

Croydon Local Plan: Detailed Policies and Proposals Evidence Base

Technical Paper – Policy DM11-16

2016

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1. Introduction

1.1 This technical note sets out and discusses the policy context and evidence that have informed the preparation of Policy DM11-16: in the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission). Section 2 states the relevant policy, (national, regional and local). Section 3 states the proposed policy itself and an explanation of how the supporting evidence has been used to inform the policy with reference to the policy context. For further information on individual pieces of evidence it is recommended that you look at the evidence documents themselves which can be found at: <https://www.croydon.gov.uk/planningandregeneration/framework/lpevidence/>

2. Where we are now

National Planning Policy

2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

2.2 In paragraph 17, the NPPF contains a set of core land-use planning principles that should underpin both plan-making and decision-taking. The NPPF states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Given the desirability of new developments to make a positive contribution to local character and distinctiveness, different role and character of different areas should be taken into account, while the vitality of main urban areas should be promoted. (This is particularly relevant to Policy DM11)

2.3 The NPPF recognises that everyone should have the opportunity to live in high quality, well designed homes, which they can afford, in a community where they want to live. In pursuing sustainable, inclusive and mixed communities, in paragraph 50 local authorities are encouraged to plan for the delivery of a wide choice of quality homes and sustainable communities. It advises that in doing so, development plans should be based on evidence of local needs and demands (paragraph 158), however, implementation of the plan should not be put at serious risk due to the cumulative impact in standards and policies (paragraph 174).

2.4 The government attaches great importance to the design of the built environment (paragraph 56), recognising good design as a key aspect in creating sustainable places that are attractive, usable, durable and adaptable, is indivisible from good planning, and should ensure contributing positively to making places better for people. (This is particularly relevant to Policies DM11,12,13,14,15,and 16)

2.5 The Council should recognise that, while visual appearance is important, accessible and inclusive design goes beyond just aesthetic considerations (paragraph 61), and designs which is inappropriate in its context, or which fails to make good use of the opportunities for improving the character and quality of an area should be refused (paragraph 57). (This is relevant to Policy DM11)

2.6 Paragraph 58 states that local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of development;
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;

- Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- Are visually attractive as a result of good architecture and appropriate landscaping.

This is relevant to all the Policies in this Technical Paper- DM11, 12, 13, 14, 15, and 16)

2.7 In paragraph 59 the NPPF suggests that in order to assure high quality developments, the use of design codes is considered which should concentrate on guiding the overall design approach, however avoiding unnecessary prescription or detail, and concentrating on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. It also states that local planning authorities should consider using design codes where they could help deliver high quality outcomes. (This is particularly relevant to Policy DM11 and 16).

2.8 Paragraph 60 states that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness. (This is particularly relevant to Policies DM11, 12 and 15, 16).

2.9 Paragraph 62 requires that local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design. They should also when appropriate refer major projects for a national design review. In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel.

2.10 Paragraph 63 states that in determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area. (This is relevant to all the Policies in this Technical Paper)

2.11 Paragraph 64 states that the local planning authority should refuse permission for developments of poor quality design that fails to take the opportunities available for improving the character and quality of an area and the way it functions. (This is relevant to all the Policies in this Technical Paper)

2.12 Paragraph 67 states that poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Control over outdoor advertisements should be efficient, effective and simple in concept and operation. Only those advertisements which will clearly have an appreciable impact on a building or on their surroundings should be subject to the local planning authority's detailed assessment. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts. (This is relevant to Policy DM13)

2.13 Paragraph 68 states that where an area justifies a degree of special protection on the grounds of amenity, an Area of Special Control Order may be approved. Before formally proposing an Area of Special Control, the local planning authority is expected to consult local trade and amenity organisations about the proposal. Before a direction to remove deemed planning consent is made for specific advertisements, local planning authorities will be expected to demonstrate that the direction would improve visual amenity and there is no other way of effectively controlling the display of that particular class of advertisement. The comments of organisations and individuals, whose interests would be affected by the direction, should be sought as part of the process. (This is relevant to Policy DM13)

The London Plan and relevant SPGs

2.14 Chapter 7 of the London Plan sets out clear policies and place-making objectives on how to shape places and spaces in order to create environments where people can work live and visit. The most relevant to the proposed policies in this Technical Paper in summary are:

- Policy 7.1 (Lifetime Neighbourhoods) advises the design of new buildings and the spaces they create should help reinforce or enhance character and provide a character that is easy to understand and relate to, and to plan across services to ensure the nature and mix of existing and planned infrastructure and services are complementary and meet the needs of existing and new communities.
- Policy 7.2 (An inclusive environment) sets out the requirement of all new development to be accessible and inclusive in design.
- Policy 7.3 (Designing out crime) advises the Council to seek to create safe, secure environments where crime and disorder, and the fear of crime does not undermine quality of life or community cohesion.
- Policy 7.4 (Local character) states that the Council should consider the different characters of its areas, landscapes, buildings and places, and ensure that developments make a positive contribution to a coherent public realm, streetscape and wider cityscape.
- Policy 7.5 (Public Realm) states the Council should develop local objectives and programme for enhancing the public realm, ensuring it is sustainable and accessible to all, and reflecting the principles of 7.1 - 7.4.
- Policy 7.6 (Architecture) advises that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. Its impact should not be adverse to surrounding area, be of high quality, and complement local architecture.
- Policy 7.7 (Location and design of tall and large buildings) sets out criteria to identify the most suitable design and appropriate, sensitive and inappropriate locations for tall and large buildings which should be part of a plan led approach to changing or developing an area. (This is particularly relevant to Policy DM16)
- Policy 7.8 (Heritage assets and archaeology) recommends the Council to seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration. (This is particularly relevant to Policy DM11.10 (I))
- Policy 7.13 (Safety, Security and Resilience to Emergency) of the London Plan states that 'The Mayor will work with relevant stakeholders and others to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register. (This is particularly relevant to Policy DM12)
- Policy 7.4 Paragraph 7.14 of the London Plan states that: 'The physical character of a place can help reinforce a sense of meaning and civility – through the layout of buildings and streets, the natural and man-made landscape, the density of development. Through characterisation studies, existing character can be identified and valued, and used to inform a strategy for improving the place. This should help ensure the place evolves to meet the economic and social needs of the community and enhances its relationship with the natural and built landscape.

2.15 Policy 3.5 Part B (Quality and design of housing developments) requires: 'The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.' This supports the need for new development to increase the communal amenity standards from those identified in the Housing SPG (March 2016) for sites in the borough to reflect local character or where there is a deficiency in open space. (This is relevant to Policy DM11)

2.16 More specifically, Policy 3.2 Part D (Improving health and addressing health inequalities) introduces an additional requirement for new developments, by recognising the fundamental impact the living environment, whether positive or negative, has on the health of the population. Good housing, employment and a good start in life can all help to reduce health inequalities at the local

level; while poor environmental quality, housing conditions or pollution can exacerbate them. (This is relevant to Policy DM11)

2.17 Additional guidance on the policies in the London Plan on what is good design and why the Council needs it in order to deliver successful new communities, is provided in the Supplementary Planning Guidance for Housing (March 2016), and is particularly relevant to Policy DM11

2.18 “Further, The Mayor of London’s Housing Supplementary Planning Guidance: The London Plan 2016 Implementation Framework (March 2016) provides following guidelines in relation to refuse and recycling facilities, relevant to Policy DM14:

- Standard 22 - Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection. Refuse and recycling stores within buildings should be located to limit the nuisance caused by noise and smells and maintained to a high hygiene standard.
- Standard 23 - Storage facilities for waste and recycling containers should be provided in accordance with local authority requirements and meeting at least British Standard BS5906:2005 Code of Practice for waste management in Buildings.

2.19 The Housing SPG also states that the London Plan Policy 5.17E requires the provision of suitable waste and recycling storage facilities in all new developments. Refuse, green waste, food waste and recycling is a rapidly changing field and there remain significant variations in local authority requirements, which need to be identified and understood at an early design stage. From January 2015, waste collection authorities are required to collect waste paper, metal, plastic and glass separately as a minimum in order to increase the quality and quantity of recycled material and reduce contamination (e.g. from food waste). The provision and design of waste recycling facilities within residential developments should support and enable collection authorities to meet this requirement.

2.20 Further, the management of waste and recycling in flatted developments poses particular challenges and needs to be factored into the design of individual dwellings and buildings at an early stage with adequate, accessible and convenient waste and recycling storage and collection facilities provided. Measures should be put in place to manage impacts on residential amenity to acceptable levels in terms of odour, noise and dust and address potential safety, security and hygiene issues. The use of separate chute systems and/or waste compactors and material balers may be appropriate in flatted developments. Adequate provision should be made for the storage and management of bulky waste.

2.21 In case of residential conversions the Housing SPG advises that local planning authority should ensure that waste and recycling facilities should not detract from the streetscape or have negative impacts in terms of flood risk, biodiversity or climate change.

2.22 In order for developments above the density range to be supported, the Housing SPG states that these should be tested against the need for appropriate management and design of refuse, food waste and recycling facilities.

2.23 In paragraph 2.3.20 of the Mayor’s Housing SPG states that the management of waste and recycling in flatted developments poses particular challenges and needs to be factored into the design of individual dwellings and buildings at an early stage with adequate, accessible and convenient waste and recycling storage and collection facilities provided. Measures should be put in place to manage impacts on residential amenity to acceptable levels in terms of odour, noise and dust and address potential safety, security and hygiene issues. The use of separate chute systems and/or waste compactors and material balers may be appropriate in flatted developments. Adequate provision should be made for the storage and management of bulky waste.

2.24 In paragraph 1.2.36, in reference to residential conversions the Mayor’s Housing SPG advises that local planning authority should ensure that waste and recycling facilities should not detract from the streetscape or have negative impacts in terms of flood risk, biodiversity or climate change. The Housing SPG advises local planning guidance to ensure residential quality and amenity

of neighbourhoods are met, especially in those areas where the pressure for redevelopment is intense.

2.25 In order for developments above the Sustainable Residential Density range of the London Plan Policy 3.4, 'Optimising Housing Potential', to be supported, the Mayor's Housing SPG states in paragraph 1.3.51 that these should be tested against the need for appropriate management and design of refuse, food waste and recycling facilities.

2.26 A series of criteria are suggested to demonstrate the appropriateness of any proposal as part of a wider urban design strategy. The policy recommends that tall and large buildings should:

- generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport,
- only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building,
- relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
- individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London,
- incorporate the highest standards of architecture and materials, including sustainable design and construction practices,
- have ground floor activities that provide a positive relationship to the surrounding streets,
- contribute to improving the permeability of the site and wider area, where possible,
- incorporate publicly accessible areas on the upper floors, where appropriate, and
- make a significant contribution to local regeneration. (This is relevant to Policy DM16)

2.27 Councils are advised to request an urban design analysis as part of the planning application. This would help establish the impact of tall buildings at streetscape level, in particular in terms of wind turbulence, overshadowing and local or strategic views. (This is relevant to Policy DM16)

Local Planning Policy

2.28 Croydon Council recognises that the built environment and landscape play a pivotal role in creating and reinforce positive perceptions, and engendering a sense of place. Policy SP4 'Urban Design and Local Character' of the Croydon Local Plan: Strategic Policies, in particular supports the creation of places that are well designed, safe, accessible, and inclusive and enrich the quality of life for all those who live in, work and visit the borough.

2.29 To achieve this, the Council will encourage and continue to work with developers to ensure that all developments are of high quality. Croydon Local Plan contains various strategic objectives and policies relevant to Policy DM11 to 16. These are listed below

- Strategic Objective 5: Ensure that high quality new development both integrates respects and enhances the borough's natural environment and built heritage. (This is relevant to Policy DM11,12,13,15,and 16)
- Strategic Objective 6: Provide and promote well designed emergency services, community, education, health and leisure facilities to meet the aspirations and needs of a diverse community. (This is relevant to Policy DM15)
- Strategic Objective 7: Conserve and create spaces and buildings that foster safe, healthy and cohesive communities. (This is relevant to Policy DM11,12,13,16)
- Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough. (This is relevant to Policy DM11)
- Strategic Objective 10: Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity. (This is relevant to Policy DM11,12)

2.30 Policy SP1.2 (b): Development proposals should respond to and enhance local character, the heritage assets and identity of the Places of Croydon. (This is relevant to all the Policies in this Technical Paper).

2.31 The Croydon Local Plan: Strategic Policies does not provide specific policy on refuse and recycling storage and refers in Policy SP2.8 'Quality and Standards' to the Detailed Policies and Proposals for specific detailed policy on design and amenity standards, alongside the London Plan and National Technical Standards, and in SP4 'Urban Design and Local Character to the requirement for high quality development which ' respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities', and in Policy SP6.6 to Waste Management which refers to strategic management of waste in collaboration with Merton, Sutton and Kingston through the South London Waste Plan. No other policies in the Croydon Local Plan: Detailed Policies and Proposals explicitly refer to waste, although Policy DM6 (Shopping parades) seeks to ensure that the vitality and viability of the borough's Shopping Parades places restrictions on the concentration of units in Use Class A5, justified in the supporting text with regard to the associated waste and delivery issues which can cause harm to residential amenity.

2.32 Policy SP4.1: The Council will require development of a high quality, which respects and enhances Croydon's varied local character and contributes positively to public realm, landscape and townscape to create sustainable communities. The Council will apply a presumption in favour of development provided it meets the requirements of Policy SP4 and other applicable policies of the development plan. (This is particularly relevant to Policies DM11, 12, 15 and 16).

2.33 Policy SP4.2: The Council will require development to protect Local Designated Views, Croydon Panoramas, the setting of Landmarks, other important vistas and skylines. (This is particularly relevant to Policy DM16)

2.34 Policy SP4.3: Planning applications in areas identified in SP4.5 as suitable for tall buildings must be supported by an elevation plan of the roof. (This is relevant to Policy DM16)

2.35 Policy SP4.5: Proposals for tall buildings will be encouraged only in the Croydon Opportunity Area, areas in District Centres and locations where it is in an area around well-connected public transport interchanges and where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or District Centres. Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and/or in District Centres, will be contained in the Croydon Local Plan: Detailed Policies and Proposals DPD. Furthermore the Croydon Opportunity Area Planning Framework should be referred to when considering the location and design of tall buildings in the Croydon Opportunity Area. (This is particularly relevant to Policy DM 16)

2.36 Of the Strategic Policies in the Croydon Local Plan those regarding tall buildings, which are high density uses, with a high number of users are relevant as the location and design of refuse and recycling facilities is particularly important to ensure there is not an adverse impact that could affect the amenity of occupants and that waste management is sustainably managed.

2.37 Policy SP4.6: Some locations within the areas listed in SP4.5 will be sensitive to, or inappropriate for tall buildings and applications for tall buildings will be required to:

a) Respect and enhance local character and heritage assets;

b) Minimise the environmental impacts and respond sensitively to topography;

c) Make a positive contribution to the skyline and image of Croydon; and

d) Include high quality public realm in their proposals to provide a setting appropriate to the scale and significance of the building and the context of the surrounding area. (This is particularly relevant to Policy DM 14 & 16)

2.38 Policy SP4.7: The Council will work with partners (including private land owners) to improve public realm within the borough. (This is particularly relevant to Policies DM11,12,15,and16)

2.39 Policy SP4.8: The Council with its partners will improve Croydon's public realm to respect, enhance, create local character and distinctiveness, and integrate with the historic environment. (This is relevant to Policies DM11,12,15 and 16)

2.40 Policy SP5.2 (b): The Council seeks to strengthen the importance of creating opportunities for healthy, fulfilling and active lifestyles for all, and ensures that new developments will provide opportunity for healthy living by the encouragement of walking and cycling, good housing design, sufficient open space and opportunity for recreation and sound safety standards.(This is particularly relevant to Policy DM11)

2.41 Given the above policy context, there is a need to ensure that opportunities to incorporate public art within new developments or public realm improvements are taken, and that any public art relates to the local character, contributes to the sense of place and reinforces local distinctiveness.(This is relevant to Policy DM15)

2.42 Croydon's Supplementary Planning Guidance (SPG) 19 provides a useful guidance for those wishing to incorporate public art within their development. However, this document provides references to 'percent for art', a London Plan policy that is no longer live. This amended policy provides a link to the Croydon Council's Public Realm Design Guide which provides more detailed guidance.(This is relevant to Policy DM15)

Issues

2.43 Croydon's image is important to attract new investment and to encourage people to want to live and work in the borough. This image needs improving after the adverse publicity received from the civil unrest on 8 August 2011. Shops suffered severe vandalism and shop owners were anxious after the civil unrest to add security features and to make their properties secure.

2.44 The need for growth and more development in Croydon in response to a growing population needs to be balanced with the need to strengthen local character and retain distinctiveness and to help increase the local community's sense of ownership and pride.

2.45 The cumulative impact of certain types of development can sometimes have an adverse impact on the street scene such as conversions such as from shops to residential, or houses in multiple occupation and change of appearance, with associated noise, and disturbance and, or parking and refuse storage often impacting on the front gardens of properties and the local character of the area.

2.46 With growth Croydon needs to ensure the quality of the built environment is improved and that new growth adds to and does not detract from the quality and with more people living in higher density dwellings, the private and communal amenity spaces provided, along with access to high quality public space and public realm will become even more important to enriching their daily lives and assisting physical and mental well-being. Communal and private amenity space in the past has been provided in developments in Croydon where it has not been particularly useable, at the side or rear of a development, but badly sited so it is not visible to any occupants and too far from the dwellings to be used for hanging out washing and, or in total shade of garages/buildings. Private amenity space has been sited next to car parking or a driveway with no enclosure or areas of privacy that occupants can sit or play in. Communal amenity space often appears as an apron to a building of space with no purpose, or next to parking with no areas of privacy that occupants can sit or play in. It often appears as an apron to a building of space with no purpose.

2.47 With more people and less space, the higher density built environment will need to look at innovative ways of providing the private, communal and public space such as access to roof and winter gardens. Policy DM11 on Design and Character and Policy DM16 on Tall and Large Buildings both consider this issue with policy for the provision of amenity space and roof gardens.

2.48 Public realm has been improving but needs to continue to do so. There is still a dominance of the car, vacant sites and empty shops, with some poor conversions to homes weakening the character of the shopping street in some Places, and adverts and street furniture accumulating over the years, often poorly sited and designed, and making the public realm unattractive and difficult to navigate and adding to poor perceptions of safety. Poor definition of public and private space has added to this perception and led to 'no man's land' where no one takes ownership to maintain it. Detailed policy is therefore needed for the improvement of the built environment, the public realm, including landscaping, street furniture and advert hoardings, and shop front design including conversions to other uses.

2.49 Some security products designed for shop fronts can give a fortress like appearance and increase the perception of unsafe environments and detract from local character with unsympathetic shutters and bars and grilles to windows. (Policy DM12 requires high quality design to try to avoid this impact.)

2.50 Where shops have been converted into residential properties these are not only poorly designed, but sometimes have privacy issues with the large front window of the former shop now a private habitable room. Unsightly solutions to this include boarding up part of the windows.

2.51 Some advert hoardings on the side of buildings in Croydon have not only detracted from the elevations, and in some cases partly obscuring windows and, or architectural detailing but have also led to trees that obstructed the visibility of hoardings, being either removed or pruned, adversely impacting on the townscape

2.52 Loss of heritage street furniture features over time and pressure on budgets for maintenance of the public realm in Croydon since the 2008 crash and subsequent recession has also created a challenge to enrichment of the public realm and local distinctiveness. It should be noted that investment has occurred in recent years in some parts of Croydon's public realm, notably in Croydon Opportunity Area, Coulsdon, Purley, and South Croydon, and is planned for South Norwood and Thornton Heath. This improvement needs to be continued with private developments also contributing with high quality spaces, frontages and public art.

2.53 Given the renewed interest in shopfront security as a result of the civil unrest on 8 August 2011, the Council acknowledges the key benefits of a robust shopfront design. It is necessary to develop a shopfront security policy that will enable the delivery of well- designed shop fronts which improve Croydon's public realm, urban environment, and vitality of its town centres. The Detailed Policy DM 13 will also support the Shopfront and Signs SPG No1 and the Shopfront Security Addendum to SPG No1.

2.54 With the introduction of kerbside recycling schemes the issue of visibility of bins on street frontages has increased. In some streets of the borough where there is terraced housing with narrow garden frontages there is little option but to have the bins on the frontage. The cumulative effect can detract and impact on the street's character. Where new development is proposed there is the opportunity to avoid this and to plan for the location of bins storage to avoid adverse impacts on the street scene and on residents. Policy DM14 is therefore proposed to provide the guidance to developers and applicants.

2.55 The siting of refuse collection areas in developments has sometimes been considered at a late stage in formation of the design and layout and as a result has impacted adversely on the frontage design of the development, the street scene and, or the private and communal amenity space for the occupants of the development. The impacts can be of both appearance and smell.

2.56 The bins sometimes have had insufficient space or enclosure for them, so they have spilt onto the street, or their location has meant the layout of the landscape and circulation on site has had to be compromised with additional areas of hard landscaping and the loss of vegetation, proposed or existing.

2.57 The Public Art Supplementary Planning Guidance was published in 2005 and refers to a percent for art policy, no longer applicable. Whilst it is still useful guidance it does not have the weight of policy to require development to comply.

2.58 Stand-alone art has in the past been vulnerable to vandalism where it has not been well maintained, or was not developed with the local community involvement.

2.59 The need for a detailed policy for tall and large buildings was identified in the adopted Croydon Local Plan: Strategic Policies to provide more detail on the criteria for their assessment, and their possible locations. By virtue of their scale and massing, tall and large buildings can be overbearing and effect negatively on the local character of the area, as well as having adverse impact in terms of activity and use in their surroundings, especially community facilities and public spaces. In consideration of this and possible impact on health and wellbeing of living in high density development, detailed policy is included that requires the provision of amenity and public spaces in DM16.

3. Policy DM11: Design and Character

3.1 This section of the technical paper looks at policy DM11 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

DM11.1 To ensure that development enhances and sensitively responds to the predominant built form and spaces that define the character of places, proposals should be of high quality and respect:

- a) The development pattern, layout and siting;
- b) The scale, height, massing, and density;
- c) The appearance, existing materials and built and natural features of the surrounding area, and
- d) Where an extension or alteration is proposed, comply with Supplementary Planning Document 2 Residential Extensions and Alterations or equivalent.

DM11.2 To improve the quality of the borough's public, private and semi-public spaces, proposals should create clear, well defined and designed public and private spaces.

DM11.3 To ensure the important contribution that historic street furniture plays in reinforcing local character and distinctiveness is recognised, the Council will seek to support proposals that restore and incorporate historic street furniture within the development.

DM11.4 All proposals for new residential development will need to provide private amenity space that.

- a) Is of high quality design, and enhances and respects the local character;
- b) Complies with Supplementary Planning Document 3 Designing for Community Safety or equivalent;
- c) Is sited to ensure private outdoor amenity space can be adequately screened;
- d) Provides functional space;
- e) Provides a minimum amount of private amenity space of 5m² per 1-2 person unit and an extra 1m² per extra occupant thereafter; and
- f) All flatted development and developments of 10 or more houses must provide a minimum of 10m² per child of new play space, calculated using the Mayor of London's population yield calculator and as set out in Table 6.1 below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless a signed Section 106 Agreement states otherwise.

DM11.5 In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.

DM11.6 The Council will support proposals for development that ensure that the amenity of the occupiers of adjoining buildings are protected and that they do not result in direct overlooking of

private outdoor space (with the exception of communal open space) or significant loss of existing sunlight or daylight levels of adjoining occupiers.

DM11.7 To create a high quality built environment, proposals should demonstrate that:

- a) The architectural detailing will result in a high quality building;
- b) High quality, durable and sustainable materials that respond to the local character are incorporated; and
- c) Services, utilities and rainwater goods will be discreetly incorporated within the building envelope¹
- d) To ensure the design of roof-form positively contributes to the character of the local and wider area; proposals should ensure the design is sympathetic with its local context.

DM11.8 To help improve the health and wellbeing of future occupants', proposals for high density developments and/or developments with building separation distances less than 18 metres should have increased ceiling heights (at least 2.5m).

DM11.9 To ensure a cohesive approach is taken to the design and management of landscape within the borough the Council will require proposals to:

- e) Incorporate hard and soft landscaping in accordance with Supplementary Planning Guidance 12 Landscape and the Croydon's Public Realm Design Guide, or equivalent;
- f) Provide spaces which are visually attractive, easily accessible and safe for all users, and provide a stimulating environment;
- g) Seek to retain existing landscape features that contribute to the setting and local character of an area;
- h) Retain existing trees and vegetation including natural habitats²; and
- i) In exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form.

DM11.10 To ensure a creative, sensitive and sustainable approach is taken to incorporating architectural lighting on the exterior of buildings and public spaces the Council will require proposals to:

- j) Respect enhance and strengthen local character;
- k) Be designed in accordance with Croydon's Public Realm Design Guide;
- l) Seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; or seek to encourage the use of public spaces and make them feel safer by incorporating lighting within public spaces; and
- m) Ensure lighting schemes do not cause glare and light pollution.

¹ The building envelope (also known as the building shell) refers to the outer structure of a building.

² Natural Habitats are defined as the natural home or environment of an animal, plant or other living organism.

Table 6.1: Private amenity and play space standards in all flatted developments and all schemes of ten or more units

Unit size	Minimum private amenity space	Minimum play space (for affordable or social rented housing)	Minimum play space (for private market or intermediate shared ownership housing)
1 bedroom house or flat	5m ²	0.8m ² per unit (based on 0.08 children per unit)	0.3m ² per unit (based on 0.03 children per unit)
2 bedroom houses or flats	6m ² or 7m ² (depending on size of second bedroom)	8.1m ² per unit (based on 0.81 children per unit)	1.2m ² per unit (based on 0.12 children per unit)
3 bed houses or flats	Between 7m ² and 9m ² (depending on sizes of second and third bedrooms)	18.5m ² per unit (based on 1.85 children per unit)	4.6m ² per unit (based on 0.46 children per unit)
4 bed houses or flats	Between 8m ² and 11m ² (depending on sizes of second, third and fourth bedrooms)	19.0m ² per unit (based on 1.9 children per unit)	10.4m ² per unit (based on 1.04 children per unit)

How the policy works/key evidence

3.2 One of the key challenges for Croydon is that a significant quantum of new homes needs to be accommodated in the Borough whilst respecting the positive local character and distinctiveness of its places.

3.3 At present Croydon was demographically a very young borough, in 2011 a quarter of its residents were under the age of 20. However, its population is changing rapidly, with one of the largest and fastest growing black and minority ethnic populations in South London, with 100 languages spoken. Further, it is expected that by 2019 the population of people aged over 65 will increase of 21%, some of whom will experience social isolation, reduced independence and dementia.

3.4 In accordance with paragraph 56 of the NPPF, it is the Council's responsibility to provide a clear framework that promotes integration and greater cohesion among existing and new communities, and recognise that *good design can help create lively places with distinctive character; streets and public spaces that are safe, accessible, pleasant to use and human in scale, where people want to live, work and relax (By Design, CABE, March 2000), and ultimately, adaptable to the needs of future generations.*

3.5 In Croydon's effort to meet its ambitious Community Strategy vision of the type of place it wants to be by 2021, and the need to proactively plan significant residential and commercial growth, the new Policy DM11 is in accordance with the core planning principle (paragraph 17) of the NPPF and the London Plan policies.

3.6 The policy DM11 will help the Council working with applicants to create modern, high quality, innovative and well-designed buildings and places that are, safe, accessible, and inclusive and enrich the quality of life for all those who live, work and visit them, whilst respecting the intrinsic character of the borough.

Local character and distinctiveness

3.7 The multiplicity of local characters and the roles of the individual places define the diversity and attractiveness of a borough. The interplay of elements such as, historic street furniture, building traditions and materials, street layout and landscape combined with cultural, social and economic aspects determines the identity of a place,

3.8 In accordance with the NPPF and the London Plan policies, the Council expects that all new developments clearly demonstrate that they positively respond to the opportunities and constraints of the area, and preserve or enhance its character accordingly. The new Policy DM11, in agreement with the Council's Strategic Objective 5, will help the Council respond to local character and the borough's built heritage, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation (NPPF, Paragraph 58).

3.9 In particular, the Policies DM11.1 and DM11.3 are in line with Policy 7.4 of the NPPF which states that new developments should help people understand where a place has come from, where it is now and where it is going, and so contributing to its diversity and determining its uniqueness. In this respect the new Policy DM11.3 will help retain historic street furniture both in the public and private spaces. This can assist in reinforcing local character and distinctiveness, and will help the Council ensure that they are restored and incorporated where suitable.

3.10 Furthermore, the new Policy DM11.10 is in line with *By Design (CABE, March 2000)* in crediting appropriate architectural lighting a significant role in emphasising and contributing to the sense of place, as well as increasing the perception of permeability and safety of an area. A well-designed lighting scheme can improve the borough's image and if creatively implemented, it can give dimension to a building and the surrounding landscape.

High quality design

3.11 Given the level of inequalities in the borough and the scale of growth that Croydon will be facing over the next 20 years, the Council's Community Strategy is clear in its priorities for creating successful places, that offer good quality, integrated and affordable housing, are attractive and safe, that can tackle imbalances and support existing and new residents to achieve their full potential.

3.12 In order to achieve these objectives, and change the perception of the borough, the Council recognises the importance of good design in raising standards of its built environment and ultimately making better places for people. The need for good design is supported in Paragraph 56 and 57 of the NPPF. Both the London Plan (policy 7.4b) and the Croydon Local Plan SP4.1 identify the need for high quality design. The new Policy DM11 builds on SP4 by setting out detailed requirements that should be met in responding to the specific character and context of Croydon. All proposals should therefore consider the physical appearance and functionality of the development site and local area, and be assessed against the design requirements set out in DM11.

3.13 Policies DM11.1 to DM11.10 collectively seek to achieve high quality design for all new developments. Of these, Policy DM11.1 and DM11.7 are particularly specific in terms of detailed requirements every proposed development should meet. Both policies are in line with Policy 3.5 of the London Plan which stresses how the design should respond to its physical context, including the character and legibility of the area and the local pattern of building, public space, landscape and topography. Through scale, material, massing, building type and architectural detailing, development

should take account of the existing character and urban grain of a place and build on its positive elements. DM11.1 was amended following the consultation in 2015 and Historic England advised that the policy should reflect the need for developments to enhance and sensitivity respond to both the built form and spaces' that define places. They set out that this also includes, in line with the NPPF ('requiring good design'), ensuring developments respond to and integrate with the historic environment (NPPF para's 58 and 61).

3.14 In response, reference has been added in the introduction to DM11 to NPPF Paragraph 58 and policy DM11.1 has been revised as recommended and as follows: "to ensure that development enhances and sensitively responds to the predominant built form and spaces that define the character of places..."

Residential amenity space

3.15 .With growth and new development in the borough existing public spaces will be used more, with more people concentrated in local areas, and policy DM11.2 is proposed for the provision of new public and private and semi - public space to try to make future provision to ensure that a quality environment is provided in Croydon. The semi- public space is defined as that owned privately but with public access allowed at certain times of the day- or possibly all the time. Clearly defined space provides better privacy and security and accords with Croydon's SPD 'Designing for Community Safety'. The spaces should be well designed. This requirement of the policy recognises that the provision of space needs to be useable and flexible. Simply providing a space that is not fully accessible to all, is not well lit, and, or does not feel safe will not assist in meeting the Local Plan's Strategic Objectives as listed in paragraph 2.14. Policy DM11.2 aligns with the London Plan Policy 7.1D' Lifetime Neighbourhoods'[regarding reinforcing neighborhoods in providing legibility by defining private, public and semi public spaces.

3.16 Furthermore, the new Policy DM11.2 will help the Council create more accessible, safe and attractive public spaces which in accordance with Policy 6.1 of the London Plan, will promote walking and ultimately encourage people for a more healthy lifestyle.

3.17 In order to ensure useable well designed private amenity space that addresses the issues identified for Croydon policy DM11.4 recognises the need to consider local character in the design and siting of the private amenity space incorporates the requirement that the space needs to be functional, and , that the outdoor space needs to be able to be screened to provide some privacy, learning lessons from some flatted developments built in the past in Croydon which were poorly sited, without screening and are not used, whilst complying with SPD3 'Designing for Community Safety which provides guidance on well-designed space that considers safety aspects in the design of the space itself and elements to incorporate as well as the siting of the space in relation to the buildings in order to minimize the potential for crime. This aligns with the Mayor's Housing SPG (Paragraph 2.2.20) which states the need to reduce opportunities for criminal behaviour through good design.

3.18 The supporting text defines private and communal open space to make it clear what the policy is referring to and also refers to balconies and winter gardens in compliance with the Major's Housing SPG, Standard 27 and paragraph 2.3.32. This states that 'In exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement. This area must be added to the minimum GIA. Enclosing balconies as glazed, ventilated winter gardens can be considered an acceptable alternative to open balconies and is recommended for all dwellings exposed to NEC noise category C or D141. Winter gardens must have a drained floor and must be thermally separated from the interior. Provision for outdoor gardens should be set in the context of local standards.'

3.19 The supporting text to DM11.4 notes that the private amenity space can be indoors in exceptional circumstances where site constraints make it impossible to provide outdoor space for all dwellings and this reflects the need to provide space. This will provide some flexibility where the exceptional circumstances are met, enabling sustainable development which provides the important amenity space needed for health and wellbeing, and ensuring this private indoors amenity space is

not taken from the Gross Internal Area calculation of the proposed homes but is in addition to it. This aligns with paragraph 2.3.32 of the Mayor's Housing SPG (quoted in the paragraph above).

3.20 The minimum amount of private amenity space referred to in DM11.4 (e) is directly taken from the Mayor's Housing SPG Standard 26 and DM11.4 (f) is taken from the London Plan Policy 3.6B of the 'Children and Young People's Play and Informal Recreation which states that 'Development proposals that include housing should make provision for play and informal recreation based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance for Children and Young People's Play and Informal Recreation sets out the guidance to assist in this process.' ; and from the Standard 5 of the Mayor's Housing SPG, which states that new development proposals should make appropriate play provision in accordance with the Mayor's Young People's Play and Informal Recreation SPG. This SPG refers to a minimum of 10 m² of dedicated play space per child. The Table 6.1 is based on the Mayor's population yield calculator and the policy states the calculation will be based on all units being affordable or social rent (unless there is a signed Section 106 stating otherwise). This takes into account that there are usually more children in affordable units, who should be provided for in terms of play and amenity space, and if a flatted development is proposed of nine or fewer units the Council will not know if it's going to be affordable housing or not in which case DM11.4(f) enables the Council to require the maximum amount of new play space, thus ensuring that there is sufficient play space, particularly in areas of high density and urban settings where there may be less public open space available for recreation. If a scheme is of 10 units or more then a Section 106 Agreement will be made identifying the quantum of affordable units. The calculation of play space for the development would be made on this basis.

3.21 Shaping Neighbourhoods: Play and Informal Recreation SPG (2012), Paragraph 1.4 states that planners, developers and designers must take account of the ways that adults, children and young people will actually use places, whether together or separately, at different times of the day. It will usually be best to allow for flexible and multifunctional use of spaces so that many different user groups can enjoy them. Planners, developers, designers and architects should promote approaches accommodating the presence of children in the built environment (such as shared public and communal space), and encouraging playable spaces where appropriate. In this way, London can be made a child friendly city. The supporting text of paragraph 6.38 to DM11.4 aligns with this and suggests that the play space may be part of the shared amenity area, a void deck with a tall flatted development, possibly on the ground floor or as part of shared or private garden in small developments of less than ten dwellings.

3.22 The new Policy DM11.4 is in agreement with the Health Impact Assessment report (May 2016) which states the requirement to assess the impact of tall and large buildings on health and wellbeing which can be done through a Health Impact Assessment. The policy will help the Council provide generous space standards which will have positive impact on mental health and for those groups who may be at home more such as older people and those who are unemployed. Amenity and communal space standards have positive impacts on mental health and provide opportunity for interaction with neighbours, reducing social isolation. Re-providing these spaces will encourage people to make use of them.

3.23 Policy DM11.5 on requirements for communal outdoor space for new flatted development and major housing schemes has been included following consultation representations on the Detailed Policies in 2015 regarding concerns that the policy did not require developers to provide any communal open space for residents of developments for multiple occupation or blocks of flats and that the previous policy in the UDP (Policy RO12) did.

3.24 Policy DM11.6 is included to address concerns that existing properties next to new development should be considered in the proposal for new developments, and not just the design of the proposed development and its own private and communal amenity space. This will also assist in the integration of new development in to the local character of an area in line with the NPPF, paragraph 61. It is recognised that indirect overlooking may occur but direct overlooking of a neighbour's private outdoor space is not acceptable. Communal open space is listed as the exception as some overlooking is required to provide natural surveillance for security. This complies with SPD3 'Designing for Community Safety'.

3.25 Representations were received in 2015 with regard to a need to specify a minimum distance between buildings and concern was expressed as to why there was a tolerance of 18-21m suggested in the supporting text to the policy and referenced as a best practice 'yardstick'. The minimum amenity space standards align with the minimum private space requirements outlined in the Mayor for London's Housing Supplementary Guidance March 2016. When applications are assessed by Croydon Council consideration is given to how the development responds to site constraints. These include constraints such as local character, the site layout (including the quality and usability of amenity space) and impact on adjacent occupiers. This approach is in line with the National Planning Policy Framework, the London Plan and other policies within the Croydon Local Plan. The distance of 18m was not referred to in the policy but as a guide as there was insufficient evidence to support specifying a set minimum distance.

Landscape and public realm

3.26 The character of a place can be significantly affected by the quality of the landscape and the way it is maintained. Sensitively designed landscape can enrich and reinforce existing wildlife habitats and improve the ecological value of sites and their surroundings. With more growth proposed in the borough and higher density in some areas the greenness provided by landscaping is important for both visual reasons, physical and mental health reasons. The Council considers landscape as an integral part of all development rather than an afterthought or optional 'add-on' and would therefore require proposals for new developments and extensions to be accompanied by plans detailing all existing and proposed hard and soft landscaping affected by or to be incorporated into the scheme. The Croydon SPG 12 (Landscape Design) is referenced in the policy and provides further detailed guidance and clarity on what the Council is seeking from development proposals on providing safe well-designed landscaped schemes. The policy reinforces the use of this guidance or equivalent updated guidance that may replace it in the future.

3.27 The new Policy DM11.2 regarding the quality, design and definition of public and private spaces is in line with Policy 7.5 of the London Plan, and will support the Community Strategy as well as meet the objective of significantly improve the quality and permeability of the public realm set in the Croydon Opportunity Area Planning Framework Supplementary Planning Document (January 2013).

3.28 Directly addressing the issues set out above in 2.17 to 2.23, the new Policy DM11.9 is in accordance with the Croydon Public Realm Design Guide (2012) in stating that the Council expects the design approach to public realm development to be of a high quality, which respects and enhances Croydon's distinctive qualities, identity and topography. design approaches must integrate with the historic environment of the relevant 'Places of Croydon' in order to create a vibrant and dynamic public realm that can be enjoyed by residents and visitors alike that celebrates Croydon's diversity and future.

3.29 The Croydon Public Realm Design Guide also sets out detailed guidance and clarity on what the Council is seeking from the public realm components of development proposals

3.30 Consultation Response on the Preferred and Alternative Options- 2015 on DM11 Design and Character The following comments were made :

Issue/Comment Please note policy DM11 was previously DM10	Council Response with additional comment to the response of the consultation log in italics
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Issue/Comment Please note policy DM11 was previously DM10	Council Response with additional comment to the response of the consultation log in italics
<p>Please can the council define amenity space - e.g. balconies, gardens, green roofs etc. (6.32 to 6.43 noted).Also need to clarification of amenity space / play space. Note: there were several responses questioning the lack of requirement for communal amenity space including for example: "The general lack of communal land for resident's flats is unsatisfactory as should be included, as much existing communal land is already overworked."</p> <p style="text-align: center;">And</p> <p>"Appendix 4 to this Croydon Local Plan: Strategic Policies sets out the policies in the current Unitary Development Plan (UDP) that will be were replaced by this the Croydon Local Plan: Strategic Policies Development Plan Document and those which will be were saved until they are replaced by the Croydon Local Plan: Detailed Policies and Proposals Development Plan Document. As far as we can determine the current policy RO12 is not carried forward into CLP1 or CLP2 although it as listed as being replaced in CLP2. There are 74 mentions of "Open Space" in the document but only one reference to "Communal" open space for residential developments which does not provide an adequate definition of requirement. I.e. an allocation of local open space per person (as previously defined in Policy RO12). It is stated in The Croydon Local Plan - Strategic Policies (Partial Review) (Preferred & Alternative Options) under table (page 170) "Open Land and Outdoor Recreation" that UDP Policy 'RO12 - Local Open Land in Residential schemes' is to be replaced by Croydon Local Plan Detailed Policies & Proposals in 2017 - but we cannot find any reference to such Policy document to the requirement or definition for 'Communal Open Land' space requirements in Residential Schemes'?"</p>	<p>Policy DM10 (<i>now DM11</i>) has been amended to clarify the requirement for both communal and play space to be incorporated.</p>

Issue/Comment Please note policy DM11 was previously DM10	Council Response with additional comment to the response of the consultation log in italics
<p>"Green Poverty": I am unconvinced that there is sufficient rigour in thinking through green and open space for residents in high density housing. Reference is made to other planning frameworks regarding statutory requirements but this should be spelt out much more clearly in our own Croydon Plan.</p>	<p>Paragraph 6.2 Key Evidence will be updated to reference the Mayor of London's updated Housing SPG. An additional policy (DM11.5) will be added with the following wording. "In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal amenity space that is designed to be flexible, multifunctional, accessible and inclusive."</p>
<p>Under Policy DM 10 Design and Character, we would advise that the policy needs to reflect the need for developments to enhance and sensitivity respond to both the built form and spaces' that define places. This also includes, in line with the NPPF ('Requiring good design'), ensuring developments respond to and integrate with the historic environment (NPPF para's 58 and 61). At present this is not explicitly expressed.</p>	<p>The policy on Design and Character has now been amended to read "DM11.1 To ensure that development enhances and sensitively responds to the predominant built form and spaces that define the character of places, proposals should be of high quality and respect:</p> <ul style="list-style-type: none"> a) The development pattern, layout and siting; b) The scale, height, massing, density and mix; and c) The appearance, existing materials and built and natural features of the surrounding area."

Sustainability Appraisal

3.31 No changes to DM11 were required as a result of the Sustainability Appraisal

3.32 The Sustainability Appraisal of the Croydon Local Plan: Detailed Policies and Proposals (2015) states that 'the Design and Character Policies (formerly DM10 now DM11), should contribute positively through its requirements to respect and enhance local character; to seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; and to support proposals that restore and incorporate historic street furniture within the development. More generally, the policy provides detailed guidance on scale, density massing, height, landscape, layout, materials and access. These are all factors that are important from a perspective of wishing to ensure conservation of townscape and heritage, recognising that there are existing problems, e.g. in relation to the conversion of houses into flats, and houses in multiple occupation.'

4. Policy DM12: Shop Frontage Design and Security

4.1 This section of the technical paper looks at policy DM12 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

DM12.1 To ensure shop fronts are attractive, secure and of a high quality design, the Council will support proposals for new shop fronts and related alterations that respect the scale, character, materials and features of the buildings of which they form part.

DM 12.2 To ensure shop fronts are attractive, secure and of a high quality design, the Council will support proposals for new shop fronts and related alterations in the Metropolitan Centre, District and Local Centres, Shopping Parades and Restaurant Quarter Parades that do not include solid, perforated/pinhole external shutters; or consist of a mix of solid and open grille which conform to Supplementary Planning Guidance No.1 Shopfronts and Signs and the Shop Front Security Addendum to SPG No.1 or its equivalent.

DM 12.3 To ensure shop fronts are sympathetically incorporated and to provide future flexibility, developments that convert shops into residential accommodation should:

- a) Respect the scale, character, proportions, materials and features of the buildings of which they form part;
- b) Retain and incorporate historic shop fronts, including signboards, roller blind boxes, corbels,

stall risers, cornices, fanlights, console brackets, transoms, pilasters and lobbies into the design;

- c) For new elements, adopt and reinterpret the language of shop front design; and
- d) Optimise window and door openings
- e) Ensure the design includes elements that provide privacy for the occupiers

How the policy works/key evidence

High quality design

4.1 Shop fronts play a key part in our perception of shopping streets because they are at eye level and are accessible to everyone. In accordance with the NPPF, the Council expects all shop front design to be of a high design quality and craftsmanship and whenever possible, use sustainable or recycled materials.

4.2 The policy DM12 is in alignment with Paragraph 56 of the NPPF (requiring good design) which outlines the need for robust and comprehensive policies that 'establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit'.

Security

4.3 Given the renewed interest in shop front security brought about as a result of the civil unrest on 8 August 2011, the Council acknowledges the key benefits of a robust shop front design. Furthermore, in accordance with paragraph 56 of the NPPF, the policy aims to 'create safe and accessible environment where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion' and to help enhance the local environment.

4.4 The new Shop Front Policy DM12.1 and DM12.2 will apply greater emphasis in favour of quality shop front design and security in line with the revised security addendum to Supplementary Planning Guidance No.1 Shop Fronts & Signs (Adopted 2012). It aims to set out basic principles of good design and to provide clear guidance to shop owners and fitters on various design solutions to protect retail and business frontages, and encourage applicants to produce attractive, secure, high quality designs in shopping areas.

4.5 The Council encourages improved shop front security and public realm through the integration of innovative technologies, by encouraging shop owners to consider the inclusion of internal shop front shutters during the early stages of the design process. This is recognition that some security features such as shutter and grilles on the outside of shops not only create an impression of an unsafe environment but are also often then covered in graffiti which detracts from the local character and public realm.

4.6 Conversion from retail to residential homes has affected parts of Croydon and detracted from the local character where the conversions are of poor design and some have been built out to the frontage of the shop bay windows infilling the doorways, creating narrow pavements and destroying the rhythm of the architectural elevations, all impacting adversely on the street. They also can have privacy issues. Policy DM12.3 seeks to address this with the requirements of a) to e) and includes in the supporting text suggestions of how design and privacy could be considered in the conversions to avoid adverse impacts on the streetscene and for the residents of the newly converted homes.

4.7 Given the increased change of use of many shops in Croydon from retail to residential, and associated reduction of the adaptability of shops and impact on the streetscape character, wherever possible it is preferable to keep and adapt existing historic shop fronts. Key features such as large windows, details and proportions of the shop front can make for unique, adaptable and attractive home that enhance and compliment the character of the local area.

4.8 Policy DM12.3 is consistent with the Addendum to Supplementary Planning Guidance No.1 Converting Shops into Homes (Adopted October 2004). The Council would expect those seeking planning permission to convert shops into homes would refer to the additional guidance. When designing conversions of retail units to residential use, the policy would encourage applicants, wherever possible to keep and adapt the existing shop front. The large windows, details and proportions of a shop front can make for unique, adaptable and attractive homes that do not detract from the street scene. Simple and inexpensive changes can be made to ensure that shops that are adapted to residential use can easily be changed back to shops in the future.

Consultation Response on the Preferred and Alternative Options-2015 on DM12 Shop front design and security

4.9 No comments or objections were made in the November 2015 consultation.

Sustainability Appraisal

4.10 In the Sustainability Appraisal of the Croydon Local Plan: Detailed Policies and Proposals 2016, policy DM12 was deemed to have a neutral impact. Paragraph 19.2.1 states that the supporting text states that “The Council expects all shop front design to be of a high design quality and craftsmanship and whenever possible, use sustainable or recycled materials”. The Sustainability Appraisal states that if the Council wishes this objective to be fully reflected in decision-making on applications, then it is recommended that such wording be incorporated into the policy itself so it can carry greater weight in decision-making. This has not been acted on as the policy DM24 on Development and Construction requires development and construction to consider impacts on the environment and the use of sustainable and innovative materials. This policy applies to shop fronts which are part of buildings, and therefore to include the use of sustainable materials in the policy DM12 is not necessary.

Health Impact Assessment

4.11 The Health Impact Assessment did not consider DM12 as the Policy screening process did not identify that an Assessment was required on this policy.

5. Policy DM13: Advertisement Hoardings

5.1 This section of the technical paper looks at policy DM13 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

DM13.1 To ensure advertisement hoardings positively contributes to the character and appearance of existing and new streets, the Council will require advertisement hoardings to:

- a) Be designed to improve the public realm;
- b) Demonstrate that the rear of the signs are well designed;
- c) Reinforce the special character of heritage assets and other visually attractive parts of the borough; and
- d) Ensure the location and size of hoardings does not harm amenity or conflict with public safety.

DM13.2 To ensure advertisement hoardings positively contribute to the character and appearance of the building on which they are attached:

- a) The design and proportions should complement the symmetry and proportions of the host

structure;

- b) They should be located where they do not obscure or destroy interesting architectural features and detailing; and
- c) They should be located where they do not cover windows or adversely impact on the functioning of the building.

How the policy works/key evidence

5.2 The policy seeks to address the issues of poorly sited advertisement hoardings detracting from the local environment, and potentially distracting motorists, whether the hoardings are free standing or attached to buildings or where they have accumulated such that they visually clutter the street scene. The advertiser/owner of the advert hoarding always wishes to make the adverts as prominent as possible and this policy seeks to ensure that, whilst this is recognised as a fundamental aim of advertisers, the new advert hoardings, (which are often proposed as illuminated or Liquid Crystal Display in an effort to make them more prominent), are as well designed as possible to enhance rather than detract from the environment and to address any associated issues.

5.3 The new Policy DM13.1 and DM13.2 is in accordance with the National Planning Policy Framework (NPPF), Paragraph 67 which highlights the importance of the need for controls on advertisements with reference to their appreciable impact on a building or surroundings and that they should only be subject of control in the interests of amenity and public safety, taking account of cumulative effects. Policy DM13.1, (a), (b) and (c) consider the impact on the local character with (d) specifically referring to ensuring there is no conflict with amenity and public safety. Policy DM13.2 is concerned with the positioning of the advertisements on the buildings. The supporting text in paragraphs 6.82 to 6.84 explain further how the policy would work with paragraph 6.85 considering areas of special advertisement control.

5.4 Whilst the Advert and Hoardings & Other Advertisements Supplementary Guidance is referred to as a key supporting document in the list of 'Key supporting documents' and in paragraph 6.81 in 'Why we need this policy' the intention is to withdraw this SPG upon adoption of the Croydon Local Plan: Detailed Policies and Proposals.

Consultation Response on the Preferred and Alternative Options-2015 on DM13 Advertisement hoardings

5.5 There were no comments or objections to policy DM13 (numbered as DM12 in the Preferred and Alternative Options version).

Sustainability Appraisal

5.6 The Sustainability Appraisal (SA) of the Croydon Local Plan: Detailed Policies and Proposals (2015) appraised the alternative to DM13 of updating the existing Supplementary Planning Guidance No.8 on Advertisement Hoardings & other Advertisements.

5.7 The Advertisement and Hoardings & Other Advertisements Supplementary Planning Guidance (SPG) No.8 (February 2003) provides guidance on acceptable locations, number, scale and type of advertisements and highlights the need to ensure advertisements are sensitively located and design to minimise the impact on residential areas and on heritage assets. The SA however concluded that having an adopted policy setting out key requirements will better ensure the protection of the character and appearance of streets and buildings, thereby supporting objectives related to human health and wellbeing and social inclusion/sense of place.

5.8 The SA stated that positive effects on energy consumption and biodiversity objectives could be strengthened by including requirements within Policy DM13 that: powered advertisements (e.g. illuminated signs and electronic displays) must demonstrate how energy efficiency has been

maximised; and that options for incorporating wildlife habitat features into the rear of advertisements be considered e.g. swift boxes, 'bug hotels'. DM13 has not incorporated either of these recommendations as they are already included in other policies of the Local Plan as follows:

- Policy DM11.7 'Design and Character' states that proposals should demonstrate that (b) high quality, durable and sustainable materials that respond to local character are incorporated'
- Policy DM24 in 'Development and Construction' proposes that the Council will promote high standards of development and construction throughout the borough by: (d) encouraging the use of sustainable and innovative construction materials in buildings' This will also apply to development and as identified in the supporting document 'The Mayor of London's Sustainable Design and Construction Supplementary Planning Guidance. Supporting documents to the Local Plan include the Croydon Public Realm Design Guide which includes the principle to source as much as possible energy efficient materials from sustainable, reclaimed, recycled or renewable supplies.
- Policy DM28'Protecting and enhancing our biodiversity' requires that development proposals should (a) incorporate biodiversity on development sites to enhance local flora, fauna and aid pollination locally'

Health Impact Assessment

5.9 The Health Impact Assessment did not consider DM13 as the policy screening process did not identify that an Assessment was required on this policy.

6. Policy DM14: Refuse and Recycling

6.1 This section of the technical paper looks at policy DM14 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

DM14.1 To ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design, the Council will require developments to:

- a) Sensitively integrate refuse and recycling facilities within the building envelope;
- b) Ensure facilities are visually screened;
- c) Provide adequate space for the temporary storage of waste (including bulky waste) materials generated by the development; and
- d) Provide layouts that ensure facilities are safe, conveniently located and easily accessible by occupants, operatives and their vehicles.

DM14.2 To ensure existing and future waste can be sustainably and efficiently managed the Council will require a waste management plan for major developments and for developments that are likely to generate large amounts of waste.

How the policy works/key evidence

6.2 Redevelopment and growth in the borough will lead to increased waste generation locally.

6.3 With national and London Plan guidance and the South London Waste Plan DPD, there is sufficient policy to ensure waste management at the strategic level, but the development management stage of decision-making is important for the achievement of sustainability objectives relating to individual dwellings and major development (of ten or more units).

6.4 Policy DM14 (Refuse and recycling) sets out requirements for the provision of refuse and recycling facilities within developments. The Policy DM14.1, looks to address the issues identified for Croydon with regard to poor planning of the layout of refuse and recycling areas in the past with (a) the requirement to integrate refuse and recycling facilities within the building envelope and that (b) they are screened to reduce the visual impact on occupants of the development and from the street, and that (c) there is adequate space for the storage, including temporary bulky waste, to avoid impacting on the public areas and the communal and private amenity space of the development, which has occurred in the past in Croydon, and (d) the practicalities of using the refuse facilities and collection also need to be considered to ensure the facilities work for Croydon's refuse collection services. The British Standards for Waste management in buildings and the Building Regulations are referred to as key supporting documents providing more detailed specification requirements.

6.5 Given the amount and scale of new developments coming forward and proposed in Croydon, high quality amenity space for both residents and users is an important element of the design of new developments, with the need to consider waste and recycling facilities as an integral part of the development process. The Draft Croydon Local Plan – Detailed Policies and Proposals Viability Assessment (October 2013) states that DM14.1 would ensure that waste and recycling facilities are to be incorporated into the development and/or visually screened in order to enhance the marketability and attractiveness of a scheme, and waste and recycling facilities would be situated so they are readily accessible by residents and refuse collection vehicles. The viability assessment concludes that policy DM14.1 would have no impact on the viability of developments as this has been a standard feature in developments for many years and enhances marketability and attractiveness of a development.

6.6 Along with Policy DM11 on Design and Character, and Policy DM16 on Tall and Large Buildings, the Policy DM14 on Refuse and Recycling considers the importance of the provision of amenity space - private and communal, with the location and design of refuse and recycling facilities needing to be an integral element of the overall design of the development and requiring in DM14.1 (a) to 'sensitively integrate refuse and recycling facilities within the building envelope.'

6.7 While there are limitations in terms of additional space allocation for waste and recycling facilities within existing residential developments, and often integrating them into the building envelope is not possible, such as in streets of terraced housing, residential conversions and intensification of areas offer some opportunities to address this. In accordance with the Housing SPG, the Council, in implementing policy DM14.1 would expect that refuse and recycling bins are located behind the building line and integrated within the landscape.

6.8 In response to the proposed growth in Croydon with more tall and large buildings and higher density developments schemes, particularly in the Croydon Opportunity Area, Policy DM14.2 requires major development to submit a waste management plan as the quantum of waste and recycling is likely to be large amounts.

Consultation Response on the Preferred and Alternative Options-2015 on DM14 Refuse and Recycling

The following comments were made:

Issue/Comment note the policy was DM13 in the Preferred and Alternative Options document	Council Response with additional comment to the response of the consultation log in italics
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Issue/Comment note the policy was DM13 in the Preferred and Alternative Options document	Council Response with additional comment to the response of the consultation log in italics
<p>Policies DM13.2 to 5 should be deleted as they provide excessive levels of detail in relation to the objective set by policy DM13.1d which is to provide safe conveniently located and easily accessible waste refuse facilities and layouts. The remainder of the Policy is an attempt to define what constitutes these criteria and they are excessively detailed and repetitive.</p> <p>Commercial waste disposal is now undertaken by private contractors and individual businesses are responsible for making their own arrangements for waste refuse removal. This works satisfactorily without the need for the significant detail set out in policies DM13.2 to</p> <p>13.5. Because commercial refuse disposal works very well without such regulation, there is no reason why residential refuse collection cannot operate on the same basis. If these standards are adopted they will also result in the homogenisation of building design, and produce developments that are awkwardly detailed and designed more in relation to refuse requirements than to their street context.</p>	<p>Policies DM13.2 (<i>now DM14.2</i>) are necessary to ensure waste can be sustainably and effectively managed, therefore will be retained.</p> <p>Policies DM13.3 - DM13.5 outline the Council's Public Realm and Safety Department requirements for new developments, however to allow future flexibility should these requirements change, policies DM13.3 - DM13.5 have been removed and are not in the Proposed Submission version.</p>
<p>We support the principle of Draft Policy DM13 and consider providing clear guidance for refuse and recycling within developments to be a sensible approach. However, we consider that criteria (a)- (e)of DM13.3 are overly prescriptive and do not provide sufficient flexibility. We would therefore request that rather than adopting a blanket-approach, individual sites should be considered on a case by case basis, taking into account local context and suitability</p>	<p>Policy DM13.2(<i>now as DM14.2 in the Proposed Submission</i>) is necessary to ensure waste can be sustainably and effectively managed, therefore will be retained. Policies DM13.3 - DM13.5 outline the Council's Public Realm and Safety Department requirements for new developments, however to allow future flexibility should these requirements change, policies DM13.3 - DM13.5 has been removed.</p> <p>The supporting text in the reason justification provides guidance about how refuse and recycling storage should be incorporated within existing buildings that have been converted. The policy and supporting text provides flexibility for a number of different types of development ranging from new builds through to conversions. However the guiding principle of DM13 is to ensure that refuse and recycling is considered at an early enough stage of the design process to ensure it can be sensitively incorporated into every development.</p>

Sustainability Appraisal

6.9 No changes to DM14 were required as a result of the Sustainability Appraisal

6.10 The Sustainability Appraisal (SA) refers to the 2011 report on the Strategic Policies and that 'the Partial Review will not lead to implications for good waste management' It also states in paragraph 16.4.1 that there is the need to avoid being overly restrictive through high level policy but that the development management stage of decision- making is set to be more important for the achievement of sustainability objectives relating to good waste management.

6.11 The SA states that 'no other policies explicitly refer to waste, although Policy DM6 (Shopping parades) seeks to ensure that the vitality and viability of the borough's Shopping Parades places restrictions on the concentration of units in Use Class A5, justified in the supporting text based on the associated waste and delivery issues which can cause harm to residential amenity. No policies refer to energy from waste; therefore the current plan would have no effect on the objective of increasing the amount of energy generated from waste. However it is noted that the South London Waste Plan (which covers Croydon and forms part of Croydon's Local Plan) includes a policy on 'sustainable energy recovery' setting out requirements for energy from waste projects. Given the existence of this policy the lack of a DM policy would seem justified, assuming a more detailed policy is not required'.

6.12 Further, as part of the site options appraisal in Appendix I of the Sustainability Appraisal of the Croydon Local Plan: Detailed Policies and Proposals (2016), it states that 'it is not possible to appraise site options in terms of the potential to support good waste management. It would not be fair to assume that larger schemes, or residential development in close proximity to household waste recycling centres, will necessarily lead to better waste management.

Health Impact Assessment

6.13 The Health Impact Assessment did not consider DM14 as the Policy screening process did not identify that an Assessment was required on this policy.

7. Policy DM15: Public Art

7.1 This section of the technical paper looks at policy DM15 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

DM15 To enhance and express local character, the Council will support the inclusion of public art and require all major schemes to include public art that:

- a) Is integrated into proposals at an early stage of the design process;
- b) Enhances and creates local distinctiveness and reinforces a sense of place;
- c) Responds to local character;
- d) Makes a positive contribution to the public realm; and
- e) Engages the local community in its creation.

How the policy works/key evidence

7.2 Given the above policy of the London Plan and the Croydon Local Plan: Strategic Policies context, there is a need to ensure that opportunities to incorporate public art within new developments

or public realm improvements are taken, and that any public art relates to the local character, contributes to the sense of place and reinforces local distinctiveness.

7.3 Public Art can contribute to economic, social and environmental objectives for the borough. It has a part to play in regenerating Croydon through:

- Improving the image of Croydon and public enjoyment of the Borough
- Expressing cultural identity, diversity and sense of pride and ownership.
- Promoting appreciation for Croydon’s historic and contemporary assets.
- Contribution to environmental improvements across Croydon and creating a sense of place
- Utilising local talent and providing employment.

7.4 In Policy DM15, “major schemes” include development of more than 10 dwellings, residential development of 0.5 ha or more, or developments over 1000m2. The policy does not preclude inclusion of art in smaller schemes but has indicated that major schemes should include public art as the size of the development not only is likely to have a more significant impact on the environment in terms of its size but is also likely to be financially viable and provide more opportunity for public art in terms of possible locations and in variety of format.

7.5 Public art proposals will, in general, be dealt with by the Council as a material consideration in determining planning applications. Public art should be raised in pre-application discussions by the Council officer, so an art consultant or artist can be commissioned while the development is being designed and the public artwork forms an integral part of the design. By considering public art during the early stages of the design process and clarifying the scope at the beginning of the pre-application process, opportunities can be taken to integrate public art into the fabric of the development itself in more imaginative ways. It is important that public art is discussed between the developer and the Council at the earliest possible opportunity to be worthwhile for all those involved.

7.6 The supporting text points (Paragraph 6.104) out that public art can be a variety of formats and provides examples of these. This reflects the experience in Croydon of public art in the past being less vulnerable to vandalism and more likely to be maintained when it is incorporated in the building or structure or has a practical purpose within the development, such as a clock or railings, as well as being artwork that adds distinctiveness to the local area. The process of developing public art projects can also have inherent value through involvement of and participation of community groups and local makers for example.

7.7 The supporting text (Paragraph 6.105) refers to the use of sustainable materials in line with Policy DM24 ‘Development and Construction’ and Croydon’s Public Realm Design Guide would need to be met. To address the issue of poor maintenance in the past of public art in Croydon the supporting text also states that ‘When commissioning public art, developers should place equal weight on creating the right piece of work, the craftsmanship of the artist and those installing the piece and the maintenance after it has been installed.’

7.8 The incorporation of public art offers the opportunity to work with the local community to create distinctive works that help engender a sense of ownership and strengthen the sense of place. In turn, developers can benefit from community involvement as it is likely to foster support for high profile and smaller schemes.

Consultation Response on the Preferred and Alternative Options-2015 on DM15 Public Art

Issue/Comment note the policy was DM14 in the Preferred and Alternative Options document	Council Response with additional comment to the response of the consultation log in italics
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Issue/Comment note the policy was DM14 in the Preferred and Alternative Options document	Council Response with additional comment to the response of the consultation log in italics
<p>The Arts Network welcomes the inclusion of the policy on public art, but considers it is limited in its vision. Amend paragraph to say 'Public art should not be confined to statues, but can be incorporated in imaginative, simple and cost effective ways such as bespoke paving, gates, lighting, signage, street furniture, playground equipment, railings and landscaping, and mural paintings, ceramic murals, decorative roof pelmets, and substantial works of art of flat roofs especially where they will be visible to pedestrians given their location'</p>	<p>The reason justification includes some of the forms of public art outlined in the comments. The reason justification has been amended to incorporate bargeboards and works of art on the building's elevation. The text now reads "By considering public art during the early stages of the design process and clarifying the scope at the beginning of the pre- application process, opportunities can be taken to integrate public art into the fabric of the development itself in more imaginative ways. Public art should not be confined to statues, but can be incorporated in imaginative, simple and cost effective ways such as bespoke paving, gates, lighting, signage, street furniture, playground equipment, railings and landscaping, murals (painted or ceramic), decorative bargeboards or. Works of art incorporated on elevations where they will be visible to pedestrians."</p>

Sustainability Appraisal

7.9 No changes to DM15 were required as a result of the Sustainability Appraisal.

7.10 The Sustainability Appraisal of the Croydon Local Plan: Detailed Policies and Proposals (2015) states that Policy DM15 will contribute to the objective of creating community identity and a distinctive sense of place by promoting the provision of public art that responds to local character and "reinforces a sense of place" as part of development schemes.

Health Impact Assessment

7.11 The Health Impact Assessment did not consider DM15 as the Policy screening process did not identify that an Assessment was required on this policy

8. Policy DM16: Tall and Large Buildings

8.1 This section of the technical paper looks at policy DM16 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

DM16.1 To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they:

- a) Are located in areas identified for such buildings in Policies DM36 to DM51, in masterplans and in the Croydon Opportunity Area Planning Framework;
- b) Are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4 with direct public transport connections to the Croydon Opportunity Area;
- c) The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale; and
- d) To improve the quality and access to open space buildings taller than 40 storeys will need to

incorporate amenity space such as sky gardens, atriums and roof terraces that is accessible to the public as well as residents of the development.

DM16.2 To ensure tall and large buildings are well integrated with the local area, the ground and first floors should incorporate a mix of publically accessible uses and spaces.

How the policy works/key evidence

8.2 The pressure to meet London's housing targets and the high demand over the last years for commercial developments in central locations has brought to a rise in tall and large footprint buildings. Councils are confronted with a high number of planning applications and pressure from developers for development of tall buildings, as well as the need to respect local identity and urban character.

8.3 Paragraph 56 of the NPPF states that the government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. In this respect, the new Tall and Large Building Policy DM16.1 and DM16.2, in conjunction with the place-specific development management policies (Policies DM32 to DM47), will help the Council establish clear design principles and more certainty for developers about the most appropriate locations for this type of proposals.

8.4 The need to expand the policy to include large buildings in addition to tall buildings, as well as ensuring the development is sensitive to its local context, is in accordance with the Croydon Local Plan Strategic Policy SP4.5, the London Plan Policy 7.25 and English Heritage and CABI's Guidance on tall buildings (July 2007).

8.5 The Croydon Opportunity Area (COA) Planning Framework (2013) expects that tall and large buildings will continue to have an important role in the development of the COA, and that such typology may be considered appropriate where they can be justified on the basis of design, location and context.

8.6 The design of new development will need to be of high quality, both to attract and retain new investors, workers and residents. Proposals for tall and large buildings need to include urban design analysis that demonstrates how the schemes align with the Opportunity Area Planning Framework and the Fair Field, Mid Croydon, Old Town and East and West Croydon Masterplans.

8.7 Under Policy DM16, the design and location of future buildings should be carefully considered. Design approaches are expected to be context led, based on an understanding of where the building is located and what the historic context and character of the surrounding area is.

8.8 Further, the Borough Character Appraisal (2015) identifies the attributes of the local areas within the COA that need to be considered when introducing new developments to ensure good design. These attributes are important considerations at both the pre-application and the planning application stages.

Location

8.9 In accordance with The London Plan (March 2016), in order to accommodate growth and make optimal use of the capacity of sites with high levels of public transport accessibility, high density developments are suitable particularly in town centres and identified opportunity areas. While high density does not imply high rise, tall and large buildings can form part of a strategic approach to meeting the regeneration and economic development goals laid out in the London Plan spatial development strategy.

8.10 As stated in the English Heritage and CABI's Guidance on tall buildings (July 2007), in the right place, tall buildings can make positive contribution to city life. They can be excellent works of architecture in their own right; some of the best post-war examples are now listed buildings.

Individually, or in groups, they affect the image and identity of a city as a whole. In the right place they can serve as beacons of regeneration, and stimulate further investment.

8.11 By virtue of their scale and massing, tall and large buildings can be overbearing and effect negatively on the local character of the area, as well as having adverse impact in terms of activity and use in their surroundings, especially community facilities and public spaces. In order for such large schemes to positively contribute to the local community and environment, the Council is expected to put great effort into identifying the right location based on a thorough urban design analysis of the context. Criteria such as alignment, spacing, height, bulk, massing and design quality should be considered.

8.12 Further, The Mayor Of London's Town Centres SPG: London Plan 2011 Implemented Framework (July 2014), suggests that in preparing development plan document's local authorities should also assess the impact of large scale developments on permeability, sunlight, wind, legibility and density. Many tall building applications are subject to environmental impact assessment or a form of environmental statement through which these issues should also be thoroughly examined.

8.13 The Strategic Policy 4.5 of the Croydon Local Plan encourages proposals for tall or large buildings only in the Croydon Opportunity Area and areas in the District Centres and sets up a list of criteria to determine the most suitable location. Appropriate locations would be where:

- A cluster of tall buildings is already established, and so ensuring that context and potential visual impact is considered,
- It is in an area around a well- connected public transport interchanges and where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or District Centres, in order to assist in delivering sustainable developments and improve connectivity,
- A tall building will respect and enhance local character; minimises the environmental impacts and responds sensitively to topography, and so respecting Croydon's natural setting of hillsides, ridges and valleys,
- A tall building makes a positive contribution to the skyline and image of Croydon, as identified in the Croydon Panorama Views, Landmarks and Local Views in the CLP.
- The proposal includes high quality public realm to provide a setting appropriate to the scale and significance of the building and the context of the surrounding area.

8.14 Further, this spatial development strategy is supported by the CLP – Viability Assessment (October 2013) which states that tall buildings should be restricted to areas deemed suitable by the Council and that demonstrate a minimum of PTAL4.

Public realm and amenity spaces

8.15 Given the large impact of tall and large buildings on the local character, existing facilities, infrastructure and public spaces in their immediate and wider surroundings, large schemes ought to give back to the community and enhance the qualities of its immediate locations and wider setting. In line with CABI and English Heritage guidance, failure to do so

8.16 In order to ensure that the quality of the environment and setting at ground level is given equal consideration and meet the Strategic Objective 7 to conserve and create spaces and buildings that foster healthy and cohesive communities, the new Policy DM16.1 and DM16.2 include the requirement for high quality public realm and public accessible amenity spaces and uses in and around the tall building.

8.17 In making a planning decision on a high density and high rise building, the new policy is in line with the London Plan, which recommends the Council to consider positively schemes that have ground floor activities that provide a positive relationship to the surrounding streets, contribute to improving the permeability of the site and wider area, and where possible incorporate publicly accessible areas on the upper floors such as sky gardens, atrium spaces and roof terraces, and make a significant contribution to local regeneration.

8.18 As stated in the CABI and English Heritage guidance, the contribution to public space and facilities, both internal and external, that the development will make in the area, including the provision of a mix of uses, especially on the ground floor of towers, and the inclusion of these areas as part of the public realm. The development should interact with and contribute positively to its surroundings at street level; it should contribute to safety, diversity, vitality, social engagement and 'sense of place'.

8.19 Further, in order to create a safe and attractive pedestrian environment around tall and large buildings, the Viability Assessment suggests buildings to be designed to minimise wind turbulence and overshadowing. This is in accordance with English Heritage and CABI's guidance which that the effect on the local environment, including microclimate, overshadowing, night-time appearance, vehicle movements and the environment and amenity of those in the vicinity of the building has to be evaluated.

Design quality

8.20 The new Policies DM16.1 and DM16.2 are complementary with the Policy DM11 Design and Character and in accordance with paragraph 57 of the NPPF which states the importance of achieving high quality and inclusive design for all developments, and in paragraph 58 the aim to ensure visually attractive developments as a result of good architecture and appropriate landscaping.

8.21 In evaluating a proposal, English Heritage and CABI's guidance recommends to carefully consider the architectural quality of the building including its scale, form, massing, proportion and silhouette, facing materials and relationship to other structures. The design of the top of a tall building will be of particular importance when considering the effect on the skyline. The design of the base of a tall building will also have a significant effect on the streetscape and near views.

Consultation Response on the Preferred and Alternative Options-2015

Issue/Comment note the policy was DM15 in the Preferred and Alternative Options document	Council Response with additional comment to the response of the consultation log in italics
<p>Historic England commented that the wording of the policy should ensure that proposals are assessed against the significance of heritage assets that may be affected by tall building proposals.</p>	<p>In response Croydon Council believes that the tall buildings policy should not be read in isolation but should be read in conjunction with other policies contained within the Local Plan, such as but not limited to policy DM19 (heritage Assets and Conservation) and in particular DM19.1 a) <i>which makes it clear that "Development affecting heritage assets will only be permitted if their significance is preserved or enhanced"</i></p> <p><i>In addition to the policy itself, which requires that developments 'do not harm the setting of heritage assets' the supporting text to DM16 sets out that proposals for tall and large buildings will 'be expected to demonstrate that they will not cause unacceptable harm...to the wider setting of heritage assets and meet all policy requirements' The supporting text for policy DM16 also sets out that proposals for tall or large developments within sensitive location (which include sites close to heritage assets) will be expected to demonstrate that they meet the requirements of the London Plan Policies 7.6 and 7.7</i></p>

Issue/Comment note the policy was DM15 in the Preferred and Alternative Options document	Council Response with additional comment to the response of the consultation log in italics
<p>Comments in reference to DM31.4 (now 35.4- re the Places for focussed intensification policy) Amend the tall buildings policy to keep the tall building zone where is suited in the centre of town</p>	<p>The objective of Policy DM31. 4(now DM35.4) is to maximise use of the existing growth capacity to focus growth on sustainable locations and to support a smart spatial vision for the borough. <i>The the policies of the Plan should not be read in isolation and Design and Character polices will apply to proposed development alongside focussed intensification policy.</i></p>

Sustainability Appraisal

8.22 No changes to DM16 were required as a result of the Sustainability Appraisal.

8.23 The Sustainability Appraisal identifies that Policy DM16 (formerly referred to as DM15) seeks to facilitate regeneration through enabling developing of tall buildings in appropriate locations, creating new jobs, homes and community facilities, and notes that the location of tall buildings is related to a Public Transport Accessibility Level (PTAL) rating of 4 with direct public transport connections to the Croydon Opportunity Area. The comments on policy DM11 are also applicable to Policy DM16 in that policy DM11 refers to density, height and massing and the SA states that the Design and Character policy should also contribute positively through its requirements to respect and enhance local character .The SA states that Policy DM16 seeks to ensure that tall or large buildings respect and enhance the local character, and do not harm the setting of heritage assets. The SA comments on the emerging preferred approach as a whole in paragraph 15.4.1 and that 'the strategy of reaffirming the adopted Strategic Policies commitment to concentrating growth in the Croydon Opportunity Area is a positive.... and the proposed increased emphasis on sustainable growth of the suburbs does not lead to major concerns.'

Health Impact Assessment

8.1 Given the impact the built environment has over the physical and mental wellbeing of the population, it is important to recognise that poor environmental quality, housing conditions and pollution can be detrimental. This is especially exacerbated in high density developments where issue such as lack of good amenity spaces, poor ecosystems, loss of privacy and direct sunlight can lead to problems like depression, obesity and vitamin D deficiency.

8.2 In particular, tall and large buildings could lead to poor quality housing or overcrowding if space standards including floor-to-ceiling heights are not generous, the size of floor plates may lead to poor daylight due to lack of windows or if sites are overdeveloped there may not be provision for open space or amenity space. Also, the removal of minimum distances between buildings can be linked to the feeling of being overlooked or not having own private space. This can impact on mental health, feeling safe and comfortable in own home.

8.3 It is the Council's priority to address these issues by building health into existing places and new developments, and create neighbourhoods that are well designed, attractive and contribute in reducing inequalities in health conditions. The new Policy DM11 in general, and DM11.8 in particular, is in line with London Plan's Policy 3.2 Part D (Improving health and addressing health inequalities) and it will help the Council ensure that, whilst accommodating for population growth, if buildings are closer together, and people are living in closer proximity to each other, taking in to account other urban environmental circumstances such as air pollution associated with road traffic and the urban heat island effect, this is compensated, in addition to room sizes meeting the London Plan and National Technical Standards, by rooms with more generous floor to ceiling heights.

9. Policy DM17: Promoting Healthy Communities

9.1 This section of the technical paper looks at policy DM17 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy, and how this relates to the broader policy context.

DM17.1 The Council, working with relevant organisations, will ensure the creation of healthy communities which encourage healthy behaviours and lifestyles by requiring developments to:

- a) Consider health and wellbeing during the design of a development to maximise potential health gains and ensure any negative impacts can be mitigated;
- b) Ensure access to open spaces and facilities for sport, recreation, play and food growing;
- c) Promote active travel and physical activity through cycling and walking opportunities that are well linked to existing pedestrian and cycling infrastructure;
- d) Create spaces for social interaction and community engagement which are designed to be safe and accessible to all; and
- e) Assess and mitigate pollutants and other environmental impacts on health.

DM17.2 The Council will work with NHS partners to support the provision of new healthcare facilities and improvements to existing facilities which provide services important for the physical health, mental health and general wellbeing of communities.

How the policy works/key evidence

9.2 The key evidence supporting this policy is the Health Impact Assessment for the Croydon Local Plan.

9.3 Croydon, like many places, has a number of health inequalities. These health inequalities can be addressed by ensuring the planning system and new developments are considering health and wellbeing. This will allow local communities to lead healthy lifestyles and adopt healthy behaviours through living quality homes, participating in physical activity and have access to quality open spaces.

9.4 Whilst many policies have aspects of addressing health inequality incorporated within them there was no overarching health policy in the Croydon Local Plan. This was identified through the Health Impact Assessment. Policy DM17 provides such an overarching policy.

Consultation Response on the Preferred and Alternative Options 2015

9.5 This policy was first included in the Croydon Local Plan: Detailed Policies and Proposals in the Proposed Submission draft.

Sustainability Appraisal

9.6 Jj

Health Impact Assessment

9.7 The need for this policy was identified through the Health Impact Assessment, in particular at a workshop of key stakeholders as part of the process of carrying out the assessment.