

LONDON BOROUGH OF CROYDON

REPORT:	STREETS & ENVIRONMENT SUB-COMMITTEE
DATE OF DECISION	1 NOVEMBER 2023
REPORT TITLE:	PARTIAL LOCAL PLAN REVIEW
CORPORATE DIRECTOR / DIRECTOR:	Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Heather Cheesbrough, Director of Planning & Sustainable Regeneration
LEAD OFFICER:	Julia Dawe - Plan Making Team Leader <u>Julia.dawe@croydon.gov.uk</u> Steve Dennington – Service Head for Spatial Planning, Growth Zone and Regeneration <u>Steve.Dennington@croydon.gov.uk</u>
LEAD MEMBER:	Cllr Jeet Bains, Cabinet member for Planning and Regeneration
AUTHORITY TO TAKE DECISION:	N/A
CONTAINS EXEMPT INFORMATION?	No
WARDS AFFECTED:	ALL

1 SUMMARY OF REPORT

- 1.1** This report sets out to inform members of the Street and Environment Sub-Committee of the on-going work that has been undertaken on the Council’s review of the Croydon Local Plan 2018 post the Regulation 19 consultation which took place between January and March 2022, and the election of the Mayor Perry as Executive Mayor.
- 1.2** It also provides members of the Sub-Committee with the opportunity to provide feedback and comments on the elements of the Local Plan 2018 that are subject to the partial review, which will be considered as part of the Local Plan Review scheduled to be considered by Executive Mayor Perry in Cabinet in December 2023. This engagement with the Street & Environment Sub-Committee is being undertaken alongside engagement with all Members of the Council, Residents’ Associations and key partners.
- 1.3** The main aim of the Local Plan Review is to set the framework for the sustainable growth of the borough for the next twenty years, including addressing the need to

help deliver more high-quality housing and affordable housing, balancing the growth of the borough with the borough's valuable character, enabling economic growth and town centre regeneration, whilst developing vibrant places to live, work, visit and socialise. With the adoption of the London Plan 2021, Croydon has a housing target of 33,985 new homes between 2019 and 2040.

- 1.4** A key stage in the journey of the Local Plan review was the Issues and Options consultation in late 2019, which presented three spatial strategies. Work continued on the Local Plan Review until November 2020, but with the Council issuing a Section 114 notice the Local Plan Review was paused. Work on the Local Plan Review recommenced mid-March 2021 and a Proposed Submission Draft was prepared and underwent public consultation under Regulation 19 of the Town and Country Planning (Local Plan) Regulations 2012 between 6th January and 17 February 2022.
- 1.5** Following the Regulation 19 consultation the decision was taken to pause work on the Local Plan until after the Mayoral election had taken place. This was due to the number of representations received in relation to the proposed areas of intensification in the Local Plan Review from local communities across the Borough. These concerns were also shared by Mayor Perry who stated, as part of his electoral manifesto, that he would review the Local Plan Review and seek to remove the relevant policies relating to the intensification areas should he be elected.
- 1.6** As a result of the consultation in early 2022 and following the Council issuing a further Section 114 Notice, the decision was made to "halt" work on the Local Plan Review to seek instruction from the new Executive Mayor once elected in May 2022.
- 1.7** Following the election of Mayor Perry in May 2022 the Mayor's Business Plan (2022-2026) was published in July 2022. This required changes to be made to the Urban Design Chapter of the Local Plan to remove the intensification areas and take a character over density approach to policy. This resulted in a new Council timetable for the production of the Local Plan review. Cabinet approval was subsequently given on 23 March 2023 for a revised Local Development Scheme (LDS). The LDS includes the updated timetable for the production of the Local Plan Review together with the Community Infrastructure Levy 2013 review. The LDS sets the timetable for amendments to be made to the Local Plan 2018 to reflect the Mayor's Business Plan 2022-26 and consider the representations made in response to the Regulation 19 consultation. Following these changes, a further round of Regulation 19 consultation is proposed early in 2024 subject to Cabinet approval.
- 1.8** The Local Plan Review has been updated to comply with the London Plan adopted in March 2021 and to reflect changes in national policy and guidance since 2018. The Plan also addresses the causes of climate change associated with planning, directs sustainable growth to sustainable locations in the borough, contributes to meeting housing need and supports economic growth, especially taking account of the impact of the Covid 19 pandemic.

- 1.9** The Local Plan Review has also identified the need to include and has developed the following three additional chapters regarding strategic transformation:
- Purley Way;
 - North End Quarter; and
 - Brighton Mainline Upgrade.
- 1.10** The Local Plan Review has developed proposed policy updates (with varying scales of change) for thematic policy areas 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. Additional evidence has been assembled to support the development of these updated policies.
- 1.11** The intensification areas have been removed from the Local Plan 2018 in accordance with the Mayor’s Business Plan 2022-26. The 16 Places of Croydon will change depending on their local character, their accessibility to services and public transport, their heritage assets and their ability to deliver sustainable growth with the required physical and social infrastructure. The Local Plan Review will set out the vision for the 16 Places as well as the proposed growth scenario for each place.
- 1.12** The proposed changes to the Local Plan 2018 are summarised in this report. The information in this report is presented as work in progress. It is scheduled that the Proposed Submission Local Plan Review will be considered by Cabinet in December 2023 and, subject to approval, publish the Local Plan Review for a further six weeks Regulation 19 consultation in early 2024. All representations received together with the representations received in respect of the previous Regulation 19 consultation will inform the examination in public before a Planning Inspector appointed by the Secretary of State who will consider the soundness of the Local Plan Review and whether it can be adopted.
- 1.13** The production of a Local Plan is a statutory function of the Council as it forms the basis on which planning applications should be determined unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) states policies in local plans and spatial development strategies, should be reviewed to assess whether they need updating at least once every 5 years, and should then be updated as necessary. Therefore, it is a statutory requirement for a Council to produce an up-to-date Local Plan.

2 RECOMMENDATIONS

- 2.1** For the reasons set out in the report, the Streets and Environment Sub-Committee is recommended:

1. To note this report, the proposed changes to the Local Plan 2018 and the publication of the Local Plan Review for a second consultation under Regulation 19 of the Town and Country Planning (Local Plan) Regulations 2012; and,
2. To consider whether it wishes to make any comments on the proposed changes to the Local Plan 2018 to be taken account of by the Executive.

3 BACKGROUND AND DETAILS

- 3.1** 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 to ensure general conformity with the London Plan 2021. Planning is critical to ensuring that Croydon meets the needs of all its residents, businesses and visitors. This Local Plan Review sets out to consider how Croydon might contribute to meeting its own housing needs, including the need for affordable homes, balance the growth of the borough with the borough's valuable character, enable economic growth and town centre regeneration, whilst tackling the causes of climate change in the borough and ensuring it is developing vibrant places for people to live, work and visit.
- 3.2** The Local Plan review has taken account of the London Plan 2021 including the reduction of the overall housing requirement, and the fixed small sites target for each borough. The final version of the London Plan was adopted on 2nd March 2021 and needs to be reflected in the Local Plan Review. This is essential as it is a statutory requirement to produce a Local Plan which is in general conformity with the London Plan.

Strategic Option

- 3.3** During the Issues and Options consultation three strategic spatial options were set out. Each of the three options proposed a proportion of homes to be built in each of the borough's 16 places based on differing criteria linked to achieving sustainable growth. The third option which proposed strategic residential led development in the Green Belt is no longer needed due to the reduced New London Plan housing target for the Borough. Taking into account the consultation responses, the statutory Sustainability Appraisal and evidence, a proposed strategic spatial option has been developed and will be included in the Local Plan Review.
- 3.4** The proposed strategic spatial option continues with significant development in the Croydon Opportunity Area, development allocations elsewhere in the borough in sustainable locations, a step change in housing supply along the Purley Way and continued development of windfall sites. The Council's housing target as set out in the London Plan is a housing target of 20,790 dwellings between 2019-29. The total housing target proposed for the Plan period April 2019 to 31 December 2040 is 33,385 units. This target has been set using the London Plan housing target of 20,790 homes. The residual figure of the target has been calculated using the land availability as set out in the GLA Strategic Housing Land Availability Assessment.

- 3.5** The London Plan Small Sites Policy requires the borough to accommodate a minimum of 641 units per annum from small sites, which should be in locations that have good access to a centre, social and physical infrastructure and reasonable sustainable transport. An element of the Council's housing land supply being from small sites is a requirement of both national and London Plan policy.
- 3.6** The previous Local Plan Review (2021) included proposed areas for intensification within the Borough. The inclusion of these areas within the Local Plan attracted a significant number of representations in response to the 2022 Regulation 19 consultation.
- 3.7** Following the election of Mayor Perry and the publication of his Business Plan 2022-26 all the proposed intensification areas have been removed from the Local Plan 2018 and Local Plan Review 2021. Additional work has been undertaken to assess the Council's housing land supply and alternative sources of small sites to enable the delivery of 641 units each year. In addition windfall completions on non-allocated sites over the previous 6 year period between 2026/17 and 2021/22 have averaged 1,004 units per annum well in excess of the 641 small sites requirement. This trend is expected to continue.
- 3.8** Sites are allocated in the 16 places of Croydon (see Appendix 1). Allocations total 18,987 new homes which are expected to come forward between 2022-2040.

Transformation Areas

- 3.9** The Local Plan review also identified the need to include three additional chapters relating to strategic transformation areas (see Appendix 2), which for different reasons require a comprehensive approach to plan for the change for these areas. These areas are summarised as follows;
- The Purley Way;
 - The North End Quarter; and
 - The Brighton Mainline.

The Purley Way

- 3.10** Forming a key part of the strategic spatial option, the Purley Way transformation area policies and allocations will facilitate considerable growth in residential, mixed use (outside the Strategic Employment Locations) and industrial intensification development to support economic growth along the Purley Way. In addition, it is proposed to create three new local centres at Valley Park, Waddon Marsh and Fiveways together with a new Neighbourhood Centre at Waddon Way. Alongside the development of the Local Plan Review chapter a masterplan for the Purley Way has also been developed, which will be adopted as a Supplementary Planning Document following the adoption of the Local Plan Review. It should be noted that the policies for the area are developed to compliment the Croydon Opportunity Area and will

enable the delivery of a significant amount of housing, whilst protecting and proposing the intensification of protected industrial designations.

The North End Quarter

- 3.11** A chapter setting out the statutory planning framework / policies for the renewal and regeneration of the Town Centre. The chapter provides a planning vision and strategy for the transformation of this area as the role of town centres change and evolve in response to the pandemic and much changed function and role of town centres. The chapter will be supplemented by URW's current master planning exercise, the Council's Town Centre Vision, Regeneration Framework and Delivery Plan commission, and the outputs from the Croydon Urban Room.

Brighton Main Line Upgrade and East Croydon Station

- 3.12** 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 bottlenecks 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 will 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.
- Allocations included to phase and guide development sites adjacent to the station post construction of the project.

Policy Topic Area Changes

- 3.13** The following changes are proposed in the Local Plan Review to support the delivery of the proposed strategy outlined in paragraph 3.4 above, to update the plan so it is consistent with both the National Planning Policy Framework (NPPF) and London Plan 2021. The Local Plan Review also addresses environmental and climate change issues.

Housing - including Affordable Housing

- 3.14** To inform the housing policies a Strategic Housing Market Assessment was originally produced in 2015 and is currently being updated. The SHMA will set out the quantity and type of housing needed over the 20-year plan period. The evidence identifies that Croydon's population is gradually getting older and household sizes are getting smaller. Open market housing (both private rented and for sale) is getting less and less affordable for many households in the borough. The report will also supply the

figure for the number of affordable rented homes a year that would be needed in Croydon to meet the need of lower income households for housing.

- 3.15** A new policy is proposed to be added to the Homes chapter to manage the quality and cumulative impact of Houses in Multiple Occupation. The policies in the housing chapter have been updated recognising the housing crisis and the need to encourage significant housing delivery, especially affordable homes. However, the affordable housing target will be in alignment with the London Plan 2021.

Employment and Retail

- 3.16** Croydon is the largest metropolitan centre in London and one of only two strategic office centres outside 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 2021, the NPPF, the latest Retail Needs Study and to respond to the changing function and use of all tiers of centres:

- Policies have 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;
- With the London Plan 2021 '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,
- Strengthen the protection of employment land and the warehousing sector.

Community Facilities

- 3.17** These policies do not need significant change as they recognise and plan for the need to provide appropriate community facilities, such as education, health, religious, sporting, cultural and creative spaces, for all residents and visitors of Croydon. However, due to the increased housing delivery the Infrastructure Delivery Plan, which informs these policies has been updated.

Transport

- 3.18** As Croydon grows, we need to manage private car use, traffic and congestion and resultant pollution in our streets with regard to the London Mayor's Transport Strategy. Changes to the transportation policies aim to address the climate

emergency, promote sustainable transport and enable sustainable growth in the borough.

Green Grid

- 3.19** Reflecting the pressure that increased housing development would place on the green grid and the need to address the climate emergency, the Local Plan Review is an opportunity to strengthen these policies. This is supported by the revisions to the NPPF and the London Plan 2021.
- 3.20** Following on from the Planning Inspector removing Local Green Spaces in the Local Plan 2018, a consultation and evidence gathering exercise has been undertaken to support the introduction of Local Green Spaces as part of the Local Plan Review.

4 APPENDICES

- 4.1** Appendix 1 – The Places in the Local Plan
Appendix 2 – Transformation Areas

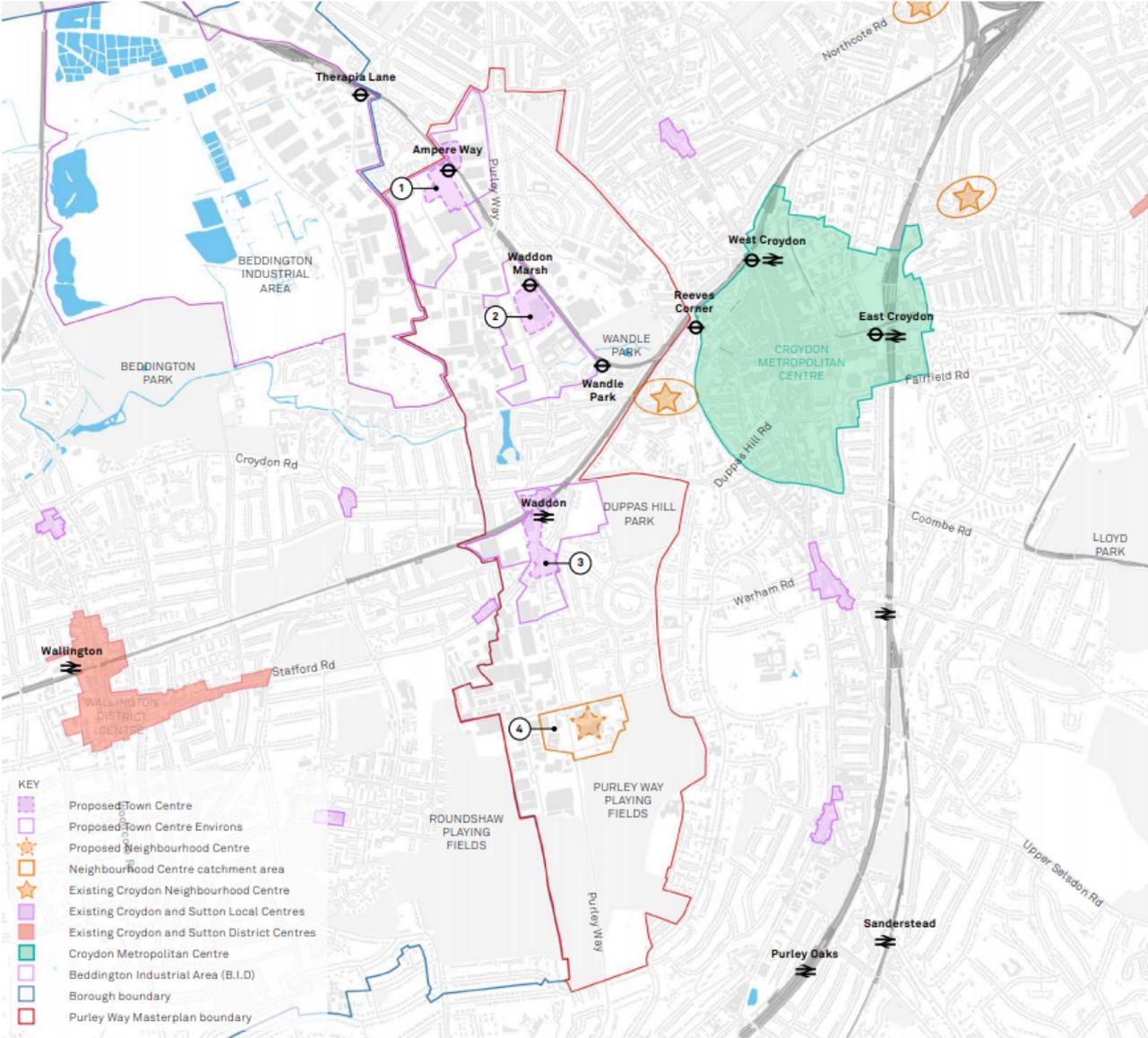
Appendix 1

The Places in the Local Plan

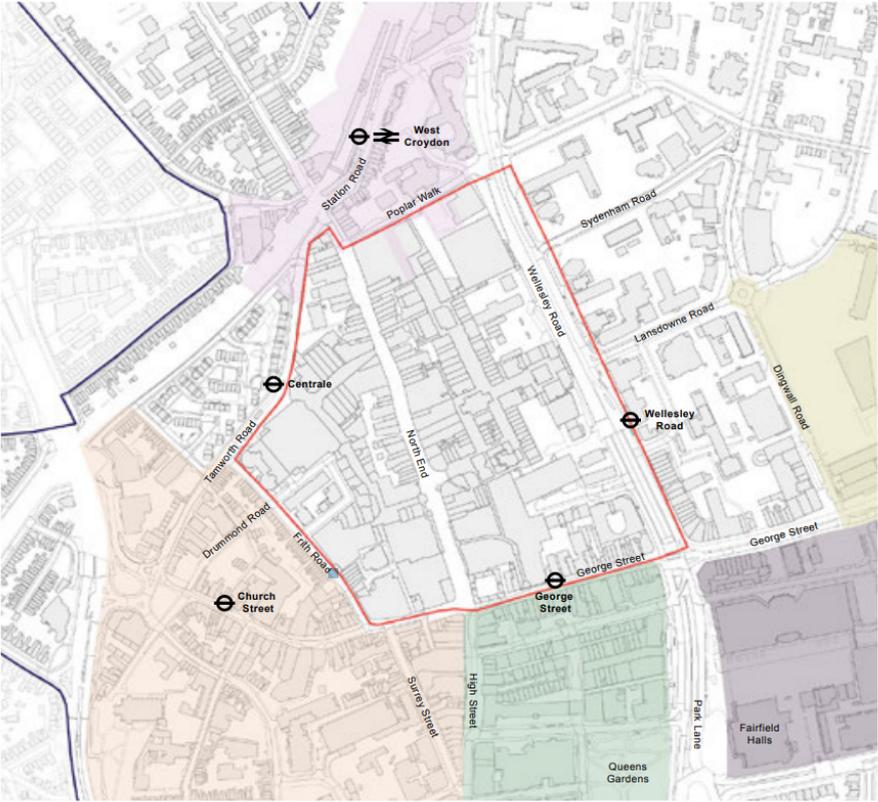


Appendix 2

Transformation Area Purley Way

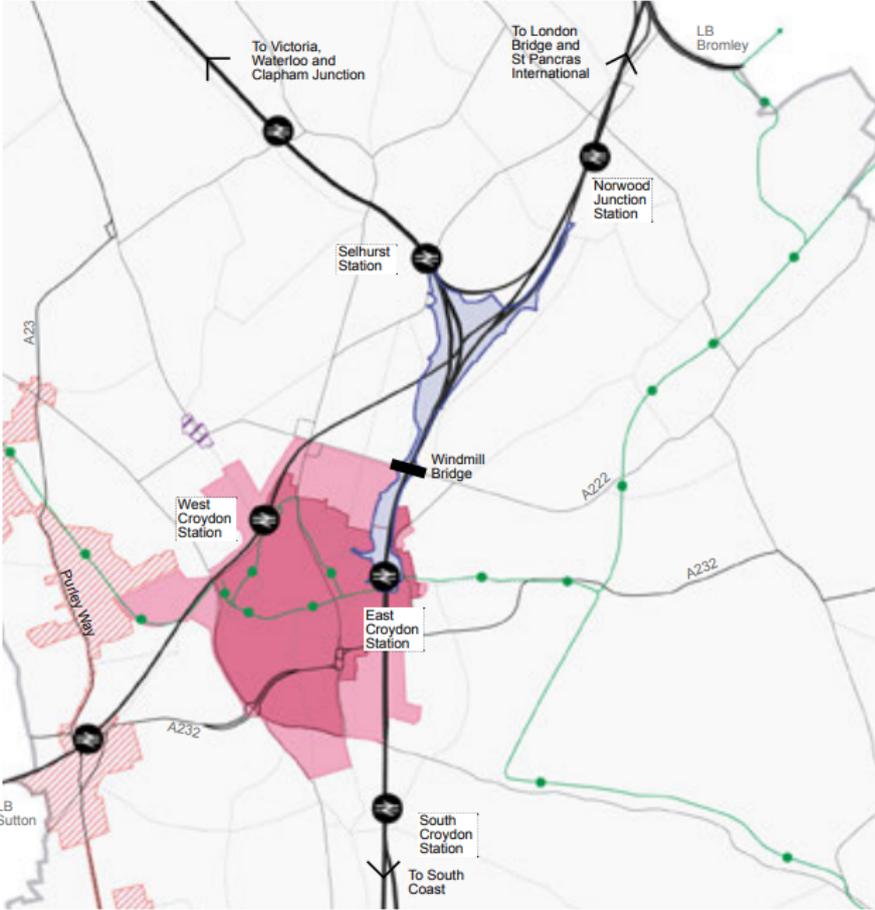


Transformation Area North End Quarter



- North End Quarter Transformation Area
- Mid-Croydon Masterplan
- Fairfield Masterplan
- East Croydon Masterplan
- West Croydon Masterplan
- Old Town Masterplan
- Opportunity Area Planning Framework

Transformation Area - Brighton Main Line Upgrade and East Croydon Station



- borough boundary
- Croydon opportunity area
- Metropolitan centre
- Local centre
- Purley Way transformation area
- Brighton Mainline upgrade project
- ⊙ Railway station
- Railway network
- TfL road network (TLRN)
- borough distributor roads
- Neighbourhood distributor roads
- Existing tram network and stops