lower income households for housing. There is also a need for 1,453 affordable home ownership homes in

the borough each year. The following policy amendments address these issues.

- Reflecting the new housing target in the London Plan – focussed to sustainable locations;
- Policy recognises the housing crisis and the need to encourage significant housing delivery, especially affordable homes and how we deliver;
- Affordable housing policy alignment with the London Plan;
- Additional housing design guidance.
- Updated policy to promote 3 bed home delivery.

Employment and Retail:

3.3.13 Croydon is the largest metropolitan centre in London and one of only two strategic office centres out of central London. There are also 9 District Centres, 9 Local Centres, 18 Neighbourhood Centres and 62 Shopping Parades in the borough. The following policy changes have been made to support the strategic option and align the Local Plan Review with the London Plan and NPPF, and respond to the changing function and use of all tiers of centres:

- Policy has been updated to reflect changes to the Use Classes Order;
- Additional clarity has been provided around the town centre hierarchy;
- Additional clarity has been provided for edge and out of centre developments taking into account changes to the use class order;
- Removing the distinction between primary and secondary retail frontages - which is a consequence of changes to the planning regulations;
- With the London Plan 'no net loss' provision for industrial and employment sites removed, policy has been amended to protect this land to support the borough's economy, supported by the Employment Land Review;
- Additional policies supporting the Creative economy, affordable workspaces and providing benefits to the local workforce; and,
- Policy changes are supported by the new evidence produced showing a need for employment land and protection of the warehousing sector.

Community facilities:

3.3.14 The key issue regarding community facilities is the access to appropriate community facilities for all ages, such as education, health, religious, sporting, cultural and creative spaces, for all residents and visitors of Croydon. The following amendments were made:

- Infrastructure Delivery Plan updated
- Housing crisis – need to match facilities with new development to mitigate impact
- Burial space provision

Transport:

3.3.15 As Croydon grows, we need to reduce the amount of private car use, traffic and congestion and resultant pollution in our streets in accordance with the Mayor's Transport Strategy. Changes to the transportation policies aim to address the Climate emergency, support the Mayor's Transport Strategy and enable growth in the borough. The following policy changes have been made:

- Addressing the London Plan parking standards;

- Promote changes to support reducing climate change impacts – promote development in sustainable locations (overall strategy);
- Encourage sustainable travel; and,
- Address development phasing and construction methods.

Transformation Areas

The Purley Way:

3.3.16 The Purley Way is the borough's primary out of centre employment location, including two London Plan Strategic Industrial Locations. There is a need to facilitate considerable growth in residential, mixed use development along the Purley Way, outside the Strategic Employment Locations, and industrial intensification development within Strategic Employment Locations. To support the Purley Way as one of the borough's strategic transformation areas the new chapter addresses:

- Redevelopment of brownfield land;
- Ability to connect and complement Croydon Opportunity Area;
- Urban design opportunity to transform a hard traffic corridor into a green street that encourages sustainable transport options and serves four new local centres;
- Gateway to Croydon physically, economically and socially;
- Opportunity for a new communities supported by new local centres;
- Delivery of high quality mixed use development;
- Support the borough's economic growth by encouraging intensification of industrial land; and
- Embracing the latest technology and sustainability.

The Brighton Main Line and East Croydon Transformation Corridor:

3.3.17 Croydon Area Remodelling Scheme (CARS) is the largest and most complex part of Network Rail's longer-term Brighton Main Line upgrade project. CARS would remove one of the most operationally challenging bottleneck on Britain's railway network, located in the 'Selhurst triangle'. East Croydon station and East Croydon is a critical sustainable transport node, providing access to the train, tram, bus, walking and cycling networks. To support this area's transformation the East Croydon transformation area policies cover the following:

- Set the policy context to inform the Transport Works Act Order Inquiry (should the project get DfT funding to progress), especially support for the Brighton Main Line Upgrade and setting the placemaking and renewal context for the Station Square and Station Building.
- Outputs linked to achieving the Mayor's transport strategy.
- Allocations included to phase and guide development sites adjacent to the station post construction of the project.

The North End Quarter

3.3.18 A chapter updating the Croydon Opportunity Area Framework for the area is included to provide a vision and strategy for the transformation of this area as the role of town centres change and evolve. There are detailed policies covering specific requirements needed to deliver the development strategy for this area.

The 16 Places

3.3.19 The longstanding 16 Places of Croydon will evolve and change based on their local character, their accessibility to services and public transport, their heritage status and the ability to deliver growth and commensurate physical and social infrastructure to mitigate growth. The structure of the places has been edited to emphasise placemaking around character, these updates have been done with reference to the character study. The places also reflect the additional allocations, intensification and the areas of focused intensification.

Allocations

3.3.20 Site Allocations are also identified under each Place, including sites for future housing and other development such as schools, health facilities and community centres. The Local Plan Review lists all site allocations, sorted by Place.

Very Special Community Green Spaces

3.3.21 National planning policy says that local communities should be able to identify for special protection green areas of particular importance to them by designating them as Local Green Spaces in Local Plans. NPPF paragraph-101 states that “Local Green Spaces can only be designated when a plan is prepared or updated, and be capable of enduring beyond the plan period.” The NPPF goes on to state in paragraph 102 that “Local Green Space designation should only be used where land is:

- in reasonably close proximity to the community it serves;
- demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
- local in character and is not an extensive tract of land.”

3.3.22 The NPPF (paragraph 103) also requires that policies for managing development within a Local Green Space should be consistent with those for Green Belts.

3.3.23 In 2016, as part of the preparation of the Croydon Local Plan 2018, the Council tried to gain this extra layer of protection for all of Croydon's parks and green spaces that met the above mentioned criteria. All identified sites were put forward to be designated, however, none of them were granted the Local Green Space designation as the Planning Inspector, appointed by the Secretary of State to review of Local Plan, felt there was not enough local evidence to prove how these spaces were special/important to local communities, or that they hold any particular local significance. In particular he said that *“many of [the characteristics identified by the Council], such as a community garden, children’s play area, natural open space, playing field or recreation ground seem rather commonplace with the consequence that, even where three of these co-exist, the criterion of “demonstrably special” or of “particular” significance within the terms of [national planning policy] is not met.”*

3.3.24 In preparation for the Local Plan Review, between 4th June 2019 to 22nd July 2019 the Council asked local residents to tell us which green spaces were special to them and why. The considerable responses received have been

reviewed by Officers. In reviewing the responses Officers have had in mind the following comments made by the Planning Inspector who examined the current Croydon Local Plan 2018 in which he said:

“A large number of [representations made to the Council about designating particular spaces as Local Green Space] argue for the general benefits of open space to recreation and health. These are undisputed but, by definition, general benefits do not amount to the special justification needed to support Local Green Space designation on a specific site. Others argue for the historic interest of particular places or pointed to their ecological or nature conservation interest. These too cannot be disputed but... the [Croydon Local Plan 2018] already contains policies to protect land with these characteristics. Other [representations] provide pointers to the kind of criteria that the Council may wish to use in the [Local Plan] Review which I recommend... The concept of Local Green Space is not simply about maintaining a quantitative standard of open space or facilities, important though that is; it is concerned with boundaries which are capable of enduring beyond the end of the plan period, i.e., not just ensuring that a sufficient quantity of open space is provided or retained in an area but that it be provided or retained on the particular site in question because its location has particular importance to the local community, possibly as the result of an event on the site or as the result of a campaign of acquisition or gift in relation to the site.”

3.3.25 Where responses have highlighted a feature or use of a green space that is beyond a general benefit; and it is not a feature protected by another Local Plan policy; then they are proposed in this Proposed Submission draft Local Plan. The proposed Local Green Spaces (referred as very special community green spaces) are set out under each Place, and include the reason why they are demonstrably special.

The table below identifies proposed Very Special Community Green Spaces that have met the demonstrably special criteria. The categories that have been used to identify sites as meeting the requirements of this designation include:

Name of the site	Place
Addiscombe Railway Park	Addiscombe
Biggin Wood	Norbury
Coulsdon Memorial Ground	Coulsdon
Foxley Wood and Sherwood Oaks	Kenley and Old Coulsdon/ Purley
Higher Drive Recreation Ground	Kenley and Old Coulsdon
Millers Pond	Shirley
Park Hill Recreation Ground	Central Croydon
Portland Road Community Garden	South Norwood and Woodside

Purley Beeches	Sanderstead
Rotary Field Recreation Ground	Purley
Sanderstead Pond (and Green)	Sanderstead
Sanderstead Recreation Ground	Sanderstead
Shirley Oaks Village Playing Field and Wood	Shirley
Shirley Recreation Ground	Shirley
Spring Park Wood	Shirley
Stambourne Woodland Walk	Crystal Palace and Upper Norwood
Temple Avenue Copse	Shirley
The Lawns	Crystal Palace and Upper Norwood
Wettern Tree Garden	Sanderstead
Woodcote Village Green	Purley

3.3.26 Just because a green space has not been put forward as a proposed Local Green Space, it does not mean that it is a development site. All green spaces are important; even more so in the context of for the target of circa 42,000 homes by 2039. These new homes will require access to green spaces. Therefore, other green spaces that do not lie within the Green Belt or Metropolitan Open Land and do not fulfill the criteria to be designated as “local green spaces” will be protected in the Local Plan review under an ‘other important green spaces’ policy. Many of them will also be part of the green grid network of open spaces proposed in the Green Grid section of this Proposed Submission Local Plan.

3.3.27 These spaces that are proposed to be protected through an “other green space” designation important include the following types of space:

- **Town (or Place) parks and natural open spaces** – These are large areas of open space that provide a landscape setting with a variety of natural features. They provide a wide range of activities, including outdoor sports facilities and playing fields, children’s play for different age groups and informal recreation pursuits. The category also includes larger areas of natural open space. They will usually provide recreation for an entire Place and can be up to 20ha in size.
- **Local parks and natural open spaces** – These provide for court games, children’s play, sitting out areas and nature conservation areas; or they are slightly larger areas of natural open space. They serve more

than the neighbourhood in which they are located, but won't serve an entire Place. Usually they will be under 2ha in size.

- **Neighbourhood parks and natural open spaces** – These also only serve the neighbourhood in which they are located but will be more formal green spaces. They include public gardens, sitting out areas, children's play spaces or other areas of a specialist nature, including nature conservation areas. Generally they are under 1ha in size.
- **Informal green spaces** – These are small areas of informal open space that provide natural surfaces and shaded areas for informal play and passive recreation that sometimes have seating and small amounts of play equipment. Typically they will serve only the neighbourhood in which they are located, and are generally under 0.4ha in size.
- **Linear open spaces** – These are paths, disused railways, nature conservation areas and other routes that provide opportunities for informal recreation. They can often be characterised by elements that are not public open space but that contribute to the enjoyment of the space.

3.3.28 To support the delivery of infrastructure set out in the Infrastructure Delivery Plan and mitigate the impact of development, the Council in early 2022/23 will explore the scope to review the Council's Community Infrastructure Levy (CIL) charging schedule adopted in 2013. This review will seek to strike an appropriate balance between additional investment through CIL to infrastructure to support development and the potential effect on the viability of developments.

4. CONSULTATION

4.1 The Issues and Options consultation for the Local Plan took place 1 November 2019 to 20 January 2020. The consultation was required under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The consultation covered the three strategic options, the local plan topic area policies, two transformation areas and the Place of Croydon chapters. Issues and options related to these areas were identified and detailed in the issues and options document.

4.2 Through the consultation period responses were collected through the Bang The Table platform. Through this consultation 3252 total responses were received across the 19 topics consulted on. There was a strong response in respect of the three strategic options and generally people were not supportive of land being released from the Green Belt but the proposed transformation of the Purley Way attracted support. There was support for the Council's Climate Change emergency declaration and people considered that it was important to maintain and improve the quality of the Council's green spaces

4.3 If approved, publication of the Proposed Submission Local Plan Review and its Sustainability Appraisal, with the supporting evidence alongside will take place under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The representations received together with the documents will be sent to the Planning Inspectorate. A Planning Inspector will hold an Examination-in-Public on the draft Proposed Submission Local Plan Review, when he/she may invite some of those people who have made representations to give evidence in person.

5 PRE-DECISION SCRUTINY

5.1 This item went to Scrutiny on 29th September 2020 and 16 March 2021. The Local Plan was discussed alongside the proposed response to the Housing White Paper. The notes of the meetings are attached.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Revenue and Capital consequences of report recommendations

6.1.1 The Local Plan Review is funded in full by the dedicated Local Plan budget reserve. This stage of the Local Plan Review can be funded in full from the Local Plan budget reserve.

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2021/22 £'000	2022/23 £'000	2023/24 £'000	2024/25 £'000
Revenue Budget available	219	100		
Expenditure	119	100		
Income	0			
Effect of decision from report				
Expenditure				
Income				
Remaining budget				
Capital Budget available				
Expenditure				
Effect of decision from report				
Expenditure				
Remaining budget	100	0		

6.2 The effect of the decision

- 6.2.1 The decision will commit Croydon to submit the Proposed Submission Draft of Croydon Local Plan document to the Secretary of State. The costs are estimated to be £219k and include all costs associated with the Local Plan Review, including evidence base assembly, consultation, document production, Local Plan Examination in Public and Adoption etc.

6.3 Risks

- 6.3.1 There is a small risk that the Local Plan Budget Reserve which is £219k after this commitment will not be sufficient to conclude the Local Plan Review to adoption. This needs to be managed carefully to ensure costs are contained within the funding available as has been the case to date.

6.4 Options

- 6.4.1 The alternative would be to delay the regulation 19 consultation stage. This would delay the review of the Local Plan and would mean having an out of date Local Plan in tension with statutory legislative requirements regarding plan making.

6.5 Future savings/efficiencies

- 6.5.1 The project is being funded by the Local Plan Review Budget Reserve, which is carefully managed through the Local Development Framework Board and project managed to ensure the project scope aligns with the budget available.

Approved by Michael Jarrett Head of Finance for Place

7. LEGAL CONSIDERATIONS

- 7.1 The Director of Law and Governance and Deputy Monitoring Officer acknowledges that this report seeks approval for the Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012 publication of the Local Plan Review and Submission of the Local Plan Review to the Secretary of State.

Approved by Nigel Channer, Interim Head of Commercial & Property Law on behalf of the Interim Director of Law and Governance & Deputy Monitoring Officer.

8. HUMAN RESOURCES IMPACT

- 8.1 There are no Human Resource impacts as the production of the partial review of the Local Plan is set out in the Spatial Plan Service Plan and can be delivered with the current established staff levels. If any should arise these will be managed under the Council's policies and procedures.

Approved by Jennifer Sankar, Head of HR Housing and Sustainable Communities, for and on behalf of Dean Shoemith, Interim Chief People Officer

9. EQUALITIES IMPACT

- 9.1 An Equalities Impact Assessment has been undertaken with the following chapters flagged for screening: Homes, Employment, Green Grid, Transportation and Communication, Urban Design and Local Character, Community Facilities, and Place Making.
- 9.2 An equality review has been undertaken in May 2021, to align the plan to current organisational priorities and to consider current data in respect of each characteristic.

Approved by: Denise McCausland – Equality Programme Manager

10. ENVIRONMENTAL IMPACT

- 10.1 The Proposed Submission Local Plan provides an update on the Council's environmental, climate change and green grid policies as a way of addressing environmental impacts. Supports the work of the Council's climate change commission. The Proposed Submission draft of the Croydon Local Plan is also supported by the commissioned Sustainability Appraisal, which further assesses the environmental, social and economic implications of the Local Plan Review and how this will help to deliver sustainable development.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no known direct crime and disorder impacts.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 Croydon needs to review its existing Local Plan to rise to the challenges facing the borough and its communities over the next 20 years and beyond. Planning is critical to ensuring that Croydon meets the needs of all its residents, businesses and visitors.
- 12.2 This Proposed Submission draft of the Croydon Local Plan sets out how Croydon might contribute to meeting its own housing needs, including the need for affordable homes; whilst tackling the causes of climate change in the borough, and ensuring it is developing vibrant places for people to live, work and visit.
- 12.3 It is a statutory requirement for the Council have an up to date Local Plan to ensure that the Council is able to determine planning applications in accordance with up to date Local Plan and resist inappropriate development and minimise the level of development occurring in the borough through the planning appeal process.
- 12.4 For this reason it is recommended to approve the Proposed Submission draft of the Croydon Local Plan for publication and for submission to the Secretary of State to enable the borough to meet the statutory duty to have an up to date

Development Plan that is in general conformity with the London Plan and consistent with national policy.

13. OPTIONS CONSIDERED AND REJECTED

- 13.1 Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans, at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Therefore, it is not an option not to review the Local Plan.

14. DATA PROTECTION IMPLICATIONS

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

YES

All consultation responses will be held in the Croydon Local Plan consultation database. This will include personal data. This data will need to be held until a date no earlier than 6 weeks after the date on which the Local Plan Review is formally adopted by the Council; or at the conclusion of any application by an aggrieved party to the High Court under Section 113 of the Planning and Compulsory Purchase Act 2004; whichever is the later date. This is so the Council can document that the Local Plan Review has been prepared in compliance with the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

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

YES – reference number 521257

The Corporate Director of Sustainable Communities, Regeneration and Economic Recovery confirms that a DPIA has been completed and is currently under review.

Approved by: Heather Cheesbrough, Director of Planning & Sustainable Regeneration

CONTACT OFFICER: Steve Dennington Head of Spatial Planning, extension 64973

APPENDICES TO THIS REPORT

Appendix 1 – Proposed Submission Draft of Croydon Local Plan

Appendix 2 – Sustainability Appraisal, Equalities Impact Assessment [Sustainability Appraisal and Equalities Impact Assessment | Croydon Council](#)

BACKGROUND PAPERS

Proposed Submission Draft of Croydon Local Plan – Policies Maps [Croydon Local Plan review - Policies maps](#)

Additional Evidence Produced as a result of the review of the Local Plan

Strategic Housing Market Assessment

<https://www.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/local-plan-evidence-topic/homes>

Green Belt Review

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20Green%20Belt%20and%20Metropolitan%20Open%20Land%20Study.pdf?src=redirection-fix>

Employment Land Review [Economy and employment | Croydon Council](#)

<https://www.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/local-plan-evidence-topic/economy-and-employment>

Future of Destination Retail Study [Economy and employment | Croydon Council](#)

Strategic Flood Risk Assessment [Climate change | Croydon Council](#)

Purley Way Masterplan

<https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20Green%20Belt%20and%20Metropolitan%20Open%20Land%20Study.pdf?src=redirection-fix>

East Croydon Strategic Regeneration Framework

<https://www.croydon.gov.uk/planning-and-regeneration/planning/planning-policy/further-guidance/masterplans/east-croydon-masterplan>

Whole Plan Viability Assessment [Viability | Croydon Council](#)

Other Reports

Scrutiny Committee Report “Croydon Local Plan” 28 September 2020

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=2140&Ver=4>

Scrutiny Committee Report “Croydon Local Plan” 16 March 2021

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=2143&Ver=4>

The full suite of evidence documents is available on the Evidence Page for the Local Plan (see paragraph 3.31) of this report for how this relates to the review of the Local Plan – [Local Plan evidence by topic | Croydon Council](#)