

REPORT TO:	CABINET 21 September 2015
AGENDA ITEM:	7.1
	Croydon Local Plan: Strategic Policies – Partial Review - Preferred and Alternative Options (CLP1.1)
LEAD OFFICER:	Jo Negrini - Executive Director – Place Department
CABINET MEMBER:	Councillor Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes, Regeneration & Planning
WARDS:	All

CORPORATE PRIORITY/POLICY CONTEXT:

The Corporate Plan (2015-2018) sets out how the council will deliver on three key ambitions:

- GROWTH, creating growth in our economy;
- INDEPENDENCE, helping residents to be as independent as possible; and,
- LIVEABILITY, creating a welcoming, pleasant place in which local people want to live.

Ambition Priority One of the Corporate Plan, growth is underpinned by the Croydon Local Plan, enabling development to occur in sustainable locations, in a desired form and at the appropriate time. The Croydon Local Plan establishes the planning policy vision and the statutory basis with which to support the growth and development objectives delivered through the Croydon Promise and Places Plans.

The Corporate Plan contains the Council’s contribution to Croydon’s Community Strategy 2013-2018 developed by Croydon’s Local Strategic Partnership (LSP). The Community Strategy sets out the direction for the Local Strategic Partnership for the next five years and beyond, to create an attractive place to live, work, visit and socialise. Community Strategy priorities relevant to the Local Plan are:

1. *An Enterprising City*- a place renowned for its enterprise and innovation with a highly adaptable and skilled workforce and diverse and responsive economy.
2. *A Caring City*- a place noted for its safety, openness and community spirit where all people are welcomed to live and work and where individuals and communities are supported to fulfil their potential and deliver solutions for themselves.
3. *A Learning City*- a place that unleashes and nurtures local talent, is recognised for its culture of lifelong learning and ambitions for children and young people.
4. *A Creative City*- a place noted for culture and creativity – one of the best incubators of new artistic and sporting talent in the country.
5. *A Connected City*- a place defined by its connectivity and permeability with one

<p>of the best digital, communications and transport networks in the country.</p> <p>6. <i>A Sustainable City</i>-a place that sets the pace amongst London boroughs on promoting environmental sustainability and where the natural environment forms the arteries and veins of the city.</p>
<p>AMBITIOUS FOR CROYDON & WHY ARE WE DOING THIS:</p> <p>The Croydon Local Plan will set the growth and development vision, and planning policies for the borough from 2016 – 2036. The Croydon Local Plan will provide the planning policy basis for the borough to plan for the borough’s housing need, deliver necessary affordable housing, accommodate sustainable growth, regenerate the district centres, strengthen neighbourhood and local centres, safeguard and provide employment floorspace and deliver a renewed Croydon Opportunity Area, with a residential population of up to 20,000 people, a comprehensively developed retail core and provision of public realm and infrastructure.</p>
<p>FINANCIAL IMPACT</p> <p>The Croydon Local Plan can be delivered from the Croydon Local Plan budget (reserve) 2015 – 2018.</p>
<p>KEY DECISION REFERENCE NO.: Not a key decision as defined by the Council’s constitution.</p>

<p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below</p> <p>1. RECOMMENDATIONS</p> <p>The Cabinet is recommended to</p> <p>1.1 To approve the publication of the Croydon Local Plan: Strategic Policies – Partial Review (Preferred Options and Alternatives) e-copy Appendices 1 and 2 for Regulation 18 (The Town and Country Planning (Local Planning) (England) Regulations 2012) consultation; and</p> <p>1.2 Delegate to the Executive Director of Place, in consultation with the Deputy Leader (Statutory) - Cabinet Member for Homes, Regeneration & Planning, the making of minor and / or factual amendments to the Croydon Local Plan: Strategic Policies – Partial Review (Preferred Options and Alternatives) prior to public consultation.</p>
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<p>2. EXECUTIVE SUMMARY</p> <p><u>Why undertake CLP1.1 Partial Review?</u></p> <p>2.1 The Croydon Local Plan: Strategic Policies (CLP1) was adopted in April 2013. The Plan sets out the vision, development objectives and strategic planning policies for the borough from 2011 to 2031. In April 2013 the Council also adopted the Croydon Opportunity Area Planning Framework (COAPF). The Croydon Local Plan: Strategic Policies and COAPF work alongside a series of Masterplans for Croydon Opportunity Area.</p>

- 2.2 As a consequence of the adoption of the Further Alterations to the London Plan (2015), the Council has commenced the Croydon Local Plan: Strategic Policies Partial Review to ensure conformity with the London Plan at the earliest opportunity.
- 2.3 The partial review also enables the Croydon Local Plan: Strategic Policies to reflect the Administration's Ambitious for Croydon, which in the planning context seeks to achieve the following.
- Increase housing supply
 - Increase affordable housing supply
 - Focus on District Centres regeneration (in addition to the COA)
 - COA retail core renewal
 - Employment opportunities and economic growth
 - Increased emphasis on culture
 - Reflection of the Croydon Promise, Croydon Growth Zone and Place Plans

Background

- 2.4 The Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options), is a draft planning policy document to form the basis of public and stakeholder consultation on the development of the Croydon Local Plan: Strategic Policies Partial Review in accord with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement 2012.
- 2.5 Once fully adopted the Croydon Local Plan: Strategic Policies Partial Review will form part of the development plan for the borough along with the Croydon Local Plan: Detailed Policies and Proposals and the London Plan. On adoption, the borough will have an up to date development plan that is focussed on sustainable growth, meeting the need for homes, jobs and associated infrastructure, whilst respecting and enhancing the character of Croydon. The Plan will set this strategic context for 15 years as national guidance recommends.
- 2.6 The key catalyst for the partial review is the adoption of the Further Alterations to the London Plan (2015), which increased the borough's housing target from 1,330 per annum to 1,435 per annum. Adoption of this target by The Mayor has rendered the existing housing requirements in the Croydon Local Plan: Strategic Policies obsolete. This combined with the desirability of extending the life of the Croydon Local Plan: Strategic Policies and having an up to date development plan provides the justification for the need to undertake the partial review.
- 2.7 The Croydon Local Plan: Strategic Policies Partial Review's preferred approach for accommodating the Further Alterations to the London Plan housing target, and exceeding it in a sustainable manner, is to accommodate growth within the existing urban area of the borough. This will be achieved through the Croydon Opportunity Area accommodating at least 9,500 dwellings, sites beyond the

Croydon Opportunity Area being allocated for at least 9,000 dwellings and sustainable growth of the suburbs and windfall sites achieving in the region of 10,500 dwellings. Alongside previous completions and bringing vacant dwellings back into use it is anticipated just over 31,500 dwellings will be delivered over the plan period 2016 – 2036.

- 2.8 The Croydon Local Plan: Strategic Policies Partial Review also proposes changes to a small number of other policies to reflect new evidence, change in circumstances and Ambitious for Croydon. These primarily relate to affordable housing policy, the need for industrial and employment space, ensuring strategic employment locations fulfil that strategic function, identification of Neighbourhood Centres, review of archeological priority areas and a move from Local Areas of Special Character to Local Heritage Areas.
- 2.9 The Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) is considered to be positively prepared, justified, effective and consistent with London Plan and national policy as required by national guidance.
- 2.10 The costs associated with evidence base, Plan production and undertaking consultation on the Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) can be met from the Local Plan Budget (reserve) 2015-18.

3. DETAIL

- 3.1 The key catalyst for the partial review is the adoption of the Further Alterations to the London Plan, which increase the borough's housing target from 1,330 per annum to 1,435 per annum. Adoption of this target by The Mayor has rendered the existing housing requirements in the Croydon Local Plan: Strategic Policies obsolete. This combined with the desirability of extending the life of the Croydon Local Plan: Strategic Policies and having an up to date development plan provides the justification to undertake the partial review.
- 3.2 The Further Alterations to the London Plan sets a 20 year housing target of 42,000 per annum and Croydon's figure of 1,435 dwellings per annum. However, these figures are driven by the Mayor's Strategic Housing Land Availability Assessment (SHLAA) and Mayor's objectively assessed housing need for London is 49,000 per annum. The Mayor is clear that planning for the Further Alterations to the London Plan target alone will not be sufficient to achieve the statutory requirement of general conformity with the London Plan. Councils have to demonstrate how they are seeking to exceed this target and contribute to the 49,000 per annum target.
- 3.3 In addition to the Further Alterations of the London Plan housing target the Council has undertaken a Strategic Housing Market Assessment (SHMA). A SHMA is an objective assessment of housing need. Croydon's SHMA has been produced in accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance. Paragraph 159 of the NPPF requires local authorities to have a clear understanding of housing needs in their area by preparing a SHMA. A SHMA should identify the scale and mix of

housing and the range of tenures that the local population is likely to need over the plan period which:

- Meets household and population projections, taking account of migration and demographic change;
- Addresses the need for all types, including affordable housing and the needs of different groups in the community; and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.

3.4 The SHMA objectively assesses the quantity of housing needed in Croydon up to 2036. It identifies an Overall Housing Need for the borough, identifies the need for affordable housing and also the needs of different groups including older people, people with disabilities, BME households, households with children, young people and those wanting to build their own home. It also sets out the need of different types of housing by housing type and size.

3.5 In accordance with the NPPF, the SHMA has produced an overall housing need (based on the 2012 - based subnational population projections and the 2011 household projections produced by DCLG). The SHMA has also produced a figure based on the methodology used in the GLA's SHMA for the Further Alterations to the London Plan, but based on the GLA's updated 2014 population projections and household projections. Using this methodology and these projections, Croydon's overall housing need is 2,162 dwellings per year and this is considered to be the borough's objectively assessed housing need and therefore referred to in the Croydon Local Plan: Strategic Policies Partial Review.

Summary of Croydon's housing figures

Source	Figure per annum
Further Alterations to the London Plan 2015	1,435
Further Alterations to the London Plan 2015 – Central variant	2,162

3.6 Most of the need for new homes in Croydon results from natural growth of the borough's population (more births than deaths). A proportion of it, however, is related to people moving to Croydon from elsewhere in the UK or overseas and historically more people have moved to Croydon than have been leaving each year (which on average between 2004 and 2013 meant that 121 more people moved the borough each year than left, and of these just under 20% were from outside of the UK). However, it is important to meet the need for homes from people moving from outside of the borough as simply not providing for them will result in overcrowding, negatively impact on well being and increase competition for accommodation and, therefore, the price of homes in Croydon (either to buy or rent) will rise making them more unaffordable to residents of the borough.

3.7 The Croydon Local Plan: Strategic Policies Partial Review's preferred approach for accommodating the Further Alterations to the London Plan housing target, and exceeding it in a sustainable manner, is to accommodate growth within the

existing urban area of the borough. This will be achieved through the Croydon Opportunity Area accommodating at least 9,500 dwellings, sites beyond the Croydon Opportunity Area being allocated for at least 9,000 dwellings and sustainable growth of the suburbs, windfall sites achieving in the region of 10,500 dwellings and maximising growth within district and local centres. Alongside, previous completions and bringing vacant buildings back into use it is anticipated just over 31,500 dwellings will be delivered over the plan period 2016 – 2036.

- 3.7 This approach is considered to be in conformity with the NPPF and London Plan policy in terms of delivering sustainable growth within the urban area, without the release of Green Belt and Metropolitan Open Land. Furthermore, through the Sustainability Appraisal process, it is clear that in sustainability terms accommodating development within the existing urban area is the most sustainable option. Due to these two factors it is considered that no other reasonable alternative(s) for accommodating development exist, and hence, the preferred option of accommodating development in the urban area is the option being consulted on.
- 3.8 What the Croydon Local Plan: Strategic Policies Partial Review demonstrates is that in the face of the considerable population growth London faces; and as a consequence, the challenges Croydon faces to meet housing need (and address the unarguable need for affordable housing), Croydon is willing to plan for growth, which is evident from the selected preferred option. What is essential is that London and South London also take responsibility for London's growth and their growth. Croydon will be working hard with the GLA and its neighbours to ensure this is the case.
- 3.9 The Croydon Local Plan: Strategic Policies Partial Review also includes revisions to the following.
- Tier 2' employment locations to ensure they are still performing a strategic employment function.
 - Minor amendments to the Plan's affordable housing policy are included to ensure continued supply and confirm that on-site provision is preferred.
 - Identification of neighbourhood centres, these are locations that are identified on the basis of their ability to support existing and future communities through the provision of community uses.
 - A review of the borough's archaeological priority areas.
 - A change from Local Areas of Special Character to Local Heritage Areas with a focus on the designation being principally heritage value based.

- 3.10 The preferred option is expressed as a series of tracked changes to CLP1 Strategic Policies (2013) and it is only the tracked changed element of Croydon Local Plan: Strategic Policies Partial Review that is being consulted on.
- 3.11 Recommendation 1.3 is necessary to ensure that at the time the consultation on the Croydon Local Plan: Strategic Policies Partial Review commences (a few weeks post Cabinet) the Plan is up to date, factually correct and minors amendments can be made to support the consultation.
- 3.12 The timetable for preparation of the Croydon Local Plan: Strategic Policies Partial Review is set out below:

Stage	When
Consultation on Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options)	6 weeks in November/December 2015
Proposed Submission draft of Croydon Local Plan: Strategic Policies Partial Review	Summer 2016
Submission of Croydon Local Plan: Strategic Policies Partial Review to the Secretary of State	Winter 2016
Independent examination by a Planning Inspector	Spring/Summer 2017
Adoption of Croydon Local Plan: Strategic Policies Partial Review as the Council's planning policies	Winter 2017

4. CONSULTATION

- 4.1 Consultation will be undertaken in conformity with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement (SCI). Therefore, consultation will include the following:
- Emails and/or letter to the Local plan consultee database, regularly updated- a list of all the organisations and stakeholders, Croydon engages with on planning documents, this includes the Duty to Cooperate authorities, Statutory Bodies, landowners and developers and local community organisations, businesses and residents.
 - Printed media and libraries- adverts in the local newspaper, and council communications including e-bulletins to promote the consultation periods and any events. The consultation documents are sent to all the libraries with promotional material such as posters for notice boards.
 - Web pages, and social media such as Facebook, Wordpress, Youtube and Flickr are utilised to reach as many people as possible
 - Workshops, information stands and bespoke engagement exercises will accompany consultation periods. The consultation should be proportionate to the consultation subject matter.

- Joint consultations with partners from external organisations and internal council departments may be considered in order to reduce the risk of consultation fatigue and to amalgamate resources.

4.2 The preferred option is expressed as a series of tracked changes to CLP1 Strategic Policies (2013) and it is only the tracked changed element of CLP1.1 that is being consulted on.

4.3 It is planned that both the consultation responses and the Proposed Submission Croydon Local Plan: Strategic Policies Partial Review itself will be reported to Cabinet in July 2016.

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1

1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2015/16 £'000	2016/17 £'000	2017/18 £'000	2018/19 £'000
Revenue Budget available				
Expenditure	56.4			
Effect of decision from report				
Expenditure (previously agreed)	43.4			
Expenditure	13			
Remaining budget	<u>0</u>	<u></u>	<u></u>	<u></u>

2 The effect of the decision

The Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) is one stage in the process of preparing the Croydon Local Plan: Strategic Policies Partial Review. Stakeholder engagement is a statutory requirement in preparing a Development Plan Document, of which the Croydon Local Plan: Strategic Policies Partial Review is one. Undertaking consultation enables further work on the Croydon Local Plan: Strategic Policies Partial Review. All the current work required to support the Croydon Local Plan: Strategic Policies Partial Review is accounted for within the current Spatial Planning Service resource level and Local Plan budget (reserve) 2015-18. There is an earmarked reserve of £380k for the delivery of the Croydon Local Plan and the expenditure for this element of the Local Plan can be funded from within it.

3 Risks

The preparation of the Croydon Local Plan: Strategic Policies Partial Review is a complex multi-stage process, being prepared to a tight timetable. There is therefore inherent risk that any unforeseen circumstances, additional analysis or legal challenge will result in additional financial costs above those available and could delay the final adoption of the Croydon Local Plan: Strategic Policies Partial Review.

These are being mitigated to reduce their impact with a programme management approach and up front communication with key stakeholders including statutory organisations. Further work is currently being undertaken to monitor the processes to ensure the document is found to be sound and based on up to date evidence.

As the Croydon Local Plan: Strategic Policies Partial Review will be part of the overarching Local Planning Authority's spatial planning strategy for the next twenty years, it is also essential that it is of sufficient quality and purpose to ensure the Council can achieve its Vision.

4 Options

There are no options with regard to consultation, as most of the processes being undertaken are specified by statutory requirements or by government policies. Failure to undertake sufficient evidential analysis or stakeholder consultation may prompt challenge at the Public Examination stage, increasing overall costs.

In the absence of the Croydon Local Plan: Strategic Policies Partial Review future planning decisions will be at risk of challenge as there could be the absence of an up to date development plan and possible non-conformity with London Plan policy.

5 Future savings/efficiencies

A sound Croydon Local Plan: Strategic Policies Partial Review will contribute indirect financial savings by assisting the regeneration of the borough through the setting of a firm planning framework that will provide certainty to the community and developers, mitigate cost associated with planning appeals and ensure the Council has an up to date development plan as set out in government guidance, which could become a performance requirement under emerging government policy.

- 6 Approved by Dianne Ellender (Head of Finance and Deputy S151 Officer)
Department Head(s) of Finance/nominated deputy(ies)

6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

- 6.1 The Council Solicitor comments that the Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) forms the basis of public and stakeholder consultation on the development of the Croydon Local Plan: Strategic Policies Partial Review in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement 2012. It will also contribute towards compliance with the Duty to Cooperate as required under Section 33A(1)(c) of the Planning and Compulsory Purchase Act 2004.

Approved by Sean Murphy - Lawyer on behalf of the Council Solicitor & Director of Democratic & Legal Services

7. HUMAN RESOURCES IMPACT

- 7.1 There are no direct Human Resources considerations arising from this report in terms of impact on staff. However, consultation on the Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) can be undertaken in a proportionate manner with the current Spatial Planning resource level and availability.

Approved by Adrian Prescod, HR Business Partner, for and on behalf of Director of HR, Resources department.

8. EQUALITIES IMPACT

- 8.1 The Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) has been subject to an Equality Analysis scoping exercise, which has assessed the draft Plan's impact on equalities and whether a full Equalities Assessment is necessary for the Proposed Submission stage. The outcome of this Equalities Assessment screening exercise is that a full Equalities Assessment should be undertaken for the Croydon Local Plan: Strategic Policies Partial Review Proposed Submission draft.

9. ENVIRONMENTAL IMPACT

- 9.1 A full Sustainability Appraisal (incorporating a Strategic Environmental Assessment) of the Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) has been prepared. Amendments have been made to the Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) as a result of the findings of the Sustainability Appraisal.

10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 The Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) report does not have a direct impact on the reduction or prevention of crime and disorder.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 11.1 Public and stakeholder engagement is an essential and statutory requirement in preparing the Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options). The Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) is considered to be positively prepared, justified, effective and consistent with national policy.
- 11.2 The preferred option is expressed as a series of tracked changes to CLP1 Strategic Policies (2013), with alternative options considered also included and it is only the tracked changed element of CLP1.1 that is being consulted on.
- 11.3 In the absence of the Croydon Local Plan: Strategic Policies Partial Review future planning decisions will be at risk of challenge as there could be the absence of an up to date development plan and possible non-conformity with London Plan policy.

12. OPTIONS CONSIDERED AND REJECTED

12.1 There are no options with regard to consultation, as most of the processes being undertaken are specified by statutory requirements or by government policies. Failure to undertake sufficient evidential analysis or stakeholder consultation may prompt challenge at the Public Examination stage, increasing overall costs and the likelihood of the plan being found unsound.

CONTACT OFFICER: Tim Naylor, Head of Spatial Planning (ext 62615)

BACKGROUND PAPERS - LOCAL GOVERNMENT ACT 1972 (*Available via* <https://secure.croydon.gov.uk/akscroydon/users/public/admin/kabmenu.pl?cmte=CAB>)

Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options):

- Interim Sustainability Appraisal Report – Croydon Local Plan: Strategic Policies – Partial Review
- Equalities Analysis Scoping Report - Croydon Local Plan: Strategic Policies – Partial Review
- Health Impact Assessment Scoping Report - Croydon Local Plan: Strategic Policies – Partial Review
- Croydon's Strategic Housing Market Assessment and Croydon's Strategic Housing Market Assessment – Addendum Report

APPENDICES

(Available via the Council website

<https://secure.croydon.gov.uk/akscroydon/users/public/admin/kabmenu.pl?cmte=CAB>)

Appendix 1 – Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options)

Appendix 2 – Changes to the Policies Map arising from proposals contained within the Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) and the Croydon Local Plan: Detailed Policies and Proposals (Preferred and Alternative Options)