

# GREATER LONDON AUTHORITY

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**Department: Planning**  
Our reference: LDF08/LDD08/CG01  
Date: 21 January 2020

Sent by email to: [ldf@croydon.gov.uk](mailto:ldf@croydon.gov.uk)

Dear Steve

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Croydon Local Plan Review Issues and Options (Regulation 18) 2019**

Thank you for consulting the Mayor of London on Croydon's Local Plan Review Issues and Options Document. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to provide comments on the emerging Local Plan on his behalf. Transport for London (TfL) has provided comments, which I endorse, and which are attached as Annex 1.

## **The draft new London Plan**

As you know, the Mayor published his draft new London Plan for consultation on 1st December 2017. The Panel's report, including recommendations, was issued to the Mayor on 8th October 2019 and the Intend to Publish version of the London Plan was published on the 17th December 2019. Publication of the final version of the new London Plan is anticipated in March 2020, at which point it will form part of Croydon's Development Plan and contain the most up-to-date policies.

Croydon's revised Local Plan will be required to be in general conformity with the new London Plan. The draft new London Plan and its evidence base are material considerations in planning decisions.

## **Strategic Spatial Options**

The Mayor welcomes the strategic review Croydon is undertaking in order to meet its new housing target. Overall, he is supportive of the key aims of the three strategic options.

In line with the draft new London Plan (Intend to Publish version), the Mayor would welcome development in line with Strategic Spatial options 1 and 2. With regards to Option 2, the Mayor

would welcome a better understanding of how approximately 12,000 homes could be delivered along the Purley Way without impacting the industrial functions of the Purley Way Strategic Industrial Locations (SIL). In this regard, it is noted that Croydon's housing target has decreased significantly from 29,490 homes over 10 years in the 2017 version of the draft Plan to 20,790 in the Intend to Publish version of the Plan and therefore development around the Purley Way SIL should not impede the long term functioning of the SIL. The Mayor's Housing and Land team are currently working with your officers to inform the capacity of the Purley Way area, along with TfL to understand the transport requirements. The potential housing capacity that could be delivered in the Purley Way area should be informed by this capacity work, and subject to further discussion with the GLA and TfL.

The draft new London Plan policy H1 places greater emphasis on delivery and Croydon should review the deliverability and sustainability of each of these two Options to inform which (or a combination of the two) is the most appropriate growth option for Croydon.

The Mayor does not support the release of London's Green Belt and the new London Plan housing targets do not rely on the release of the Green Belt. One the aims of the Green Belt is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Croydon is proposing two large regeneration areas at Croydon Town and along the Purley Way. The release of the Green Belt could hinder or delay the development of these areas. Therefore, such an approach would not be in conformity with the London Plan. As stated above, Croydon's housing target has dropped significantly and there is no justification for the release of the Green Belt.

Croydon's policy framework will need to clearly support the most deliverable option so that it provides clarity and confidence to developers to invest and bring sites (large and small) forward.

## **Themed policies**

### **Housing target**

The Mayor welcomes Croydon's ambition to deliver 46,040 homes between 2019 and 2039. The draft new London Plan (Intend to Publish version) sets Croydon a 10-year net housing completions target of 20,790 homes between 2019 and 2028. Of this target 6,410 completions should be identified from small sites. With regards to the delivery of small sites, including the numbers sets out in Croydon's Strategic Spatial Options, the panel report specifically states that the small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework of 2019.

Whilst Croydon's Local Plan needs to consider the National Planning Policy Framework 2019, the Planning Practice Guidance (Paragraph: 013 Reference ID: 2a-013-20190220) is clear that where a spatial development strategy has been prepared by the Mayor, it is for the relevant strategic policy-making authority to distribute the total housing requirement which is then arrived at across the plan area. Croydon's housing target is set out in the London Plan.

Croydon's 10-year housing target is based on the borough's capacity as set out in the London Strategic Housing Land Availability Assessment 2017, which Croydon fed into; and a methodology for small sites. It does not rely on release of the Green Belt or further release of land in Strategic Industrial Locations. As stated above, given the significant drop in Croydon's

housing target from the 2017 draft London Plan to the Intend to Publish version there is no justification to release Green Belt or impinge on SIL.

Croydon should clearly set out how it will deliver 20,790 homes between 2019 and 2028 and that the proposed 25,250 homes to 2039 have had regard to the 2017 SHLAA and local evidence of capacity.

## **Environment**

The Mayor welcomes Croydon's intention to update and strengthen its environmental planning policies. In this regard the approaches set out in the London Plan (intend to Publish version) have been found sound and are based on up-to-date evidence. The most relevant policies are those set out in Chapters 8 and 9 of the draft new London Plan.

The Mayor has raised concerns regarding the draft South London Waste Plan, and therefore Croydon should ensure it safeguards sufficient land to meet its element of South London's waste apportionment over the plan period.

## **Green Grid and Open space**

The Mayor would support policies that seek to create a Green Grid across Croydon and protect and improve access to open spaces. He would also support the protection and creation of additional open spaces and biodiversity. Chapter 8 of the draft new London Plan sets out the most relevant strategic policies that have been found by the Examination Panel.

## **Transport**

The Mayor welcomes the council's commitment to addressing the climate emergency and housing crisis and its recognition of the importance of transport in achieving this, as well as tackling other health and environmental challenges. In particular, the Mayor welcomes the recognition of the need for a future with reduced parking for cars, and the shift that is needed in how people view car ownership and use, particularly for short journeys.

The Mayor would strongly support an ambitious parking policy that minimises the additional congestion, emissions and road danger created by new development in Croydon. He would expect this to at least be in line with the new London Plan, and welcome the possibility raised of applying lower maximum standards. Officers at TfL would be happy to discuss further how this could be approached and what enhancements to public transport, walking and cycling conditions in the borough could support this.

## **Affordable housing**

In line with draft new London Plan policy H4, the Mayor welcomes Croydon's aim to increase the delivery of affordable homes across the borough, and especially from schemes of 10-15 units. It should be noted that to be in conformity with the London Plan, Croydon must adopt the threshold approach for major developments as set out in draft new London Plan policy H5 and H6. The Mayor would also welcome an approach that seeks affordable housing contributions from schemes of less than 10 dwellings.

## **Housing type and quality**

The Mayor would welcome policies that seek to ensure the most appropriate forms of housing are delivered in Croydon, based on local evidence. The Mayor would also welcome policies that ensure high quality housing is delivered across the borough. Draft London Plan Chapter 3 sets out the Mayor's design policies, including housing standards and Chapter 4 provides guidance on the provision of various forms of housing.

## **Employment**

### **Offices**

Draft new London Plan policy E1 and Annex 1 identify potential for the growth in office floorspace in Croydon town centre which is noted as being a strategic outer London office location. London Plan evidence shows Croydon has lost a significant amount of office floorspace via office to residential permitted development rights. It would be useful if the Local Plan, based on strategic and local evidence, sets out the projected demand for office floorspace and how this will be delivered over the plan period.

Draft new London Plan policy E1 seeks to focus office floorspace in town centres. A masterplan that seeks to intensify commercial uses, including offices at Purley Way should follow the town centre hierarchy. In this regard, Annex 1 of the draft new London Plan notes that Purley town centre has a low potential for commercial growth.

### **Industrial land**

Croydon's partial review should note that draft new London Plan policy E4 identifies Croydon as a borough that is to retain its industrial capacity. However, Croydon's SIL at Purley Way straddles the boundary with the London Borough of Sutton, which is a borough that is to provide additional industrial capacity. Croydon should look to work with Sutton to investigate the potential to intensify the Purley Way SIL and provide additional industrial capacity. The Mayor welcomes the overall continued protection of the Purley Way SIL.

The Mayor welcomes the protection, retention and intensification of Croydon's Tier 1 (Locally Significant Industrial Sites LSIS) industrial areas. However, from the approach set out in the Places section of the draft Local Plan, it appears that Croydon may wish to introduce co-location within the SIL. It should be noted that draft new London Plan policies E4 and E5 do not allow residential development in SIL. Any approach in line with draft new London Plan policy E7 should consolidate and deliver new industrial capacity before the SIL is released and developed/co-located with housing.

Croydon should set out a clear strategy as to how its industrial floorspace will be protected, intensified and increased to meet local and strategic demand, especially within LSIS and SIL. It should be noted that the strategic evidence shows the greatest demand for B8 floorspace, and Croydon's strategy should ensure it provides sufficient capacity for this type of provision in line with draft new London Plan policy E4 and Paragraph: 031 Reference ID: 2a-031-20190722 of the revised Planning Practice Guidance.

Croydon is proposing to intensify a range of uses, including residential use around existing industrial area and therefore Croydon's Local Plan should include the Agent of Change principle in line with draft new London Plan policy D13.

### **Creative Enterprise Zones (CEZ)**

The Mayor would welcome policies that support Croydon's Mayoral CEZ designation – Croydon Creatives. The Local Plan should include policies that will protect and provide capacity for the creative businesses that Croydon wishes to support through this Mayoral initiative. In this regard, the Mayor notes that Site Allocation 28, 30, 495 is proposed as a Cultural and Creative Industries Enterprise Centre and the Croydon Place aims to support Croydon's local arts scene. In line with draft new London Plan policy E1, creative uses falling within B1(a) office use class should be located within town centres.

### **Retail**

The Mayor would welcome policies that seek to support and diversify town centre uses to promote vibrant town centres in line with draft new London Plan policies SD6, SD7, SD9 and E9. The Local Plan policies should also promote a night time economy.

### **Design and Heritage**

The Mayor would welcome design policies that follow those set out in chapter 3 of his draft new London Plan.

### **Social Infrastructure**

The Mayor would welcome policies that seek to ensure Croydon's growth is supported by social infrastructure. In this regard he welcomes the site allocations that seek the provision of social infrastructure. However, before Croydon identifies sites in the Green Belt, MOL or other open space for the provision of social infrastructure, it must be satisfied it has explored all other options such as intensifying existing social infrastructure sites, co-locating on appropriate major development sites and providing social infrastructure on other brownfield sites.

### **Croydon's Places**

Overall, the Mayor welcomes the clarity that this section provides regarding setting out the growth that could potentially be delivered by each Strategic Spatial Option. He also welcomes the identification of areas of focused intensification.

### **Addington**

The Mayor objects to the proposed urban extension on the Green Belt which would be in line with Croydon's proposed Strategic Spatial Option 3. The London Plan housing targets have dropped significantly and do not rely on the release of the Green Belt. Therefore, such an approach would not be in conformity with the London Plan.

The Mayor welcomes the protection of the Tier 1 Integrated Industrial Location (LSIS) at Vulcan Way.

The draft new London Plan (Annex 1) classifies New Addington as a district town centre with a low potential for commercial growth and a medium potential for residential. It is also a strategic area for regeneration.

## **Addiscombe**

The draft new London Plan (Annex 1) classifies Addiscombe town centre as a district town centre with a low potential for commercial growth and a medium potential for residential growth.

## **Broad Green and Selhurst**

The Mayor welcomes the protection of the Tier 1 Strategic Industrial Location (SIL) and Tier 2 Integrated Industrial Location (LSIS) at Purley Way. Along with the approach set out in the Theme policy on industrial land, the Place policies should ensure that there is no net loss of industrial capacity in Croydon's SIL and LSIS. The Theme Employment approach suggests the protection of SIL, whereas here, the approach includes co-location. It should be noted that draft new London Plan policies E4 and E5 do not allow residential development in SIL. Any approach in line with draft new London Plan policy E7 should consolidate and deliver new industrial capacity before the SIL is released and developed/co-located with housing.

Housing capacity in the Purley Way area should be informed by the capacity study being prepared with the GLA and TfL.

In line with the Mayor's response above, on the provision of social infrastructure, Croydon should fully investigate all other options and demonstrate that there are no other suitable locations before proposing a new school on MOL. Alternative options should include the potential to co-locate schools on appropriate major development sites as well as existing sites for social infrastructure and brownfield sites.

Site Allocation 8 – it is unclear whether this site is within the SIL. In line with draft new London Plan policies E4 and E5 residential development is not permitted in SIL.

## **Coulsdon**

The Mayor welcomes the protection of the Tier 1 Strategic Industrial Location (SIL) at Marlpit Lane in line with draft new London Plan policies E4 and E5.

The draft new London Plan Annex 1 classifies Coulsdon as a district town centre with a low potential for commercial growth and a medium potential for residential growth.

In line with the Mayor's response above on the provision of social infrastructure, Croydon should fully investigate all other options and demonstrate that there are no other suitable locations before proposing a new school in the Green Belt. Alternative options should include the potential to co-locate schools on appropriate major development sites as well as existing sites for social infrastructure and brownfield sites.

## **Central Croydon**

The draft new London Plan (Annex 1) classifies Croydon as a metropolitan town centre with a high potential for residential and commercial growth, with the capacity, demand and viability to accommodate new speculative office development. Croydon town centre has a night time economy of regional or sub-regional significance. It is also a strategic area for regeneration. The Mayor welcomes the support for the Mayoral CEZ in this section of the draft Local Plan.

## **Crystal Palace and Upper Norwood**

The Crystal Palace / Upper Norwood town centre is shared with Lambeth and Bromley. The draft new London Plan (Annex 1) classifies Upper Norwood / Crystal Palace as a district town centre with a low potential for commercial growth and a high potential for residential growth. The Mayor welcomes the support for a dedicated Creative Enterprise Centre and an evening economy in this Place.

## **Norbury**

The draft new London Plan (Annex 1) classifies Norbury as a district town centre with a low potential for commercial growth and the potential for incremental residential growth. Norbury town centre has a night-time economy of local significance.

## **Purley**

The Mayor welcomes the development of a masterplan for Purley to support increased sustainable development. The draft new London Plan (Annex 1) classifies Purley as a district town centre with a low potential for commercial growth and a high potential for residential growth. The Mayor welcomes the support for the night-time economy.

## **Sanderstead**

The Mayor objects to the proposed urban extension on the Green Belt which would be in line with Croydon's proposed Strategic Spatial Option 3. The London Plan housing targets do not rely on the release of the Green Belt. Therefore, such an approach would not be in conformity with the London Plan.

The expansion of Gresham Primary School in the Sanderstead recreation ground should be fully justified and of the smallest footprint possible.

## **Selsdon**

The Mayor objects to the proposed urban extension on the Green Belt which would be in line with Croydon's proposed Strategic Spatial Option 3. The London Plan housing targets have dropped significantly and do not rely on the release of the Green Belt. Therefore, such an approach would not be in conformity with the London Plan.

The draft new London Plan (Annex 1) classifies Selsdon as a district town centre with a low potential for commercial growth and the potential for incremental residential growth.

## **Shirley**

The draft new London Plan (Annex 1) does not classify Shirley as a district town centre as is suggested on the map in the Local Plan. It is noted the supporting text in the Local Plan refers to Shirley as a local centre.

## **South Croydon**

The Mayor welcomes the protection of the Tier 1 Strategic Industrial Location (SIL) at Selsdon Road, including as a potential railhead to transfer freight to rail in line with draft new London Plan policies E4, E5, T3 and T7.

In line with the Mayor's response above on the provision of social infrastructure, Croydon should fully investigate all other options and demonstrate that there are no other suitable locations before proposing a new school on the Coombe Road Playing Fields. Alternative options should include the potential to co-locate schools on appropriate major development sites as well as existing sites for social infrastructure and brownfield sites.

## **South Norwood and Woodside**

The draft new London Plan (Annex 1) classifies South Norwood as a district town centre with a low potential for commercial growth and a medium potential for residential growth. It is also a strategic area for regeneration.

## **Thornton Heath**

The draft new London Plan (Annex 1) classifies Thornton Heath as a district town centre with a low potential for commercial growth and a medium potential for residential growth. It is also a strategic area for regeneration.

## **Waddon**

The Mayor welcomes the protection of the Tier 1 Strategic Industrial Locations (SIL) along the Purley Way. Along with the approach set out in the Theme policy on industrial land, the Place policies should ensure that there is no net loss of industrial capacity in Croydon's SIL and LSIS. The Theme Employment approach suggests the protection of SIL, whereas here the approach includes co-location. It should be noted that draft new London Plan policies E4 and E5 do not allow residential development in SIL. Any approach in line with draft new London Plan policy E7 should consolidate and deliver new industrial capacity before the SIL is released and developed/co-located with housing. The site allocations should be consistent with this approach.

Housing capacity in the Purley Way area should be informed by the capacity study being prepared with the GLA and TfL.

The draft new London Plan (Annex 1) does not classify Waddon as a district town centre and the supporting text in the Local Plan refers to Waddon as a neighbourhood centre.

## **Next stages**

The Mayor encourages Croydon to continue working with his officers to inform the spatial approach and policies in Croydon's Local Plan. He will provide more detailed comments on the emerging Croydon Local Plan at the next consultation stage and his opinion on general conformity with the London Plan at the Regulation 19 stage.

I hope that these comments can inform the development of Croydon's revised Local Plan. If you would like to discuss any of my representations in more detail, please contact Celeste Giusti (020 7983 4811) who will be happy to discuss any of the issues raised.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Debbie Jackson', enclosed in a light grey rectangular box.

**Debbie Jackson**

Director – Built Environment

Cc Steve O'Connell, London Assembly Constituency Member  
Andrew Boff, Chair of London Assembly Planning Committee  
National Planning Casework Unit, MHCLG  
Lucinda Turner, TfL



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20/1/2020

Dear Sir/Madam,

**Re: Croydon's Local Plan Partial Review: Issues and Options (December 2019)**

*Please note that these comments represent the views of Transport for London (TfL) officers and are made entirely on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to this matter. The comments are made from TfL's role as a transport operator and highway authority in the area. These comments also do not necessarily represent the views of the Greater London Authority (GLA). A separate response has been prepared by TfL Property to reflect TfL's interests as a landowner and potential developer.*

Thank you for giving Transport for London (TfL) the opportunity to comment on Croydon's Local Plan review. Given the advanced stage of the draft London Plan in its adoption process – with the Intend to Publish version now available on the [GLA website](#) – we will have regard to it when assessing and responding to local planning policy consultations, including Croydon's local plan review.

We welcome the council's commitment to addressing the climate emergency and housing crisis and its recognition of the importance of transport in achieving this, as well as tackling other health and environmental challenges. In particular, we welcome the recognition of the need for a future with reduced parking for cars, and the shift that is needed in how people view car ownership and use, particularly for short journeys.

We would strongly support an ambitious parking policy that minimises the additional congestion, emissions and road danger created by new development in Croydon. We would expect this to at least be in line with the new London Plan, and welcome the possibility raised of applying lower maximum standards. We would be happy to

discuss further how this could be approached and what enhancements to public transport, walking and cycling conditions in the borough could support this.

We welcome the vision and opportunity maps for public transport and cycling as a means to start this conversation. The policy options for transport are positive and reflect the interaction between land use and transport planning well, such as by referring to the 'critical mass' of residents needed to support investment. We also welcome the council's commitment to the tram network in the borough, though would also stress the importance of exploring how the appeal of bus services on key corridors can be widened, such as by changes to services, vehicles or infrastructure.

Car clubs may have a role to play in supporting growth that is less car-dependent overall. They would be most effective – and viable for operators – when paired with measures to discourage private ownership (such as parking policies) and enable most trips to be made by sustainable modes. The expansion of Controlled Parking Zones (CPZ) will also be an important element, both for supporting a restraint-based parking policy and for improving walking and cycling conditions on local residential streets. We would be happy to provide support on this issue, such as through helping to identify best practice from elsewhere or forecasting where future CPZ needs may be concentrated in light of new development.

Our responses to the questions raised in Croydon's Local Plan review document are set out in more detail in Appendix A.

We look forward to contributing further in the development of your Local Plan.

Yours faithfully,

**Josephine Vos | Acting Manager**

**London Plan and Planning Obligations team | City Planning**

Email: [josephinevos@tfl.gov.uk](mailto:josephinevos@tfl.gov.uk)



## Appendix A: Specific suggested edits and comments from TfL on Croydon's Local Plan

Section	Page	Track change/comment
<b>Strategic Options</b>		
Strategic Option 1	31	Option 1 uses small 'windfall' sites to deliver 40 per cent of new developments in the borough. These type of developments in the right locations can help add to the 'critical mass' of population referred to under the transport policy options section, supporting local walking and cycling interventions and bus service improvements. These would be most appropriate in areas around train stations and tram services and in areas with good public transport connections more broadly. This will help maximise residents' travel by non-car modes.
Strategic Option 2	31	Option 2 promotes the delivery of 12,000 homes through the Masterplan for Purley Way transformation area. In general, we support the delivery of growth through planning frameworks and masterplans so that development can be planned alongside infrastructure needs and designed to deliver places which enable walking, cycling and public transport and efficient deliveries and servicing. The Local Plan should identify the infrastructure needed to support growth and achieve mode shift in the borough over the plan period and we will support the council to do this.
Strategic Option 3	31	Option 3 includes the release of Green Belt to build 5,600 homes. In transport terms, it is important to note that areas of Green Belt are considerably more likely to have low levels of connectivity by public transport i.e. PTAL 0-1. These areas also tend not to have established local amenities or the near comprehensive level of bus service that developed areas of London benefit from, meaning that even if there is a rail station within walking distance, it is difficult to cater for local trips by sustainable modes (in contrast to strategic option 1, see first map in appendix B).

GG1. How can we make it easier for people to walk and cycle more?	39	<p>New developments can support more people to walk and cycle in a variety of ways. Firstly, new developments should fit within patterns of land use that facilitate shorter trips by foot or cycle. When new developments alter existing or create new street environments, the ten Healthy Street Indicators should be used to demonstrate how changes deliver for people walking and cycling.</p> <p>Developer contributions can play an important role in improving public realm, cycle routes and local public transport services which are accessed by foot or cycle. Development proposals should consider how the site in question links to local walking, cycling and bus networks and should be permeable to people walking and cycling, reflecting desire lines. Cycle parking should be provided at all developments so people can start and end their journeys by cycle securely and conveniently.</p> <p>The revised Local Plan should also refer to how road danger will be reduced in the borough so that Vision Zero can be achieved. Croydon's LIP3 references that 85 per cent of Croydon Council controlled roads are now covered by 20mph speed limit roads and that this is planned to be extended to other locations with specific safety concerns. We strongly support this proposal and detail should be provided on how this is to be delivered.</p>
<b>Transport</b>		
T1. What issues do you experience relating to transport in Croydon?	43	<p>The borough benefits from a number of excellent public transport connections in the north of the borough and from the town centre, including both local links and fast services to central London. The south is less well connected and more car-dependent and there a number of locations with high congestion, particularly Lombard Roundabout and Purley Gyratory. To maximise the potential for mode shift, it will also be important to engage with residents (particularly those who use cars more often) such as through Croydon's Liveable Neighbourhood proposals.</p>
T2. What would encourage you to use your car less and either	43	<p>In general, walking, cycling and public transport need to become more convenient and attractive options than the car to Croydon's residents. Croydon's Liveable Neighbourhood Programme will help to do this by improving facilities for people walking and cycling. The borough's plans for the</p>

walk, cycle or take public transport?		<p>Old Town Area will look to improve both the urban realm and safety of the area reducing severance. Other policies that could complement this approach could include: the rationalisation of car parking in town centre and other destination parking; converting on-street parking spaces to parklets, cycle hangars, green infrastructure and other uses; and enforcement measures to prevent unsafe or obstructive parking, especially along cycle routes and streets with a lot of footfall.</p> <p>Residents of new development can be supported to travel without a car by locating new developments in areas with high public transport connectivity, near stations and town centres. Opportunities to build higher density residential development near to the existing public transport network, particularly on Purley Way could help maximise the number of homes with good connectivity. New development with good access to public transport should be car free or car-lite, and provide sufficient quantities of good quality cycle parking.</p>
T3. Which walking or cycling routes would you like to see improved?	43	<p>The council should look to provide routes along the corridors identified in TfL's strategic cycling analysis (such as the A232, as is currently being investigated) complemented by a local network such as that identified in the vision and opportunities map on page 45. Routes to and from town centres and stations will be particularly important to improve and enable mode shift away from car travel. We will continue to work with Croydon Council to make sure opportunities for improved walking and cycling facilities are maximised.</p>
T4. Do you think tram extensions within Croydon are a good idea? If so, where and why?	43	<p>While we welcome Croydon's commitment to the Tram network, the Local Plan Review consultation recommends a large number of tram extensions as a way of enabling growth. However, TfL have not committed to such extensions of the tram network, and would recommend that specific references to tram extensions are softened through the document, with upgrades to the public transport network more appropriately referenced. Future growth in Croydon can be supported via a combination of upgrades to the existing network, including bus priority measures and Metroisation. These options should therefore be considered before looking at new tram routes, particularly as the consultation does not fully explain why trams would be a more effective mode. It is also unclear why certain corridors and routes have been selected.</p>

		<p>While light rail can be highly successful in the right circumstances, it should be recognised that there are some significant issues to be considered – not least that the success of the existing Tram network means that upgrades to accommodate growth along the existing network should be prioritised first, and that delivering more capacity and frequency on the existing network may well preclude some of the extension options that Croydon propose. It should also be noted that any type of street-based rapid transit corridor will require significant reallocation of road space from private traffic, in order to be viable. It is important that the Borough and TfL work together on these to ensure that the proposals are feasible and represent value for money.</p> <p>However, we believe that upgrades to the existing Tram network particularly the New Addington branch, and the line through Waddon Marsh could unlock the high density housing that they propose in Strategic Spatial Option 2 in particular. Concentrated housing growth makes the case for major upgrades much easier as well as more attractive to potential funding partners.</p> <p>We will be setting out our proposals to upgrade the Tram network to accommodate dense housing growth, in our Trams for Growth strategy which is due in the spring. We will also work with Croydon Council to investigate the options for new infrastructure to support growth in the borough.</p> <p>The commitment to safeguarding land for new transport infrastructure is welcome. We would also seek to encourage the council to ensure that existing transport infrastructure (land and buildings) are safeguarded to maintain existing operations and support additional capacity where required.</p>
T5. To provide the homes and infrastructure for our future Croydon we have to build in every place in the borough,	43	To minimise additional congestion created by new development, the Local Plans should seek to maximise the use of walking, cycling and public transport in place of car travel. This include location and design of new development, applying parking restraint and ensuring developments

<p>what can be done to minimise congestion on the borough's roads?</p>		<p>provide and/or contribute towards sustainable modes. It will also be important to ensure freight movements are planned for and co-ordinated as far as possible.</p> <p>We would also recommend that the council work closely with TfL's Network Performance/ Network Management Team to reduce congestion on the TLRN. Site allocations may also require appropriate levels of modelling to understand the impact of future development on the existing transport network.</p>
<p>T6. Are there any other policy options that we should be focussing on? Please explain your answer.</p>	<p>43</p>	<p>Transport improvements should explore how upgrades can be made to the existing transport network, including bus priority measures and Metroisation, rather than primarily focusing on tram extensions. We have proposed to Croydon that we jointly carry out a multimodal assessment of different public transport options that can help them meet their housing targets as well as deliver mode shift and a good public transport experience. A thorough assessment of the options would include measures such as bus priority to improve bus services and Metroisation of the rail network, and compare these with the value for money of major capital investments in light rail.</p> <p>TfL's Freight and Servicing Action Plan (2019) details the actions required to ensure freight traffic in London in the future is as safe, clean and efficient as possible. The volume of existing freight traffic on the strategic network in Croydon is high, and there are constraints for servicing and deliveries in some parts of the borough, such as in the town centre. We would support the preparation of area freight management plans, particularly in parts of the borough expected to have significant levels of growth. We would require new development to demonstrate how they will support safe, low emission and efficient servicing and delivery trips, and expect that Delivery and Servicing Plans and Construction Logistics Plans will be secured with any planning approval as necessary.</p>

		Another policy option that could be explored is the integration of Sustainable urban Drainage (SuD) in the walking and cycling green grid. This would help alleviate the risk of flooding in high flood risk areas of Croydon.
Public Transport – Vision and Opportunities	44	<p>We welcome the inclusion of bus priority improvements to the Croydon Opportunity Area and would welcome further discussion on key bus corridors providing connections beyond this area. This could potentially be covered by the terms ‘rapid transit routes’ and ‘public realm and sustainable transport improvements’, but this is currently unclear.</p> <p>We would like more clarity on what the terms ‘road improvements’ and ‘road junction improvements’ to be clarified, as neither as described in the previous section (for example whether these are intending to improve conditions for people walking, cycling and using public transport, or to increase capacity for motorised traffic).</p>
<b>Car Parking</b>		
CP1. Thinking about parking, what’s the most important thing to you?	48	<p>There are clear relationships between car parking and ownership, and between ownership and use. Higher parking provision is therefore associated with greater congestion, emissions and road danger. Given the nature of car travel, these impacts are not limited within the boundaries of the borough the car travel originates in, affecting boroughs’ and TfL’s abilities to fulfil their duties under the Traffic Management Act 2004 to manage the road networks in London. Parking policy also plays a key role in shaping the growth that can be accommodated in London, as lower parking provision enables a better use of land. This means more homes can be delivered, particularly in the most sustainable locations.</p> <p>In light of the document’s emphasis of the climate emergency, it is also worth noting that it is not solely the endpoint of carbon emissions that is important (e.g. the year of ‘net-zero’ emissions) but rather the cumulative total that affects our planet’s climate. This means there is a considerable benefit to reducing emissions more quickly, such as through ambitious parking and</p>

		<p>mode shift policies, than relying on longer term emission reductions alone (e.g. full electrification of the vehicle fleet).</p> <p>It is therefore essential that as far as possible car parking in new developments is kept to a minimum, and is at least in line with the standards set out the draft London Plan.</p>
<p>CP2. Do you have any thoughts on new development proposals being car free or permit free?</p>	<p>48</p>	<p>We strongly support car-free developments, particularly in town centres and in areas that are well connected by public transport. Our evidence suggests that in the well connected parts of outer London, residents have a considerably higher number of viable alternatives to car travel for their typical trips (based on the London Travel Demand Survey) and are much more likely to have a range of important services within a 10 minute walk compared to the less well connected parts of outer London.</p> <p>While to some the idea of not being able to own a car while living in a particular dwelling may be unattractive, it is important to view new housing within the context of the overall stock. Around two thirds of existing London households either own a car or have off-street parking where they could store one if they wished. Most of the remaining third of households have access to on-street parking should they wish to own a car. Restricting parking in new development seeks to <i>minimise the creation of new residential parking</i>, while in turn maximising how many new homes can be sustainably delivered. This in effect prioritises making it easier to find a home over making it easier to own a car.</p> <p>A number of boroughs restrict residents of car-free developments from being eligible for on-street parking permits to prevent additional parking stress on surrounding streets. This ensures the parking policies are an effective means of reducing car use and prevents negative impacts on existing residents. An alternative approach could be to follow the example of Brighton &amp; Hove City Council, who have capped the total number of permits to be issued at any one time in two</p>

		central CPZ zones and operate a waiting list for those who move into the area (regardless of whether the stock is new or old).
CP4. What are your ideas for how Croydon could make more use of car clubs, particularly in the suburbs?	48	<p>Car clubs may have a role to play in supporting growth that is less car-dependent overall. For example, in some areas, car clubs can help support lower parking provision and less car-dependent lifestyles by enabling multiple households to make infrequent trips by car. However, it is also important that car clubs are a genuine replacement for private ownership, and not creating new car trips in addition.</p> <p>Car club provision is generally lower in more suburban areas as the document alludes to. This may be in part due to the historic lack of disincentive to privately own a car, meaning most have little incentive to use a car club instead. Car club operators have tended to focus on areas where car ownership is lower, but continuing this pattern risks generating additional car trips.</p> <p>The most effective solution – both for reducing overall car use and expanding car club coverage – would be to pair their provision with measures to discourage private ownership (such as parking policies) and enable most trips to be made by sustainable modes.</p> <p>We would also like to highlight that car club provision counts towards the maximum parking standards in the London Plan. However, car clubs could help support maximums lower than the London Plan in areas of PTAL 4 or lower.</p>
CP5. Are there any other measures which could be rolled out?	48	<p>To fully support car-free development, existing on-street parking controls should be reviewed and extended or strengthened as necessary, or introduced if not currently in place. Controlled Parking Zones (CPZs) can be funded by developers when secured as mitigation for the impacts of their development. The approach was referred to in the recent Inspectors’ report for the draft London Plan which in relation to implementing restraint-based parking polices for new development state: <i>‘whilst area based street parking controls can be controversial, they can be successful in tackling problems at a local level.’</i> There are good examples of CPZ consultations in London, such</p>

		<p>as Southwark’s approach to Canada Water. This focused on explaining the need for CPZ expansion to maintain existing residents’ safe and efficient access to parking, and consulted on how this should best be approached. We would be happy to offer further advice on the topic and analysis of where CPZ need could grow in future given parking policies and population growth projections, if the council would it beneficial.</p>
<p>CP6. Would you make any changes to the council’s current car parking policies, to make them more effective?</p>	<p>48</p>	<p>Policy DM30 and Table 10.1 in Croydon’s Local Plan (2018) outlines the council’s current parking standards for car and cycle parking. Other than requesting the council to revise their parking standards to be at least in line with the draft London Plan residential parking standards, we have a number of more specific requests.</p> <p>We suggest removing part D of the policy which requires the redevelopment of existing car parking to be dependent on demonstrating there is no ‘need’ for the spaces. The availability of parking generates use and thus occupancy rates are not an indication of need or even the extent of alternative modes but rather how people have been incentivised to travel historically. The draft London Plan identifies car parks as a source of land for additional housing and restricting the availability of these sites could undermine the delivery of new homes.</p> <p>We also do not support the requirement in part F of the policy for cycle parking to accommodate mobility scooters and motorcycles. The design of cycle parking should not be compromised to accommodate vehicles other than cycles. Mobility scooter provision can be important but should be considered separately. As per the draft London Plan, motorcycle provision should be considered at the same time as car parking and count towards the maximum standard, due to their impacts on noise, road danger and vehicle dominance.</p> <p>As set out above, there are potential risks with car club provision. We would recommend not having a minimum requirement as currently set out in Table 10.1 for residential development. In addition, at major residential developments, it is important to note that car clubs cater for multiple households and thus ideally should be used to deliver parking <i>below</i> the London Plan</p>

		<p>maximum rather than at it (which could otherwise be replacing a private car with a car club that may be used more intensely, generating more use overall). It is unclear to us who the target user base for car club bays at all non-residential developments, though there may be cases where this is justified.</p> <p>The disabled persons car parking requirements should more closely align to the draft London Plan, taking into account local take up of Blue Badges. Providing one space for the outset for each wheelchair user dwelling could result in a significant land requirement on denser housing schemes. In some cases/locations this may be appropriate; in other this may be over-provision and a more flexible approach may be more appropriate.</p>
CP7. Do you have any ideas how the Local Plan review can address the parking needs of new development proposals?	48	Croydon's Local Plan review should focus on existing and future residents and visitors' travel needs as opposed to parking needs, and look to cater for as high a proportion as possible by walking, cycling and public transport.
CP8. Should Croydon produce parking standards that are different to those set out in the London Plan? Please explain why?	48	<p>We would strongly support an ambitious parking policy that minimises the additional congestion, emissions and road danger created by new development in Croydon. We would expect this to at least be in line with the new London Plan, particularly in light of the Inspectors' report on the draft London Plan which states that there is '<i>clear and compelling evidence</i>' to justify its car parking standards, which have been maintained in the intend-to-publish version.</p> <p>We welcome the possibility raised in the document of applying lower maximum standards and believe there is a strong case for this in some or all of Croydon. In setting strategic standards, the London Plan reflects different circumstances across London by the use of PTAL and geographical designations, particularly inner and outer London. The council could build on this by considering local evidence to justify an approach that goes beyond the London Plan standards for outer London (as supported by Policy T6 part H).</p> <p>For instance, Croydon town centre has the highest connectivity of any outer London town centre. PTAL is based on the Public Transport Access Index (PTAI) with scores above 25 classed as a PTAL</p>

		<p>score of 6. Parts of Croydon town centre have a PTAI score of over 80, which is typically only seen in places such as Clapham Junction, Stratford and central London (see second map in Appendix B). While this underlines the importance of car-free development in the town centre, this could also justify a more ambitious approach in areas beyond this with good links to the town centre, particularly in the north of the borough. Nearly all PTAL 4 in the borough is either in the north of the borough or around the town centre, and thus there could be a strong case for a car-free maximum in these locations as well.</p> <p>We would be happy to discuss further how this could be approached and would offer our support for a more ambitious parking policy. We would also been keen to discuss what enhancements to public transport, walking and cycling conditions in the borough could support this more ambitious approach.</p>
CP9. Should the council set a minimum level of parking in areas with very limited accessibility to public transport, and why?	48	<p>As set out in the draft London Plan, Outer London boroughs wishing to adopt minimum residential parking standards through a Development Plan Document (within the maximum standards set out in Policy T6.1 Residential parking) must only do so for parts of London that are PTAL 0-1. Minimum standards are not appropriate for non-residential use classes in any part of London.</p> <p>If the council were to pursue minimum standards, we would expect to see an evidenced-based case for why this was necessary. We would generally advise against minimum standards as they present a considerable and inflexible space requirement which in turn has effects on the design of a development. If parking is seen as necessary at a particular site in such a location and can be accommodated without unacceptable impacts, then it can be secured on a case-by-case basis.</p>
CP10. Are there any other policy options that we should be focussing on? Please explain your answer.	48	<p>The council should consider aspects of car parking design and management to minimise vehicle dominance and ensure the most efficient use of space over the lifetime of the development. These include issues such as ensuring on-street parking is not continuous and requiring the leasing rather than the sale of spaces so they can be repurposed if necessary.</p>

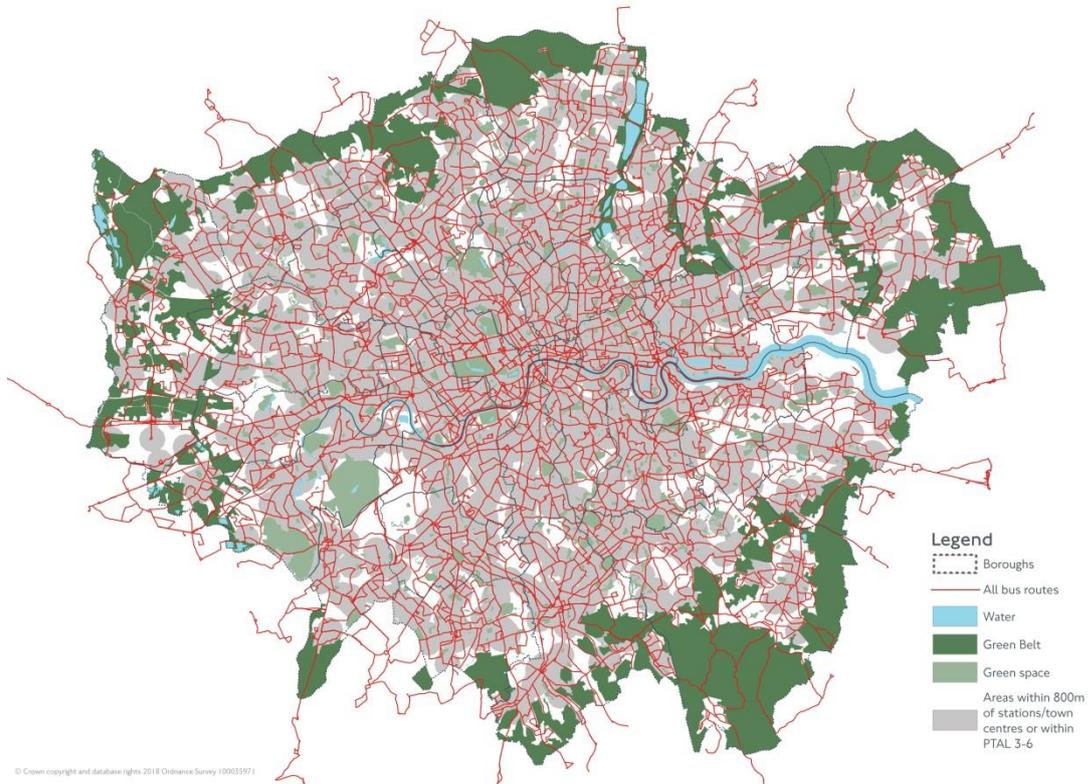
<b>Housing</b>		
H7. How can the Local Plan support the delivery of high density family homes across the borough, and meet the need for this type of housing?	55	Transport can play a key-role in supporting higher density development. As described above, lower car parking provision can support better use of land and reduced road network impact, helping to support higher densities. Planning public transport capacity and connectivity alongside growth can help support as more new homes, while improving step-free access can help make public transport easier to use for families. The design and location of development can also support higher densities by maximising the potential for walking and cycling for short trips, such as through: mixed used development putting services within walking distance; connecting to existing walking and cycling networks; and providing good quality cycle parking and public realm in and around schemes.
<b>Purley Way Masterplan</b>		
PW1. Can you tell us about any issues you'd expect from our proposals for a new residential and commercial neighbourhood on the Purley Way?	67	We support the overall vision for the Purley Way Masterplan and particularly support the development of clear policies and design guidance to ensure the success of mixed use development that functions well for both businesses and residents. In order to maximise opportunities for the Purley Way Masterplan the council should be proactive in identifying how they will attract the types of commercial opportunities that would support the overall vision of the area. Providing a range commercial facilities and services that local residents want to use will help reduce the need for travel by car and will enable the success of the area as both a residential and commercial hub.
PW3. What would help encourage more sustainable travel between Purley Way and Central Croydon/Purley Town Centre?	67	Improving the urban realm and street environment by providing high quality walking, cycling and public transport links will encourage people to travel sustainably between these areas. The vision and opportunity maps for public transport and cycling on pages 44 and 45 respectively start to identify potential links to help achieve this. The former does not appear to identify potential improvements along any direct links between Purley Way itself and Central Croydon, other than through bus priority measures around the Croydon OA. Further work focusing on Purley Way specifically may help identify additional opportunities for improved connectivity to Croydon town centre, such as changes to bus services/infrastructure.

<p>PW4. Should we consider developing a new zero carbon district to act as an example of good practice for London? Please explain your answer.</p>	<p>67</p>	<p>We would strongly support the principle of a new zero carbon district and would welcome further information on how this would be approached, particularly in relation to increasing walking, cycling and public transport, as well as ensuring how buses and freight vehicles could be zero-carbon themselves.</p>
<p>Central Croydon</p>	<p>111</p>	<p>It should be noted that TfL are seeking public transport contributions to support enhancements to existing service capacities to support growth. This will likely also be applicable to the Purley Way transformation area.</p>



## Appendix B:

### London bus routes, areas around stations/town centres and Green Belt



### London Public Transport Access Levels/Index

