

**Croydon Local Plan: Strategic  
Policies (Partial Review) and Detailed  
Policies and Proposals Evidence  
Base**

**Technical Paper – Heritage Assets and  
Conservation**

**2016**

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# 1. Introduction

- 1.1. This technical note sets out and discusses the policy context and evidence that have informed policy SP4 of the Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) and Policy DM19 of the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission).
- 1.2. Section 2 states the relevant policy context (national, regional and local). Sections 2-3 state the proposed policies 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 the individual pieces of evidence it is recommended that you look at the evidence documents themselves which can be found at:  
[www.croydon.gov.uk/planningandregeneration/framework/lpevidence](http://www.croydon.gov.uk/planningandregeneration/framework/lpevidence).

## 2. Policy Context

### National Planning Policy

2.1 The National Planning Policy Framework (NPPF) sets out the requirements for the protection and enhancement of the borough's heritage assets. A heritage asset is defined as:

*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).*

2.2 The core land-use planning principles in the NPPF should underpin both plan-making and decision-taking. The NPPF states that planning should “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*”.

2.3 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, and ensure that policies and decisions “*respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation*”.

2.4 Section 12 of the NPPF relates to conserving and enhancing the historic environment, with a particular focus on heritage assets. Paragraph 126 states that:

*Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:*

- *The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *The desirability of new development making a positive contribution to local character and distinctiveness; and*
- *Opportunities to draw on the contribution made by the historic environment to the character of a place.*

2.5 Paragraph 127 states that when considering the designation of conservation areas “*Local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest*”.

2.6 Paragraphs 128-134 relate to the identification and assessment of significance of any designated heritage assets affected when determining a planning application. The level of detail used to describe the significance of a heritage asset is expected to be proportionate to the asset's importance. The NPPF (paragraph 132) states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, and if it would lead to

**substantial harm** or total loss of significance of a designated heritage asset, consent should be refused unless the substantial public benefits outweigh that harm or loss. If a proposal would lead to less than substantial harm, it should be weighed against the public benefits of the proposal, including securing its optimum viable use.

2.7 Paragraph 135 relates to the effect of an application on the significance of a non-designated heritage asset. The NPPF clearly states that the effect on a non-designated heritage asset should be taken into account, using a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.

2.8 Paragraph 141 states that *“Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. They should also require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted”*.

## The London Plan

2.9 Policy 7.8 of the London Plan relates to heritage assets and archaeology. The relevant sections of the policy are listed below:

- A. *London’s heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.*
- F. *Boroughs should, in LDF policies, 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.*
- G. *Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.*

2.10 The London Plan (paragraph 7.31-7.31b) asserts that the careful protection and adaptive re-use of heritage buildings and their settings is crucial to their preservation. It reiterates paragraphs 128-134 of the NPPF in that substantial harm to or loss of a designated heritage asset should be exceptional, and when a development proposal will lead to less than substantial harm to the significance of a designated asset, it should be weighed against the public benefits of the proposal, including securing its optimum viable use. Heritage assets should be protected from inappropriate development that is not sympathetic in terms of scale, materials, details and form.

2.11 In relation to Local Designated Views, Panoramas and Landmarks, Policy 7.7 ‘Location and Design of Tall and Large Buildings’ of the London Plan states

- D. *Tall buildings should b) should not impact on local or strategic views adversely*

2.12 Policy 7.11 The London View Management Framework, relates to London Views but the principles for the selection of the views and landmarks as listed below relevant to Croydon-

- A. ....*These views are seen from places that are publicly accessible and well used....*
- B. *Within the designated views the Mayor will identify landmarks that make aesthetic, cultural or other contributions to the view and which assist the viewer's understanding and enjoyment of the view*
- C. *The Mayor will also identify strategically important landmarks in views that make a significant contribution to the image of London at the strategic level or provide a significant cultural orientation point. He will seek to protect vistas towards strategically important landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a protected vista. These elements together form a protected vista. Each element of the vista will require a level of management appropriate to its potential impact on the viewer's ability to recognise and appreciate the strategically important landmark.*

2.13 The supporting text of paragraph 7.37 it is stated that *'the Mayor will seek to protect the composition and character of, particularly if they are subject to pressure from development. New development will often positively contribute to the views and can be encouraged. However in others, development is likely to be compromise the setting or visibility of a key landmark and should be resisted.'*

2.14 Policy 7.12 Implementing the London View Management Framework includes the following that are particularly of relevance to Croydon

- B. *Development in the foreground and middle ground of a designated view should not, be overly intrusive, unsightly or prominent to the detriment of the view. C Development proposals in the background*
- C. *Development proposals in the background of a view should give context to landmarks and not harm the composition of the view as a whole....*
- D. *In addition to the above, new development in designated views should comply with the following: a London Panoramas – should be managed so that development fits within the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole. The management of views containing Strategically Important Landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the Strategically Important Landmark in the foreground, or background where appropriate.*
- E. *Viewing places should be accessible and managed so that they enhance people's experience of the view.*
- F. *In addition to the above, where there is a Protected Vista: a development that exceeds the threshold height of a Landmark Viewing Corridor should be refused*
- J. *Boroughs should reflect the principles of this policy and include all designated views, including protected vistas, into their Local Development Frameworks. Boroughs may also wish to use the principles of this policy for the designation and management of local views*

## Local Planning Policy

2.15 The Croydon Local Plan: Strategic Policies (proposed submission) - (CLP1.1) contains the following strategic objectives which are relevant to heritage assets and conservation:

*Strategic Objective 5: Ensure that high quality new development both integrates, respects and enhances the boroughs natural environment and built heritage.*

*Strategic Objective 7: Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.*

2.16 Based on the above policy context, the protection and enhancement of Croydon's heritage assets in line with the National Planning Policy Framework is essential to achieve the 'We are Croydon' long-term vision. Therefore, Croydon needs to ensure protection of its heritage assets and their settings, to retain local distinctiveness and character.

## Issues

2.17 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, the protection of heritage assets and the retention of local distinctiveness and to help increase the local community's sense of ownership and pride.

2.18 Over a number of years more areas have been designated as Local Areas of Special Character, that did not always have a significant heritage value but were attractive to look at and valued by the local community. The criteria were not well defined in terms of heritage significance and there is a need to align with the NPPF and in particular paragraphs 126,128-134.

2.19 A list of Views, Croydon panoramas and Landmarks were listed in the Unitary Development Plan, 2006, with the list carried forward into the adopted Croydon Local Plan: Strategic Policies 2013. Some views in the interim had been obstructed by tree growth, whilst, with the development of Croydon's Borough Character Appraisal and Conservation Area Management Plans, new views, local landmarks and panoramas were identified that could be considered for designation. Policy SP4 of the adopted Local Plan had also introduced a public realm map (Figure 5.1) which identified key routes that a majority of the local community use to connect to the District Centres within and outside the borough including the Strategic Road Network. There are key views and landmarks along some of these routes that were not previously designated in the UDP or Local Plan that inform the local character and provide the community with orientation.

2.20 There is a need to enable sustainable development in compliance with the NPPF. Heritage has been seen in the past as hindering growth, rather than being a positive to assist regeneration. The Old Town Masterplan is an example of a heritage led approach to growth which Croydon produced and was adopted in 2014. In accordance with the Strategic Objective 5 of the Local Plan, Croydon has proposed the Policy DM19 to facilitate this approach.

## 3. Policy SP4: Urban Design and Local Character

3.1 This section of the technical paper looks at Policy SP4.11 – SP4.15 of the Croydon Local Plan: Strategic Policies (Proposed Submission) and sets out the evidence and methodologies underpinning the proposed policy amendments, and how this relates to the broader policy context.

### Character, Conservation and Heritage

**SP4.11**The Council and its partners will promote the use of heritage assets and local character as a catalyst for regeneration and cohesion and to strengthen the sense of

place.

**SP4.12** The Council and its partners will respect, and optimise opportunities to enhance, Croydon's heritage assets, their setting and the historic landscape, including through high quality new development and public realm that respects the local character and is well integrated.

**SP4.13** The Council and its partners will strengthen the protection of and promote improvements to the following heritage assets and their settings<sup>1</sup>:

- a) Statutory Listed Buildings;
- b) Conservation Areas;
- c) **Registered** Historic Parks and Gardens;
- d) Scheduled Monuments;
- e) Archaeological Priority Areas;
- f) Local List of Buildings **of Historic or Architectural Importance**;
- g) Local List of Historic Parks and Gardens;
- h) Local ~~Areas of Special Character~~ **Heritage Areas**
- i) Local Designated Views;
- j) Croydon Panoramas; and
- k) Local Designated Landmarks

**SP4.14** The Council will maintain a regularly updated schedule of Croydon's designated heritage assets and locally listed heritage assets.

**SP4.15** The Council and its partners will promote improvements to the accessibility of heritage assets to allow enjoyment of the historic environment for all.

## How the policy works/key evidence

3.2 Policy SP4 (Urban Design and Local Character) supports the creation of places that are well designed, safe, accessible, inclusive and enrich the quality of life for all those who live in, work in and visit the borough.

3.3 Policies SP4.11, SP4.12, SP4.14 and SP4.15 of the Croydon Local Plan: Strategic Policies (Proposed Submission) are retained as adopted, and do not represent a policy shift. The primary change in CLP1.1 is that Policy SP4.10 has been updated to reflect changes in designation from Local Areas of Special Character to Local Heritage Areas. A review of Local Designated Landmarks, Croydon Panoramas, Landmarks and a review of the designations for Archaeological Priority Areas has also been undertaken and is further discussed below.

3.4 In the list of types of heritage assets under SP4.13 'Registered' has been added to Historic Parks and Gardens for clarity and completeness, as has 'of historic or architectural importance' to Locally Listed Buildings.

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<sup>1</sup> A full list of heritage assets can be found in Appendix 5 of the Strategic Policies (Proposed Submission)



## Local Heritage Areas

3.5 In the context of the protection and enhancement of Croydon's heritage assets under Policy SP4.13, the Council has de-designated Local Areas of Special Character and has designated Local Heritage Areas (LHAs). The evidence base supporting this change is the [Local Heritage Areas Review](#) (2016).

3.6 LASCs were first designated in the Croydon Unitary Development Plan (UDP) 1997 and again with the adoption of the Croydon Local Plan: Strategic Policies in 2013. LASCs were identified as areas of the borough which, although unlikely to meet the criteria for designation as conservation areas, possessed architectural, townscape and environmental quality, considered at the time to be of significant local value. Although not explicitly stated, heritage significance was always at the centre of their designation. In particular the UDP policy emphasised encouraging the retention and restoration of buildings that contribute to the special character of the area; alterations should respect the quality, setting and character of neighbouring buildings in LASCs.

3.7 The purpose of the Local Heritage Areas review (2016) was to redefine the designation of non-statutory Local Areas of Special Character (LASC) against a better defined heritage based criteria. In summary, the review aimed to:

- Provide robust and transparent criteria for the designation of LHA that meets National Planning Policy Framework (NPPF) requirements and represents a comprehensive and sound basis for designation.
- Provide comprehensive information about the transition from LASC to LHA.
- Examine existing Local Areas of Special Character and those proposed in the course of consultation on the Croydon Local Plan: Detailed Planning Policies against the new set of designation criteria.
- Recommend Croydon Local Plan designations appropriate for the management of development in the assessed areas.
- Make information about LHA, including descriptions and reasons for designation publicly accessible.

### Local Heritage Area Designation Criteria

3.8 A comprehensive set of designation criteria was developed to reflect the status of LASC as LHA, the new policy framework introduced by the NPPF and the Croydon Local Plan: Strategic Policies (CLP1) with an associated evidence base related to Borough Character Appraisal (2013). The criteria are based on the original LASC designation criteria outlined in the Croydon Unitary Development Plan (1992 and 2006) and the results of the public consultation of the Croydon Local Plan: Detailed Planning Policies (2014).

3.9 In order to qualify for designation as a Local Heritage Area, an area (1) must be of heritage significance, and (2) must meet one or more of the following three criteria:

#### ARCHITECTURE

The architecture in the area must be of a high quality, distinctive and well preserved. This is because:

- of the collective value of a group of historic buildings with consistent architectural form, style, features, detailing or materials; and
- the group will often, but not always, have been built as a single development over a short period of time.

#### TOWNSCAPE

The townscape of the area must be of high quality, distinctive and well-preserved. This is because:

- of the attractive and historic composition of urban form; and

- the area will often, but not always, have been planned.

#### LANDSCAPE

The landscape of the area must be of a high quality, distinctive and well preserved. This is because:

- of the distinguishing quality, extent or features of its historic landscape; and
- it will often, but not always, have been planned.

### The Review Process

The Local Heritage Areas is a result of a detailed review conducted by the Council consisting of:

- Public consultation completed in autumn 2013 on the designation criteria and call for new areas to be considered for designation.
- Re-engagement with the public completed in winter 2014 with those who proposed sites for LHA designation.
- Desk top studies completed in winter 2014.
- Historic research completed in spring – summer 2014.
- Site visits completed in spring – summer 2014.
- Internal workshops within Department of Development and Environment completed in summer 2014.
- Consultations with Councillors through Member Liaison Group (MLG) to be carried out in November 2014.
- Public consultation completed in December 2015 on the proposed designations of Local Heritage Areas

3.10 As stated in the [Local Heritage Areas Review](#) (2016), areas examined against the Local Heritage Area Designation Criteria were 39 existing LASCs, and 17 new proposals for LHAs suggested during the course of consultation on the Croydon Local Plan: Detailed Policies and Proposals.

### Areas Recommended for Local Heritage Area Designation

3.11 The review resulted in 25 Local Heritage Area designations which are listed in Table 5.1 of the Strategic Policies (Proposed Submission) and shown on the policies map. These form a more robust basis for the protection and enhancement of the borough's character and heritage, in accordance with the NPPF (in particular paragraph 127). The reasons for recommendation for Local Heritage Area designation are included in the below table.

**Table 1 Areas Recommended for Local Heritage Area Designation**

	NAME OF LOCAL HERITAGE AREA	CURRENT DESIGNATION	RECOMMENDATIONS	LLB proposal	ARCHITECTURE	TOWNSCAPE	LANDSCAPE
1.	Addiscombe College Estate	LASC 2013	LHA Former name: Inglis Road LASC	NO	<input checked="" type="checkbox"/>		
2.	Auckland Rd	proposed LHA 2014	LHA	18 & 31 Auckland Rd	<input checked="" type="checkbox"/>		
3.	Beatrice Avenue	LASC 1997	LHA	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
4.	Bingham Road	LASC 2013	LHA	TBC	<input checked="" type="checkbox"/>		

	NAME OF LOCAL HERITAGE AREA	CURRENT DESIGNATION	RECOMMENDATIONS	LLB proposal	ARCHITECTURE	TOWNSCAPE	LANDSCAPE
5.	Birdhurst Rd	LASC 1997	LHA	47, 49-51 Birdhurst Rise 12 Birdhurst Rd	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
6.	Bishops Walk	LASC 1997	LHA	NO		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
7.	Brighton Rd (Purley)	LASC 1997	LHA + extend boundaries	2-14 High Street	<input checked="" type="checkbox"/>		
8.	Campden Rd & Spencer Rd	LASC 2013	LHA	NO	<input checked="" type="checkbox"/>		
9.	Chipstead Valley Rd (St Dunstan's Cottages)	LASC 2013	LHA	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
10.	Henderson Rd	LASC 1997	LHA	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
11.	Ingatestone Rd	LASC 1997	LHA	NO	<input checked="" type="checkbox"/>		
12.	Laud Street	LASC 2013	LHA	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
13.	London Rd (Broad Green)	LASC 1997	LHA + reduce boundaries	TBC	<input checked="" type="checkbox"/>		
14.	London Rd (Norbury)	LASC 1997	LHA + reduce boundaries Former name: St Helen's LASC	2-4 and 6-8 St Helen's Rd 1370 London Rd	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
15.	Pollards Hill South	LASC 1997	LHA	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
16.	Portland Rd Terrace	LASC 2013	LHA + reduce boundaries section of former Portland Rd LASC	TBC	<input checked="" type="checkbox"/>		
17.	Portland Rd Market Parade	LASC 2013	LHA + reduce boundaries	TBC	<input checked="" type="checkbox"/>		
18.	South End with Ye Market	LASC 1997 LASC 2013	LHA merge and extend boundaries	12 Ye Market	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
19.	St Peter's Rd	LASC 1997	LHA	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
20.	Station Approach Coulsdon	LASC 1997	LHA	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
21.	Stoats Nest Village	proposed LHA 2015	LHA	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
22.	Stuart Crescent	LASC 2013	LHA	NO		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
23.	The Netherlands	LASC 2013	LHA + reduce boundaries	NO	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

	NAME OF LOCAL HERITAGE AREA	CURRENT DESIGNATION	RECOMMENDATIONS	LLB proposal	ARCHITECTURE	TOWNSCAPE	LANDSCAPE
24.	Thornton Heath	proposed LHA 2014	LHA	NO	<input checked="" type="checkbox"/>		
25.	Upper Shirley Rd	LASC 1997	LHA + reduce boundaries	NO	<input checked="" type="checkbox"/>		

### Areas not recommended for Local Heritage Area Designation

The areas that did not comply with the Local Heritage Area Designation Criteria are listed in Table 2 below, including a summary of the justification for non-compliance as set out in the Local Heritage Areas review (2016).

**Table 2 Areas not recommended for Local Heritage Area Designation**

NO	NAME	CURRENT DESIGNATION	NON COMPLIANCE JUSTIFICATION	LLB PROPOSAL
1.	<b>140-158 Melfort Rd</b>	LASC 2013	In recent years the buildings at Numbers 140-158 Melfort Road have lost most of their original features or had them replaced with poor quality substitutes. As a result, their heritage value and architectural significance has been substantially reduced and the specific criteria for designation as a Local Heritage Area in relation to Numbers 140-158 Melfort Road are not met.	NO
2.	<b>169-205 Melfort Rd</b>	LASC 2013	None of the specific criteria for designation as Local Heritage Area in relation to No's 169-205 Melfort Road have been met. The design is distinctive in the area, but does not clearly show the heritage value and represents a typical residential development of 1930's.	NO
3.	<b>Box Ridge</b>	proposed LHA 2014	The development in Box Ridge Avenue, Purley Rise and Hill Road is well integrated with the rich topography and mature landscape with mature tree lines made of lime, chestnut and maples, which are an important feature; however it does not clearly show historic or heritage value, or contain architecturally significant buildings which would meet the criteria for Local Heritage designation.	NO
4.	<b>Cheston Av</b>	1997	Cheston Avenue is a well preserved area revealing architectural and urban design typical of the International Modern movement of 1930's, but none of the specific Local Heritage Area designation criteria have been met.	NO
5.	<b>Court Av</b>	LASC 1997	Court Avenue displays architectural and townscape features typical for suburban development of the 1930's in Britain. The buildings of distinctive architectural merits are on the Local List. None of the specific criteria for Local Heritage Area designation have been met.	NO
6.	<b>Covington Way</b>	LASC 2013	Covington Way does not reveal distinctive elements which would meet the criteria for Local Heritage Area designation. Despite its exceptional visual relationship with the Conservation Area, the grouping is characteristic of other suburban developments in the area, with typical house and townscape features.	NO

NO	NAME	CURRENT DESIGNATION	NON COMPLIANCE JUSTIFICATION	LLB PROPOSAL
7.	<b>Denning Rd</b>	proposed LHA 2014	Denning Road and Layton Crescent / Holder Crescent has a very interesting layout that contains a large crescent with circular green spaces in the middle. Though the original layout is well preserved, the quality of townscape is not high due to oversized public realm in relation to the scale of buildings, plain architecture and poor soft landscaping. None of the specific criteria for Local Heritage Area designation have been met.	NO
8.	<b>Dornton Rd</b>	LASC 1997	The Dornton Road area contains buildings with a typical design that can be seen in the other areas in Croydon. Alterations such as roof and side extensions, replacement UPVC windows and loss of front gardens have had a detrimental impact on heritage value due to the loss of original features. None of the specific criteria for Local Heritage Area designation has been met	No.48 Croham Road
9.	<b>East Hill</b>	proposed LHA 2014	The East Hill and part of Hook Hill area does not reveal distinctive elements which would meet the criteria for Local Heritage Area designation. It is characteristic of other suburban developments in the area, with typical house types, townscape and landscape features.	NO
10.	<b>Ecclesbourne Rd</b>	LASC 1997	Buildings of Ecclesbourne Road frontage, though distinctive in the context of the area, do not reveal heritage significance or high quality components which would meet the criteria for Local Heritage Area designation.	NO
11.	<b>Elstan Way</b>	proposed LHA 2014	As a single building it does not meet the criteria for LHA designation. Consider for LLB.	NO
12.	<b>Epsom Rd</b>	LASC 1997	While the Epsom Road area contains a few distinctive buildings, It is characteristic of other suburban developments in the area, with typical house types, townscape and landscape features. The area does not reveal distinctive elements which meet the criteria for Local Heritage Area designation.	TBC
13.	<b>Foxley Ln</b>	LASC 2013	The Foxley Road and Smitham Bottom Road area does not reveal distinctive elements which would meet the criteria for Local Heritage Area designation. It is characteristic of other suburban developments in the area, with typical house types, townscape and landscape features.	TBC
14.	<b>Hartley Farm</b>	LASC 2013	The Hartley Way and Hartley Farm area does not reveal distinctive elements which would meet the criteria for Local Heritage Area designation. Although it is exceptionally well maintained and is laid out to provide scenic views, it is characteristic of other interwar developments in the area, with typical house types, townscape and landscape features.	Nos 10 & 30 Hartley Way

NO	NAME	CURRENT DESIGNATION	NON COMPLIANCE JUSTIFICATION	LLB PROPOSAL
15.	Huntly Rd	LASC 2013	Huntley Road and Sangley Road contain buildings with a typical design that can be seen in the other areas in Croydon with some bespoke features. Alterations such as roof and side extensions, replacement UPVC windows and loss of front gardens have had a detrimental impact on heritage value due to the loss of original features significantly narrowed the character of Sangley Road. Overall the area does not reveal heritage significance. None of the specific criteria for Local Heritage Area designation has been met	NO
16.	Northampton Rd	proposed LHA 2014	The area between Northampton Road, Northampton Road and Shirley Road, Addiscombe Road and Lower Addiscombe Road is an attractive residential location representing a typical interwar suburban development, similar to many others in Croydon and in the country. There are a number of well-preserved buildings of note scattered over a large area that represent potential for local listing. Addiscombe Recreation Ground forms the only distinctive landscape element in this area and it is currently on Croydon's Local List of Parks and Garden.	No's 23, 61-63 Northampton Rd, No10& 15 Cheyenne Walk
17.	Oakwood Av	proposed LHA 2014	The Oakwood Avenue area does not reveal distinctive elements which would meet the criteria for Local Heritage Area designation. It is characteristic of other suburban developments in the area, with typical house types, townscape and landscape features.	No 23, No 35, Little Barn (opposite No 56, adjacent to 75)
18.	Peaks Hill	proposed LHA 2014	The Peaks Hill area does not reveal distinctive elements which would meet the criteria for Local Heritage Area designation. It is characteristic of other suburban developments in the area, with typical house types, townscape and landscape features.	TBC
19.	Penwortham Rd	proposed LHA 2014	The Penwortham Road is an attractive residential street with an architectural style, townscape and landscape that are characteristic of other suburban developments in the Croydon. It does not reveal any significant heritage value or contain distinctive elements which would meet the criteria for Local Heritage Area designation.	No's: 33, 68, 70 Penwortham Road & 83 Purley Downs Road

NO	NAME	CURRENT DESIGNATION	NON COMPLIANCE JUSTIFICATION	LLB PROPOSAL
20.	<b>Preston Rd</b>	LASC 1997	Preston Road is an attractive and well preserved single street frontage from the end of C19 containing a variety of well-kept typical architectural features of early vernacular style. It does not however reveal the particular heritage value, or contain buildings of architectural significance which would meet the criteria for Local Heritage designation.	NO
21.	<b>Purley Way airport</b>	proposed LHA 2014	A single building does not meet the criteria for LHA designation.	Airport hotel
22.	<b>St Paul's Rd</b>	LASC 1997	The character of the St Paul's Road, Norfolk Road, Manchester Road, Liverpool Road and Norwich Road area, though its historic layout represents a heritage value, does not display distinctive elements which would meet the criteria for Local Heritage Area designation.	NO
23.	<b>Stanhope Rd</b>	LASC 2013	The Stanhope Road area is an attractive residential location containing a variety of well-kept typical domestic architectural styles set in high quality townscape and landscape. It does not however reveal the areas historic or heritage value, or contain buildings of architectural significance which would meet the criteria for Local Heritage designation.	NO
24.	<b>West Hill</b>	LASC 2013	Though West Hill area contains a number of buildings inspired by Arts and Crafts style, it represents fairly typical pattern of development for the higher end suburban development in 1930's. The area's historic or heritage value is not readily apparent and it does not represent coherent architectural significance which would meet the criteria for Local Heritage designation.	32 West Hill
25.	<b>Whitgift Estate</b>	proposed LHA 2014	The Whitgift Estate area is an attractive residential location; however does not reveal distinctive elements which would meet the criteria for Local Heritage Area designation.	18 Fitzjames Avenue
26.	<b>Wickham Rd</b>	proposed LHA 2014	As a single building it does not meet the criteria for LHA designation.	Crown PH
27.	<b>Woodcote Estate</b>	LASC 2013	The Woodcote Estate exhibits high quality townscape and landscape features but it does not clearly reveal historic or heritage value, or represent coherent architectural significance which would meet the criteria for Local Heritage designation.	NO

NO	NAME	CURRENT DESIGNATION	NON COMPLIANCE JUSTIFICATION	LLB PROPOSAL
28.	<b>Woodcote Valley Rd</b>	LASC 2013	The Woodcote Valley Road area is an attractive residential location but does not reveal distinctive elements which would meet the criteria for Local Heritage Area designation. The area does contain a number of buildings of architectural note which will be put forward for local listing	Nos: 55+57, 47+49, 20, 24, 60, building at corner of WVR and Manor Way 18, 23 Manor Way
29.	<b>Woodland Way</b>	proposed LHA 2014	It is fortunate that this area of woodland has been preserved, though it has substantially diminished in size since 1933. The built environment does not bear any particular relationship to the copse: the houses are typical of the surrounding suburban areas, and are not considered of significant architectural merit. Criteria for Local Heritage Area designation have not been met.	NO

The review is considered to be consistent with the NPPF and London Plan policy direction as heritage assets would be identified and conserved in a manner appropriate to their significance. In particular, the concept of conservation is not devalued through the designation of areas that lack special interest.

## Local Designated Views, Croydon Panoramas, and Local Designated Landmarks

3.12 The Local Designated Views, Panoramas and Landmarks listed in Appendix 5 of CLP1.1 have been reviewed against the criteria developed from a series of meetings of council officers in May 2012 onwards, which considered the London Plan policies, the NPPF on its introduction and definitions in Croydon's UDP 1997 and 2006 which stated that

- *Croydon recognises that views and landmarks within Croydon contribute a variety and interest to the townscape that reinforces Croydon's sense of place and gives local identity.*
- *The definition of a Landmark is stated as 'A landmark building or structure that contributes significantly to the image and built environment of Croydon; that is easy to see and recognise, that provides an orientation point and that is visible in long views from around the Borough.'*
- *The definition of a Local View is stated as 'A view that contributes significantly to the image and built environment of Croydon; where the viewing place is open, publicly assessable and well used, where the view is clearly defined and focusses on a building of significant architectural or historic importance and where it makes a significant contribution to the character of the locality'*
- *The definition of a Croydon Panorama is stated as 'A view that contributes significantly to the image of the built environment of Croydon; where the viewing place is open, publicly assessable and well used, and the majority of the Croydon Metropolitan Centre cluster is visible.'*



3.13 Alongside the UDP definitions, the London Plan Policy 7.12 'Implementing the London View Management Framework' was taken into account, and although there are no strategic views located in Croydon identified in the London Plan the principles were considered in establishing the criteria for Croydon's views and landmarks and to establish an updated list to that of CLP1.

3.14 The criteria for the viewpoints for Local Designated Views and Croydon Panoramas included in the Proposed Submission of the Croydon Local Plan: Strategic Policies – Partial Review is in the Glossary in Appendix 1, is in alignment with the London Plan Policy 7.11 A, B, and C and is listed below in bold.

- **'The viewpoint must be in a publicly accessible location in a major public area or'.....**

This is established as in line with the previous definition from the UDP for viewpoints and a major public area that is accessible to many people is in line with the Mayor's SPG on the London View Management Framework, the London Plan, and paragraph 126 of the NPPF regarding cultural and social, economic and environmental benefits that conservation of the historic environment can bring. It also may assist in providing a sense of belonging and ownership to the community in line with Strategic Objective 7 of the Croydon Local Plan.

- **'The viewpoint must be located in an area or on routes identified in Figure 5.1 of the Croydon Local Plan: Strategic Policies for public realm improvements.'**

This network of roads was identified in the adopted Strategic Policies of CLP1 in 2013 and incorporates the Strategic Road Network and the main roads linking District Centres within and outside the borough and are considered as the roads most accessed and therefore the views are more frequently seen by the community and where strategically important views to the borough should be identified. This also aligns with the principles of the London View Management Framework.

3.15 For Local Designated Views the criteria for the subject matter states

- **'The subject matter must contribute positively to the local character;'** This aligns with the definition in the UDP, the NPPF Section 12, and the London Plan (Policy 7.8).
- **'Key landmarks (Local Designated Landmarks) are seen or it is a unique view and'** This aligns with the London Plan, NPPF and the stipulation of a unique view comes from the fact that Croydon is a place of valleys and hillsides, with many very similar views from the hillsides across the valleys. If the 'uniqueness' were not a consideration the management of the views and the consideration of them in determining planning applications would prove to be impractical.
- **'It must be substantially of a part of the borough'** (This recognises that the subject matter in views outside of the borough are not in the control of Croydon Council and as stated alongside the criteria for Croydon Panoramas).

3.16 The criteria for Croydon Panoramas in addition to the criteria for viewpoints in common with the Local Designated Views and listed in 3.15 above is:

- **'The viewpoint selected is where the widest panorama can be viewed'**. This ensures the viewpoint is located in the optimum position to view the panorama.
- **'The viewpoint selected is also the one that gives the clearest view, has the least obstructions of the subject matter; and'** This is to ensure the view as assessed is of value to be designated and differentiate it from other views from the hillsides that may be of the subject matter but have some obstructions preventing a clear view.

- **'Is a view of substantial parts of the borough of Croydon (views looking out of Croydon are not included as the subject matter is outside the remit of the Council)'** As explained in 3.16 above.

3.17 The criteria for Local Designated Landmarks aligns with the London Plan Policy 7.11 B and C applied to Croydon

- **'It is a prominent building /structure;'** There are many distinctive buildings in Croydon but many are also hidden from view, or set back from the main road/junction and do not have a distinctive street presence. There are a number of public houses on key junctions of roads as Croydon was a staging post in pre motor car times, however the majority cannot be seen in long views or until close up to a junction as they tend to be in built up areas with other buildings partly obscuring views along streets to them. To be a Local Designated Landmark the presence on the street is important to the contribution they make to local character
- **'It is easily recognisable close up;'** This criteria is included to assess the distinctiveness of the architecture and considers their positive role in place shaping ,aligning with the London Plan Policy 7.8 in addition to 7.11B
- **'It is easily recognisable from a distance and in a Local Designated View: and'** This aligns with London Plan Policy 7.11C
- **It positively contributes to the built environment of Croydon, and local distinctiveness and may provide an orientation point/way finding**  
This acknowledges that whilst in compliance with the London Plan policy 7.11 C with regards to providing a '*significant cultural orientation*' the landmark should be one that enhances and adds to the sense of heritage by positively contributing to the area. There are structures and buildings in Croydon that meet all the landmark criteria listed including providing for some orientation/wayfinding but are unsightly and have a negative impact on the local built environment.

3.18 The criteria were not queried in the consultation on Croydon Local Plan: Detailed Policies in 2013(CLP2) and was published in the supporting evidence for the CLP1.1 Preferred Options consultation 6 November -18 December 2015. It is listed in CLP1.1 – Proposed Submission in Appendix 1 – the Glossary.

3.19 The views considered for assessment were taken a number of sources:

- initially from Council Planning Officers, Croydon's evidence base and planning framework including the UDP, The Borough Character Appraisal and the Croydon Opportunity Framework SPD (it identified the same panoramas and landmarks as in the UDP and CLP1, but added linear views along main routes which have not been considered as they do not have a fixed viewpoint, needed to assess and designate local views in the Croydon Local Plan).
- From Members and officer suggestions
- From consultation on the Detailed Policies in 2013 and 2015 on the Preferred Options.

3.20 Each view, panorama and landmark has had a site visit, and photographs taken where possible as part of the assessment against the criteria. The criteria remain unchanged from the Croydon Local Plan: Detailed Polices (Preferred and Alternative Options) October 2013 (CLP2). The Assessment of the Local Designated Views, Croydon Panoramas and Local Designated Landmarks, which includes all the representations which made suggestions, through the consultations of 2013 and 2015 on the Local Plan Preferred Options is available on the Council's website on the local evidence by topic page

for Urban Design, Local Character and Heritage.

<https://www.croydon.gov.uk/planningandregeneration/framework/lpevidence/urban-design-local-character-and-heritage>

## Archaeological Priority Areas

3.21 Together with Historic England, the Council has undertaken a review of its Archaeological Priority Zones (APZ). As part of the review and to align with Historic England's guidelines, APZ's are now referred to as Archaeological Priority Areas (APA) to promote consistency in the recognition and definition of these areas across London. The review is evidenced by information held in the Greater London Historic Environmental Record to ensure its robustness as an evidence base for the Local Plan.

3.22 The review has resulted in a consolidation of APA's across the borough and aligns with the approach taken elsewhere. There are areas where the designation has been removed as the most recent review indicates that there is lesser interest in these areas than previously considered.

3.23 The review introduces tiers of archaeological significance and potential which vary depending on the archaeological significance and potential of that particular area.

3.24 There are instances where Areas of Focussed Intensification correspond with areas designated as APA's. Where development occurs in these areas, as in all other areas of the borough subject to archaeological interest, developers will have to satisfy policy requirements pertaining to the protection of the borough's heritage, in particular Policy DM19.9.

3.25 There were no responses to the consultation which objected to the findings of the APA review undertaken by Historic England.

## Consultation Response on the Preferred and Alternative Options- 2015 on SP4- LHAs, and APAs

3.26 Note the comments on Local Designated Views, Croydon Panoramas and Landmarks are included in the section below on Policy DM18 on Views and Landmarks

<b>Issue/Comment</b>	<b>Council Response with additional comment to the response in the consultation log</b>
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Issue/Comment	Council Response with additional comment to the response in the consultation log
<p>Many comments objecting to the loss of Local Character Areas with concerns that this will undermine Croydon's heritage and benefit developers.</p>	<p>The objections have been noted, however if they were not substantiated in planning terms no changes were made to the list of LHAs proposed.</p> <p>In response to representations received on the Croydon Local Plan some adjustments have been made to the Local Heritage Areas proposed to be included in the proposed submission draft of the Croydon Local Plan.</p> <p>-The Council notes that the Campden Road and Spencer Road area meets designation criteria but was excluded from Local Heritage Area designation on the basis that current status of Locally Listed Buildings would secure sufficient recognition and protection of the key heritage assets. Based on the supporting information from the Conservation Officer, Campden and Spencer Road will be recommended for the Local Heritage Area designation.</p> <p>-It is worth highlighting that St Helen's Road area was recommended for the Local Heritage Area designation with slightly modified boundaries as London Road (Norbury).</p> <p>-Chalfont Road became part of the South Norwood Conservation Area in 2007.</p> <p>-Stoat Nest Village has been examined against designation criteria for Local Heritage Areas in the course of this consultation and is currently proposed for LHA designation</p> <p>The complete Local Heritage Area review is available on the Council's website on the evidence base pages which support the Croydon Local Plan.</p>
<p>Consider Pollards Hill area for the Conservation Area designation</p>	<p>There is no evidence in the Council records to support Conservation Area aspirations for the Pollards Hill area. The complete Local Heritage Area review is available on the Council's website on the evidence base pages which support the Croydon Local Plan.</p>
<p>It is noted that the Council's Archaeological Priority Areas are being reviewed with the support of Historic England. Once the updated information is received, which is expected to be known in the coming weeks, then the list of APA needs to be updated.</p>	<p>The list of Archaeological Priority Areas has been updated to reflect the work carried out by Historic England.</p>

## Sustainability Appraisal

3.27 The Sustainability Appraisal (November 2015) of the Strategic Policies Partial Review is silent on the heritage and conservation aspects of SP4 including Archaeological Priority Areas, with the exception of a brief description of the change from Local Areas of Special Character to Local Heritage Areas in paragraph 19.1.4. However, it acknowledges that policy DM19 is the key policy on heritage assets and conservation that will have a significant positive effect on heritage related sustainability objectives. This is further discussed in the key evidence for DM19 in this Technical Paper. The Sustainability Appraisal states that it is not clear that there is a policy shift in any way with regards to the Local Designated Views, and landmarks in SP4.13, rather that the amendments simply reflect the latest evidence/situation on the ground and that the Strategic Policies Partial Review is to amend the number and extent of the designations on the Policies Map.

## Health Impact Assessment

3.28 The Health Impact Assessment did not consider SP4 as the Policy screening process did not identify that an Assessment was required on these policy.

## 4. Policy DM18 Views and Landmarks

4.1 This section of the technical paper looks at Policy DM18 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.

**DM18.1** The Council will consider the proposed development in relation to its impact on protected Local Designated Views such that developments should not create a crowding effect around, obstruct, or appear too close or high in relation to any Local Designated Landmarks identified in the Local Designated View:

**DM18.2** Developments should enhance Croydon Panoramas as a whole and should not tightly define the edges of the viewing corridors from the Panoramas. Developments should not create a crowding effect around, obstruct, or appear too close or high in relation to any Local Designated Landmarks identified in the Croydon Panoramas.

## How the policy works/key evidence

4.2 The key evidence to inform policy DM18 is listed below:

- The London Plan- Policy 7.11 The London View Management Framework
- The London Plan Policy 7.12 Implementing the London View Management Framework

4.3 The policy is informed by the London Plan policy 7.11 and 12, on the London View Management Framework and as stated in paragraph 2.14 of this report. Although there are no strategic views located in Croydon identified in the London Plan the principles were considered in drafting policy DM18 with regard to ensuring the Local Designated Landmarks can clearly be seen in the Local Designated Views and Panoramas, as local heritage assets which contribute to local character and in compliance with Policy SP4.2 which requires development to 'b) *Protect Local Designated Views, Croydon Panoramas, the Setting of Landmarks, other important vistas and skylines*' and SP4.13 which states '*The Council and its partners will strengthen the protection of and promote improvements to the following heritage assets and their settings*', and lists the Local Designated Views, Croydon Panoramas and Local Designated Landmarks. Policy DM18 provides further guidance on what is meant by Policy SP4.2 in terms of what elements require protection.

4.4 Appendix 5 of CLP1.1 lists what is considered valuable and protectable in both the Croydon Panoramas and the Local Designated Views. Thus development is still enabled

(and in compliance with the NPPF) in the viewing corridor provided that the elements identified as protectable and valuable are still clearly visible in the views.

4.5 , In addition to a number of suggestions made during consultation the Preferred Options and Policy on SP4.13 for new local views, panoramas and landmarks which are in the Assessment of Local Designated Views, Croydon Panoramas and Local Designated Views Evidence – as listed in paragraph 3.21 there were the following comments on Policy DM18( formerly DM16 Views and Landmarks) which raised some issues as listed in Table 3

### **Consultation Response on the Preferred and Alternative Options- 2015 on DM18- Table 3 Comments and Responses**

<b>Issue/Comment</b>	<b>Council Response with additional comment to the response in the consultation log</b>
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Issue/Comment	Council Response with additional comment to the response in the consultation log
<p>2843/01/009</p> <p>The policy should be reworded to the following 'Developments should conserve or enhance the Croydon panorama'. It is considered that conserve in this context means 'not harm'. Unlike the London View Management Framework, the views mentioned within this policy do not have geometrically defined corridors to strategic corridors and therefore the extract' and should seek to avoid buildings that tightly define the edges of the viewing corridors' is not relevant.</p>	<p>The viewing corridor is not defined but the viewpoint is identified (on the draft Policies Map) and to ensure that the policy aligns with SP4.2b the reference to the viewing corridor is made.</p> <p>Policy DM18.2 is phrased so that the policy aligns with the Strategic Objective 5 of CLP1' <i>Ensure that high quality new development both integrates, respects and enhances the boroughs natural environment and built heritage.'</i></p> <p>Photographs of the Panoramas are included in the Assessment of Local Designated Views, Panoramas and Local Designated Landmarks which show the view that should be considered by those proposing development to consider the potential impact on the Panorama and specifically to ensure that it does not constrict the edges of the viewing corridors and obstruct part of the vista. E.g. in line with London Policy 7.12 and 7.12 D in particular which refers to panoramas '(refer to paragraph 2.14 in this Paper )'</p> <p>if at the viewpoint viewing a panorama and a proposed development close to the viewing point in the foreground would block some degree of the vista it would need to consider if it could be reduced in height/scale to allow the degree of vista to be retained, and in compliance with the principles of Policy 7.12 The supporting text to Policy DM18 explains the assessment approach to new development, but is further explained here as follows in relation to the protection of the Local Designated View and Croydon Panorama-If the proposal obscured a Designated Landmark, or crowded it so it lost its visual separateness in the view, and as listed in Appendix 5 of CLP1.1 as valuable and protectable the development proposal would not be acceptable.</p>

Issue/Comment	Council Response with additional comment to the response in the consultation log
<p>0103/01/007- we support your decision to de-designate Local View 7(New Addington to Addington Palace) and to include a new Panorama from Parkway to Addington Village and Shirley Hills. However there is insufficient data and information in this policy to consider whether it will be effective. There is no description of the viewing point, no description of what can be seen, and no indication as to why this viewpoint is important.</p> <p>0103/01/009There is no indication of what is to be protected, not any assessment methodology to consider how the panorama may be affected</p>	<p>The viewpoint meets the criteria for viewpoints and what is considered valuable and protectable is now included in Appendix 5 of CLP1.1</p> <p>The viewpoint is indicated on the draft Policies Map.</p>
<p>0790/01/001 We object to the de-designation of New Addington to Addington Palace Local Designated View. We believe this helps to protect the panorama from the high chalk ground at New Addington to the wooded hills arising from Gravel Hill and Addington Palace and helps to retain the landscape character of this part of Croydon</p>	<p>The Local Designated View was de-designated as it is not a unique view and a Croydon Panorama was identified that meets the criteria for designation and includes the view of Addington Palace</p>
<p>0129/01/007-8Concerns expressed that although policy approach is deliverable but concerns about the narrow scope it sets- re local landmarks of Leslie Arms, Ashburton Library and Ashburton Park, and East India House, Clyde Hall, St Mary Magdalene and London Metropolitan Cattle Trough</p>	<p>The Council reviewed these proposals against the criteria (<i>which is in alignment with the London Plan</i>). The suggested landmarks do not meet the criteria. The Assessment will be published alongside the Proposed Submission of the Detailed Policies and Proposals</p>
<p>0119/01/001 The proposed new Local View from Kenley Common of Riddlesdown is supported in principle. However the District Council would wish to be consulted on the location of the proposed viewpoint bearing in mind the close proximity to Tandridge</p>	<p>Maps of viewpoints will be made available as supporting evidence for the next consultation. The viewpoint has been adjusted and its map reference is TQ 533218,158728. The view is now proposed as a Croydon Panorama as it is a very side view of Riddlesdown.</p>



Issue/Comment	Council Response with additional comment to the response in the consultation log
<p>Issue: Is there a conflict with Intensification areas and protected views ? </p>	<p>There are 5 proposed Focussed Intensification Areas of which there is not conflict with the following :</p> <p>1)the Local Designated View from Heathfield does not include the Area around Forestdale Neighbourhood Centre( area of Selsdon Park Road /Featherbed Lane) as the view is looking towards New Addington on the hill</p> <p>2) The Croydon Panorama from Riddlesdown of Kenley has no conflict as the area proposed around Kenley Station, is in the valley and there is no designated landmark to protect the view of</p> <p>3) The Croydon Panorama of Croham Hurst looking south west, of Purley and the Downs has no conflict with the Brighton Road (Sanderstead Road) Local Centre as the area is in the valley and any development here would not impact on the view of the owns or its setting and there is no designated landmark identified to protect the view of.</p> <p>4) The Local Designated View from South Norwood Hill of Shirley Windmill is looking up Shirley Hill and the area of Shirley Local Centre and Shirley Road Neighbourhood Centre is lower down the hill and any development here would not impact on the view of the Local Designated Landmark of Shirley Windmill.</p> <p>Where a Designated Landmark is in a view which has a an area of Focussed Intensification and there is a potential conflict is in the area of the setting of Sanderstead Local Centre where the Local Designated Church of All Saints is situated and is in the view From Limpsfield Road, near Wentworth Way of All Saint’s Church. Whilst the Church is on slightly higher land and it is only the Church roof and steeple that can be seen clearly when viewed from the viewpoint in Limpsfield Road, any new development in this area of focussed intensification will need to ensure it does not further obscure the church steeple or its roof.</p>

## Sustainability Appraisal

4.6 The Sustainability Appraisal (November 2015) comments on SP4.13 as stated in paragraph 3.12 in this paper, with no further comments on the Detailed Policy on Local Designated Views, Croydon Panoramas and Local Designated Landmarks.

## Health Impact Assessment

4.7 The Health Impact Assessment did not consider SP4 or DM18 as the Policy screening process did not identify that an Assessment was required on these policies.

## 5. Policy DM19: Heritage Assets and Conservation

5.1 This section of the technical paper looks at Policy DM19 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.

**DM19.1** To preserve and enhance the character, appearance and setting of heritage assets within the borough, the Council will determine all development proposals that affect heritage assets in accordance with the following:

- a) Development affecting heritage assets will only be permitted if their significance is preserved or enhanced;
- b) Proposals for development will only be permitted if they enhance the setting of the heritage asset affected or have no adverse impact on the existing setting;
- c) Proposals for changes of use should retain the significance of a building and will be supported only if they are necessary to keep the building in active use;
- d) Where there is evidence of intentional damage or deliberate neglect to a heritage asset, its current condition will not be taken into account in the decision-making process; and
- e) Proposals for enabling development must have public benefits that outweigh the detriment of departing from other planning policies and the proposed development must be the minimum necessary to secure the heritage asset's long-term future.

**DM19.2** Applications for development proposals that affect heritage assets or their setting must demonstrate:

- a) How particular attention has been paid to scale, height, massing, historic building lines, the pattern of historic development, use, design, detailing and materials;
- b) That it is of a high quality design that integrates with and makes a positive contribution to the historic environment; and
- c) How the integrity and significance of any retained fabric is preserved.

**DM19.3** To preserve and enhance Listed Buildings, Scheduled Monuments and Registered Parks and Gardens within the borough, the Council will determine all development proposals that affect these heritage assets in accordance with the following:

- a) Substantial harm to or loss of a Grade II Listed Building or Registered Park and Garden should be exceptional;
- b) Substantial harm to or loss of a Grade I or II\* Listed Building or a Scheduled Monument should be wholly exceptional; and

c) All alterations and extensions should enhance the character, features and setting of the building or monument and must not adversely affect the asset's significance.

**DM19.4** To preserve and enhance the character, appearance and setting of Conservation Areas within the borough, the Council will determine all development proposals that affect Conservation Areas in accordance with the following:

a) The demolition of a building that makes a positive contribution to the special character and appearance of a Conservation Area will be treated as substantial harm;

b) Where the demolition of a building in a Conservation Area is considered to be acceptable, permission for its demolition will only be granted subject to conditions linking demolition to the implementation of an approved redevelopment scheme; and

c) All proposals for development must have regard to the development principles in the Conservation Area General Guidance Supplementary Planning Document and Conservation Area Appraisal and Management Plan Supplementary Planning Documents or equivalent.

**DM19.5** To protect and enhance the character, appearance and setting of Locally Listed Buildings within the borough, the Council will determine all development proposals that affect Locally Listed Buildings in accordance with the following:

a) Substantial weight will be given to protecting and enhancing Locally Listed Buildings; where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building;

b) All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building; and

c) All proposals for development must have regard to Croydon's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document or equivalent.

**DM19.6** To preserve and enhance the character, appearance and setting of Local Heritage Areas within the borough, the Council will determine all development proposals that affect a Local Heritage Area in accordance with the following:

a) Substantial weight will be given to protecting and enhancing buildings, townscape and landscape features that make a positive contribution to the special character and appearance of a Local Heritage Area; and

b) All proposals for development must have regard for the development principles in the Conservation Area General Guidance Supplementary Planning Document and the Local Heritage Area evidence base.

**DM19.7** Substantial weight will be given to conserving and enhancing landscape features or planting that makes a positive contribution to the special historic character and original layout of Registered and Locally Listed Historic Parks and Gardens.

**DM19.8** All development proposals must preserve and enhance War Memorials and other monuments, and their settings.

**DM19.9** In consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority.

## How the policy works/key evidence

5.2 The key evidence to inform policy DM19 is listed below:

- The Setting of Heritage Assets, Historic England - Historic Environment Good Practice Advice in Planning 3 (2015)
  - Conservation Area Designation, Appraisal and Management - Historic England Advice Note 1(2016)
  - Understanding Place: Historic Area Assessments – English Heritage (2011)
  - Enabling development and the conservation of significant places, English Heritage (2008)
  - Borough Character Appraisal (2015)
  - Croydon's Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document (2007)
  - Conservation Area Appraisal and Management Plans (various)
  - Conservation Area General Guidance Supplementary Planning Document (2013)
  - Local Heritage Areas Review (2014)
  - Croydon Opportunity Area Planning Framework (2013)
  - East Croydon Masterplan (2011)
  - West Croydon Masterplan (2011)
  - Mid Croydon Masterplan (2012)
- and
- Fair Field Masterplan (2013)
  - Old Town Masterplan Supplementary Planning Document (2014)

5.3 Policy DM19 will seek to maintain and enhance the contribution of built, landscaped and buried heritage to environmental quality, cultural identity and economy. The above documents have been used to inform Policy DM19 and associated supporting text. Under policy DM19, the Council will seek to protect all heritage assets (designated and undesignated) from demolition due to their national or local historic and architectural significance, and the contribution that they make to the borough's townscape character.

5.4 Where development proposals affect heritage assets the submission of a full planning application would be sought as opposed to an outline planning application, unless Local Planning Authority has sufficient comfort that the level of detail submitted will ensure that the proposed development will preserve or enhance the affected asset or assets. In accordance with the NPPF (paragraph 128-134) the level of detail used to describe the significance of any heritage asset is expected to be proportionate to the asset's importance.

5.5 The policies give great weight to the conservation of heritage assets in accordance with paragraph 132 of the NPPF and paragraph 7.21-7.31b of the London Plan. In particular:

- Proposals affecting heritage assets that enable development are required to have public benefits that outweigh the detriment of departing from other planning policies (policy DM19.1 (e)).
- Substantial harm or loss to a Grade II asset should be exceptional, or in relation to a Grade I or II\* asset, substantial harm or loss should be wholly exceptional ((DM19.3 (a) and (b)).
- Substantial weight is given to protecting and enhancing locally listed buildings; where demolition is proposed it should be demonstrated that all reasonable attempts have been made to retain all or part of the building (Policy DM19.5(a)).

- Substantial weight is given to protecting and enhancing buildings, townscape and landscape features that make a positive contribution to the character and appearance of a Local Heritage Area (Policy DM19.6 (a)).

5.6 In line with the London Plan, the Council will seek to retain original features and detailing present on buildings and ensure that alterations and extensions to historic buildings are carried out in a manner that does not harm their significance and respects the scale, character, detailing, form and materials of the original building and area.

5.7 In accordance with paragraph 126 of the NPPF, those heritage assets most at risk through neglect, decay or other threats will be managed using the 'Heritage at Risk Register' managed by Historic England. If deemed appropriate, the Council will exercise its legal powers to ensure that essential maintenance of designated heritage assets is undertaken. Further, when a planning application is being considered in circumstances where there is evidence of intentional damage or deliberate neglect to a heritage asset, its current condition would not be taken into account in the decision-making process. The Council will seek to work with partners to secure creative solutions to heritage assets that are at risk so that they can contribute positively to local character and vitality.

5.8 The policy would be read in conjunction with existing and future Council guidance documents including:

- a) Conservation Area General Guidance Supplementary Planning Document;
- b) Conservation Area Appraisal and Management Plan Supplementary Planning Documents;
- c) Local List of Buildings of Historic or Architectural Importance Supplementary Planning Document; and
- d) Residential Extensions and Alterations Supplementary Planning Document.

## Consultation Response on the Preferred and Alternative Options- 2015 on DM19

5.9 During the November to December (2015) consultation period, comments were received from Historic England on DM19. The comments are summarised in the following table:

**Table 4 Historic England Comments and Responses**

<b>Comment note the policy was DM13 in the Preferred and Alternative Options document</b>	<b>Council Response ( with additional comment to the response of the consultation log in italics)</b>
<p>We still have concerns with regards to the treatment of heritage assets, where proposal for intensification takes place within the setting of assets. This could be through individual sites or through a culmination of sites in historically sensitive locations. We would seek to be assured that sufficient policy checks are in place that ensures future developments are sustainable (e.g. deliver equally economic, social and environmental dimensions of sustainable development).</p> <p>Acceptance of our advice on the Strategic Policy Document and comments on policies such as DM10 and DM15 would help towards addressing this concern.</p>	<p>No change made to policy DM17 itself (<i>now DM19</i>) however Historic England's advice was followed on DM10 and DM15 (<i>now DM11 and DM16</i>) and wording changed accordingly to emphasise heritage assets.</p> <p>The comments on Croydon Local Plan: Strategic Policies are noted and have been considered and responded to, other than those made on parts of the Strategic Policies that were not proposed changes and therefore not being consulted on.</p>

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>Policy DM17.5 deals with locally listed buildings. As drafted it does not correctly reflect the advice set out in the NPPF.</p> <p>DM17.5a gives substantial weight to protecting and enhancing locally listed buildings yet the NPPF makes clear that the demolition of a locally listed building requires a balanced judgement to be made having regard to the scale of any harm or loss and the significance of the heritage asset in relation to the proposals for redevelopment. Protecting all locally listed buildings in this way is heavy handed and unimaginative and does not accurately reflect the approach set out in the NPPF. The Policy is unlikely to be sound or achieve the protection sought</p>	<p>The policy is complementary to NPPF and the London Plan and should be read in conjunction <i>with these documents</i>. In order to flag up the option of demolition the bullet point (a) <i>in DM19.5</i> will be expanded to read: 'Substantial weight will be given to protecting and enhancing Locally Listed Buildings; where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building'</p>

## Sustainability Appraisal

5.10 The Sustainability Appraisal identifies policy DM19 (heritage and conservation) as the key policy for conservation of the built environment that will have a significant impact on heritage related sustainability objectives to:

- Maintain and enhance the historic environment
- Bring forward investment in the historic environment for regeneration, reuse and adaptation
- Use heritage assets to provide educational opportunities and combat social exclusion

5.11 The Sustainability Appraisal states that DM17 (now renumbered as DM19) could perhaps give greater emphasis on opportunities for heritage led regeneration, as although the supporting text notes that the Council supports the principle of heritage-led regeneration but no details are provided. It goes on to state that the policy will set out clear requirements to ensure that the character, appearance and setting of heritage assets within the borough is preserved and enhanced. Under the policy, historic buildings should be maintained in their original use wherever possible unless fully justified by demonstration that this is necessary to secure its long term future viability; and where a proposed change of use is fully justified, it should be demonstrated how the building's original fabric and character is to be preserved.

5.12 The policy also recognises that: *"[i]n addition to the collective value of buildings and their relationship to each other, the character of conservation areas and Local Heritage Areas (LHA) may be defined by the wider townscape, land uses, public realm, open spaces, road layout or landscaped areas. This character can be relatively consistent or in larger areas may contain several 'character areas' within the conservation area or LHA. In addition to protecting individual buildings the Council will ensure that the wider character of an area is protected and enhanced."*

5.13 In relation to archaeological heritage, the sustainability objectives are to:

- Maintain and enhance the historic environment

- Facilitate fair and equal access for all members of the community to education and training
- Improve educational and training facilities within the Borough
- Increase in places for children's education

5.14 The SA (2015) states that Policy DM17 (Heritage assets and conservation) includes a requirement that: *"In consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority"*. This policy provides additional clarity to developers about the requirements relating to maintaining archaeological heritage.

## **Viability Assessment**

5.15 The Viability Assessment for the Detailed Policies and Proposals (2015) identifies that Policy DM19, as drafted, would not have cost implications for development, as the requirements reflect the standard protection given to listed buildings and conservation areas by all local authorities.

## **Health Impact Assessment**

5.16 The Health Impact Assessment did not consider DM19 as the Policy screening process did not identify that an Assessment was required on this policy.