

# **Croydon Local Plan: Detailed Policies and Proposals Evidence Base**

## **Technical Paper – Community Facilities**

**January 2017**

# 1. Introduction

1.1 This technical note sets out and discusses the policy context and evidence that have informed the preparation of policies DM20 – DM23 inclusive in the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission).

DM20: Providing and protecting community facilities

DM21: Supporting Selhurst Park as the home stadium of Crystal Palace Football Club

DM22 Protecting Public Houses

DM23 Cemeteries and burial grounds

1.2 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/>

1.3 An increasing population will put more pressure on existing community facilities and is likely to require the provision of more community facilities. Over time the types of community facilities provided will need to change to reflect demographic change – the population becoming older and more ethnically diverse, more people living alone and changing lifestyles.

1.4 There are changes to public policy on service provision and co-location of services.

1.5 There will also be a need to accommodate 1,900 extra burials in Croydon by 2031 in the borough.

1.6 Nationally Croydon have a lower than average number of older people, with 17 percent of the population over 60, although this percentage is expected to rise. Ethnic minorities make up 37 percent of the population in Croydon, a proportion which is expected to increase to 42 percent in the next five years.

1.7 Local planning authorities are expected to ensure that infrastructure is provided in support of existing and growing communities. Modern society needs a wide range and network of facilities provided locally to support the population in its health, safety, sport, leisure, education and meeting place needs. The precise needs of these services vary but an essential requirement is that they are located so as to be reasonably accessible to the diverse population they serve.

1.8 The pattern and extent of existing health facilities, schools and colleges, indoor and outdoor leisure, libraries, halls and of schools and Children's' Centres is described in the Infrastructure Delivery Plan. The pattern of service provision will need to change over time to reflect changing needs caused by demographic change (ageing, more people living alone, more children, a more ethnically diverse population and changing lifestyles). Additionally the process of growth creates service pressures for more public service outlets in the community and gives positive support for physical changes to accommodate more and improved community facilities.

1.9 The expected growth in the borough's population means an increase in community facilities will be required. In addition to seeking opportunities to provide new facilities, the council will protect existing community facilities where they still serve, or have the ability to serve the needs of the community.

1.10 Public satisfaction with local neighbourhoods increases with ready access to sport and leisure facilities. Likewise the probability of people enjoying an active and healthy lifestyle increases with access to leisure and sporting facilities.

1.11 Provision and ease of access to health and community facilities have positive impacts on wellbeing and healthcare. Such facilities need to be accessible to all sections of the community, including those without a car, the disabled or others with social, economic or physical characteristics limiting their mobility. Where possible services will be co-located so as to enable multi purpose trips, reduce the need to travel and for the convenience of the user. Additionally the service providers through co-location will be able to share spaces and services and to reduce capital and revenue costs.

## 2. Policy context

### 2.1 Why we need this policy

2.2 The National Planning Policy Framework in paragraph 69 states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The Council recognises the benefits of a healthy community and with the expected growth in the borough's population, existing community facilities that serve their current and future needs should be retained and new facilities provided.

2.3 Croydon's population, as it grows, will put increasing pressure on community facilities. Consequently, a changing approach towards locating services and facilities is needed, especially to ensure they are provided in sustainable locations.

2.4 The London Plan Policy 3.16 cites the protection and enhancement of social infrastructure which includes community uses and encourages London boroughs to develop policies to protect these uses. London Plan Policy 4.8 cites the protection and enhancement of social infrastructure which can include public houses

2.5 As examples of social infrastructure need, the Croydon Opportunity Area Development Infrastructure Funding Study (December 2014) has identified that growth in the Opportunity Area will require 10.7 additional Whole Time Equivalent (WTE) GPs. The majority of the housing and population growth in the Croydon Opportunity Area is located in the East Croydon GP network.

2.6 Furthermore, Croydon has six planning areas for primary schools; Central, East, North West, South, South East and South West. Demand for primary school places is greatest in the Central and South West planning areas up to 2023/2. There are two planning areas for its secondary schools; North and South. It is predicted that there is a need for up to an additional 24FE by 2023/24. This is being planned for and delivered through the Local plan and the Council's Education Strategy.

2.7 This following sections of the technical paper looks at the detailed policies relating to Community Facilities of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policies, and how this relates to the broader policy context.

### **Policy DM20: Providing and protecting community facilities**

**DM20.1 The Council will ensure the provision of a network of community facilities, providing essential public services throughout the borough by protecting existing community sites that still serve, or have the ability to serve, the needs of the community.**

**DM20.2 The Council will permit the loss of existing community facilities where:**

- a) It can be demonstrated that there is no need for the existing premises or land for a community use and that it no longer has the ability to serve the needs of the community;**
- b) The existing use is located on the ground floor within a Main Retail Frontage, a Secondary Retail Frontage, a Shopping Parade or a Restaurant Quarter Parade; or**
- c) Community facilities for a specific end user (either on site or off site as part of a comprehensive redevelopment) that meet current or future needs are provided.**

**DM20.3 The Council will support applications for community use where the proposals:**

- a) Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion;**
- b) Are accessible to local shopping facilities, healthcare, other community services and public transport or provides a community use in a location and of a type that is designed to meet the needs of a particular client group; and**
- c) Are for a use that is a town centre use, as defined by the National Planning Policy Framework, are located within Croydon Metropolitan Centre or a District or Local Centre, have no more than 280m<sup>2</sup> of floor space (net) and are in the vicinity of a Neighbourhood Centre, or are a change of use of an existing unit in a Shopping Parade.**

## **How the policy works**

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#### **DM20: Providing and protecting of existing community facilities**

##### **Protection of existing community facilities**

Proposals involving the loss of a community facility will need to:

- a) Explain why the current use is no longer needed if the building/site is occupied; and
- b) Show that the loss would not create, or add to, a shortfall in provision of floor space/sites for the existing community use by providing details of a marketing exercise that meets the criteria below or provide a replacement community facility for a specific end user either on site as part of a mixed use development or elsewhere on a site with no current community use.

Exceptions to this policy may include proposals involving the loss of an existing profit-making community use (such as a private gym or cinema) which would require evidence to be submitted to demonstrate that the existing community use is not financially viable. This evidence will be assessed on behalf of the Council by an independent RICS valuer (paid for by the applicant).

The marketing exercise associated with this policy should be for site and premises be for a minimum period of eighteen months. Space should be offered at a reasonable charge for community groups/voluntary sector organisations reflecting its existing use value unfettered by any hope value. In the event that a community facility is listed on the Assets of Community Value register and is offered for sale, the local community is given six months to prepare a bid to buy it. In such circumstances the marketing statement could be reduced to a period of a minimum continuous period of twelve months in addition to the six months that the community has to prepare a bid to buy it.

In cases where a community use ceases it has to be successfully demonstrated that there is no local need or demand for alternative community uses.

The protection of community facilities will not apply to Main Retail Frontages, Secondary Retail Frontages, Shopping Parades and Restaurant Quarter Parades as these are locations where Class A uses are the preferred uses.

##### **Proposals for new community facilities**

The use of a building and the needs of communities can change over time. Therefore, new community facilities should be designed to be flexible and adaptable to changing circumstances including being capable of multi-use and expansion.

New community facilities should be located so that they are close to schools, local shopping facilities and public transport and other community services to reduce the number of trips people need to make to access them. However, it is acknowledged that there may be circumstances where the needs of a particular group or client base mean that it that it does not need to be located close to other services. In such instances applications would need to be supported with information demonstrating how the lack of access to other services will not have a negative impact on the end users of the new community facility and the amenity of the surrounding area.

## **DM21: Supporting Selhurst Park as the home stadium of Crystal Palace Football Club**

**The Council will continue to support Selhurst Park as the home stadium of Crystal Palace Football Club and ensure that any redevelopment would enhance the club's position with a football stadium which makes a significant contribution to the Borough**

### **Where we are now and why we are proposing this Policy**

The presence of a major Football Club within Croydon brings many economic, social and cultural benefits. It is therefore important to protect the facilities that are considered necessary for the retention of such a club. Furthermore, any future Crystal Palace Football Club development and enhancements should enhance the economic, social and cultural benefits for Croydon.

Selhurst Park has been home to Crystal Palace Football Club since 1924 and the Football Club is the only Premier League Club at present in South London. It brings many cultural and leisure benefits to the area and the continued presence of a Premier/Football League Club within Croydon is significant for the Borough and the wider South London conurbation

London Plan policy 4.6 provides support for the continued success of professional sporting enterprises and the cultural, social and economic benefits that they offer to residents, workers and visitors

## **DM22 Protecting Public Houses**

**The Council will not grant planning permission for the demolition or change of use of a public house, unless the Council is satisfied that there is not a defined need for a public house. Even where the Council is satisfied that there is not a defined need for the public house, the Council must be satisfied that:**

- a) **The loss of the public house would not result in a shortfall of local public house provision of this type;**
- b) **That the public house is no longer considered economically viable when considered against the CAMRA's Public House Viability Test; and**
- c) **The public house has been marketed as a public house, at a market rate for public houses, for a consistent period of 18 months**

### **How the policy works**

Proposals involving the loss of a public house will need to demonstrate that there is not a defined need for a public house.

A defined need can be demonstrated in no particular order of preference by:

- a) The public house being statutorily Listed;
- b) The public house being Locally Listed;
- c) The public house being a non-designated heritage asset;
- d) The public house having other local contextual significance;
- e) There being sustained and documented local objection to the loss of the public house; and
- f) The public house being used for a wider variety of ancillary uses such as functions, social events and other community activities.

The Council will resist the loss of these facilities unless it can be demonstrated that it is no longer required in its current use. Evidence will be required to show that the loss would not create, or add to, a shortfall in provision for the public houses and demonstrate that there is no demand for such a use on the site. This would include the submission of evidence of suitable marketing activity for a period of eighteen months. Genuine marketing at a market rate for public houses, for a consistent period of 18 months has been carried and that the public house is no longer considered economically viable when considered against the CAMRA's Public House Viability

In the event that a public house is listed on the Assets of Community Value register and is offered for sale, the local community is given six months to prepare a bid to buy it. In such circumstances the marketing statement could be reduced to a period of a minimum continuous period of twelve months in addition to the six months that the community has to prepare a bid to buy it. This evidence should demonstrate that the existing use is no longer financially viable through the submission of financial evidence. Marketing details also need to include a site description, photographs and reasonable terms commensurate with public house use. In cases where a public house use has ceased it has to be successfully demonstrated that there is no local need or demand (including from new landlords or brewery).

Key supporting documents

- CAMRA Guidance – Pub Planning Policy Tool Kit (2014)
- 'How to save London's pubs as community resources' - Steve O'Connell, London Assembly GLA (2013)
- The Social Value of Community Pubs (2012)

### **Where we are now and why we are proposing this Policy**

The National Planning Policy Framework (NPPF) in paragraph 69 states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The loss of public houses over recent years has increased due to rising property values, changing drinking and eating habits and breweries increasingly prepared to consider alternative uses for loss making public houses (CAMRA, May 2013). The importance of public houses as a community asset has been acknowledged through the NPPF which requires local authorities to 'plan positively' for such uses. There is also a body of evidence produced by organisations such as CAMRA (The Campaign for Real Ale), the All Party Parliamentary Beer Group and the Institute for public Policy Research (IPPR) which also supports this view .

### **Decrease in public houses**

CAMRA have identified the following reasons for the reduction in public houses across the country:

- (1) Rising costs faced by landlords
- (2) High rents, particularly in urban locations
- (3) Increasing land value, which raises the amount developers are prepared to pay
- (4) The high price of alcohol in pubs as opposed to the supermarkets and off licences
- (5) Competition from alternative leisure pursuits.

### **Significance of public houses**

The IPPR published 'The Social Value of Community Pubs' (2012). This details the social and community importance of public houses, outlining their importance as hubs for the development of social networks. It notes the significant long-term consequences, and associated costs, for communities with a lack of social infrastructure which can support the wellbeing of both individuals and communities.

In May 2013 CAMRA advised that public house losses had been running at 26 per week in the six months to March 2013.

## **DM23: Providing for cemeteries and burial grounds**

**The Council will support applications for new cemeteries and burial grounds where the proposals:**

- a) Have good means of access from roads and are near bus routes or other transport nodes;**
- b) Are located in areas of with no risk of flooding from all potential sources of flooding;**
- c) Are not located in a Groundwater Source Protection Zone;**
- d) Would not have unacceptable adverse impact on the biodiversity of the borough; and**
- e) Are not located in Metropolitan Green Belt or on Metropolitan Open Land unless it has been demonstrated that there are no suitable sites that are not in Metropolitan Green Belt or on Metropolitan Open Land, there is no impact on openness and existing provision of public access is maintained.**

### **Where we are now and why we are proposing this Policy**

A burial needs study of Croydon reveals a need to accommodate 10,000 deaths by 2031 and consequently a need for 1,900 new burial spaces. The London Plan also encourages boroughs to consider supplying burial grounds close to the borough they are in. Past burial trends and future predictions on population and burial rates indicate that there is a quantitative burial need in the Borough to provide for around about 10,000 full body burials and burial cremated remains, or 450 per year, for the next twenty years.

Sites within the borough were considered by the Council but were found to be unsuitable following on from a detailed investigation regarding archaeology and groundwater. In a result to this, the decision was taken to pursue an extension of the Council owned cemetery in Tandridge. Croydon's Bereavement Services team has met with officers in adjoining boroughs to discuss the proposal and to consider the scope for cross borough burial arrangements.

A planning application for the burial ground was submitted to Tandridge but permission was refused in February 2014. An appeal against this decision has been submitted but was not successful.

The service is considering the issues raised by the Planning Inspectorate for not upholding the appeal against the original planning application as part of exploring all options.



## **How the policy works**

A new cemetery or burial ground needs to be well accessed from roads and bus routes or other transport nodes in order to be accessible for residents of the borough to visit.

Cemeteries and burial grounds would be particularly adversely affected by flooding. Therefore, they must not be located in areas of flood risk (from any source of flooding). Applications would be subject to consultation with the Environment Agency and will be refused if there is any risk of flooding to the site irrespective of whether a sequential test demonstrates that there are no other suitable sites within the borough.

They also have a greater potential to contaminate groundwater supplies. Groundwater provides a third of our drinking water in England and Wales, and it also maintains the flow in many rivers. In some areas of Southern England, groundwater supplies up to 80% tap water. It is crucial that these supplies and sources are looked after and ensure that tap water is completely safe to drink. The Environment Agency has defined Groundwater Source Protection Zones for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. Maps are available from the Environment Agency (on their website) showing the extent of Groundwater Source Protection Zones in Croydon.

National Planning Policy Framework lists facilities for cemeteries as potentially being acceptable in Green Belt. However, the presumption is that this is for existing cemeteries and that new cemeteries and burial grounds need to demonstrate exceptional circumstances before being permitted in Green Belt (and by default, Metropolitan Open Land).

Therefore, a new cemetery or burial ground will only be permitted in Metropolitan Green Belt or Metropolitan Open Land if it has first been demonstrated that there are no suitable sites outside of Metropolitan Green Belt or Metropolitan Open Land. These sites do not have to be within the borough boundary of Croydon. Furthermore, any ancillary facilities associated with a new cemetery or burial ground must be kept to a minimum so that there is no impact on openness of Metropolitan Green Belt or Metropolitan Open Land. Existing public access to any site in Metropolitan Green Belt or Metropolitan Open Land must also be maintained.

Cemeteries and Burial Grounds are not acceptable on Local Green Space as these are green spaces which are special to a local community and have a particular local significance such as a recreational use or wildlife area and not an extensive tract of land. In accordance with the NPPF they enjoy the same policy status as Green Belt and Metropolitan Land.

### Key supporting documents

Burial Land Need and Provision Study (2010)

Infrastructure Delivery Plan (2016)