

Sustainability Appraisal (SA) of the Croydon Local Plan Partial Review

SA Report
Draft version

December 2021

Quality information

Prepared by	Checked by	Verified by	Approved by
Mark Fessey, Associate Director	Alastair Peattie, Associate Director	Steve Smith, Technical Director	Steve Smith, Technical Director

Prepared for:

London Borough of Croydon

Prepared by:

AECOM Limited
Aldgate Tower
2 Lemn Street
London E1 8FA
United Kingdom
aecom.com

© 2021 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") in accordance with its contract with London Borough of Croydon (the "Client") and in accordance with generally accepted consultancy principles and the established budget. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

1	Introduction.....	1
2	Plan aims and objectives.....	2
3	What is the scope of the SA?	7
Part 1: What has plan-making / SA involved up to this stage?		9
4	Introduction to Part 1	10
5	Establishing growth scenarios	11
6	Growth scenarios appraisal	44
7	The preferred growth scenario.....	53
Part 2: What are the appraisal findings at this stage?		54
8	Introduction to Part 2	55
9	Appraisal of the Partial Review.....	56
Part 3: What are the next steps?		67
10	Plan finalisation	68
11	Monitoring.....	68

1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Croydon Local Plan Partial Review (“the Partial Review”).
- 1.1.2 Once in place, the Partial Review will serve to adjust the spatial strategy for growth and change set out within the adopted Croydon Local Plan (CLP, 2018), including by adjusting the package of sites allocated to deliver the strategy, and will also serve to adjust the suite of strategic and development management policies (i.e. policies against which planning applications are judged). The Partial Review will also extend the plan period to 2039 (from 2036 in the adopted Local Plan), such that the plan period is 2019 to 2039.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions** -
- What has Plan-making / SA involved up to this point?
 - including with regards to consideration of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This SA Report

- 1.3.1 This is the formally required SA Report for the Partial Review, published under Regulation 19 of the Local Planning Regulations. This report is produced with the intention of informing representations on the Partial Review, which will then be submitted for consideration by an appointed Planning Inspector as part of a process of Examination in Public (see discussion of ‘next steps’ in Section Part 3 of this report).

Structure of this report

- 1.3.2 This report is structured according to the three questions set out above.² Before answering the first question, there is a need to further set the scene by setting out:
- the plan’s aims and objectives; and
 - the scope of the SA.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2 Plan aims and objectives

2.1 Introduction

- 2.1.1 The aim here is to explain more fully the context to plan preparation, introduce the plan area, explore the context provided by the CLP 2018 and discuss the plan vision / objectives.

2.2 Legislative and policy context

- 2.2.1 The Partial Review is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current government policy as set out in the National Planning Policy Framework (**NPPF**, 2021) and Planning Policy for Traveller Sites (2015), and must also be prepared mindful of Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets development needs as far as is consistent with sustainable development.
- 2.2.2 The Partial Review is also being prepared in the context of the adopted **London Plan** (2021), which notably assigns a ten year (2019 to 2029) **housing target** of 20,790 homes (2,079 dwellings per annum, dpa), which is a significant reduction on the target included in the earlier draft version that was available at the time of the Partial Review 'Issues and Options' consultation (2019). The London Plan also notably identifies much of the Borough as falling within the "Trams Triangle / London-Gatwick-Brighton mainline" strategic **growth corridor**, and identifies Croydon itself as an **opportunity area** to deliver 14,500 new homes (2019 to 2041) and 10,500 new jobs (2016 to 2041).
- 2.2.3 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the **Duty to Cooperate** established by the Localism Act 2011. For example, context is provided by the strategic policies of the Greater London Authority (GLA), Transport for London, the Croydon Clinical Commissioning Group and Government's environmental agencies, namely the Environment Agency, Historic England and Natural England. LB Croydon must also cooperate with neighbouring areas, particularly the immediately adjacent authorities, namely Sutton, Merton, Lewisham, Bromley, Tandridge and Reigate and Banstead. LB Croydon also cooperates closely with other authorities within the Wandle Valley regional co-ordination corridor, which includes authorities through south London and outwards towards Gatwick Airport.
- 2.2.4 Finally, it is important to note that the plan will be prepared mindful of any 'made' or emerging Neighbourhood Development Plans; however, at the current time none are made, nor are any in preparation. NDPs must be in general conformity with the Local Plan; however, it is equally the case that made and emerging Neighbourhood Plans are a consideration for Local Plan-making.

2.3 The plan area

- 2.3.1 Croydon is London's biggest borough and has the largest youth population in London. It is one of the top retail and commercial centres in London and enjoys some of the best transport connections in the UK, with London's only tram system; 15 minute rail connections from East Croydon Station to central London and only 20 minutes to Gatwick. Key characteristics include (N.B. quotes taken from the plan document):
- Historic context – *"from historic market town... to dynamic Victorian County Borough and booming 1960s commercial centre, a strong sense of civic identity and ambition runs through Croydon's history";*
 - Modern history – *"From the 1970s...Croydon Town Centre suffered a period of gradual decline as the Modernist vision fell out of favour and with the launch of a new office district at Canary Wharf. Central government's increased emphasis on out of town shopping areas through the 1980's and 90's resulted in a new retail area growing along the A23 (Purley Way). Croydon is changing the reputation it received as a result of its post-war development endeavours. As it became clear that the vehicular transport system previously central to the Modernist vision was unsustainable, new public transport infrastructure was developed as part of a new vision. The new East Croydon railway station was opened in 1992 and the Croydon Tramlink (introduced 2000) provided improved east-west links. A series of detailed masterplans have already been drawn up for Croydon Town Centre and support the current Croydon Local Plan 2018. These lie at the heart of a new wave of transformation across the Town Centre."*

- Cultural offer - including fostering the birth of Punk, Dubstep and Grime, and with institutions such as The Fairfield Halls, Croydon Art College, and the Brits School;
- Croydon Town Centre - which has more shops in one location than anywhere else in London apart from the West End, but which faces major challenges, including dated office spaces from the 1950s - 1960s;
- Transport connectivity – Croydon enjoys some of the best transport connections in the UK, with London's only tram system; 15 minute rail connections from East Croydon Station to central London, only 20 minutes to Gatwick and connections to London Overground at West Croydon;
- Purley Way - home to two of the Borough's three Strategic Industrial Locations (SILs) and extensive out of town shopping areas (following support for such schemes in the 1980s and 1990s);
- Variation in deprivation - with concentrations in the north of the Borough and in the Places of Addington and Shirley, and some of the least deprived areas of London in the south and east;
- Demographic trends - Croydon is a young borough, however, by 2031 the number of people in Croydon over the age of 65 will have increased by 41%; and
- Green Belt and open spaces - together cover over a third of the Borough, albeit with a major concentration in the south.

2.4 The context provided by the CLP 2018

2.4.1 The CLP 2018 sets out: eight **strategic policies**, each with an associated suite of **detailed policies**; plus a detailed policy is presented for each of the 16 **Places** that make up the Borough (see Figure 2.1).

2.4.2 Strategic Policy (SP) 2 (Housing) is a key policy setting the context for the current Partial Review. It provides for 32,890 homes over the plan period (2016 to 2036) through:

- 10,760 homes within the Croydon Opportunity Area (OA);
- 6,970 homes through allocations elsewhere; and
- 10,060 homes across the borough on windfall sites.

2.4.3 The housing target of 32,890 homes exceeded the London Plan target, as it stood at that time, but fell short of the number of homes needed in order to meet objectively assessed housing needs. As explained by the supporting text to SP1:

“There is a need for over 42,930 new homes in Croydon by 2036 and evidence indicates that half of these need to be larger homes. However there is only a limited supply of land in Croydon for new homes without eroding the Metropolitan Green Belt, Metropolitan Open Land (MOL) and Local Green Spaces which are all protected by national policy and the London Plan. The target of [32,890] homes reflects the availability of land for development in Croydon, facilitating the sustainable growth of the suburbs, the need to provide a mix of homes to support sustainable communities and the objective to provide a choice of homes for people at all stages of life. It also reflects the need to provide land for other uses such as employment, education, health and other infrastructure to support growth in Croydon...”

2.4.4 Further key context for the Partial Review is provided Policy DM10 (Design and character) and associated policies. The supporting text to the policy explains that:

“The challenge for the... Local Plan is to respect local character and distinctiveness whilst accommodating growth. Croydon's aspiration is for this to be done in a way that contributes to the improvement of each of Croydon's 16 places and accommodated in the following ways as set out in Table 6.4...”

2.4.5 Table 6.4 from the adopted Local Plan is presented below as Table 2.1. Key points to note are that:

- DM34 to DM49 are the 16 policies that each relate to one of the 16 defined places – see Figure 2.2;
- DM10.11 identifies four areas as suitable for focussed intensification;
- DM36.2 relates to a potential new Local Centre at Valley Park and its environs;
- DM38.1 relates to the Croydon OA; and
- DM49.1 relates to a potential new Local Centre at Waddon and its environs.

Table 2.1: Table 6.4 from the CLP 2018

Method of accommodating growth and improving Croydon	How it works	Applicable policies
Evolution without significant change of area's character	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the local context and seeks to reinforce and enhance the existing predominant local character. Most development throughout the borough will be of this nature.	DM10.1 – DM10.10
Guided intensification associated with enhancement of area's local character	Areas where the local character cannot be determined as a result of no one character being dominant, further growth can be accommodated through place specific enhancement policies.	DM34 – DM49
Focused intensification associated with change of area's local character	Further growth can be accommodated through more efficient use of infrastructure. Due to the high availability of community and commercial services, intensification will be supported in and around District, Local and potential Neighbourhood Centres which have sufficient capacity for growth.	DM10.11
Redevelopment	In larger areas where growth would result in a change to the local character it must be supported by masterplans or design codes.	DM36.2 DM38.1 DM49.1

2.4.6 The net effect of the various elements of the spatial strategy explained above - namely redevelopment within the Croydon OA; redevelopment at Waddon and Valley Park; focused intensification at four locations; allocations elsewhere; and 'guided intensification' through windfall development elsewhere - is summarised in Figure 4.1 of CLP 2018 (repeated below as Figure 5.2). The summary shows:

- Highest growth in the Croydon Opportunity Area (or 'Central Croydon');
- High growth in the west the Borough within Broad Green and Selhurst, Waddon and Purley;
- Moderate growth at either end of the western spine within Thornton Heath and Coulsdon;
- Lower growth in those places to the east of the Croydon, namely Addiscombe, South Croydon and Shirley, as well as at Crystal Palace and Upper Norward to the north and Addington to the east; and
- Lowest growth at Norbury at the northern edge of the Borough and also at the cluster of three 'Places' at the southeast extent of the Borough, namely Kenley and Old Coulsdon, Sanderstead and Selsdon.

2.4.7 The adopted spatial strategy can also be summarised further, in the following terms:³

"The strategy to deliver the housing target of the circa 33,000 homes is based on three sources. A third in Croydon Opportunity Area, a third on other allocated sites and the final third in the suburbs through suburban intensification / evolution (windfalls)."

Figure 2.1: The 16 defined Croydon Places



³ LB Croydon Matter Statement submitted in respect of Matter 12 of the London Plan Examination: See https://www.london.gov.uk/sites/default/files/m12_lb_croydon_5662.pdf

2.5 Objectives and vision

Objectives

2.5.1 The objectives of the Partial Review are as per the objectives of the adopted Local Plan. The established objectives are as follows:

- A place of opportunity
 - Strategic Objective 1: Establish Croydon as the premier business location in South London and the Gatwick Diamond.
 - Strategic Objective 2: Foster an environment where both existing, and new, innovative, cultural and creative enterprises can prosper.
 - Strategic Objective 3: Provide a choice of housing for people at all stages of life.
 - Strategic Objective 4: Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.
- A place to belong
 - Strategic Objective 5: Ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.
 - Strategic Objective 6: Provide and promote well designed emergency services, community, education, health and leisure facilities to meet the aspirations and needs of a diverse community.
 - Strategic Objective 7: Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.
- A Place with a Sustainable Future
 - Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
 - Strategic Objective 9: Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.
 - Strategic Objective 10: Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.
 - Strategic Objective 11: Tackle flood risk by making space for water and utilising sustainable urban drainage systems.

2.5.2 However, understanding of planning policy priorities does naturally evolve over time, with the Partial Review needing to respond to the emerging new London Plan and changes to the wider planning and policy context. The Issues and Options consultation explained that key priorities relate to:

- Climate change – this is now a priority following declaration of a climate emergency by the Council.
- Housing crisis - understanding of housing needs has moved-on since adoption of the CLP 2018, including light of the Strategic Housing Market Assessment (SHMA, 2019).

What is the plan not seeking to achieve?

2.5.3 Firstly, there is a need to reiterate that the Partial Review aims to build on the CLP 2018, and that the objectives of the adopted plan are being rolled-forward through the Partial Review. The Partial Review only seeks to update certain aspects of CLP 2018, and other aspects of CLP 2018 are not a focus of the Partial Review or, in turn, the SA process or the current consultation.

2.5.4 More generally, there is a need to be clear that the Partial Review will be strategic in nature, and hence naturally omit consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, namely at the planning application stage. The strategic scope of the Partial Review is reflected in the scope of the SA.

Vision

2.5.5 A vision for Croydon was established by the Corporate Plan 2018-2022 - see Figure 2.2.

Figure 2.2: The Croydon Vision



3 What is the scope of the SA?

3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan.
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix II** presents further information, and the SA scope is also discussed as part of appraisal work (Sections 6 and 9) as necessary.

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, these authorities were consulted on the SA scope in 2019.⁵

3.3 Key issues and objectives

- 3.3.1 Table 3.1 presents the sustainability topics and objectives that form the core of the SA framework.

Table 3.1: The SA framework

Topic	SA objectives
Air quality	<ul style="list-style-type: none"> Take action to reverse the trend for increasing emissions by supporting and enabling the use of low emission technologies and actively encouraging sustainable modes of transport such as walking and cycling, particularly where it is possible to leverage the opportunities presented by new development. Locate and design development so that current and future residents will not regularly be exposed to poor air quality.
Biodiversity	<ul style="list-style-type: none"> Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of national and local significance. Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.
Climate change adaptation	<ul style="list-style-type: none"> Adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.
Climate change mitigation	<ul style="list-style-type: none"> Continue to drive down CO₂ emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.
Communities	<ul style="list-style-type: none"> Support good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.
Economy and employment	<ul style="list-style-type: none"> Improve the physical and mental health and wellbeing of Croydon residents, including through enhancing access to outdoor recreational spaces, and reduce health inequalities between local communities within the Borough.
Health	<ul style="list-style-type: none"> Improve the physical and mental health and wellbeing of Croydon residents, including through enhancing access to outdoor recreational spaces, and reduce health inequalities between local communities within the Borough.

⁴ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

⁵ The Scoping Report is available at: croydon.gov.uk/planning-and-regeneration/planning/get-involved-croydons-planning/croydon-local-plan-review

Topic	SA objectives
Heritage	<ul style="list-style-type: none"> Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.
Housing	<ul style="list-style-type: none"> Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of residents, including older people, people with disabilities and families with children.
Land and soils	<ul style="list-style-type: none"> Promote the efficient and sustainable use of land and natural resources, including supporting development which makes effective use of previously developed land and avoids the best and most versatile agricultural land where applicable.
Landscape	<ul style="list-style-type: none"> Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps and key views.
Transport	<ul style="list-style-type: none"> Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change whilst helping to reduce congestion and travel times. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to the public realm, including key services.
Water	<ul style="list-style-type: none"> Promote sustainable forms of development which minimises pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive.



Croydon Central Library

Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

4.1.1 The aim here is to introduce the information set out in this part of the report, i.e. provided in order to answer the question: *What has plan-making / IIA involved up to this stage?*

4.2 Overview

4.2.1 Plan-making has been underway since 2019; however, the aim here is not to relay the entire ‘story’ of plan-making to date, but rather the work undertaken to examine reasonable alternatives in 2020.

Table 4.1: Overview of the plan-making / SA process

	Plan-making	SA
2019	Evidence-gathering	Scoping Report
2019	Issues and Options consultation	Interim SA Report
2020	Examine reasonable alternatives	
2021	Publication of the Proposed Submission Plan	SA Report
2021	Submission to Secretary of State	

4.2.2 Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - **Chapter 5**
- present an appraisal of the reasonable alternatives - **Chapter 6**
- explain the plan-maker’s reasons for selecting the preferred option in light of the appraisal - **Chapter 7**

4.2.3 Presenting this information reflects the requirement to present an appraisal of “reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with” within the SA Report.

Reasonable alternatives in relation to what?

4.2.4 The legal requirement is to examine reasonable alternatives taking into account the objectives of the plan,⁶ which are introduced above, within Section 2.5. Following a review of these objectives, it was determined appropriate to focus on **spatial strategy**, which is defined as the approach to meeting objectively assessed development needs, both in terms of total quantum and spatial distribution, leading to a package of site allocations and other sources of deliverable and developable supply (NPPF paragraphs 11 and 68), with site and area-specific policy also an aspect of spatial strategy (e.g. setting out site-specific development capacity/yield and use mix). A focus on spatial strategy reflects the approach taken at the Issues and Options stage, when ‘Strategic Spatial Options’ were a focus of the consultation.

4.2.5 At the current time, the most suitable term is considered to be **‘growth scenarios’**, with the aim being to arrive at growth scenarios more-or-less in the form of alternative key diagrams, i.e. reflective of the level of detail in the plan (as opposed to ‘strategic’ scenarios).

4.2.6 Finally, it is important to note that work to establish growth scenarios can reasonably be ‘housing-led’; however, supply of sufficient employment land is also integral.

Whose responsibility?

4.2.7 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (LB Croydon), with AECOM acting in an advisory capacity; assessing the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

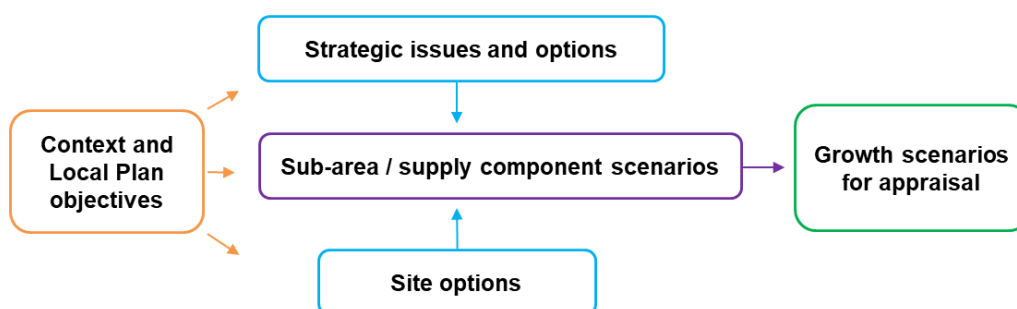
⁶ Regulation 12(2) requires that reasonable alternatives are defined in light of “the objectives and geographical scope of the plan”.

5 Establishing growth scenarios

5.1 Overview

- 5.1.1 The legal requirement is to explore reasonable alternatives “*taking account of the objectives... of the plan*”,⁷ hence there is a need to explore only growth scenarios that align with the Local Plan objectives.
- 5.1.2 From this starting point, and also from the starting point of lessons learned through the Issues and Options consultation in 2019, the Council and AECOM went through a process of exploring strategic issues/options, site options and then sub-area scenarios, before arriving at reasonable borough-wide growth scenarios for appraisal. Figure 5.1 summarises the process.

Figure 5.1: Establishing growth scenarios



Structure of this section

- 5.1.3 This section is broken down into four sub-sections:
- Section 5.2 - discusses strategic issues and options;
 - Section 5.3 - discusses site options;
 - Section 5.4 - discusses sub-area scenarios;
 - Section 5.5 - draws upon the preceding analysis to arrive at growth scenarios.

5.2 Strategic issues and options

- 5.2.1 The first step in the process involved the consideration of strategic parameters and options in respect of:
- Quantum – how many new homes are required (regardless of capacity / potential supply)?
 - Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum

- 5.2.2 Plan-making involves **A)** establishing needs; and then **B)** developing a policy response. The Planning Practice Guidance explains:⁸ “*Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.*”
- 5.2.3 However, in the case of London boroughs such as Croydon there is also a need to be in general conformity with the London Plan. In this light, a difficulty arises due to the fact that the London Plan prescribes a housing requirement for each of the boroughs only for the 10 year period of 2019 to 2029, whilst Borough Local Plans must look beyond this, with NPPF paragraph 22 identifying a need for all Local Plans to “look ahead over a minimum 15 year period from adoption”. For Croydon the proposal is for the plan period to cover the 20 year period from 2019 to 2039.

⁷ Regulation 12(2)(b) of the SEA Regulations

⁸ Reference ID: 2a-001-20190220 at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

- 5.2.4 The previous London Plan (2016) set a 10 year net annual 'target' of **1,435 dwellings per annum (dpa)** for LB Croydon, which was taken into account, alongside understanding of objectively assessed housing need, when establishing a housing requirement. Ultimately the decision was made to support a requirement of **1,645 dpa** for the 20 year plan period 2016 to 2036 (amounting to 32,890 homes in total).
- 5.2.5 At the current time, the London Plan (2021) sets a 10 year (2019 to 2029) housing target of 20,790 homes, or **2,079 dpa**. With regards to the latter part of the 20 year plan period, it is challenging to know the best approach to take in the London context, as recently discussed within Section 2 of a Housing Topic Paper recently prepared by Enfield Borough.⁹ Box 5.1 presents further discussion.
- 5.2.6 In **conclusion**, there is a strong argument for simply rolling forward the 2,079 dpa figure for the latter ten years of the plan period and, in turn, setting the Local Plan housing requirement at 41,580 (20 x 2,079). However, there is also a clear argument for exploring higher growth options through the SA process.

Box 5.1: Housing requirement options for the period 2029 to 2039

There are broadly three options.

Firstly, there is the option of following the advice presented at Paragraph 4.1.11 of the London Plan, which states: *"If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites."* The London [SHLAA](#) from 2017 is dated, and following this approach would amount to supporting a low growth strategy over the period 2019 to 2039, of perhaps 32,738 homes,¹⁰ which is not supported in light of the housing needs that exist locally, as explored through the Issues and Options consultation (2019), as discussed above (paragraph 2.5.2) and as discussed further below. As such, this approach is not supported and, indeed, is seen as unreasonable for the Croydon LP Partial Review.

Secondly, there is option of simply rolling forward the 2,079 figure for the latter ten years of the plan period and, in turn, setting the Local Plan housing requirement at 41,580 (20 x 2,079). There is specific guidance to support this approach, and the GLA response to a recent Enfield Local Plan consultation raised a concern with this approach (see page 4 [here](#)); however, this approach was recently supported within the Inspectors' Reports for the Westminster (see paragraphs 56 and 58 [here](#)) and Havering (see paragraphs 60 and 63 [here](#)) Local Plans.

Thirdly, there is the option of seeking to respond to identified needs for market and affordable housing,¹¹ which in practice would mean setting a housing requirement for the period 2029 to 2039 in excess of 2,079 and, in turn, a housing requirement for the plan period in excess of 41,580. This was the approach taken in CLP 2018 (see discussion above), although it is difficult to draw parallels, because the housing requirement ultimately set within 2018 was the outcome of an exercise to explore supply options, and not simply a reflection of 'top down' need. Further context comes from 2019 Issues and Options consultation, when the proposal was to set the housing requirement at 46,040 for the plan period (2029 to 2039); however, again it is difficult to draw parallels, for two reasons. Firstly, the proposal reflected an understanding of supply options that has now evolved significantly. Secondly, the proposal reflected an understanding that the London Plan target for the period 2019 to 2029 would be much higher than the figure ultimately included within the adopted London Plan.¹² Finally, there is a need to note the following statements made within recent Inspectors Reports:

- Westminster (paragraph 56): *"Fundamentally, the [PPG] makes it clear that local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies."*
- Havering (paragraph 60): *"I have considered whether [housing need] should be the housing requirement in the Plan. However, the LP2021 [para 4.1.2] makes clear that London should be considered as a single housing market area and that boroughs are not required to carry out their own housing needs assessment. The approach of the Plan as modified to seek to meet the LP2021 housing target is therefore sound."*

⁹ See https://new.enfield.gov.uk/services/planning/housing-topic-paper_all-appendices-2021-planning.pdf

¹⁰ 32,738 homes breaks down as: A) 20,790 for the first ten years, in line with the London Plan target; plus B) 5,538 homes from large sites phase 4 (2029/30 to 2033/34); plus 758 homes from large sites phase 5 (2034/5 to 2040/41); plus 6,410 homes from small sites, to reflect the London Plan sites target figure (641 dpa). N.B. there is some uncertainty around this calculation.

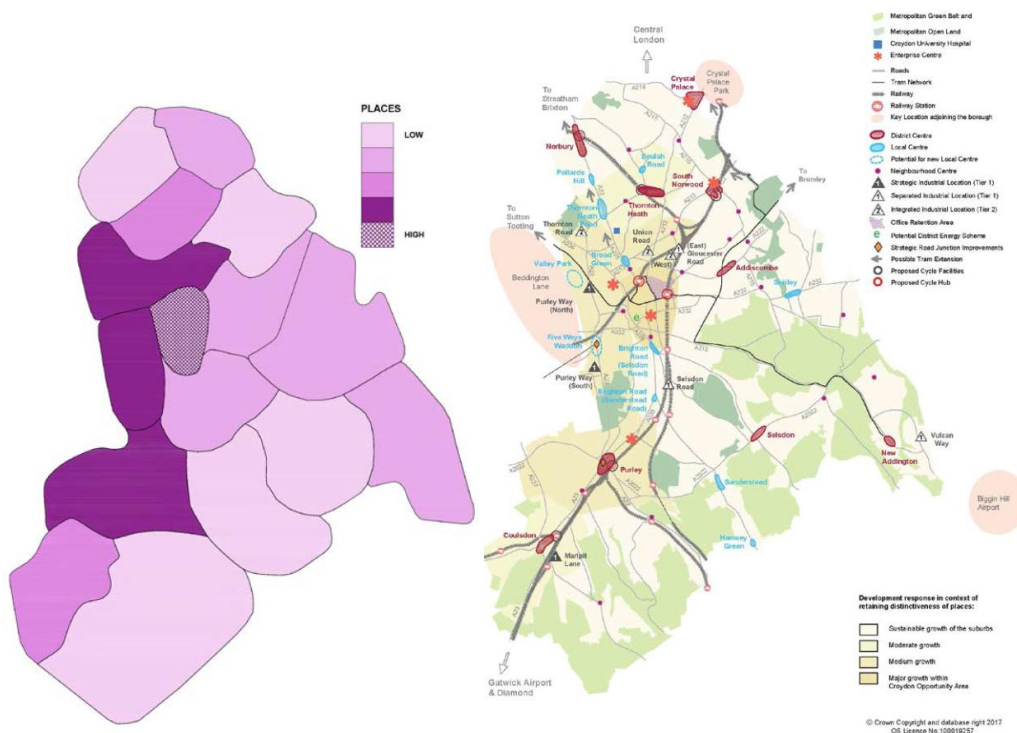
¹¹ Focusing on affordable housing, the Strategic Housing Market Assessment (SHMA) Update (2019) estimated a need for 2,254 affordable rented homes a year in the Borough over the next 20 years (N.B. any need for affordable home ownership or other 'intermediate' housing products is in addition to this). Affordable housing is primarily provided as a part of market-led housing schemes - e.g. at a rate of 30, 40 or 50% - hence any attempt to meet affordable housing needs in full would necessitate providing for a very large number of market homes. In practice any such approach would not prove deliverable, due to a lack of need/demand for this number of market homes (without prices reducing, which would impact on development viability).

¹² Specifically, the proposal at the Issues and Options stage was to meet the London Plan target (as understood at that time) of 2,949 homes for the period 2019 to 2029 and then a lower figure of 1,655 homes for the period 2029 to 2039.

Broad distribution

- 5.2.7 This is the second of two sections examining ‘strategic issues and options’ with a bearing on the selection of reasonable spatial strategy alternatives. This section considers broad distribution.
- 5.2.8 A starting point, when considering broad distribution, is the approach taken by the **CLP 2018**, as more or less ‘rolling forward’ this approach is potentially an option open to the Council. The adopted Local Plan approach has already been discussed above (Section 2.4), and is summarised in two key figures within the CLP 2018, which are reproduced below, as Figure 5.2.

Figure 5.2: CLP 2018 housing distribution summary and Key Diagram



- 5.2.9 The first point to note from the two figures is the clear focus on two key areas:
 - **Croydon Opportunity Area** – an Opportunity Area Planning Framework (OAPF) was adopted in 2013, and work has been ongoing since that time to deliver on its aims and objectives. The CLP 2018 then allocated sites for at least 10,760 homes over the period 2016 to 2036. Subsequently, the Issues and Options consultation document identified some additional development capacity, as reflected in an assumed supply of 8,990-10,440 homes over the period 2019 to 2039.

The Issues and Options consultation document also identified a major opportunity at Croydon East Station, associated with upgrade works along the Brighton Mainline, and Network Rail subsequently consulted on a proposal to “*unblock the Croydon bottleneck to provide Brighton Main Line passengers with more reliable, more frequent and faster services, and to provide the capacity needed for future growth*” as part of which East Croydon station could be moved to a new location, along with significant new enabling housing.¹³ The most recent situation is that the **Brighton Main Line and East Croydon Transformation Corridor** is to be designated as a transformation area through the Partial Review to “*accommodate major new transport infrastructure enabling growth across the borough and elsewhere in the Croydon-Gatwick-Brighton corridor*”.

Also, subsequent to the Issues and Options consultation, the decision was taken to designate another transformation area, namely the **North End Quarter Transformation Area**, which covers the retail core, including the main pedestrianised shopping street (North Street) and two shopping centres.

The Croydon Opportunity Area (COA) is discussed further below, within Section 5.3.

¹³ See networkrail.co.uk/running-the-railway/our-routes/sussex/upgrading-the-brighton-main-line/unblocking-the-croydon-bottleneck

- **Purley Way Transformation Area** – building on CLP 2018, the Issues and Options consultation document (2019) identified the Purley Way as a potential location for transformational change, with major residential and mixed use development alongside protection and intensification of strategic industrial areas, transport infrastructure upgrades and improvements to the public realm and green infrastructure. The approach to growth at Purley Way was one of the variables across the ‘Strategic Options’ that were a focus of the consultation document and accompanying Interim SA Report (2019), with the approach to growth varying between 2,900 and 12,000 homes (plus new jobs). Detailed work was subsequently undertaken to explore how to bring the area forward, including preparation of a draft masterplan that was then published for consultation in early 2021. The Purley Way is discussed further in Section 5.3.

- 5.2.10 Secondly, there is a need to consider **Green Belt** – see light green in Figure 5.2. Green Belt release was considered to be a reasonable option to explore at the Issues and Options stage (Strategic Option 3), and the appraisal presented within the Interim SA Report did highlight the option of Green Belt release as having merit in terms of a number of respects – see Figure 5.3. However, CBC officers are of the view that the option of Green Belt release was found to have very low levels of support through the consultation, and that there would be support for high densities in the urban area ahead of Green Belt release. Also, it seems clear that the GLA is wary of Green Belt release through Local Plans ahead of maximising densities within the urban area, with the recent GLA [response](#) to the Enfield Draft Plan consultation of note:

“[Green Belt release] risks undermining brownfield delivery and viability”... “It is important to note that the London Plan is clear in paragraph 0.0.22 that it does not meet all of London’s identified development needs and that further work will be required to explore the potential options for meeting this need sustainably in London and beyond. However, this is a matter for a future London Plan and will require close collaboration with local and strategic authorities and a clear commitment from the Government... In light of this, and the fact that the draft Plan demonstrates that it has a land supply to meet almost all of its growth needs, it is considered that the intention to release Green Belt land is premature.”

- 5.2.11 The ‘high bar’ set in respect of demonstrating exceptional circumstances to justify Green Belt release in the case of London Borough’s is also reflected in the following statement made at paragraph 49 of the recent Havering Borough Local Plan Inspector’s Report:

“Having regard to the support in the LP2021 and in Government policy for the protection of the Green Belt and the fact that the Plan can demonstrate a 10-year housing supply [N.B. the plan period is 15 years], I am not satisfied that the current lack of a 5 year housing land supply provides the exceptional circumstances necessary to alter the boundaries of the Green Belt as part of this Plan.”

- 5.2.12 The latest situation in respect of the London Plan housing target for Croydon Borough is also a further indication that the ‘reasonableness’ of Green Belt release has decreased since the Issues and Options stage, namely the fact that the housing target for the Borough over the period 2019-2029 within the final adopted London Plan (2,079 dpa) is lower than the equivalent figure within the Draft London Plan that was used as the basis for preparing the Issues and Options consultation document (2,949 dpa).

- 5.2.13 However, on balance, it is considered reasonable to explore the option of Green Belt release for housing at this stage, as per the view taken at the Issues and Options stage.

- 5.2.14 This reflects an understanding that: there are arguments for exploring a high growth strategy for the plan period as a whole akin to the strategy envisaged at the Issues and Options stage (46,040 homes, or 2,302 dpa), as discussed above (para 5.2.5); and there are sustainability issues and delivery challenges associated with urban intensification (as discussed further below).

- 5.2.15 Thirdly, there is a need to consider the approach to growth elsewhere, namely locations other than the Croydon OA, Purley Way and Green Belt/MOL. The approach to growth in CLP 2018, as reflected in Figures 5.2 (above), is a reflection of both site **allocations** and support for **windfall**. Specifically, CLP 2018 allocated 119 sites to deliver 6,970 homes in the Croydon Local Plan’s Detailed Policies, and identified the potential for / an expectation of 10,060 homes at windfall sites.

Figure 5.3: Growth scenarios appraisal from the Issues and Options stage

Objective	Rank of preference and significant effects		
	Strategic Option 1: Suburbs	Strategic Option 2: Purley Way	Strategic Option 3: Green Belt
Air quality	3	2	★
Biodiversity	★1	2	3
Climate change adaptation	2	2	★1
Climate change mitigation	3	★1	2
Economy and employment	2	★1	2
Health	2	★1	★1
Heritage	3	★1	2
Housing	3	2	★1
Land and soils	2	★1	3
Landscape	2	★1	3
Population and communities	3	2	★1
Transport	1	2	★1
Water	★1	★1	2

Summary discussion:
 The appraisal shows Option 2 (Purley Way) to perform well in respect of the greatest number of objectives, and also to result in significant positive effects in respect of the greatest number of objectives. However, it does not necessarily follow that Option 2 is best performing, or ‘most sustainable’ overall, recognising that the sustainability objectives are not assigned any particular weight. It will be for the decision-maker (LB Croydon) to assign weight and trade-off between the competing objectives ahead of establishing a preferred approach.

5.2.16 Focusing on **windfall**, there is a need to introduce the story over time:

- **CLP 2018** – provides for around 30% of supply from windfall, and supports a degree of spatial targeting at the Croydon Opportunity Area (Policy DM36.2), four focussed areas of intensification DM10.11) and two new Local Centres and their environs (DM36.2 and 49.1). However, elsewhere there is a blanket expectation of “sustainable growth of the suburbs”, which in practice might involve either ‘evolution without significant change’ or ‘guided intensification’, according to detailed work through planning applications (guided by place specific policies as well as the Borough Character Appraisal, 2015).
- **Issues and Options** – the consultation document proposed a significant change of tack, in response to: A) the major focus on small sites windfall / suburban intensification set out within the Draft London Plan (2017); B) a desire to set housing targets for each of Croydon’s 16 places to assist Neighbourhood Plans in the future (in line with the NPPG); C) new evidence available through the Suburban Design Guide SPD (2019) which served to provide evidence that an ambitious approach to suburban intensification can be supported whilst limiting negative impacts on places; and D) further new evidence through a “Windfall or Small Sites Evidence Base” study (2019).

The proposed approach was to set each of Croydon’s 16 places a housing target taking into account how suitable it is for small sites windfall, which in turn was determined according to: A) urban character, which is understood on the basis of the Borough Character Appraisal (2015); and B) accessibility to a town/district centre, train and/or tram stop. Two scenarios were then identified for each place, one involving higher growth through windfall and the other lower growth, with the net effect that the total supply from small sites windfall varied between 9,660 and 18,950 homes over the 20 year plan period, amounting to up to 20 – 40% of supply.

- At the **current time** - the final published London Plan (2021) reflects a reduced ambition, in respect of small sites windfall, in comparison to the Draft London Plan (2017); however, the level of ambition is still significant (Policy H2), with Croydon assigned a 10 year target of 6,410 homes. Supply from small sites windfall is discussed further below, within Section 5.3.
- 5.2.17 Finally, there is a need to consider other features shown in the CLP 2018 Key Diagram, notably: Croydon University Hospital; the series of Enterprise Centres, Key locations adjoining the Borough, the network of District, Local and Neighbourhood Centres, the potential new local centres at Waddon and Valley Park, the designated industrial locations, the Office retention area, the potential district energy scheme and proposed locations for strategic transport infrastructure upgrades.
- 5.2.18 In short, none of these are key 'drivers' of the Partial Review, and did not influence the selection of Strategic Options in 2019 (rather, the Strategic Options varied in respect of small sites windfall / suburban intensification, Purley Way and Green Belt – see Figure 5.3 - which are matters discussed above).
- 5.2.19 However, it is helpful to recap the final London Plan position on **industrial land**, as set out in [Policy E7](#): Industrial intensification, co-location and substitution. The supporting text explains:
- “In collaboration with the Mayor, all boroughs are encouraged to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses... There may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses...”*
- 5.2.20 The Policy itself more specifically explains:
- “Development Plans... should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation... or as part of a co-ordinated masterplanning process... In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered.*

Conclusion on strategic issues and options

- 5.2.21 The discussion above has considered broad quanta and distribution options in turn.
- 5.2.22 In respect of quanta, there is a strong argument for setting the Local Plan housing requirement at 41,580 (20 x 2,079). However, there is also a clear argument for exploring higher growth options. Also, in addition to the matter of the housing requirement, there is a need to consider the total supply figure, i.e. consider whether there is a need for a 'supply buffer' over-and-above' the requirement, or whether this is not necessary when the plan period is viewed as a whole, so long as supply is strong in the earlier years of the plan period.¹⁴
- 5.2.23 In respect of broad distribution, there is a need to further consider the possibility of the borough-wide growth scenarios varying in respect of housing supply from:
- Brighton Main Line and East Croydon Transformation Corridor;
 - North End Quarter Transformation Area;
 - Elsewhere within the Croydon Opportunity Area;
 - Purley Way Transformation Area;
 - Allocations elsewhere within urban area;
 - Green Belt allocations; and
 - Windfall sites.

¹⁴ The first five year period is very important, in light of NPPF paragraph 68, and as discussed in the Havering Local Plan Inspector's Report. The first ten years is also very important, mindful of the London Plan target. Years 10 to 15 also potentially have a degree of importance in light of NPPF paragraphs 22 and 68.

5.3 Site options

5.3.1 The process of selecting sites for allocation and determining an appropriate housing capacity figure for each site – mindful of use mix, character/design and other factors – has been led by the Council, through a Strategic Housing Land Availability Assessment (SHLAA), building upon the London SHLAA 2017.

5.3.2 Site options are not ‘reasonable alternatives’ in the context of Local Plans, and hence need not be a particular focus of the SA process. Nonetheless, in order to feed-into and inform the process of arriving at reasonable growth scenarios, the decision was taken to run a quantitative GIS-based exercise to examine the spatial relationship (proximity and intersect) between all site options and a range of constraint/push (e.g. flood zones, heritage assets) and opportunity/pull (e.g. district centres) features for which data is available in digitally mapped form for the Borough as a whole.

5.3.3 The outcome of the analysis is in the form of a large spreadsheet of data, with 148 rows – one per site option – and around 30 columns presenting data for a range of performance metrics (e.g. proximity to / intersect with a conservation area). It is not possible to report the spreadsheet in full here, and so it is necessary to present summary information. Specifically, for each site option, rather than presenting full data for each metric, summary performance is reported on a red-amber-green scale, as follows:

- **Air quality** – all of Croydon falls within an Air Quality Management Area (AQMA); however, it is appropriate to highlight those sites that are adjacent to a main road on the Strategic Road Network (SRN), as this could potentially be indicative of poorer air quality. 44 site options are within 20m of a road that forms part of the SRN, and these sites are shown as **amber** in Table 5.1.
- **Biodiversity** – the primary consideration here is intersect with / proximity to a locally designated Site of Importance for Nature Conservation (SINC). 16 sites intersect or are adjacent to (within 10m) a SINC, and are shown as **red** (also, those sites significantly intersected are shown with an asterisk). Additionally, a further 13 sites are within 100m, and are shown as **amber**.

With regards to nationally designated SSSIs, the nearest site option is 133m distant, namely Site 23270411, which is shown as red in the table below because it is adjacent to, and slightly intersects (3%) a SINC. The second closest site is 458m distant (Site 372, and the fourth closest 590m (22080411).

- **Climate change** – the only metric against which the performance of site options can be measured, on the basis of the available data, is percentage intersect with a fluvial flood risk zone. It is difficult to know how best to categorise performance, but one approach is to: show sites that intersect flood zone 3 by more than 25% or flood zone 2 by more than 50% as **red**; and sites that intersect flood zone 3 by less than 25% or flood zone 2 by less than 50% as **amber**. Intersect with a fluvial flood zone is clearly an important metric, and so detailed data for those sites intersecting a flood zone is presented below.

Site	% intersect with flood zone 3	% intersect with flood zone 2	Summary performance
101	100	0	Red
405	100	0	Red
54	92	3	Red
495	89	5	Red
347	71	6	Red
946	6	82	Amber
324	2	5	Amber
411	1	26	Amber
35	1	2	Amber
683	1	1	Amber
351	0	90	Red
355	0	82	Red
147	0	60	Red
332	0	38	Amber
125	0	33	Amber
570511	0	28	Amber
334	0	23	Amber
144	0	13	Amber
314	0	4	Amber

- **Communities / accessibility** – numerous datasets are available, as set out below.

Metric	Performance categories
Croydon Metropolitan Centre (MC)	Sites within 400m = dark green ; within 1km = light green .
District centres	Within 400m of Croydon MC = grey ; within 400m = dark green ; within 1km = light green ; beyond 1.5km = amber ; site beyond 2.5km = red .
Local centres	Within 400m of Croydon MC or a district centre = grey ; within 400m = dark green ; within 1km = light green ; beyond 1.5km = amber ; beyond 2.5km = red .
Retail parade	Within 400m of Croydon MC, a district centre or a local centre = grey ; within 400m = light green ; beyond 800m = amber .
PTAL	6 = dark green ; ¹⁵ 5 = light green ; 4 = no colour; 3 = amber ; 2 = red ; 1 = red + asterisk. ¹⁶
Metropolitan Open Land (MOL)	Within 400m = dark green ; within 800m = light green
Local green space (LGS)	Within 400m of MOL = grey ; within 400m = dark green ; 800m = light green
Other green space	Within 400m of MOL or LGS = grey ; within 200m = light green

- **Landscape** – intersects Green Belt or MOL = **red**.¹⁷
- **Townscape** – intersect locally designated view, or within 50m of a local landmark – **amber**.
- **Historic environment** – – numerous datasets are available, as set out below.¹⁸

Metric	Performance categories
Listed building	11 sites intersect or are within 20m of a listed building = red . In each case the nearest building is grade 2 listed, bar one which is grade 2* listed, which is highlighted with an asterisk in the table. Also, one site (211) is 30m from a grade 1 listed church, and is highlighted red with an asterisk. A further 9 sites are within 50m of a listed building (grade 2 in each instance) = amber .
Conservation area	13 sites intersect or are adjacent to a conservation area = red . A further 16 sites are within 100m = amber . Also, one site (951) is within a Local Heritage Area = amber .
Park/Garden / Scheduled Monument	Three sites significantly intersect a locally designated park/garden = red . Also, two sites (372 and 22250411) intersect or are adjacent to a scheduled monument = red with an asterisk. 8 sites are then adjacent or near adjacent (10m) to a locally designated park/garden = amber . Also, two sites (19530411 and 90) are within 100m of a nationally registered park/garden – amber .

- **Strategic Industrial Location (SIL)** – eight sites significantly (>1%) intersect a SIL = **red**. Also, one site comprises an Integrated Industrial Location = **amber**.

¹⁵ All sites intersect PTAL 6b bar sites 396 and 471, which intersect 6a.

¹⁶ No sites intersect only PTAL zone 0, although the following three intersect by more than 50%: 22250411; 502; 20290411

¹⁷ No sites significantly intersect either local green space or other green space

¹⁸ The distance thresholds used reflect an understanding that the great majority of site options in contention are within the urban area, with little reliance on GIS analysis in respect of those site options in the Green Belt.

5.3.4 Performance of each of the site options in respect of the metrics introduced above, and with performance categorised using the methodology introduced above, is set out in **Table 5.1**. The table groups site options by place, and then orders them as follows:

- Firstly, the table presents those sites that are supported for allocation through the Council's SHLAA, ordered according to the capacity figure identified through the SHLAA.
- Secondly, the table lists a small number of 'omission sites', i.e. sites not supported for allocation through the SHLAA. All of these bar four are located within the Green Belt.

5.3.5 Notes on the tables are as follows:

- The table presents sit options in the order that they are discussed in Section 5.4.
- The Croydon Opportunity Area (COA) is split into the following sub-areas: Brighton Mainline (BML); North End Quarter (NEQ); North East; West Croydon Station area (WCS); Office Retention Area (ORA, specifically land between NEQ and BML); Mid Town (MT); Fairfield (FF); South, West and South East.
- Purley Way Transformation Area (PW) is split into the following sub-areas: Valley Park (VP); Waddon Marsh (WM); Five Ways (FW); and Waddon Way (WW).
- Purley (outside the Purley Way TA) is split into three sub-areas
- The first columns shades sites as follows:
 - Grey indicates a site with planning consent;¹⁹
 - Blue indicates a retained CLP allocation;
 - Purple indicates a new proposed allocation;
 - Red indicates an omission site.
- The fourth column highlights sites that are shortlisted for discussion in Section 5.4, which seeks to identify potentially reasonable higher growth scenarios within each of the Borough's places / sub-areas.

Table 5.1: Site options GIS analysis

Ref	Place	Sub-area	Shortlisted in Section 5.4?	Area (ha)	Proposed homes ²⁰	SRN	SINC	Flood risk	Metropolitan Centre	District centre	Local centre	Shopping parade	PTAL	MOL	Local green space	Other green space	GB and MOL	Townscape	Listed building	Conservation area	Historic Park/Garden / SM	SIL
138	COA			0.4	456																	
21	COA	BML		0.4	201																	
45	COA		Y	2.8	0																	
175	COA	BML(E)		0.7	195																	
50	COA			0.3	120																	
199	COA	BML(N)	Y	1.6	107																	
172	COA	BML(W)		0.4	158																	
200	COA		Y	0.4	66																	
37	COA		Y	0.2	33																	
393	COA	NEQ	Y	7.8	600																	
220	COA			0.2	76																	
201	COA			1.2	216																	
396	COA	NW		0.3	72																	
417	COA			0.1	24																	
133	COA	WCS		1.1	505																	

¹⁹ All sites with consent are existing allocations in CLP 2018 bar one, namely site 51 in South Norwood and Woodside.

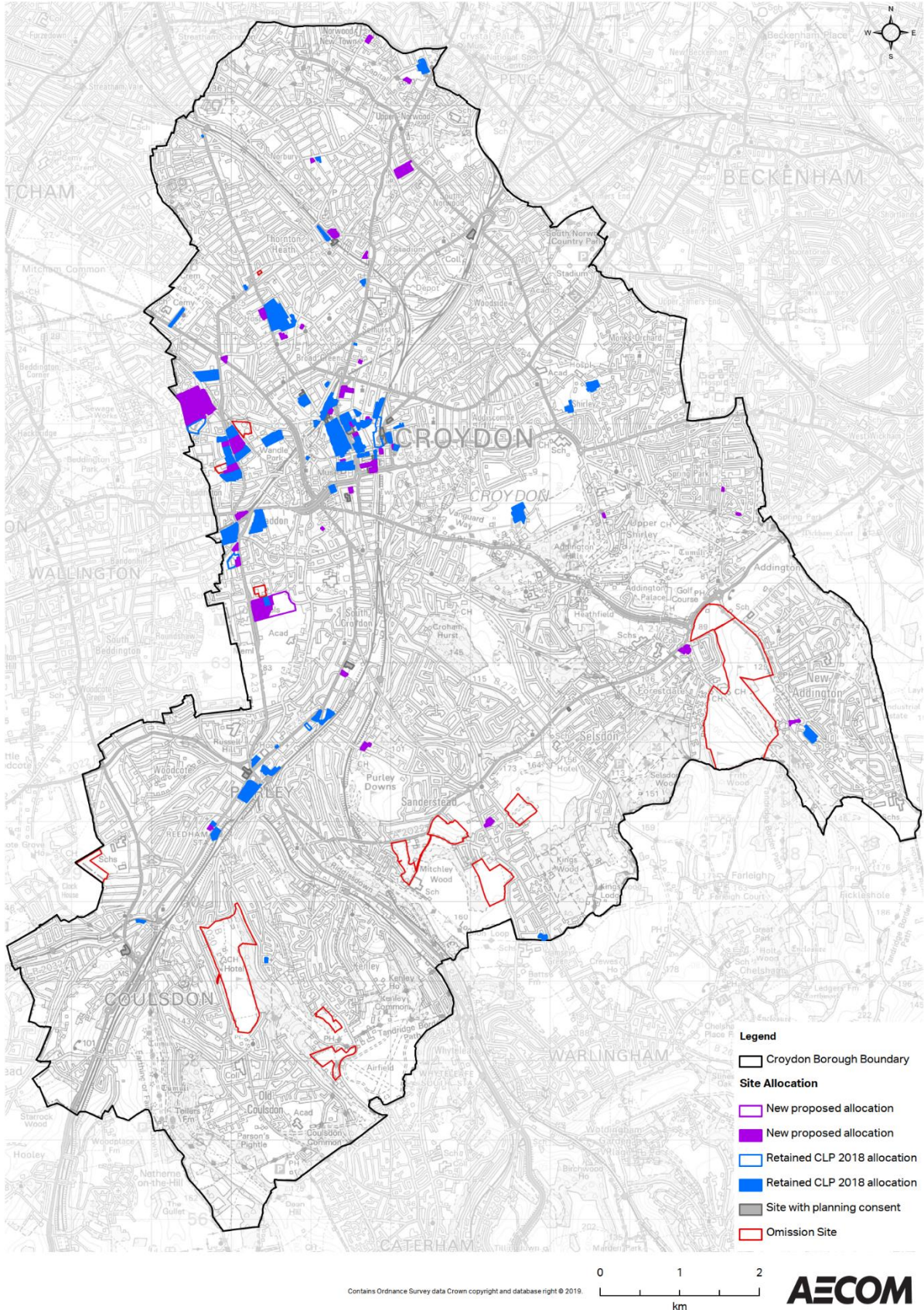
²⁰ Figures require final updates and should not be relied upon

Ref	Place	Sub-area	Shortlisted in Section 5.4?	Area (ha)	Proposed homes ²⁰	SRN	SINC	Flood risk	Metropolitan Centre	District centre	Local centre	Shopping parade	PTAL	MOL	Local green space	Other green space	GB and MOL	Townscape	Listed building	Conservation area	Historic Park/Garden / SM	SIL	
123	COA	WCS		0.6	291	Yellow			Green	Grey	Grey	Grey	Green							Yellow			
211	COA			0.3	240				Green	Grey	Grey	Grey	Green						Red	Red			
203	COA		Y	1.9	109				Green	Grey	Grey	Grey	Green								Yellow		
40	COA			0.3	76				Green	Grey	Grey	Grey	Green								Yellow		
184	COA			0.3	66				Green	Grey	Grey	Grey	Green								Yellow		
142	COA	ORA		0.5	794	Yellow			Green	Grey	Grey	Grey	Green		Light Green								
218	COA			1.3	418	Yellow			Green	Grey	Grey	Grey	Green		Light Green								
234	COA			0.9	342				Green	Grey	Grey	Grey	Green		Light Green	Grey		Yellow		Yellow			
148	COA			0.4	266				Green	Grey	Grey	Grey	Green		Light Green								
42	COA			0.3	158				Green	Grey	Grey	Grey	Green		Light Green								
493	COA			0.3	158				Green	Grey	Grey	Grey	Green		Light Green								
236	COA			0.6	145	Yellow			Green	Grey	Grey	Grey	Green		Light Green								
950	COA			0.7	133	Yellow			Green	Grey	Grey	Grey	Green		Light Green	Grey		Yellow		Yellow			
187	COA			0.1	133				Green	Grey	Grey	Grey	Green		Light Green								
311	COA			0.2	76				Green	Grey	Grey	Grey	Green		Light Green								
489	COA		0.2	50				Green	Grey	Grey	Grey	Green		Light Green									
194	COA	MT		1.8	874				Green	Grey	Grey	Grey	Green		Light Green	Grey	Yellow	Red	Red				
231	COA			0.2	38				Green	Grey	Grey	Grey	Green		Light Green			Red	Red				
47	COA			0.1	18				Green	Grey	Grey	Grey	Green		Light Green	Green			Red				
34	COA	FF	Y	1.6	626	Yellow	Yellow		Green	Grey	Grey	Grey	Green		Light Green	Grey				Yellow			
31	COA			0.1	573				Green	Grey	Grey	Grey	Green		Light Green								
245	COA			0.2	133				Green	Grey	Grey	Grey	Green		Light Green			Yellow					
294	COA			0.3	76	Yellow			Green	Grey	Grey	Grey	Green		Light Green						Yellow		
192	COA			0.3	66	Yellow			Green	Grey	Grey	Grey	Green		Light Green						Yellow		
182	COA	S		0.2	33				Green	Grey	Grey	Grey	Green		Light Green								
190	COA			0.4	357				Green	Grey	Grey	Grey	Green		Light Green						Yellow		
222	COA			0.6	158	Yellow			Green	Grey	Grey	Grey	Green		Light Green	Green					Yellow		
41	COA			0.3	158				Green	Grey	Grey	Grey	Green		Light Green	Grey			Yellow	Yellow			
952x	COA		-	121					Green	Grey	Grey	Grey	Green		Light Green								
374	COA	W		0.1	21				Green	Grey	Grey	Grey	Green		Light Green			Yellow	Yellow	Red			
5	COA	SE		0.2	76				Green	Grey	Grey	Grey	Green		Light Green	Grey		Yellow					
33	COA			0.1	76				Green	Grey	Grey	Grey	Green		Light Green			Yellow					
174	COA			0.4	57				Green	Grey	Grey	Grey	Green		Light Green			Yellow					
314	BG + Sel	PW (VP)		6.8	976			Yellow		Yellow			Red	Light Green									
348	BG + Sel			3.0	685	Yellow				Yellow	Light Green	Light Green	Yellow	Light Green								Red	
147	BG + Sel			6.6	590			Red		Yellow	Light Green			Light Green				Yellow					
8	BG + Sel			0.4	65					Yellow	Light Green	Light Green	Red	Light Green		Light Green							
334	BG + Sel			2.4	0				Yellow	Red	Light Green			Red								Red	
125	Waddon	PW (WM)		2.8	632	Yellow		Yellow	Light Green	Red	Light Green	Light Green	Yellow		Light Green								
946	Waddon			2.7	385			Red	Red	Green	Grey	Grey	Light Green			Light Green					Yellow	Red	
48	Waddon			2.6	331	Yellow		Red		Light Green	Red		Light Green			Light Green					Yellow		
332	Waddon			1.5	265	Yellow	Yellow	Yellow	Light Green	Red	Light Green		Light Green	Yellow		Light Green							
355	Waddon			1.4	260	Yellow		Red	Light Green	Yellow	Light Green		Light Green	Yellow		Light Green							
316	Waddon			1.0	184	Yellow			Light Green	Red		Light Green	Light Green	Yellow		Light Green							Red
146	Waddon			1.0	148	Yellow			Light Green	Red		Light Green	Light Green	Yellow		Light Green							

Ref	Place	Sub-area	Shortlisted in Section 5.4?	Area (ha)	Proposed homes ²⁰	SRN	SINC	Flood risk	Metropolitan Centre	District centre	Local centre	Shopping parade	PTAL	MOL	Local green space	Other green space	GB and MOL	Townscape	Listed building	Conservation area	Historic Park/Garden / SM	SIL	
349	Waddon	PW (WM)		1.0	146																		
351	Waddon			0.7	124																		
144	Waddon			0.4	74																		
570511	Waddon			2.8	-																		
14060511	Waddon			1.4	-																		
25	Waddon		PW (FW)		3.8	1099																	
110	Waddon			0.7	168																		
16	Waddon			3.6	126																		
132	Waddon			0.5	111																		
153	Waddon			0.4	91																		
350	Waddon	Y		1.6	-																		
137	Waddon	PW (WW)		3.5	659																		
11	Waddon			1.0	152																		
143	Waddon			0.3	84																		
135	Waddon			1.0	70																		
152	Waddon			6.8	0																		
1290511	Waddon			1.7	-																		
44	Addington			1.7	376																		
1	Addington			0.4	46																		
68	Addiscombe			0.2	12																		
3	Addiscombe			0.7	-																		
2	Addiscombe			0.5	-																		
416	BG and Selhurst			0.8	40																		
13	BG and Selhurst			0.4	39																		
468	BG and Selhurst			0.3	30																		
20	BG and Selhurst			0.1	16																		
22	BG and Selhurst			0.1	16																		
471	BG and Selhurst			0.2	16																		
78	BG and Selhurst			0.0	8																		
372	Coulsdon			0.8	157																		
945	Coulsdon	Y		0.3	66																		
139	Coulsdon			0.4	-																		
357	CP and Upper Norwood			1.5	135																		
126	CP and Upper Norwood			2.4	72																		
58	CP and Upper Norwood			0.4	41																		
59	CP and Upper Norwood			0.3	16																		
28	CP and Upper Norwood			0.1	0																		
937	Kenley and Old Coulsdon			0.2	12																		
951	Norbury			0.0	24																		
106	Norbury			0.2	18																		
347	Purley	Centre	Y	3.8	479																		
61	Purley				0.6	182																	
30	Purley				0.7	118																	
35	Purley				0.4	114																	
130	Purley				0.4	106																	

Ref	Place	Sub-area	Shortlisted in Section 5.4?	Area (ha)	Proposed homes ²⁰	SRN	SINC	Flood risk	Metropolitan Centre	District centre	Local centre	Shopping parade	PTAL	MOL	Local green space	Other green space	GB and MOL	Townscape	Listed building	Conservation area	Historic Park/Garden / SM	SIL
683	Purley	Centre		0.6	99																	
490	Purley			1.0	36																	
64	Purley	Reedham		0.3	26																	
410	Purley			0.2	18																	
405	Purley			0.7	99																	
495	Purley	P Oaks		0.3	0																	
324	Purley			1.1	G+T																	
411	Purley			0.1	8																	
79	Sanderstead			0.7	62																	
306	Sanderstead			0.5	41																	
71	Sanderstead			0.6	26																	
85	Selsdon			0.9	86																	
948	Selsdon			0.1	26																	
128	Shirley			1.4	91																	
504	Shirley			0.7	24																	
87	Shirley			0.1	18																	
89	Shirley			0.1	16																	
90	Shirley			0.1	11																	
502	Shirley		Y	2.9	9																	
54	South Croydon			0.6	42																	
101	South Croydon			0.4	41																	
114	South Croydon			0.1	8																	
51	S Norwood and W'dside			0.7	102																	
140	S Norwood and W'dside			3.9	-																	
499	Thornton Heath			8.2	372																	
136	Thornton Heath			0.7	124																	
149	Thornton Heath		Y	0.9	118																	
103	Thornton Heath			0.8	118																	
326	Thornton Heath			0.4	66																	
105	Thornton Heath			0.3	22																	
284	Thornton Heath			0.2	18																	
248	Thornton Heath			0.1	11																	
22420411	Thornton Heath			0.2	-																	
21170411	Add'n/Sels'n	GB-LL	Y	110	-		*															
19530411	Add'n/Sels'n	GB-LL(N)	Y	13.2	-		*															
23010411	Sanderst'd	GB-MH	Y	10.5	-																	
N/a	Selsdon	GB-GH	Y	-	-																	
23270411	Sanderst'd	GB-MA	Y	8.3	-		*															
20520411	Coulsdon			6.3	-																	
151511	Ken and OC			55.1	-		*															
22250411	Ken and OC	GB		8.7	-		*					*										
20290411	Ken and OC			3.6	-		*					*										
22080411	Sanderst'd			15.5	-		*															
19320411	Sanderst'd			8.1	-																	

Figure 5.4: Proposed allocations and omission sites



5.4 Sub-area / supply component scenarios

5.4.1 Having considered strategic (or 'top down') issues, parameters and options with a bearing on the establishment of reasonable growth scenarios, and the site options supported/not supported for allocation through the SHLAA (and the capacities identified through the SHLAA), the next step (and the penultimate step before arriving at borough-wide growth scenarios), was to explore growth scenarios for individual sub-areas across the borough and other supply components (specifically, windfall).

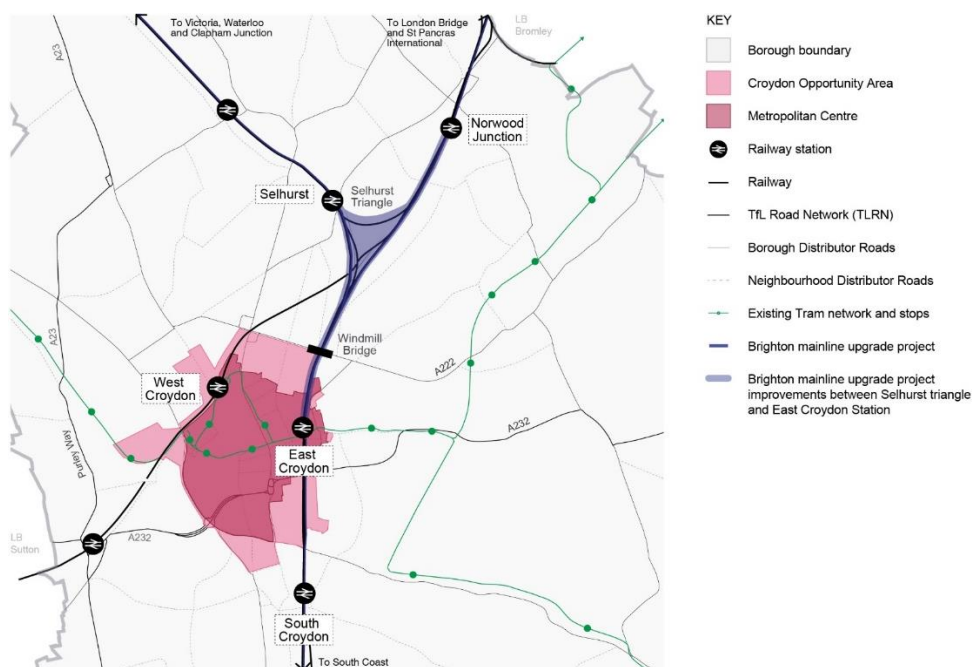
5.4.2 In light of the discussion in Section 5.2 (see concluding paragraph 5.2.6), this section considers:

- Brighton Main Line and East Croydon Transformation Corridor;
- North End Quarter Transformation Area;
- Elsewhere within the Croydon Opportunity Area;
- Purley Way Transformation Area;
- Allocations elsewhere by sub-area;
- Green Belt; and
- Windfall sites.

Brighton Main Line and East Croydon Transformation Corridor

5.4.3 The corridor has already been introduced above, and is introduced and explained in detail in the Partial Review document. Figure 5.5 further sets the context.

Figure 5.5: East Croydon Station and the Brighton Mainline in the wider context



5.4.4 East Croydon station and the immediate surrounding area has been a focus for development since the Masterplan of 2011, the principles and objectives of which remain valid. This has seen notable developments reach consent, commencement and completion adjacent to East Croydon Station. At the current time, three of the nine proposed allocations in the transformation corridor have planning consent, for a total of 777 homes. Importantly, two of these will also deliver office space, whilst the third will be a residential scheme contingent on existing businesses being able to relocate, recognising that this area falls within Croydon's office retention area, indeed the station area is Croydon's core office location.

5.4.5 Focusing on the six proposed allocations without planning consent, the centrally important site is East Croydon Station itself (Site 45). The proposal here is to relocate the main station building approximately 150m to the north of its current location, increase the number of platforms from 6 to 8 and create a new station square over the railway line (at the existing level of George Street), to include expanded tram platforms at its southern extent, on George Street, next to the current bus station.

- 5.4.6 The possibility of delivering new homes over the railway, within Site 45, was discussed with CBC officers, mindful that delivering new homes over railway lines is increasingly seen as a solution to meeting London's housing needs (for example, one [study](#) identified the theoretical possibility of delivering over 280,000 homes in this way across London). However, the decision was reached that this option is unreasonable, as it was identified as an option by Network Rail in the initial scoping for the project (see <https://www.networkrail.co.uk/wp-content/uploads/2019/04/Network-Rail-Property-unlocking-homes-for-London-brochure.pdf>), but this option was rejected prior to CLP 2018 (which set out ambitions for the East Croydon area that the Partial Review is now seeking to expand upon). Any option to deliver new homes would conflict with key objectives for the scheme, including objectives: deliver “a high quality civic hub and transport interchange [with] spacious and inclusive design”; and “seek to enhance Croydon’s Green Grid, walking a cycling connections [notably east-west] and biodiversity”.
- 5.4.7 There are also wider choices in respect of the station square / Site 45, as explained in the current Partial Review document: “The final form of the station square, particularly whether the station square includes a void or not, should be determined prior to submission of the TWAO application after a joint Council / Network Rail assessment of the alternatives. A robust alternatives assessment process means that reasonable alternatives have been considered using agreed evaluation criteria to select the preferred option.” However, there is no reasonable need to explore alternatives through the Partial Review SA.
- 5.4.8 Aside from Site 45, the other non-consented proposed allocations are as follows:
- Site 175 – is located to the east of the station, and is separated by the B243. The current proposed capacity of 195 homes (0.69 ha = 283 dph) broadly aligns with that within CLP 2018 (97 to 279 homes), although it is notable that the proposed capacity at the Partial Review I&Os stage was potentially higher (132 to 380 homes). The character of the area is: “Large buildings in an urban setting.”
 - Site 199 – comprises a builders yard adjacent to the railway lines, to the north of the station. The current proposed capacity of 107 homes (0.78 ha = 138 dph) is slightly lower than the capacity range proposed at by CLP 2018 and at the Partial Review I&Os stage (109 to 313 homes). The proposal was, and remains, to deliver a mixed use scheme to include light industrial workshops and studio spaces. The character of the area is described as: “Industrial Estates; Large houses on relatively small plots.”
 - Sites 37 172 and 200 – are adjacent sites to the northwest of the current station.
 - Site 37 is a new proposed allocation, with a proposed capacity of 33 homes (0.17ha = 194 dph), which is a modest capacity for this area, and is lower than the proposal at the I&Os stage (37 to 117 homes). However, this proposed capacity reflects the outcomes of detailed work by the Council’s place-making team, such that there is not considered to be any reasonable need to explore a higher growth option. The surrounding character is described as: “Industrial estates, large buildings with surrounding space.”
 - Site 172 – is the northern-most section of a much larger CLP 2018 allocation (also Site 172; mostly comprising Ruskin Square, with CLP 2018 supporting up to 625 homes and notably identifying the potential to connect to a district heating network), and is the only remaining part of the CLP 2018 allocation that remains unconsented and requires an allocation through the Partial Review. The site is 0.43 ha and the proposed capacity is 158 homes, which equates to 367 dph.
 - Site 200 – was a proposed allocation for up 384 homes in CLP 2018 and at the I&Os stage; however, the latest proposal is to support 66 homes on part of the site (0.44 ha = 150 dph), with the remainder of the site used for car-parking (the site is currently a multi-storey car park), in line with the Croydon OAPF (2013), which allows for the loss of 200 parking spaces across the New Town and East Croydon.
- 5.4.9 A final consideration relates to phasing, with the Partial Review document explaining a need to: “[Delay] the development of some existing Local Plan allocations, which will need to be implemented later than originally planned in order to allow the [station etc.] upgrade works to take place.” However, there is no reasonable options to explore that would avoid or reduce this issue.
- 5.4.10 In **conclusion**, it is reasonable to test a higher growth scenario, in addition to the scenario that emerges on the basis of the SHLAA, recognising that this is a proposed transformation corridor. However, it is difficult to identify a higher growth scenario, given the transformation corridor’s specific objectives, which are not focused on housing delivery. There is no reasonable potential to deliver new homes on Site 45; however, it is reasonable to explore the option of modestly higher growth across the other non-consented proposed allocations. On balance, it is considered reasonable to explore the option of **150 additional homes** in total; specifically, 50 extra homes at each of the non-consented proposed allocations with a proposed capacity equating to below 200 dph (Sites 37, 199 and 200).

North End Quarter Transformation Area

- 5.4.11 As discussed in Section 5.2, this proposed transformation area comprises the dense built form either side of North Street, which is Croydon's main pedestrianised shopping area, and a historic street that forms part of the Central Croydon Conservation Area (albeit with just one nationally listed building, at its southern extent, which is grade 1 listed). The proposed transformation area includes the bulk of the Croydon Primary Shopping Area, and including two large shopping centres, either side of North Street. The current Partial Review document explains the current situation, in respect of retail, as follows:

“Altogether Croydon town centre has more retail floor space than any other Metropolitan Centre in London, with 30,000m² more floor space than Stratford. However it also has the highest vacancy rate among London’s Metropolitan Centres (at 27%). And whilst Croydon town centre has the 5th highest rate of spending on comparison goods amongst Metropolitan Centres in London, when this is converted to how much is spent per square metre of floor space, Croydon falls to the lowest rate of spend in London.”

- 5.4.12 Detailed work to explore the future of this area is presented within *Croydon Future of Destination Retail* (2020). The report begins with an explanation that:

“The revival and development of the North End area of Croydon Town Centre will be delivered in a period of unprecedented changes. The impacts of the... pandemic, Brexit, and the post-Covid recession, combined with the major challenges facing our societies in the 21st Century — tackling climate change, addressing public health issues, and reducing inequalities — alongside Croydon’s specific urban, social, environmental and economic challenges, all serve to only elevate the importance of a renewed and aspirational vision for the North End area.

There are strong opportunities for positive changes, and Croydon has the right ingredients. With clear outcomes, objectives and processes in place, the area can be remodelled to become a pioneering inclusive, resilient, and unique destination for all, which revives central Croydon’s bold and visionary heritage, with innovation and biodiversity at its heart. It will build on the area’s existing assets and legacy of innovation and enterprise, to become a highly productive quarter that helps tackle climate change, improves public health and wellbeing, celebrates diversity, and fosters social and community cohesion through all stages and parts of its development.”

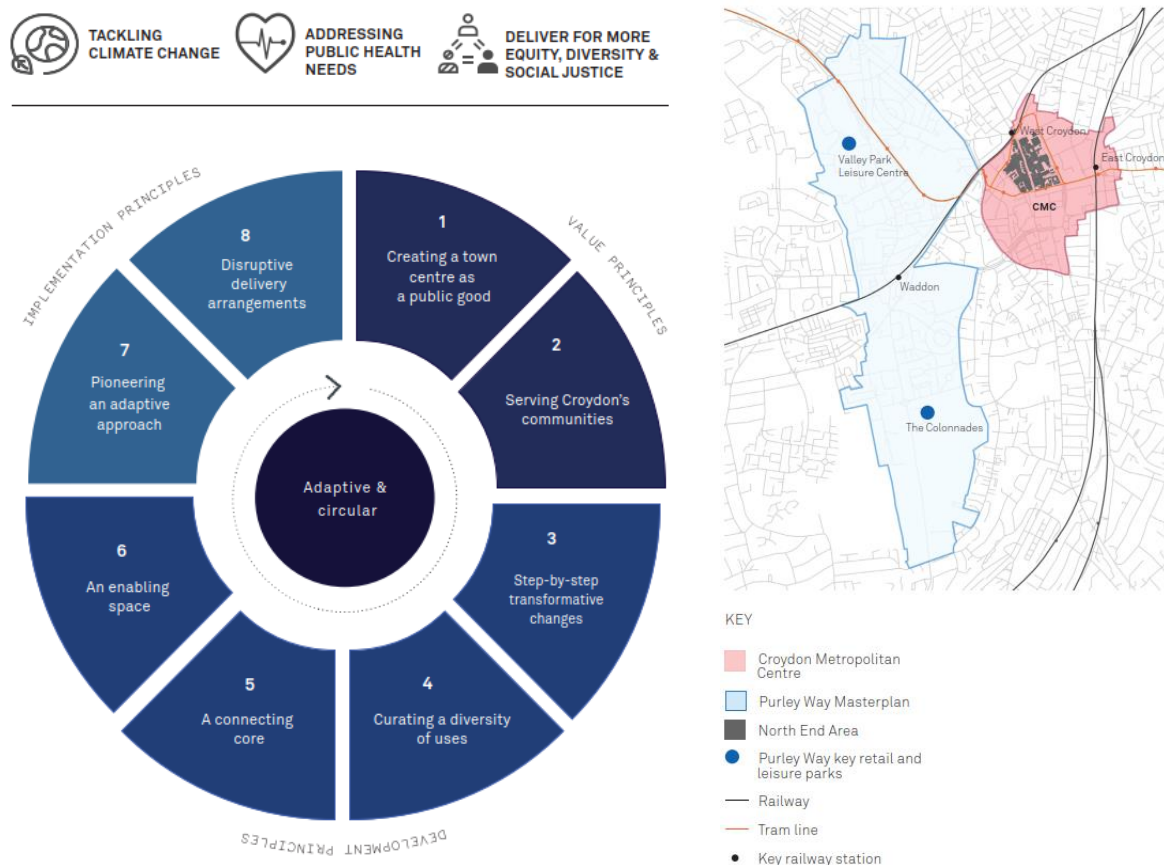
- 5.4.13 The report gives early consideration to the policy/planning context, including:

- Croydon OAPF (2013) – policy for the ‘retail core’ area *“needs to be re-invented to be bolder and more ambitious. Whilst most of the OAPF principles still endure, it is clear that some of them are outdated in the light of recent trends, political priorities and broader societal challenges.”*
- The Whitgift outline planning permission - in 2013, Hammerson and the Westfield Group formed a joined venture to redevelop the Whitgift Centre. In 2015, the venture gained consent for an outline planning proposal for the site which would involve comprehensive redevelopment of the Whitgift Centre for a high-density retail-led mixed use development, including between 626 and 967 residential units. However, in early 2020, it was confirmed that the redevelopment of the Whitgift Centre, as proposed in the outline planning permission, will not be delivered.

- 5.4.14 The report then goes on to explore issues and opportunities in detail, under a framework of eight emerging ‘principles’ (see Figure 5.6a), and with careful consideration given to in-combination effects with growth and change elsewhere within the Croydon Metropolitan Centre / Opportunity Area and within the Purley Way Transformation Area – see Figure 5.6b. The report concludes by presenting an Illustrative Vision, which is described in summary terms as follows [emphasis added]:

*“The area will be home of to a diverse mix of uses to cater for the needs of a diverse resident population, workers and visitors, along with **residential housing**. ‘Mixed-use’ will characterise the all area, but also individual streets and blocks, horizontally and vertically. The area will host public life amenities at different levels, including podiums and rooftops... Biodiversity will be at the heart of the North End with productive and regenerative landscape provided along circulation routes, within new public spaces and pocket parks, and at uppers levels.” [emphasis added]*

Figure 5.6: North End Transformation Area proposed principles;²¹ and (b) the area in context



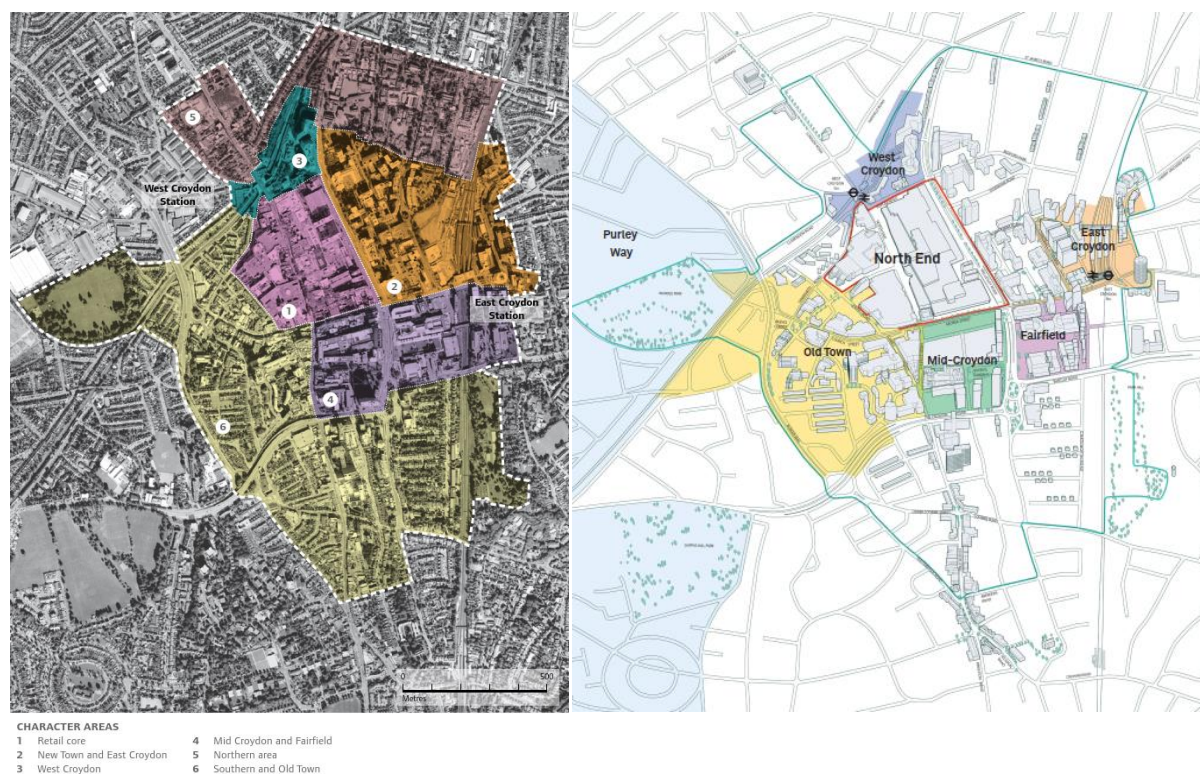
- 5.4.15 With regards to residential housing, there is only one primary proposed allocation within the transformation area, namely the Whitgift Centre (Site 393; there is also a small proposed allocation for 76 homes (Site 220), which is not associated with any strategic choice, and so is not discussed further). The proposal in CLP 2018 and at the Partial Review I&Os stage was to deliver 400 – 1000 homes. However, the latest proposed capacity is 600 homes, with this figure having been arrived at particularly mindful of the need to avoid building heights that would negatively impact on the setting of the conservation area.
- 5.4.16 Croydon Future of Destination Retail (2020) does not discuss housing growth options, nor does it state that there could be an opportunity to explore options that would involve more or less housing than was expected to be delivered through the Whitgift outline planning permission (up to circa 1,000). However, it seems, reasonable to explore a higher housing growth option at the current time.
- 5.4.17 Specifically, it is reasonable to test the option of 1,000 homes at Site 393. It is noted that the long term proposal is also to redevelop the Centrale shopping centre, on the western side of North Street, which opened in 2004, in line with the Croydon OAPF (2013), which sets out that the preferred approach to redevelopment of the Whitgift and Centrale areas of Croydon town centre, was through a comprehensive approach as part of a large redevelopment and renewal approach. However, the Centrale shopping centre is not a proposed allocation, presumably on account of not being available, such there is no reasonable potential to test the option of allocation for mixed use redevelopment through the Partial Review SA.
- 5.4.18 In **conclusion**, in addition to latest preferred scenario, which involves 600 homes at Site 393 and 76 homes at site 220, it is reasonable to test a higher growth scenario involving an **additional 400 homes**.

²¹ Croydon Future of Destination Retail (2020); prepared by We Made That and PRD; available at: XXX

Elsewhere within the Croydon Opportunity Area

5.4.19 The OAPF defined six character area and six masterplans were adopted between 2011 and 2014 (plus a draft masterplan has been prepared for adjacent Purley Way) – see Figure 5.7.

Figure 5.7: Croydon OA character areas and masterplan areas



5.4.20 The aim of this section is to briefly consider all of the proposed allocations and proposed capacity figures identified through the SHLAA (N.B. there are no omission sites) with a view to exploring reasonable higher growth options. Sites are considered according to geographical location.

North west extent

5.4.21 At the northwest extent of the OA is a cluster of three adjacent sites, including one that falls just outside of the OA. Beginning with the site just outside of the OA (Site 396), this now has consent for 72 homes, which is notably more than the 9 to 52 home capacity figure within CLP 2018. With regards to the two non-consented sites:

- Site 201 – is proposed for a primary school plus 216 homes, in line with proposal in CLP 2018, where the suggested housing capacity figure was 51 to 293 homes.
- Site 417 – comprises a vacant office building, where the proposal is for redevelopment or conversion to deliver 24 homes, which is a figure at the low end of the range indicated by CLP 2018 (23 - 64 homes).

5.4.22 In conclusion, whilst a high growth scenario can potentially be envisaged, this would deliver only very modest higher growth, and so does not warrant further consideration through the Partial Review SA.

West Croydon Station area

5.4.23 Moving east, there is a cluster of five sites in the vicinity of West Croydon Station, plus there is one further site a short distance to the north.

5.4.24 One of these sites is now consented, namely Site 211, which has consent for a high density scheme (800 dph) including a 25 storey tower. Adjacent to Site 211 is West Croydon Bus station (Site 40), which is a new proposed allocation for 76 homes, which amounts to 238 dph, and aligns with the range identified at the I&Os stage (45 to 142 homes). In addition to needing to retain the bus station, heritage is a constraint to development, with a need to conserve the settings of Croydon Quaker Meeting House and the Adult School Hall, plus the grade 1 listed Parish Church of St Michael and All Angels is nearby.

- 5.4.25 Adjacent to the north is Site 123, where the latest proposal is for 291 homes, equating to 485 dph, which is a notably higher density than the maximum density identified in CLP 2018 and at the Partial Review I&Os stage, namely 320 dph. Heritage is a constraint here, namely the setting of the Wellesley Road (North) Conservation Area and locally listed buildings.
- 5.4.26 The next site to consider is Site 203, which includes West Croydon Station. The proposed capacity of 109 homes amounts to just 59 dph, and is at the low end of the previously identified range (79 to 455 homes). The proposed scheme involves: *“Remodelling of station and redevelopment to provide an improved transport interchange, cycle hub, retail & office units with residential development above.”*
- 5.4.27 Finally, Site 133 is a new site at the northern extent of the OA. It currently comprises residential blocks, and is closely associated with the Wellesley Road (North) Conservation Area. The proposal is to deliver a scheme involving 505 homes (presumably this is a net increase), equating to 549 dph.
- 5.4.28 In conclusion, the proposed capacity of Site 203 stands out as potentially low, noting the densities that are consented or proposed at other nearby sites. However, there is no evidence available to suggest that a higher growth option is achievable, as part of a scheme focused on station remodelling / delivering an enhanced transport interchange etc, or would deliver any particular benefits besides additional homes. As such, there is not considered to be a reasonable need to explore a higher growth scenario.

East of the A212 (Office Retention Area)

- 5.4.29 There is a large cluster of 11 sites to the east of the A212, namely land between the North End Quarter and East Croydon Station. This area entirely comprises the Croydon Office Retention Area. This is a relatively unconstrained area in environmental terms, with no conservation area or listed buildings, although there is a need to consider that that A212 is a busy dual carriageway, giving rise to air and noise pollution concerns. The tram line runs down the centre of the A212, linking to the two rail stations.
- 5.4.30 Only one of the 11 sites is committed, namely Site 142, where there is consent for a 794 mixed use scheme, equating to 1,654 dph, to include a 68 storey tower. This is a capacity almost twice that anticipated within CLP 2018 (419 to 441 homes).
- 5.4.31 Eight sites (187, 218, 234, 236, 311, 489, 493, 950) are retained allocations from CLP 2018, with the stand-out site being Site 187, where the proposal is to increase the capacity to 133 homes (1,654 dph), in comparison to a capacity of 16 to 44 homes in CLP 2018. The proposal at Site 493 is also to increase the capacity from the CLP 2018 stage, specifically to 158 homes (510 dph) from 44 to 125 homes. The capacities at the other sites align with CLP 2018, with dph figures ranging between 200 and 400 dph.
- 5.4.32 Finally, there are two new proposed allocations, namely Sites 42 and 148, with proposed densities of 630 and 700 dph respectively. In both cases the proposed capacity was notably lower at the I&Os stage.
- 5.4.33 In conclusion, the discussion above serves to suggest that an ambitious approach is being taken to supporting higher density schemes that deliver a large number of new homes alongside offices and other uses. There is no reasonable need to explore a higher growth scenario.

Mid Croydon and Fairfield

- 5.4.34 This sub-area is located to the south of Church Street / North End Quarter / George Street / East Croydon Station, and to the north of the A232.
- 5.4.35 Beginning with Mid Croydon, to the east, this area is strongly associated with the Central Croydon Conservation Area, as well as Queen’s Gardens open space. Of the three proposed allocations, two are retained from CLP 2018, namely Sites 194 and 231. The former is a large and constrained site (the grade 2* listed clock tower is adjacent, and the view cone intersects the site), where the proposal is for 874 homes (431 dph), which is a notable increase on the equivalent figure from CLP 2018 (88 to 504 homes). The latter is a small site comprising a listed office building, where the proposal is for 38 homes alongside a cultural facility, which is a slight reduction on the 40 homes figure from CLP 2018. Site 47 is then a new proposed allocation for 18 homes, and comprises a vacant building in the conservation area.
- 5.4.36 Moving east to the Fairfield area, this is a civic and cultural area, associated with Fairfield Halls (refurbished and a centrally important component of the Cultural Quarter, with Croydon named as the Mayor of London’s Borough of Culture for the year 2023), Croydon College, Fairfield Gardens and the Magistrates Court. There are few designated constraints, with no listed buildings. Taking sites in turn:

- Site 31 (Croydon College car park, College Road) is a stand-out site, where there is consent for 573 home scheme equating to nearly 5,000 dph, with the scheme set to include a 49 storey tower. This is a figure much higher than the 159 homes anticipated in CLP 2018, plus the site is reduced in extent.
- With regards to the three non-consented sites taken forward from CLP 2018, the proposal for Site 245 is of note, as the proposed capacity (133 homes; 633 dph) is an increase on the 30 to 85 homes figure in CLP 2018. The other two sites (182, 192) are modest sites, with capacities in line with CLP 2018.
- Finally, Site 34 is a new proposed allocation, with the SHLAA indicating a capacity of 626 homes (389 dph). This is a notable decrease on the proposal from the Partial Review I&Os stage - 814 to 2098 homes. This is a complex site, including within it the law courts and Fairfield Gardens.

5.4.37 In conclusion, Site 34 stands out as feasibly being associated with a higher growth option; however, this is a complex site, associated with wide ranging detailed masterplanning and design considerations, hence there is no reasonable need to explore a higher growth option.

South of the A232

5.4.38 This area, at the southern extent of the Opportunity Area, lies to the east of the River Wandle floodplain and the Laud Street local heritage area, to the south of Mid Town and the A232 and to the west of the A212 (Park Lane) and a residential conservation area.

5.4.39 There are four sites, one of which (Site 190) is consented for 357 homes (541 dph), which is a figure notably higher than the CLP 2018 capacity figure (56 to 162 homes). Site 222 is then a retained allocation from CLP 2018, where the anticipated capacity (158 homes; 282 dph) aligns with CLP 2018.

5.4.40 The other two sites (41 and 952x) are both new allocations of note, including due to proximity to listed buildings, including (in the case of Site 952x) a grade 2* listed building. Site 952x is not discussed in Section 5.3, because it emerged late in the process, following a refused planning application.

5.4.41 In conclusion, it is difficult to envisage a reasonable higher growth scenario.

Sites elsewhere

5.4.42 Beginning with the west, Site 374 is a small site in the Old Town, and within a conservation area. The proposal is to support 21 homes (263 dph), a slight decrease on the 23 to 64 range from CLP 2018.

5.4.43 Finally, there are three sites (5, 33 and 174) at the south east extent of the OA, specifically south east of the East Croydon station (south of the Addiscombe Road). One of these sites (174) is a retained allocation from CLP 2018, with the proposed capacity (57 homes; 163 dph) at the lower end of the CLP 2018 range (49 to 141). The other two sites are modest in scale, with proposed densities of 292 and 585 dph.

5.4.44 In conclusion, it is difficult to envisage a reasonable higher growth scenario.

Overall conclusion

5.4.45 The aim of the discussion has been to consider each of the proposed allocations located within the Croydon Opportunity Area but outside of the two proposed transformation areas. The aim of doing so is to inform discussion of whether there is a reasonable higher growth scenario, involving a quantum of homes over-and-above the figure that emerges from the SHLAA (7,709 homes). It is important to explore the possibility of a higher growth scenario, recognising that this is a designated Opportunity Area.

5.4.46 The discussion serves to highlight two sites that could potentially deliver significant additional homes:

- Site 203 (West Croydon station and shops, 176 North End) – the proposed capacity of 109 homes (59 dph) stands out as notably low, given the very high public transport accessibility, and noting the densities that are consented or proposed at other nearby sites. However, there is no evidence available to suggest that a higher growth option is a achievable, as part of a scheme focused on station remodelling / delivering an enhanced transport interchange, or would deliver any particular benefits besides additional homes. As such, there is not considered to be a reasonable need to explore a higher growth scenario.
- Site 34 (Land Bounded by George Street, Park Lane, Barclay Road and the railway) – the proposed capacity of 626 homes (389 dph) is a notable decrease on the proposal from the Partial Review I&Os stage - 814 to 2,098 homes. However, this is a complex site, associated with wide ranging detailed masterplanning and design considerations, hence there is no reasonable need to explore higher growth.

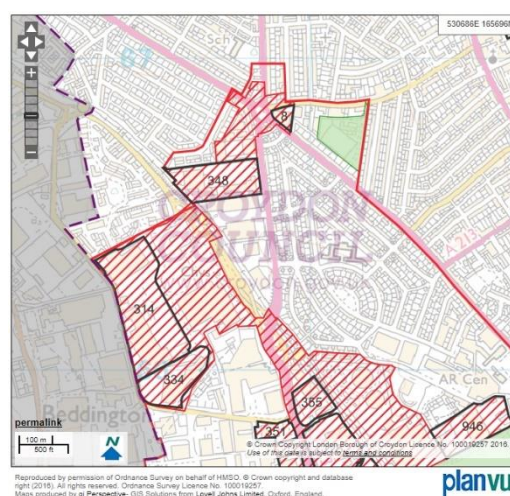
Purley Way Transformation Area

- 5.4.47 The transformation area has already been introduced above (Section 5.2), including by explaining consultation at the Partial Review Issues and Options (I+Os) stage on options ranging from ranging from 2,900 to 12,000 homes, and by explaining the masterplanning work completed in 2020 and 2021.
- 5.4.48 The vision for the area involves four new neighbourhoods / areas of transformational change, retention and intensification of the three areas of SIL, a focus on enhancing the A23 Purley Way corridor itself, other wide ranging transport and other infrastructure upgrades and urban evolution elsewhere in the transformation area (including protection and enhancement of the major green spaces that exist).
- 5.4.49 Set out below is a discussion of how latest proposals vary to those at the I+Os stage, followed by a concluding discussion on reasonable growth scenarios for the area.

N.B. **maps** presented below show allocations from the Issues and Options stage.

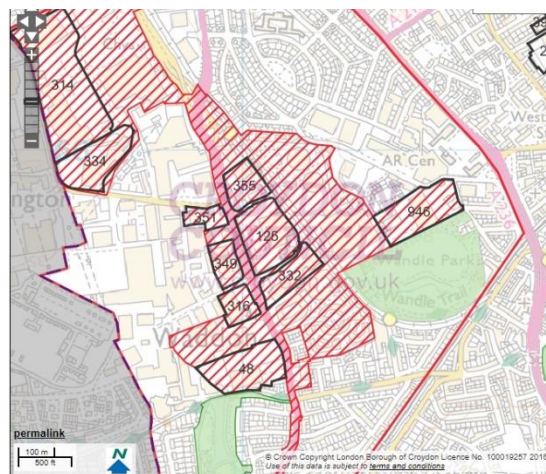
Valley Park

- 5.4.50 This is at the northern extent of the Masterplan Area, stretching from the Lombard roundabout, south along Purley Way to the tram line. The transformation area comprises land between Purley Way and the tram line, and to the west of the tram line, with a residential neighbourhood to the east of Purley Way.
- 5.4.51 Important context comes from the CLP 2018, which established policy in support of a new Local Centre at Valley Park (DM36.2; focus on land to the west of the tramline) and growth alongside enhancements Lombard Roundabout) DM36.3).
- 5.4.52 Focusing on the Lombard Roundabout, the first point to note is that a 96 home residential-led scheme has recently come forward at the southern edge of the roundabout, on land formally designated as SIL. At the eastern edge of the roundabout, Site 8 was proposed for 13-33 homes at the I+Os stage, and the latest proposal is for 65 homes (the masterplan suggests 40 to 50 homes).
- 5.4.53 Moving to the south, land between Purley Way and the tram line comprises a small remaining area of SIL, and then Site 348, which was proposed for 128-482 homes at the I+Os stage, and is now proposed for 685 homes, as part of a mixed use scheme within the potential Valley Park Town Centre and environs.
- 5.4.54 Moving to the southwest, the entire area land within the TA, as defined at the I&Os stage, falls within the land identified for a new Local Centre ('Valley Park') by CLP 2018. This is a major area of proposed change, with two allocations proposed at the I&Os stage, and new proposed allocation at this stage:
- Site 314 – was proposed for 237-641 homes at the I+Os stage, and is now proposed for 976 homes as part of a mixed use town centre scheme.
 - Site 334 – was proposed for 34-90 homes at the I+Os stage, but is now proposed for town centre uses with no anticipated housing supply.
 - Site 147 – is a new site, not proposed at I+Os stage (and hence not shown on the map above), located to the east of Site 314, currently comprising IKEA and subject to flood risk (much of the site is within flood zone 2). It is proposed for 590 homes as part of a mixed use town centre scheme.
- 5.4.55 Overall, the proposal for this area is now to deliver a new Local Centre ('Valley Park') centred on the tram stop at Ampere Way, with the local centre stretching either side of the tramline (as opposed to being focused to the west, as per the CLP 2018 proposal), integrating closely with an area of SIL, and with the extensive Beddington SIL in LB Sutton to the west.
- 5.4.56 In **conclusion**, the proposed housing capacity of 2,300 homes is higher than at the I+Os stage, hence it is difficult to envisage a higher growth scenario. Attention focuses on Site 334, which is not associated with any anticipated housing supply, but there is a need to avoid conflict with town centre masterplanning.



Waddon Marsh

5.4.57 This area primarily comprises a tight cluster of allocations either side of the Purley Way, extending east as far as the tram line, which together will deliver a new town centre and environs. An important issue here is flood risk, with flood risk zone 2 significantly intersecting a number of the sites, and almost entirely covering the two northern-most sites.



5.4.58 The cluster comprised seven sites at the I+Os stage, and the latest proposal involves nine sites, with the two additional sites filling the two gaps that can be seen on the map between the sites to the west of the Purley Way.

5.4.59 Focusing on the seven sites retained from the I+Os stage, the latest proposal is to increase the capacity of all seven. In most cases the proposal is to support a capacity modestly above the upper range figure identified at the I+Os stage; however, Site 125 is an outlier, with the latest proposal for 632 homes a very significant increase on the 38 to 141 homes range from the I+Os stage. 33% of this site intersects fluvial flood risk zone 2.

5.4.60 The final proposed allocation is to the east of the main cluster, namely Site 946 (Stubbs Mead), which comprises designated SIL, is a South London Waste Plan safeguarded waste site and almost entirely comprises flood risk zone 2 (also a small area of flood risk zone 3). This was a proposed allocation in CLP 2018 for 157 to 440 homes, and is now proposed for 385 homes as part of a mixed use scheme to include industrial and warehousing uses. The Masterplan explained: *“The park-facing southern part of both Stubbs Mead and Turners Way Gas Works [adjacent to the west of Stubbs Mead]... could be appropriate for mixed use residential development, however the sites are SIL designated, along with a safeguard placed on part of the site for a waste facility as part of the South London Waste Plan.”*

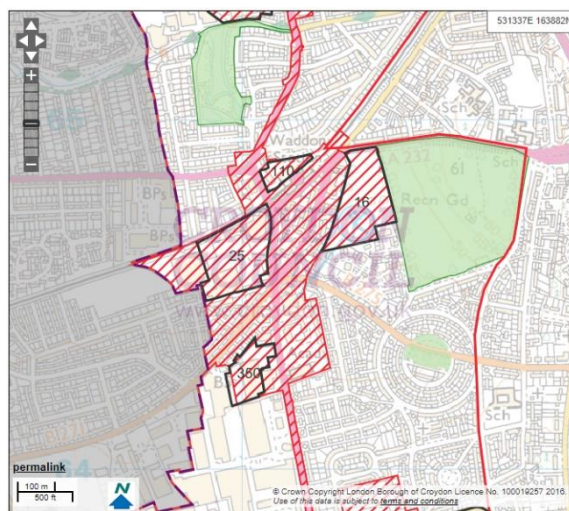
5.4.61 The Masterplan explored options for the Gas Works site, and the site is discussed in Section 5.3, above, as an omission site (ref. 570511), but is not considered a reasonable option at the current time. A second omission site (ref. 14060511) is also shown, but comprises SIL and is set back from Purley Way.

5.4.62 As a final point, it is worth noting that to the south east of the main cluster is Woodall Court, which is a recent scheme involving residential co-location with B8 uses, with the SIL designation retained (which also involved deculverting of the River Wandle).

5.4.63 In **conclusion**, the proposed housing capacity of 2,550 homes is higher than at the I+Os stage, and flood risk is an important constraint in this area, hence it is difficult to envisage a higher growth scenario.

Five Ways

5.4.64 This area extends from Waddon Station south to Five Ways roundabout and also takes-in land to the south of the roundabout, including a small area of SIL.



5.4.65 Context comes from CLP2018 (DM49.1), which proposed a new Local Centre at ‘Waddon’, centred on the roundabout.

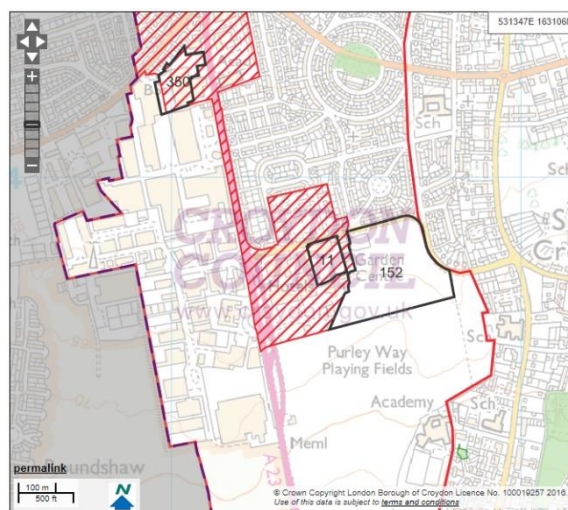
5.4.66 At the I&Os stage the proposal was to deliver 421 - 1,637 homes across four sites (16, 25, 110 and 350), along with a new Local Centre.

5.4.67 The latest proposal is for 1,530 homes across three of the four sites from the I+Os stage (Site 350 is no longer available), plus two additional modest sites.

- 5.4.68 A stand-out large proposed allocation is Site 25, where the proposal at the I+Os stage was for 251 to 1,028 homes, and the latest proposal is for 1,032 homes.
- 5.4.69 Also, it is important to note that one of the two new sites since the I+Os stage (Site 153) comprises a small isolated SIL, adjacent to the Five Ways roundabout. The proposal is for a scheme involving 91 homes and town centre uses, with consideration given to the adjacent grade 2 listed tithe barn.
- 5.4.70 In **conclusion**, the proposed housing capacity of 1,530 broadly aligns with the proposal at the I+Os stage. Attention focuses on Site 350, which was a proposed allocation for up to 660 homes in CLP 2018 and at the I+Os stage; however, in addition to being unavailable, this site is relatively distant from Waddon Station, and this area does not benefit from tram links, unlike Valley Park and Waddon Marsh.

Waddon Way

- 5.4.71 This is the southern-most of the proposed growth areas, with the I&Os document identifying one modest allocation (Site 11) for 35 to 94 homes, as well as allocating Site 152 for leisure facilities.
- 5.4.72 The most recent proposal involves three additional proposed allocations, all adjacent to Site 11, with the combined proposal for 965 homes, linked to a potential Waddon Way Neighbourhood Centre. In addition, the proposal remains to allocate Site 152 for leisure uses.
- 5.4.73 Focusing on Site 11, which is the only retained allocation from the I+Os stage, the new proposed capacity of 152 homes is notably higher than the previously proposed capacity of 35 to 94 homes.
- 5.4.74 In **conclusion**, the current proposal is for an ambitious approach to growth relative to the I+Os stage, hence there is little reason to suggest exploring a higher growth scenario. This area is relatively poorly connected in transport terms, although work will be undertaken to explore the option of a new tram corridor along the Purley Way to Purley and Coulsdon.



Overall conclusion

- 5.4.75 The current proposal is to allocate 23 sites to deliver in the region of 7,500 homes, with several new allocations identified since the I+Os stage, and capacity increased across several sites. A small number of omission sites can be identified, and there are arguments, in theory, for exploring a more ambitious growth strategy, including with a view to supporting major transport infrastructure upgrades, to include a tram extension along the Purley Way to Purley (which is a current and proposed focus of growth, as discussed below) and Coulsdon. However, the overriding consideration is that more work needs to be done to understand the existing infrastructure constraints in the area, particularly transport infrastructure, but also community infrastructure (e.g. secondary school capacity). Transport infrastructure concerns are particularly acute, because there is a need to address traffic along the Purley Way, which suffers from heavy traffic, air pollution and a poor street environment, with a number of identified 'pinch points'.
- 5.4.76 For this reason, the proposed Local Plan policy for the Transformation Area is set to required that:
- “From 2019 no more than 4,000 additional homes shall be consented in the Purley Way Transformation area in advance of detailed transport modelling being completed to objectively assess the highway and sustainable transport measures needed to accommodate more than 4,000 homes and the implementation of associated further improvements to highway and sustainable transport capacity.” There are also potentially transport infrastructure challenges that could constrain growth at levels below 4,000 homes, with the Partial Review document explaining: “... TfL has estimated that there is sufficient capacity on the Wimbledon branch of the existing tram network to support 2,000 additional homes in the area... Beyond this number, capacity on the existing tram network would need to be increased, either by longer trams or greater frequency, or both.”*
- 5.4.77 In this light, there is no reasonable higher growth scenario.

Allocations elsewhere

5.4.78 The aim of this section is to consider all other site allocations to emerge from the SHLAA by Croydon Place (alphabetical order). Sites and sub-area options are given relatively light touch consideration in comparison to the discussions presented above, which deal with strategic growth locations.

Addington

5.4.79 Both proposed allocations are associated with New Addington, which is one of the most deprived areas in Croydon. Site 1 is a new proposed allocation, comprising an area of amenity land associated with Council built housing. The proposed capacity of 46 homes is in the middle of the range proposed at the I+Os stage (18-64 homes). Site 44 is located within the District Centre, and is a CLP 2018. The proposed capacity of 376 homes is a significant increase on the proposal in CLP 2018 (50-290 homes), and it is noted that the proposal is also to amend area specific policy such that there is support for “opportunities to create buildings with a larger footprint to the west of Central Parade that have a height of up to 8-11 storeys”.



5.4.80 In conclusion, there is no evidence to indicate a higher growth scenario. N.B. there are two shortlisted Green Belt omission sites discussed separately below.

Addiscombe

5.4.81 Located to the east of the Croydon OA, much of the Addiscombe is relatively affluent, and the area benefits from a district centre, tram links and strategic open space. The one proposed allocation is a previously developed (vacant industrial) backland site located close to the Croydon OA. It is a retained allocation from CLP, with the proposed capacity (12 homes) at the bottom end of the previous range (10-57 homes).

5.4.82 There are also two omission sites:

- Site 2 – a new proposed allocation for 18 to 104 homes at the I+Os stage, but no longer a proposed allocation and is understood to be unreasonable as an option (comprises Blackhorse Lane Station); and
- Site 3 – as above (comprises a nursing home).

5.4.83 In conclusion, whilst there are two omission sites, both appear to be ruled out for clear cut reasons, hence there is no evidence to indicate a higher growth scenario.

Broad Green & Selhurst

5.4.84 Located to the north of the Croydon OA, the area contains some significant pockets of relative deprivation. Selhurst station is at the eastern extent of the area, and two main north-south road corridors pass through the area, but parts of the area have low PTAL.

5.4.85 Five proposed allocations have already been discussed above, as they are located within the Purley Way Transformation Area. Focusing on the seven other proposed allocations:

- Four are retained allocations from CLP 2018 (Sites 78, 416, 468 and 471), all of which are modest in scale. The proposed capacities align with the range presented in CLP 2018, although Site 416 is of note, because the proposed capacity of 40 homes is at the low end of the CLP 2018 range (36 to 136). This site is closely associated with Croydon cemetery, which is MOL, SINC and a local heritage area.
- The three new proposed allocations are all small sites, and the proposed capacity figures align with the proposals at the I+Os stage. Site 13 is of note as a vacant industrial site closely associated with Thornton Heath and Croydon Hospital (a proposed allocation, discussed below), with the proposal for a mixed use scheme to include industrial/warehousing. Site 20 is also of note at the current proposed use is two HMOs for supported housing.

5.4.86 In conclusion, there is no evidence to indicate a higher growth scenario.

Coulsdon

- 5.4.87 Is located at the south west extent of the Borough, closely associated with the railway line (with a station), the A23 and a large SIL. There is a degree of relative deprivation.
- 5.4.88 Both of the proposed allocations are located within the district centre. Firstly, Site 372 now has consent for a 157 home residential scheme, having previously been proposed for a mixed use scheme (with no housing supply assumed) in CLP 2018. Secondly, Site 945 is a new site located close to the rail station. The proposed capacity at Site 945 equates to circa 244 dph, which is perhaps somewhat low given the PTAL, but the proposal is also to deliver retail and car parking (the site currently comprises a supermarket).
- 5.4.89 In conclusion, attention focuses on Site 945; however, on balance there is insufficient evidence to indicated a reasonable higher growth scenario.

Crystal Palace & Upper Norwood

- 5.4.90 The stand-out large site is Site 357, which is located within the district centre and within the Upper Norwood Triangle Conservation Area. The proposal is for a 135 home mixed use scheme, with CLP 2018 having proposed 39 to 223 homes. Also, adjacent is Site 28, which is proposed for a Cultural and Creative Industries Enterprise Centre, as per CLP 2018.
- 5.4.91 The other stand-out site is Site 126, which is a new proposed allocation since the I+Os stage. The site currently comprises a school, and the proposal is for education facilities and 72 homes. PTAL rating is 2.
- 5.4.92 The final two sites are new sites since CLP 2018, but were proposed at the I+Os stage. The proposed capacities are both in line with the proposals at the I+Os stage.
- 5.4.93 In conclusion, there is no evidence to indicate a higher growth scenario.

Kenley and Old Coulsdon

- 5.4.94 The one proposed allocation (Site 937) is located in Old Coulsdon and is the subject of a pending planning application for 12 homes, with CLP 2018 previously having supported a mixed use scheme to include a community use. This is a poorly connected part of the Borough, distant from road and rail corridors.
- 5.4.95 In conclusion, there is no evidence to indicate a higher growth scenario.

Norbury

- 5.4.96 This area comprises the north west extent of the Borough, and is mostly associated with good PTAL. Site 106 is a new proposed allocation currently comprising a community centre. The proposal is for a mixed use residential and community (to retain equivalent floor space or functionality of the community use), to include 18 homes. Site 951 is located within the District centre, and in close proximity to the rail station. It is a retained allocation from CLP 2018, with the proposed capacity of 24 homes slightly higher than the range proposed in CLP 2018 (15 to 22 homes), and equating to circa 800 dph, plus retail is proposed.
- 5.4.97 In conclusion, there is no evidence to indicate a higher growth scenario.

Purley

- 5.4.98 This area is a key focus of growth, but is subject to a range of issues and constraints, including associated with the River Wandle valley (including flood risk and heritage). There are three clusters of sites:
- Sites 30, 35, 61, 130, 347 and 683 – are located within and around the district centre, in proximity to Purley Station, and all are retained allocations from CLP 2018:
 - Site 30 – is proposed for 118 homes, with the current allocation for 30 to 171 homes;
 - Site 35 – has consent for 114 homes, with the current allocation for 20 to 111 homes;
 - Site 130 – has consent for 106 homes, with the current allocation for 77 to 100 homes;
 - Site 61 – is proposed for 182 homes, with the current allocation for 21 to 119 homes;
 - Site 347 – is a stand-out large site, proposed for 479 homes as part of a mixed use scheme, with the current allocation 172 to 990 homes, and strongly associated with flood risk zone 3;

- Site 683 – is proposed for 99 homes, with the current allocation for up to 91 homes. The proposal is for “residential development... including new industrial units to replace those... on the site.” The site is adjacent to the designated local heritage area.
- Sites 64, 410 and 490 – are located in proximity to Reedham Station.
 - Site 64 is a new proposed allocation for 26 homes plus leisure uses (90 dph), having been proposed for 14 to 52 homes at the I+Os stage.
 - Site 410 – is proposed for 18 homes, with the CLP 2018 allocation for 10 - 37 homes;
 - Site 490 – was proposed for a primary school in CLP 2018, but is now proposed for a “primary school (on up to 0.4ha of the site) and residential development [36 homes], to be brought forward in one phase, and limited retail / food and drink (up to existing floor space)”.
- Sites 324, 405 and 495 – are retained allocations from CLP 2018 located to the south of Purley Oaks station. Site 405 is proposed for housing (99 homes; CLP 2018 allocation 59 to 221 homes; strongly associated with flood risk zone 3; also PTAL rating of 1); Site 324 for Gypsy and Traveller pitches; and Site 495 for light industrial units and studio space (this site is also located within flood risk zone 3).

5.4.99 In conclusion, attention potentially focuses on Site 347, as a larger site located within a district centre in very close proximity to a rail station; however, this site is subject to flood risk, and there is a need to avoid conflicts with established regeneration objectives, as set out in the [Purley Strategic Regeneration Framework](#) (2021). As such, there is no reasonable need to explore a higher growth scenario.

Sanderstead

- 5.4.100 Site 306 is a retained allocation from CLP 2018 proposed for a 41 home residential scheme, with the CLP2018 allocation for a 8 to 24 home mixed use scheme. Within a local centre, but PTAL rating of 1b.
- 5.4.101 Sites 71 and 79 are new proposed allocations. Site 79 is of note because the proposed capacity (62 homes) is higher than the proposal at the I+Os stage (26 to 54 homes). This site is some way distant from a rail station (PTAL 1b), but is associated with a local centre.
- 5.4.102 In conclusion, there is no evidence to indicate a higher growth scenario. N.B. there are two shortlisted Green Belt omission sites discussed separately below.

Selsdon

- 5.4.103 Site 85 is a new site for: “Residential development incorporating a new shopping parade with retail, finance, and food & drink.” The proposed capacity of 86 homes is notably higher than the proposed 16 to 41 homes at the I+Os stage, although the site does benefit from accessibility to the tram line (PTAL 3). The other proposed allocation (site 948), now has consent for 26 homes.
- 5.4.104 In conclusion, there is no evidence to indicate a higher growth scenario. N.B. there is one shortlisted Green Belt omission site (also two more associated with the gap between Selsdon and Addington) discussed separately below.

Shirley

- 5.4.105 Located at the eastern extent of the Borough, and mostly associated with low PTAL
- 5.4.106 There are three new proposed allocations, of which Site 87 (Shirley Community Centre) is the stand-out site, with the proposal for: “Mixed use development with residential [18 homes] and replacement community facility that provides at least equivalent functionality to the existing centre.” The proposed number of homes is fewer than at the I+Os stage (20-25 homes). The other two new proposed allocations are small sites, with the proposed capacity figures in line with the proposals at the I+Os stage.
- 5.4.107 With regards to the three retained allocations from CLP 2018, the stand-out site is Site 502, which is a previously developed site in the Green Belt. The current allocation is for 90 homes “so long as the development has no greater footprint, volume or impact on openness on the... Green Belt than the existing buildings...”; however, the proposal is now for 9 homes. PTAL rating is 0 and a SINC adjacent.
- 5.4.108 Site 504 is also of note as it is closely associated with a cemetery (a designated SINC) and an area of open green space. The CLP 2018 allocation is for 26 to 68 homes however, the proposal is now for up to 24 homes. This area has a PTAL rating of 2.

5.4.109 In conclusion, Site 502 potentially stands out as a site with proposed capacity figure notably lower than the equivalent figure in CLP 2018; however, this site has poor accessibility and environmental constraints.

South Croydon

5.4.110 Of the three proposed allocations, one now has consent for 42 homes (Site 54; within flood risk zone 3) and the other two sites are new proposed allocations. Specifically, Site 101, which is within flood risk zone 3, is proposed for 41 homes, having been proposed for 13 to 35 homes at the I+Os stage; and Site 114 is proposed for 8 homes, having been proposed for 20 to 50 homes at the I+Os stage. This latter site is located in an area with a PTAL rating of 3.

5.4.111 In conclusion, there is no evidence to indicate a higher growth scenario.

South Norwood and Woodside

5.4.112 Site 51 is a new proposed allocation, and has consent for 102 homes plus community uses (144 dph). This site is located adjacent to the district centre and within a conservation area.

5.4.113 Also, Site 140 is an omission site. The site benefits from an adjacent tram stop, but comprises MOL.

5.4.114 As such, there is no evidence to indicate a higher growth scenario.

Thornton Heath

5.4.115 There are eight proposed allocations for a total of 849 homes. Three are clustered in the district centre and in very close proximity to the rail station:

- Site 149 – is a new site proposed for 118 homes (125 dph), with the I+Os stage proposal for 45 to 254;
- Site 136 – is proposed for a 124 home mixed use scheme, with the CLP allocation (also the I+Os proposal) for 25 to 55 homes, and the proposal is to remove the requirement for employment; and
- Site 326 – is proposed for 66 homes, with the CLP 2018 allocation for 26 to 145 homes. A change of circumstances is that the site has been identified by the NHS as being in an area with a need for additional healthcare facilities, hence the new proposed site specific policy states: *“The inclusion of healthcare facilities should be explored with the NHS before development takes place.”*

5.4.116 The other stand out large site is 499 Croydon University Hospital Site, London Road, which is an 8.2 ha site proposed for 372 homes, which is notably more than the current allocation (also the proposal at the I+Os stage) for 77 to 290 homes. The proposal is as per CLP 2018, namely consolidation of the hospital uses on a smaller area of the site with enabling residential development on remaining part subject to there being no loss of services provided by the hospital in terms of both quantity and quality. However, there is a change of circumstances in that the site has been identified by the NHS as being in an area with a need for additional healthcare facilities, hence the new proposed site specific policy states: *“The inclusion of healthcare facilities should be explored with the NHS before development takes place.”*

5.4.117 Finally, there is one omission site here (ref 22420411); however, this is a small site comprising an existing residential block in an area with PTAL rating of 3, although a local centre is nearby.

5.4.118 In conclusion, the possibility of higher density development in the district centre (e.g. Site 149) could feasibly be explored; however, the proposed densities are potentially in line with the PTAL rating of 4.

Overall conclusion

5.4.119 It is generally appropriate to rely on the ‘bottom-up’ SHLAA analysis of site capacity, as none of the areas discussed above are existing or proposed transformation areas. The discussion above serves to identify that work to explore higher growth options could potentially focus on certain sites in:

- Purley - which is a strategic focus of growth, associated with regeneration opportunities;
- Coulsdon – e.g. to build the case for a tram extension along the Purley Way to Coulsdon via Purley; and
- Shirley – which is not a strategic growth area, but where there is a stand-out large site where the current proposed capacity is lower than the capacity figure set out in the CLP 2018 allocation.

5.4.120 However, in each cases there are site-specific issues that constrain higher growth options. As such, there is no reasonable higher growth scenario involving additional homes from ‘allocations elsewhere’.

Green Belt

5.4.121 As discussed in Section 5.2, there are reasons to suggest that the option of Green Belt release in order to deliver new homes is now ‘unreasonable’, such that it does not warrant being subjected to detailed appraisal and consultation. However, on balance, it is considered reasonable to explore the option as per the approach taken at the Issues and Options stage.

5.4.122 At the Issues and Options stage the Council assessed 52 submitted sites in the Green Belt, considering them in clusters so as to identify opportunities for sites to be brought forward in combination as a strategic urban extension (at least several hundred homes, to secure infrastructure etc). This assessment was set out in a paper entitled *Proposed urban extensions on Green Belt land – site selection analysis*. A focus of the assessment was on performance against Green Belt purposes (see figures below) and accessibility (e.g. proximity to a tram stop), but consideration was also given to wider factors, for example impact on the Addington Village Conservation Area, and potential to integrate with existing built form.

Figure 5.9: Green Belt site options (west)

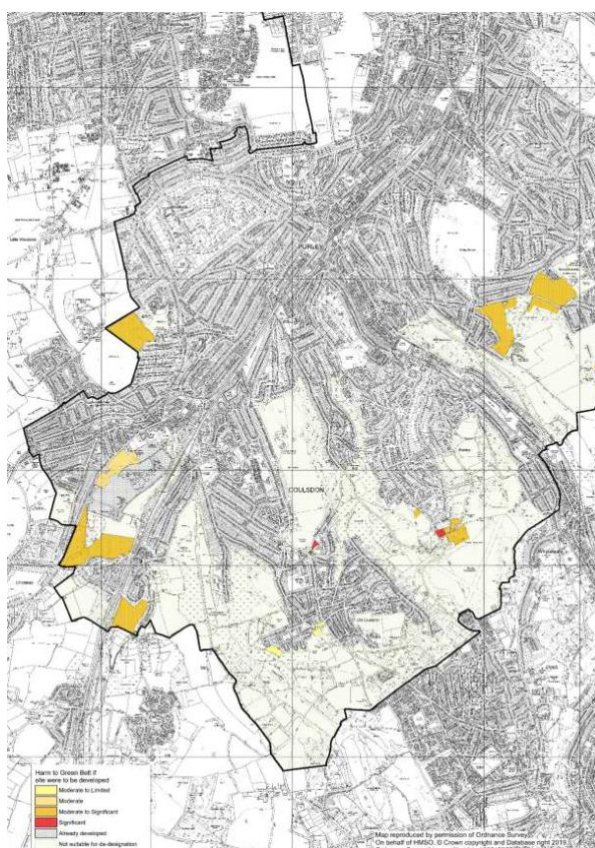
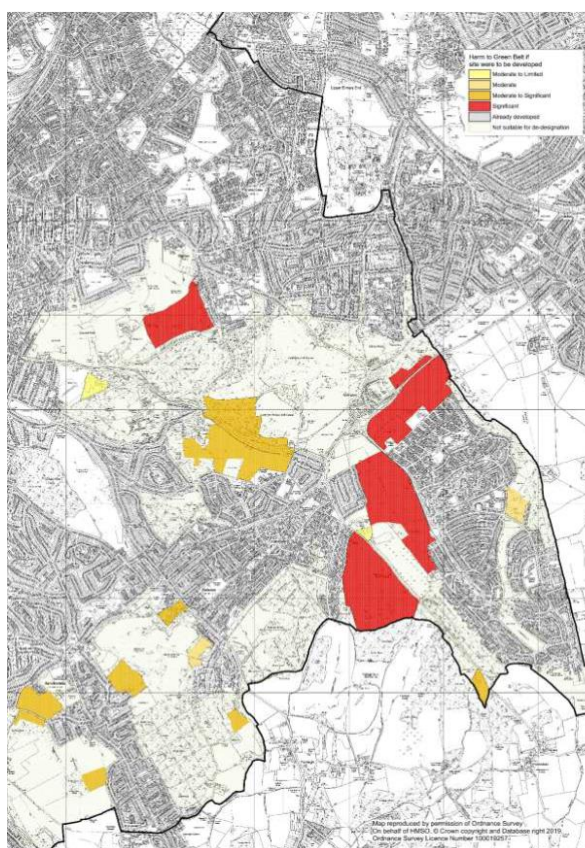


Figure 5.10: Green Belt site options (east)



5.4.123 In light of the assessment the Council identified a shortlist of three Green Belt urban extension options:

- Lodge Lane, New Addington/Selsdon – comprises Council owned land at the western edge of New Addington, with one of the sites comprising the eastern half of Addington Court Golf Club. This is the largest of the three shortlisted options, with a capacity perhaps in the range 2,000 to 3,000 homes.

N.B. see Figure 5.11 (not Figure 10) for an accurate understanding of potential developable area.

Transport connectivity is strong, given the adjacent tram line; and development could be well integrated with New Addington. However, there is a clear concern from a Green Belt perspective, as the landscape gap to Selsdon would be reduced to c.200m. The landscape parcel as a whole, between Selsdon and New Addington, is judged to contribute significantly to Green Belt purposes (see Figure 5.10); however, the proposed scheme would involve only the eastern half of the parcel. There are also biodiversity and potentially landscape sensitivities associated with the valley / valley sides to the southwest.

It is also noted that land directly to the north was submitted to the Council through the Issues and Options consultation. This site benefits from being adjacent to the Addington Village bus/tram interchange, but mostly comprises a Site of Importance for Nature Conservation (SINC), and development in combination with land to the south would risk coalescence between New Addington and Selsdon.

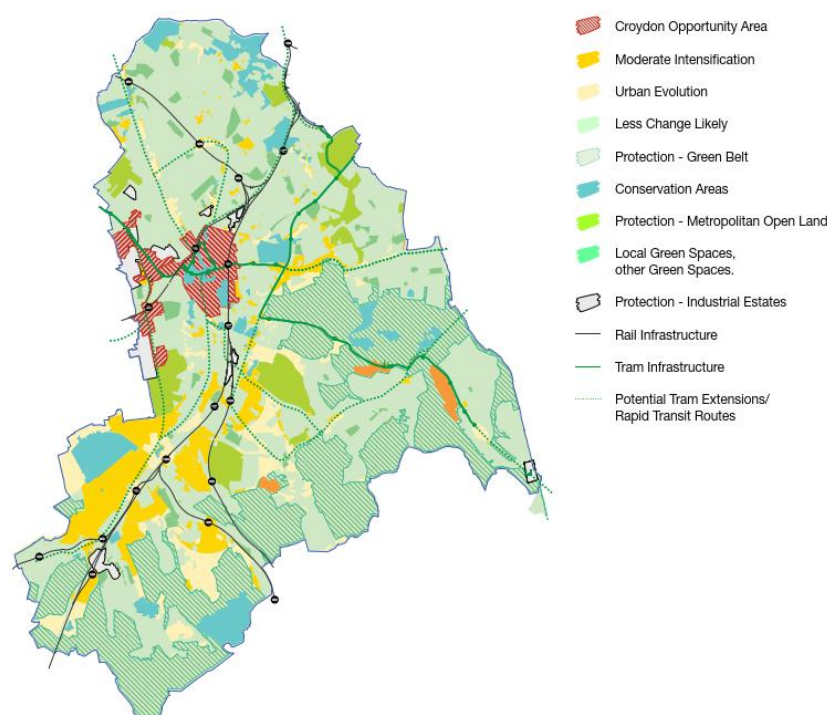
- Mitchley Hill, Sanderstead – performs less well in transport accessibility terms, but better in Green Belt terms, with the Council’s assessment explaining *“it is in effect completing a development begun in the interwar period that was never completed due to the onset of World War II.”* This is, however, quite steeply sloping land, and there is a need to consider whether it could be suitable for an enhanced green infrastructure role, noting that the site forms part of the same valley as nearby Mitchley Wood SINC.

It is also important to note that the promoter of this site responded to the consultation, pointing out that the assumed capacity figure in the Issues and Options document (680 to 780 homes) was not correct. The site is in the region of 10ha in size, and so capacity is assumed here to be circa 300 homes.

- Gravel Hill, Selsdon – comprises land between the northern edge of Selsdon and Gravel Hill, forming the southern part of a wider landscape parcel (Figure 5.10) that stretches north beyond Gravel Hill, and is judged to make a ‘moderate to significant’ contribution to Green Belt purposes. Further considerations include: adjacent grade 2 listed Heathfield, which is associated with a designated view cone that crosses the site; nearby Addington Palace and Addington Village Conservation Area; and the very high density of woodland in the vicinity of the site, including associated with former Addington Park.

The Issues and Options consultation document suggested a capacity of 1,300 to 1,540 homes; however, this site is now judged to perform poorly relative to the two sites discussed above.

Figure 5.11: Strategic Option 3 from the I+Os stage, showing the shortlisted GB sites at that time



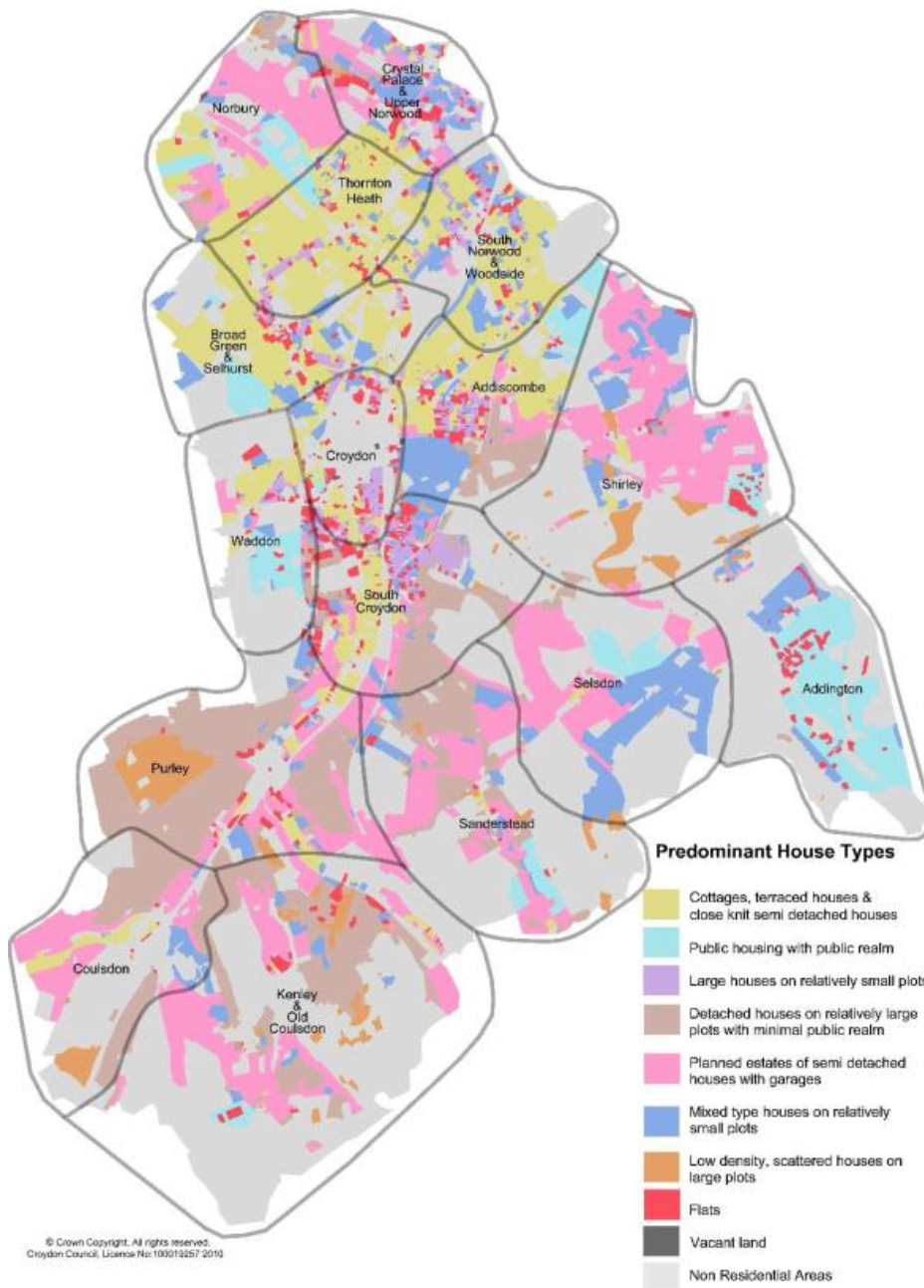
5.4.124 Other Green Belt site options can be ruled out. One other site is of note because a representation was received from the site promoter at the Issues and Options stage, namely site 531 from the Council’s assessment, known as Mitchley Avenue; however, the Council’s assessment sets out clear reasons for ruling this site out, including: *“Site 531, also on Mitchley Avenue, would only integrate well with the existing built form if it were a small linear development along Mitchley Avenue (and therefore, not an urban extension), or if it were undertaken as part of the development of all the sites identified along Mitchley Avenue and Mitchley Hill.”* The site does benefit from being closer to Riddlesdown Station than the shortlisted Mitchley Hill site, discussed above; however, there are clear sensitivities around the edges of the site, namely public rights of way, Mitchley wood and mature hedgerows/small areas of woodland shown to be priority habitat by the national dataset. A cul-de-sac from Mitchley Avenue might be envisaged, with a considerable amount of the site given over to green space and habitat creation (including the southern raised part of the site), but such a scheme might be modest in scale, such that it does not warrant further consideration here, through the appraisal of borough-wide growth scenarios.

5.4.125 In **conclusion**, in addition to the emerging preferred option, which involves nil homes through Green Belt urban extensions, it is also reasonable to explore a scenario involving new homes through Green Belt release. On balance, it is considered reasonable to explore a scenario involving in the region of **2,500 homes** at the “Lodge Lane, New Addington/Selsdon” and “Mitchley Hill, Sanderstead” discussed above.

Small sites windfall

- 5.4.126 In the Croydon context it is well established that there are policy choices to be made in respect of windfall, both in terms of *where* there is more or less support for windfall schemes and the total supply from windfall schemes that is supported, and *how much* can be assumed within the Borough-wide housing land supply position for plan period. In practice, attention focuses on the former choices, and the cumulative effect of area specific decision-making leads to an overall borough-wide windfall figure for the plan period.
- 5.4.127 It is well established, following the Council’s Windfall or Small Sites Evidence Base” study (2019),²² that spatial choices regarding support for windfall must be made taking account of: A) variation in urban character, which is understood on the basis of the Borough Character Appraisal (2015);²³ and B) accessibility, including to a town/district centre, train and/or tram stop. Figure 5.12 shows character types across the Borough, whilst Figure 5.13 shows parts of the Borough judged to be more accessible.

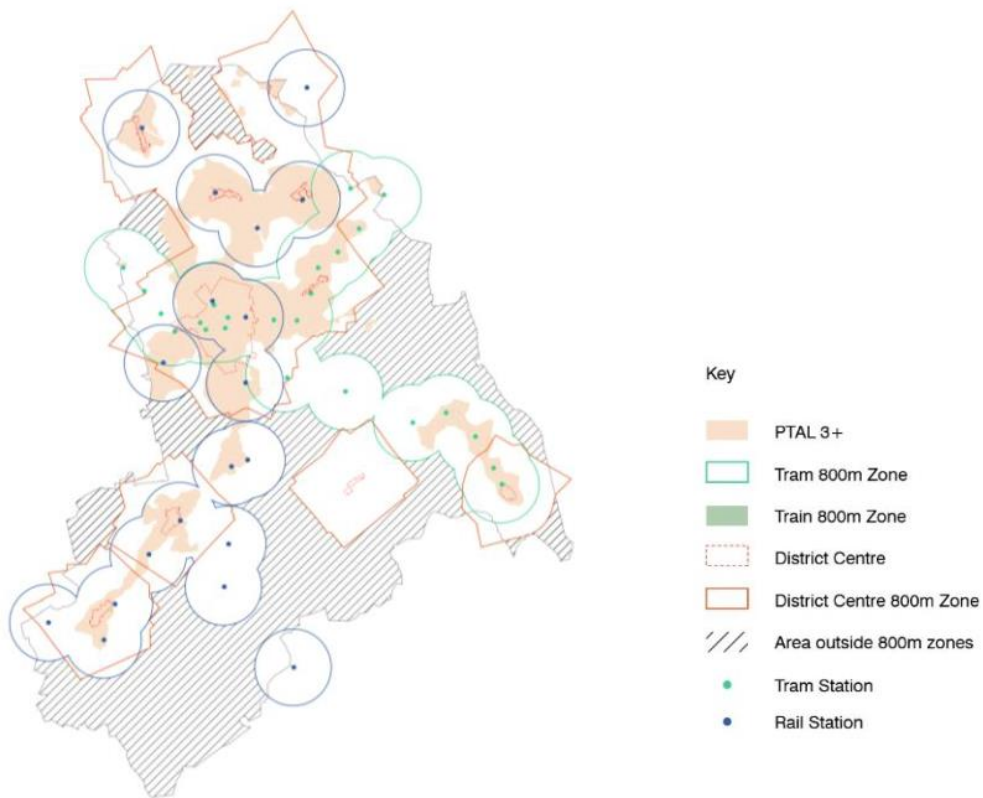
Figure 5.12: Distribution of urban (residential) character types



²² See www.croydon.gov.uk/planningandregeneration/framework/localplan/croydon-local-plan-review

²³ See www.croydon.gov.uk/planningandregeneration/framework/lpevidence/urban-design-local-character-and-heritage

Figure 5.13: Areas judged to be more/less accessibly by the Windfall and Small Sites study (2019)



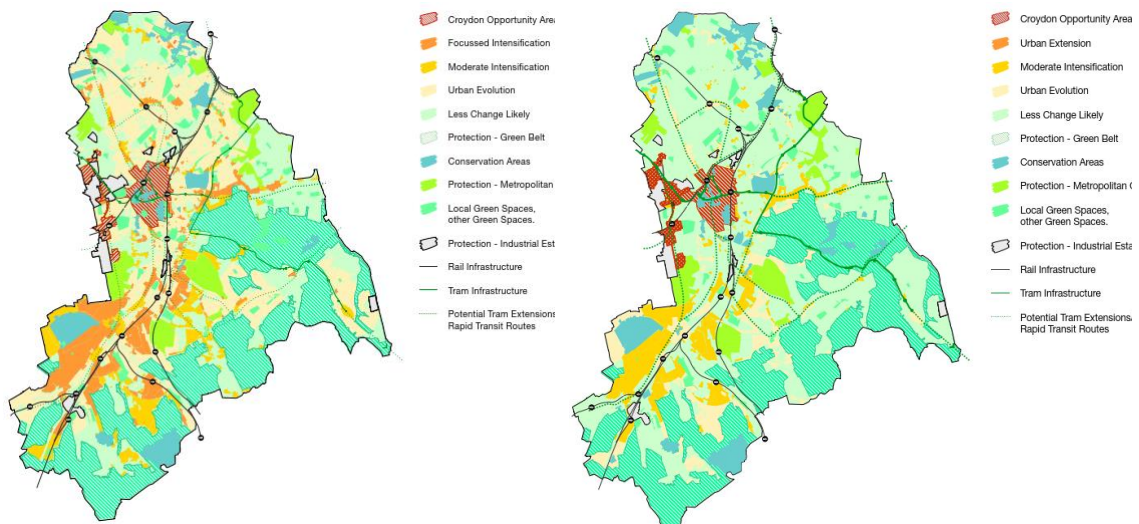
5.4.128 At the Issues Options stage appraisal and consultation focused on two overall windfall supply options:

- 9,660-12,070 homes and
- 15,160-18,950 homes.

5.4.129 The differences in these two options spatially can be seen in Figure 5.14. Specifically, under Strategic Option 1, which was the option involving the higher windfall figure, it can be seen that:

- areas suited to moderate intensification (MI) under a baseline scenario see focused intensification (FI);
- areas suited to urban/suburban evolution (USE) under a baseline scenario see MI; and
- some areas suited to less change (LC) under a baseline scenario see UE.

Figure 5.14: Strategic Options 1 (left) and 2 (right) from the I+Os stage



5.4.130 At the current time, there are two key contextual factors to consider.

- Firstly, there are arguments for exploring high growth scenarios, given: latest understanding of infrastructure constraints affecting the Purley Way (as discussed above; essentially Strategic Option from the I+Os stage is now unreasonable); limitations to the number of homes that can be delivered in the Croydon Opportunity Area and through allocations elsewhere (as discussed above); and an understanding that Green Belt release has low support and must be a last resort.
- Secondly, the London Plan (2021) sets a small sites (i.e. windfall) target for the Borough of 641 dpa, such that there is a need to enable and support 10,897 homes (641 dpa x 17 years) in total through the plan, assuming adoption in 2023. This figure is notably lower than the 1,511 dpa figure within the early draft version of the London Plan that fed into development of the Strategic Options at the I+Os stage.

5.4.131 In this context, the Council undertook further work, following the Issues and Options consultation, to refine the preferred spatial approach to supporting windfall development. As part of this, the decision was taken to refine down the number of 'zones' from four (FI, MI, USE, LC) to three (FI, MI, USE). In practice, therefore, the task was to identify areas of FI and MI. The methodology applied was very similar to that applied at the Issues and Options stage, but with some adjustments – see Table 5.2.

Table 5.2: Criteria for designating MI and FI areas

Criteria	Moderate Intensification area	Focused Intensification area
Croydon OA or a district centre	800m	400m
Local Centre, Neighbourhood Centre or Shopping Parade and PTAL	800m and PTAL 3	400m and PTAL 4
Local Centre, Neighbourhood Centre or Shopping Parade and train or tram stop	800m	400m
Conservation or Local Heritage Area	No intersect	No intersect
School (secondary or primary)	-	800m
Open space (GB, MOL, LGS, other)	-	800m
Character type	Any	The area has capacity to change meaning either the local predominant character types are Detached Houses on Large Plots and Scattered Houses on Large Plots; or there are large development sites

5.4.132 These criteria have been set so as to support in the region of 10,897 homes at windfall sites over the plan period. However, there is also a clear need to explore a higher growth scenario, in light of the discussion above (namely discussion of housing needs in Section 5.2 and discussion of reasonable scenarios for other 'supply components' earlier within this current section).

5.4.133 Higher growth scenarios could be defined by varying any of the criteria-based rules presented in Table 5.2. Furthermore, consideration could once again be given to the possibility of splitting the USE designation into two, as per the proposal at the Issues and Options stage. However, it is beyond the scope of this study (i.e. the Partial Review SA process) to go through a process of exploring higher growth scenarios in detail, with a view to defining one or more reasonable higher growth scenarios for appraisal.

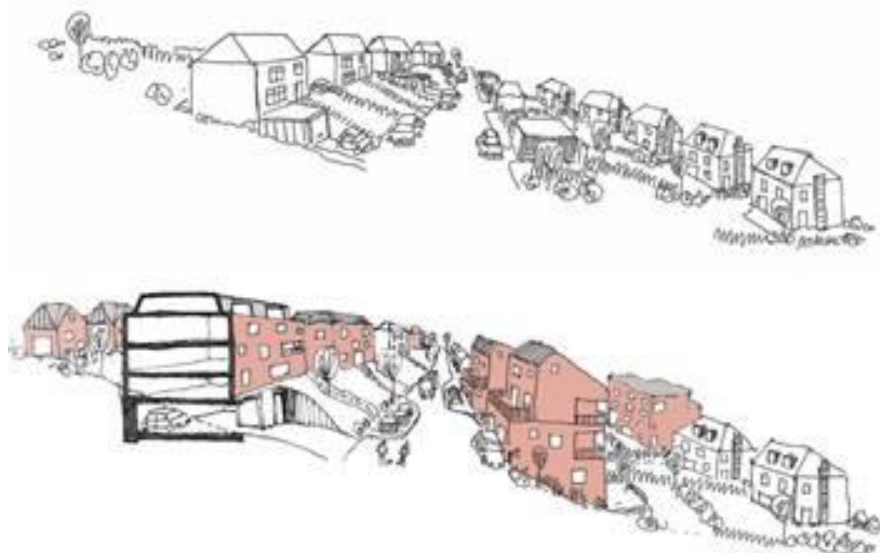
5.4.134 In this light, discussions were held between AECOM and LBC officers, and the decision was taken to define a higher growth scenario simply involving increasing the distance thresholds within Table 5.2 by 50% (so the 400m threshold becomes 600, and the 800m threshold becomes 1200m).

5.4.135 It has not been possible to run a GIS exercise to map and quantify this higher growth scenario; however, the following statement included within a LBC statement submitted to the Draft London Plan examination in 2019 is of note: *"Applying the circa 15,000 homes from windfall sites equally across the 15 Places of Croydon (excluding the Croydon OA), and realistically assuming that this will need to be met from semi-detached and detached units, as an average over the 20 year plan period, this analysis suggests that nearly 27% of the boroughs existing semi-detached and detached stock would need to be demolished and redeveloped. This is far from suburban evolution and at the heart of the Council's concerns."*

5.4.136 At this current time there is no reasonable need to explore the option of 15,000 homes from windfall sites over the plan period, as this would involve exceeding the London Plan target by almost 40%. However, it is reasonable to explore a higher growth scenario involving increasing support for windfall such that the total supply from windfall exceeds the London Plan target by circa 20%.

5.4.137 In **conclusion**, it is reasonable to explore a higher growth scenario involving an additional circa 2,000 homes at windfall sites, defined spatially in the manner described above.

Figure 5.15: Before and after focussed intensification



5.5 The reasonable growth scenarios

5.5.1 Section 5.4 identifies two scenarios for four separate supply components. Taking a pragmatic approach to combining these, and mindful of the discussion of housing needs presented in Section 5.2, leads to four reasonable growth scenarios for appraisal and consultation – see Table 5.3.

Table 5.3: The reasonable growth scenarios (N.B. constant supply components greyed-out; figures rounded)

		Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
Completions since 2019		3,844	3,844	3,844	3,844
Sites under construction ²⁴		TBC			
Allocations	Brighton Mainline	1,340	1,490	1,340	1,340
	North End Quarter	680	1,080	680	680
	Elsewhere in the COA	7,740	7,740	7,740	7,740
	Purley Way	7,430	7,430	7,430	7,430
	Allocations elsewhere	3,870	3,870	3,870	3,870
	Green Belt sites (x2)	0	0	2,500	0
Windfall		10,900	10,900	10,900	13,000
Total supply 2019-2039²⁰		TBC	TBC	TBC	TBC

²⁴ The data for sites that are under construction is still being analysed and will need to be verified against the sites with planning permission and allocations. Due to the GLA closing down the old Kibana monitoring system and moving to a new system in the 2020-21 year this data is still un-verified. When the data is received the table will be finalised.

6 Growth scenarios appraisal

6.1 Introduction

6.1.1 The aim of this section is to present an appraisal of the reasonable growth scenarios.

6.2 Appraisal findings

6.2.1 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to both categorise the performance of each of the reasonable growth scenarios in terms of significant effects (using **red** / **amber** / **light green** / **green**)²⁵ and rank the reasonable growth scenarios in order of preference.

6.2.2 Further points on methodology

- Significant effects – in accordance with the SEA Regulations, the primary aim is to “identify, describe and evaluate” significant effects in respect of each element of the established appraisal framework in turn. Equally, the aim is to differentiate effectively, regardless of significant effects.
- Systematic appraisal – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance.
- Evidence and assumptions – every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented ‘on the ground’ and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the appraisal text.

Air quality

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
★ 1	2	3	4

6.2.3 Air quality is a key consideration in Croydon and the entire borough has been declared an Air Quality Management Area (AQMA). There are also five Focus Areas identified through the 2018 Air Quality Action Plan: London Rd, Norbury (north); Purley Cross and Russell Hill (central Purley); Thornton Heath / Brigstock Rd / High Street / Whitehorse Lane; London Rd between Thornton Heath Pond and St James Road; Wellesley Rd.

6.2.4 In order to address poor air quality there is a need to minimise car movements and particularly car movements through known air pollution and traffic congestion hotspots. The matter of noise pollution is also closely related.


6.2.5 In this light, there is a concern with Scenario 4, which would involve focused intensification in areas more distant from a district/local and/or less well connected by public transport. There are also potentially considerations around indoor air quality and access to garden space, but these are less clear and less significant.

6.2.6 There would also be a risk of a degree of increased car dependency under Scenario 3, e.g. office workers might travel to central Croydon by car. However, the larger of the two shortlisted Green Belt sites is located adjacent to a tram stop, and the smaller site is within fairly easy walking distance of an overground station. New Addington is also located on the national cycle network (NCN 21), and there are opportunities to improve the network such that there is a direct and safe route to Croydon Metropolitan Centre. Furthermore, there is an aspiration to deliver a new tram depot at New Addington.

²⁵ **Red** indicates a significant negative effect; **amber** a negative effect with limited or uncertain significance; **light green** a positive effect with limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

- 6.2.7 With regards to Scenario 2, the issue is potentially noise pollution more so than air pollution, with one of the sites in question adjacent to the Brighton Mainline, and a second adjacent to the A212 (this section has six carriageways, counting bus lanes). Higher densities could potentially hinder noise mitigation. From an air pollution perspective, it is difficult to argue against additional homes in such a well-connected location.
- 6.2.8 Finally, with regards to Scenario 1, there are a number of proposed allocations adjacent to the Strategic Road Network (SRN; see Table 5.1), there are significant air, noise and wider environmental quality issues (and opportunities) associated with the Purley Way Transformation Area and the proposed high growth strategy for Purley also gives rise to issues/opportunities, noting the Central Purley Air Quality Focus Area. These matters are explored in further detail in Part 2 of this report.
- 6.2.9 In conclusion, it is fair to highlight a particular concern with Scenario 4. The other three scenarios are more finely balanced, but it is fair to highlight Scenario 1 as preferable.

Biodiversity

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
	2	3	3

- 6.2.10 The Borough is associated with a dense network of Sites of Importance for Nature Conservation (SINCs), and a priority issue is both to protect this network of locally designated sites (including mindful of the potential for indirect impacts, e.g. recreational pressure) and enhance the network.
- 6.2.11 With regards to enhancement, efforts must be focused both on the sites themselves and also functional connectivity between the sites, mindful that they are not distributed randomly, but rather are associated with clear patterns at landscape scales, often correlated with topography, historic land uses and historic settlement. There is also a need to consider the national and regional (London Plan) context to biodiversity enhancement efforts, including the Environment Act (2021), which requires a strategic approach to securing biodiversity net gain under a framework set out through Local Nature Recovery Strategies (LNRS). A LNRS is not yet in place for Croydon, but in the interim there is a need to ensure a strategic approach to nature recovery.
- 6.2.12 In this light, there are concerns with all three of the higher growth options over-and-above Scenario 1:
- Scenario 2 – work completed to date in respect of both the North End Quarter and the Brighton Mainline / CARs project has included a focus on realising targeted biodiversity objectives (i.e. objectives tailored to the local situation, mindful that there are no SINCs in proximity to either area). As such, there is a concern that higher densities could conflict with biodiversity / greenspace objectives, albeit there is uncertainty as higher densities could be achieved via taller buildings, and could feasibly lead to enhanced development viability and, in turn, more funding for biodiversity measures (e.g. green roofs, green walls).
 - Scenario 3 – both of the sites in question have limited onsite sensitivity, but are associated with wooded valleys. Onsite habitat creation at either site could prove well targeted.
 - Scenario 4 – the concern here is loss of mature gardens, potentially to include mature trees. This is a significant issue London-wide (e.g. see a report prepared by the London Wildlife Trust [here](#)), and gardens across suburban Croydon are potentially significant in the London context. There could well be a correlation between areas with mature / valued gardens and SINCs / biodiversity priority areas.
- 6.2.13 Finally, with regards to Scenario 1, there are a range of issues associated with certain site allocations. For example, Table 5.1 highlights a number of proposed allocations that are adjacent or close to a SINC (but none that significantly intersect a SINC). Also, the proposed areas of focused and moderate intensification warrant scrutiny (e.g. the proposed area of moderate intensification at the northern edge of Selsdon is surrounded by woodland SINCs on three sides). Furthermore, there are significant biodiversity issues and opportunities associated with transformation of the Purley Way, particularly to the north (River Wandle) and to the south (rising land towards Roundshaw Down) of the area. However, overall there is confidence that Scenario 1 would involve taking a suitability proactive approach to avoiding conflicts with biodiversity objectives through site selection / spatial strategy. These matters are explored in further detail in Part 2 of this report.

- 6.2.14 In conclusion, there are clear concerns associated with Scenarios 3 and 4. Under these scenarios there could well be significant tensions with national and regional biodiversity / nature recovery objectives. The other two scenarios are more finely balanced.

Climate change adaptation

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
=	=	=	=

- 6.2.15 Whilst climate change adaptation objectives have wide ranging implications for the Partial Review, the key matter for consideration here is avoiding areas of flood risk, and fluvial flood risk in particular (it is more challenging to differentiate scenarios in terms of surface water flood risk, given available evidence).
- 6.2.16 Beginning with Scenario 1, a number of the proposed new allocations, as well as existing allocations where the proposal is now to support higher density development (relative to CLP 2018), intersect the flood risk zone (see Table 5.1). Furthermore, two of the proposed Focused Intensification Areas (Purley and Purley Oaks) significantly intersect the area of flood zone 3 associated with the River Wandle. However, it is not uncommon, in the London context, for proposed locations for residential development or intensification to intersect the fluvial flood risk zone, including because it is often areas within river valleys (which are also invariably associated with transport corridors) where the last remaining areas of relatively low intensity land uses (e.g. industrial areas) can be found. In this context, it is not at all clear that Scenario 1 performs particularly poorly, in terms of flood risk. Furthermore, it is important to recognise that there are wide range of well-established approaches and methods for avoiding and mitigating flood risk through master planning, design and other measures at the development management / planning application stage. Matters are explored further in Part 2.
- 6.2.17 With regards to the three higher growth scenarios, none of them give rise to any significant concerns regarding new homes in a fluvial flood risk zone. A further consideration is increased surface water run-off leading to increased downstream flood risk, and this is potentially a consideration for the two Green Belt sites, which are associated with fairly steeply sloping valley sides. Focusing on the larger site at New Addington, a clear surface water flood channels follows the valley bottom (along Featherbed Lane), and 'downstream' passes through the centre of Addington Village, and then further downstream becomes a fluvial flood risk channel that passes through West Wickham and Hayes, before meeting the River Ravensbourne at Bromley. However, there would be excellent potential to design-in high quality Sustainable Drainage Systems (SuDS).
- 6.2.18 In conclusion, it is not possible to differentiate between the growth scenarios with any confidence, but it is appropriate to highlight a degree of concern with all scenarios, including Scenario 1, ahead of comments being received from the Environment Agency through the current consultation.

Climate change mitigation

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
2	1	2	2

- 6.2.19 The focus of discussion here is minimising per-capita emissions from the built environment, given that matters relating to per capita transport emissions are discussed below under 'Transportation'.
- 6.2.20 A key consideration is that higher density development can give rise to opportunities to design-in and deliver new heat networks, linking heat sources (e.g. waste heat from industry or tube-train breaking or ambient heat from the ground or water sources, captured via heat pumps) and heat users, e.g. offices and residential areas, which together will have a good constant demand for heat across a 24 hour period. For example, London Borough of Lewisham has recently completed work to explore the potential for delivery of a fifth generation heat network as part of the regeneration of Catford town centre.

- 6.2.21 In this light, there could well be an opportunity associated with Scenario 2, which would see higher density development feasibly enhanced development viability. There could be a particular opportunity at the North End Quarter Transformation Area, given the mix of uses onsite (i.e. residential, retail, offices, leisure).
- 6.2.22 With regards to Scenario 3, it could well be that strong development viability associated with greenfield development supports an ambitious approach to built environment decarbonisation, particularly at the larger New Addington site, likely in the form of greenhouse gas emissions standards that exceed the minimum requirements set by the Building Regulations; however, there is no certainty at this stage.
- 6.2.23 With regards to Scenario 4, residential intensification can provide an opportunity to improve the thermal efficiency of the building stock, deliver rooftop solar PV and ensure that homes are heated by heat pumps rather than gas boilers (the three key considerations when seeking to manage operational, or ‘in use’ built environment emissions). However, there is also a need to be mindful of non-operational emissions, including the embodied carbon within building materials and emissions associated with demolition and construction. The extent to which additional suburban intensification would be achieved via reuse of existing buildings versus new build is unclear.
- 6.2.24 Finally, with regards to Scenario 1, the proposal is for three transformation areas, other areas for high density development in the Croydon Opportunity Area (see discussion in Section 5.4) and also several areas of focused intensification (including linked to district centres, namely at Purley and Selsdon). However, it is not clear that heat network opportunities are set to be fully realised (opportunities are identified at both Purley and Coulsdon, but with limited detail). It is important to recognise that this is a fast moving policy area (e.g. since CLP 2018 the view of combined heat and power (CHP) as a low carbon solution has changed dramatically, due to recent decarbonisation of the national grid, which leads to support for the use of electricity for heat production).
- 6.2.25 In conclusion, there is support for Scenario 2 as it would involve an additional focus on high density mixed use development, whilst the other scenarios are judged to perform broadly on a par. With regards to effect significance, on one hand climate change mitigation is a global issue such that local actions can only have limited significance; however, on the other hand, climate change mitigation is a national, regional and local priority. There is a need to take a highly proactive approach through Local Plans and, in this context, it is appropriate to flag a risk of opportunities not being realised in full under all scenarios.

Communities

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
★ 1	★ 1	★ 1	2

- 6.2.26 A key consideration is schools capacity, and in this respect it is fair to highlight a particular opportunity under Scenario 3, as New Addington site would certainly be able to deliver new capacity alongside housing. It could also be that the scheme could deliver targeted community infrastructure to the benefit of the local community, which experiences a notable degree of relative deprivation; however, this is uncertain.
- 6.2.27 Conversely, Scenario 4 could well lead to increased pressure on school facilities.
- 6.2.28 A further consideration is the need to support the objectives for the North End Quarter, including as set out in *Croydon Future of Destination Retail* (2020). It could feasibly be the case that increased housing under Scenario 2 is at the expense of retail, at least to some extent, leading to a mix of uses more weighted towards residential. This could potentially represent an opportunity, given the changing role of town centres. The current consultation document sets out the vision for the North End Quarter as a central feature within the wider Croydon OA, for example explaining: *“With a regenerated and revitalised North End/Retail Core at its heart, the Croydon Metropolitan Centre will develop as a unique mixed-use destination in the borough and the region, with retail, office, arts and culture (including a diverse evening/night-time economy), leisure and sports, entertainment, learning and workspace activity. It will also be a strategic commercial centre in South London.”*
- 6.2.29 With regards to Scenario 1, it is recognised that there are a number of proposed site allocations associated with current or proposed future community facilities onsite, as discussed further in Part 2.
- 6.2.30 In conclusion, it is difficult to arrive at a conclusion on an overall order of preference, because of wide range and sometimes competing factors. On balance, it is fair to highlight a concern with Scenario 4.

Economy and employment

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
=	=	=	=

- 6.2.31 The growth scenarios vary only in respect of residential development, and there is no reason to suggest that any of the three higher growth scenarios would constrain or conflict with the achievement of employment land or wider economic objectives. On this basis, the scenarios are judged to perform broadly on a par.
- 6.2.32 There is an argument that new and expanded family housing under Scenarios 3 and 4 could help to ensure a suitably skilled workforce locally, thereby minimising the need for in-commuting; however, it is difficult to conclude that this is a significant consideration (it is recognised that New Addington benefits from very good proximity to Biggin Hill, where the Bromley Local Plan (2019) has allocated land to deliver about 2,300 jobs over the next 15-20 years). Equally, under Scenario 3 and possibly also Scenario 4, there could be some new opportunity for small scale employment land (also shared living and working space and homeworking space), but there is no reason to suggest a significant opportunity.
- 6.2.33 With regards to effect significance, wide ranging land supply components that feature as constants under all of four scenarios are highly positive from an 'economy and employment' perspective, perhaps most notably the proposed transformation areas and the proposed approach to protecting and intensifying SIL. However, there are also potentially certain tensions, e.g. around the proposed fine grained mix of residential and industrial uses along the Purley Way, hence uncertain positive effects are predicted.

Health

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
=	=	=	=

- 6.2.34 One important consideration is ensuring access to health facilities, but there is little potential to differentiate between the growth scenarios in this respect. Additional windfall development under Scenario 4 could potentially lead to health infrastructure capacity issues in some areas, but there is little reason to suggest that this would be a significant issue. With regards to the existing and new proposed allocations that are a constant under all of the scenarios, it is noted that site specific policy is set to include a considerable focus on identifying sites with the potential to deliver new facilities (subject to further discussions with providers), although there are also certain issues and potential tensions, e.g. proposed redevelopment at Croydon University Hospital.
- 6.2.35 Aside from access to health facilities, another important consideration is access to green and blue infrastructure, and access to private or shared garden spaces. In this respect Scenario 3 clearly has a degree of merit, as a high proportion of the new homes would likely have private gardens. With regards to Scenario 4, on one hand there would undoubtedly be loss of garden space; however, on the other hand, a high proportion of the new homes delivered would likely have some access to garden space.
- 6.2.36 In conclusion, whilst there are arguments in favour of Scenario 3 and potentially Scenario 4, these are relatively marginal considerations, so the scenarios are judged to perform on a par overall. With regards to effect significance, the clear focus on health facilities is encouraging, but objectives relating to health and local plan-making are wide ranging, so there is a degree of uncertainty regarding effect significance.

Heritage

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
★ 1	3	★ 1	2

- 6.2.37 There is an immediate concern with Scenario 2, because it would involve higher density development, likely in the form of taller buildings, within the North End Quarter Transformation area, which is closely associated with the Central Croydon Conservation Area (see discussion in Section 5.4). The proposed densities within the transformation area under Scenario 1 specifically aim to avoid impacts to the setting of the conservation area, particularly the context to historic buildings as viewed from North Street. As such, Scenario 2 gives rise to a clear tension; however, significance is uncertain, e.g. noting few listed buildings.
- 6.2.38 With regards to Scenario 3, neither of the sites in question are located in close proximity to a nationally designated asset, although the Addington Village Conservation Area (also Addington Palace Registered Park and Garden, which is grade 2 listed) is located a short distance to the north of the New Addington urban extension site that, it is assumed, would feature under Scenario 3.
- 6.2.39 With regards to Scenario 4, there is no reason to assume that extended Focused Intensification Areas would intersect with a conservation area or a local heritage area. For example, there is no reason to suggest any increased concern in respect of the Webb Estate & Upper Woodcote Village Conservation Area at Purley (which is associated with very large plots). However, there would be more widespread erosion of suburban character, which will often be associated with a degree of heritage value, and there could be pressure for intensification in proximity to locally and even nationally listed buildings. In some cases the design of suburbs presumably specifically sought to integrate and protect historic buildings, and a number of suburbs that could come into contention for intensification under Scenario 4 are pre-WWI and so likely associated with historic character (although areas with particular character are designated, either a conservation area or local heritage area).
- 6.2.40 Finally, with regards to Scenario 1, there are relatively few instances outside of the Croydon Opportunity Area (which is a very specific context) of an existing or new proposed allocation intersecting or in proximity to a listed building, conservation area or other designated asset/area, and issues are quite concentrated, e.g. Purley (see Table 5.1). It is also noted that existing and proposed new site specific policy includes a significant focus on avoiding and mitigating historic environment impacts (e.g. listed building issues/impacts are discussed as part of site specific policy for 13 sites).
- 6.2.41 In conclusion, in addition to Scenario 2, there is a clear degree of concern in respect of Scenario 4, although significance is uncertain. The views of Historic England will be sought through the current consultation, including on the matter of tensions between suburban intensification and heritage in the Croydon context.

Housing

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
4	3	★ 1	2

- 6.2.42 Regardless of the housing requirement that is ultimately set (see discussion in Section 5.2), all of the scenarios would involve taking a proactive approach to housing growth, in the sense that the London Plan target/requirement figure for the first ten years of the plan period (2019 to 2029) would be met, and then there would be additional planned supply for the latter ten years of the plan period (2029 to 2039). There would naturally then be the potential to boost supply through a Local Plan Review (or another Partial Review).
- 6.2.43 On this basis, significant positive effects are predicted for all three scenarios. However, there is clearly particular support for the higher growth scenarios, namely Scenarios 3 and 4, in light of established housing needs (see discussion in Section 5.2).

- 6.2.44 Focusing on affordable housing, the Strategic Housing Market Assessment (SHMA) Update (2019) estimated a need for 2,254 affordable rented homes a year in the Borough over the next 20 years (N.B. any need for affordable home ownership or other 'intermediate' housing products is in addition to this), and notably concludes (para 7.10) that *"affordable housing need in the Borough has increased notably since the previous assessment."* This contrasts to a London Plan total target figure of 2,079 dpa.
- 6.2.45 Aside from the matter of total supply / growth quantum supported under each of the scenarios, there is a need to consider the nature and location of sites that are supported. In this respect, there is clear support for Scenario 3, because the two shortlisted Green Belt sites would likely deliver a high proportion of family housing. There would also likely be additional family housing under Scenario 4, if implementation is well managed, e.g. with single homes on large plots redeveloped to provide several smaller family homes.
- 6.2.46 A further consideration is that a high proportion of the additional sites under Scenario 4 would likely fall below the threshold size at which there is a requirement to provide affordable housing. It is for this reason that Scenario 3 is judged preferable to Scenario 4. It is recognised that there are other arguments in favour of Scenario 4, e.g. meeting very localised housing needs and also low delivery risk (in comparison to Scenario 3); however, affordable housing delivery is a highly significant consideration.
- 6.2.47 In conclusion, all of the scenarios perform very well in terms of total quantum of new housing, but there are clear arguments in favour of maximising housing growth, and also Green Belt release so as to secure affordable and family housing to meet well-established needs.

Land and soils

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
2	1	3	2

- 6.2.48 There is clear support for Scenario 2, because higher density development in the Croydon OA would reduce the pressure for greenfield development (Scenario 3) and/or loss of gardens (Scenario 4).
- 6.2.49 With regards to Scenario 3, the nationally available agricultural land quality dataset (which is low resolution and low accuracy) suggests that both sites comprise land that is 'grade 3 quality', and neither site has been surveyed in detail. However, in both cases adjacent land *has* been surveyed in detail. Specifically, at New Addington adjacent land to the north has been surveyed and been found to comprise grade 2 quality land (i.e. land that is best and most versatile, BMV) and, at Sanderstead, adjacent land has been surveyed and found to be of grade 3b quality (i.e. not BMV). Both sites contain land currently in agricultural use, although the majority of the New Addington site comprises a golf course.
- 6.2.50 In conclusion, there is support for higher densities under Scenario 1 and concerns regarding Scenario 3 (loss of agricultural land, including land that may be BMV) and Scenario 4 (loss of gardens).

Landscape and townscape

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
1	2	4	3

- 6.2.51 Both of the shortlisted Green Belt sites under Scenario contribute to Green Belt purposes (see discussion in Section 5.4) and area also likely to be associated with a degree of wider landscape value, e.g. accounting for their contribution to the wider character of wooded valleys. In the case of the Sanderstead site, there is a footpath along one edge of the site, and clear views of the site from Mitchley Hill. In the case of the New Addington site, there is a notable absence of public footpaths, but this land is presumably highly visible from trams and undoubtedly provides a rural context to New Addington (although potentially the Fieldway estate more so than the earlier New Addington estate, which was constructed from 1935).

- 6.2.52 With regards to Scenario 4, there would clearly be implications for suburban character, and there is a need to consider the close links between suburban areas in the south of the Borough and surrounding wooded hillsides. However, these matters have already been discussed above, under Historic environment. It is difficult to suggest that any potential additional areas that would see intensification under Scenario 4 give rise to a particular landscape or townscape concern, although attention potentially focuses on the Coulsdon area, given views to and from high ground.
- 6.2.53 With regards to Scenario 2, there are no particular concerns regarding an increased risk of impacts to any of the designated Croydon Panoramas, but generally concerns regarding proliferation of tall buildings.
- 6.2.54 In conclusion, there is a need to consider the risk of direct and indirect impacts to the characteristic valley landscapes of the south of the Borough, which gives rise to concern in respect of Scenario 3 and Scenario 4.

Transport

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
2	1 	3	4

- 6.2.55 Transport issues and opportunities have already been discussed above under Air quality, with a headline concluding being that Scenarios 3 and 4 do not perform well, albeit one of the two shortlisted sites under Scenario 3 is adjacent to a tram line and potentially associated with a cycle infrastructure opportunity.
- 6.2.56 With regards to Scenario 4 there would be support for intensification in areas more than 800m distant from district/local centres and transport hubs, which could well have an effect on per capita car dependency / distance travelled by car within the Borough. There is also a need to consider the implications of suburban intensification for electric vehicle charging infrastructure.
- 6.2.57 Another important consideration here is support for the objectives of the Brighton Mainline / CARS project under Scenario 2. There is little reason to suggest that modest higher densities at select sites would conflict with objectives relating to upgrading the rail service and creating a new transport hub, but there is a need for caution, given the strategic importance of the scheme.
- 6.2.58 With regards to Scenario 1, it is fair to describe the proposed spatial strategy as transport-led, noting the focus of Brighton Mainline, the wider Croydon OA with the NEQ at its heart, the Purley Way (where there are a range of existing issues, and potentially an opportunity for housing growth to unlock a tram extension), Purley (which is set to benefit from ‘metroisation’ of the rail service, following BML upgrades) and other district and local centres (with identified opportunities to support walking/cycling and public transport, e.g. the A235 corridor).
- 6.2.59 In conclusion, it is considered appropriate to highlight Scenario 2 as performing well, as there would be an increased focus of growth in that part of the Borough with highest PTAL, and a location that is very well-connected in the London and even national context; however, it is recognised that there is a need to avoid any risk of conflict with the objectives of the Brighton Mainline / CARS scheme.

Water

Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
=	=	=	=

- 6.2.60 A key consideration for Local Plans is capacity at wastewater treatment works (WwTW), which in the Croydon context means considering capacity at Beddington WwTW (in LB Sutton), Crossness WwTW (in LB Bexley) and within Dartford Borough. It is understood that no major concerns were raised by Thames Water through the 2019 Issues and Options consultation, but there will be a need for further scrutiny through consultation. Wastewater treatment work capacity is high on the agenda nationally at the current time, hence there is a need to avoid risks of capacity breaches as far as possible. This can mean directing growth to locations served by WwTW with existing capacity, as opposed to relying on capacity upgrades, which can be subject to delays.

6.3 Summary and conclusions

6.3.1 The table below presents an overview of the appraisal findings presented across the 13 sections above.

Table 6.1: Summary appraisal conclusions

Objective	Rank of preference and significant effects			
	Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
Air quality	★1	2	3	4
Biodiversity	★1	2	3	3
Climate change adaptation	=	=	=	=
Climate change mitigation	2	★1	2	2
Economy and employment	=	=	=	=
Health	=	=	=	=
Heritage	★1	3	★1	2
Housing	4	3	★1	2
Land and soils	2	★1	3	2
Landscape	★1	2	4	3
Population and communities	★1	★1	★1	2
Transport	2	★1	3	4
Water	=	=	=	=

Concluding discussion

The appraisal shows Scenario 1 (the preferred scenario) to perform best in terms of the greatest number of objectives, and Scenario 1 is also predicted fewest negative effects. However, it does not necessarily follow that Scenario 1 is best performing or 'most sustainable' overall, recognising that the sustainability objectives are not assigned any particular degree of importance or weight in the decision-making process. For example, if particular weight were to be attributed to housing objectives, including in respect of meeting needs for affordable and family housing, then there could potentially be overall support for Scenario 3. It is for the plan-maker (LB Croydon) to assign weight and trade-off between the competing objectives to reach an overall conclusion on which of these scenarios best reflects the plan objectives and represents sustainable development.

7 The preferred growth scenario

Introduction

- 7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the reasonable growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of LBC Officers to the appraisal.

Officers reasons for selecting the preferred scenario

- 7.1.2 The following statement explains Officers' reasons for supporting **Growth Scenario 1**, in-light of the appraisal. It is important to be very clear that this statement is a response to the appraisal; it is not an appraisal:

The appraisal shows Scenario 1 to perform well in a number of respects. Indeed, it performs best in terms of more sustainability objectives than any of the other scenarios, and is predicted fewest negative effects.

It is recognised that higher growth scenarios would help to meet housing needs more fully, including need for affordable and family housing. This is an important consideration; however, a higher growth strategy would risk departing from the London Plan, which balances housing needs and capacity across London.

With regards to Scenario 2, it is recognised that there could be certain benefits to higher density development, likely in the form of taller buildings, at the North End Quarter and/or in the vicinity of East Croydon Station (although the station redevelopment itself is not anticipated to involve a residential element). However, there is a need to balance competing objectives, for example heritage objectives in the case of North End Quarter.

Figure 7.1: The Key Diagram summarising the preferred growth scenario (Scenario 1)

[Insert key diagram]

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal the CLP Partial Review as a whole.

8.1.2 In practice, this means:

- expanding on the appraisal of Growth Scenario 1 presented in Section 6;
- appraising proposed new thematic policies and proposed adjustments to CLP 2018 policies; and
- being mindful of aspects of CLP 2018 that are not proposed to be changed, noting that whilst these aspects of CLP 2018 are not the subject of the current consultation, there is naturally a need to consider in-combination (or ‘cumulative’) effects associated with the Partial Review acting in combination with those parts of CLP 2018 that are proposed to remain unchanged.

Overview of the Partial Review

8.1.3 An immediate difference between the Partial Review and CLP 2018 is the introduction of three new transformation areas, namely Brighton Mainline, North End Quarter and Purley Way (a ‘transformation corridor’). Secondly, outside of these three areas there are many adjustments to the package of site allocations; specifically, there are 45 new site allocations and the great majority of retained CLP allocations are associated with adjustments to site capacity, in many cases significant adjustments. Thirdly, the Partial Review introduces a new approach to spatial targeting of windfall development, namely defined areas that will see either focused or moderate intensification. The result of these three changes to the spatial strategy is a housing supply sufficient to enable an (annualised) housing requirement of 2,079 dpa, in line with the London Plan target, in contrast to the 1,645 dpa annualised requirement within CLP 2018.

8.1.4 Aside from these headline changes to the spatial strategy, the Partial Review also includes extensive changes to the suite of strategic and development management (DM) policies. The broad framework of strategic policies is unchanged, but several new borough-wide DM policies are proposed, plus there are significant proposed changes to place specific and site specific policies.

Appraisal methodology

8.1.5 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the Partial Review, as a whole, before reaching an overall conclusion on significant effects. Specifically, in accordance with the SEA Regulations, the aim is to “identify, describe and evaluate” significant effects.

8.1.6 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the Partial Review. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how the Partial Review will be implemented ‘on the ground’ and the effect on particular receptors.

9 Appraisal of the Partial Review

9.1 Introduction

9.1.1 The aim of this section is to present an appraisal of the Partial Review under the 13 SA topics

9.2 Air quality

9.2.1 Air quality is a key consideration in Croydon, as discussed in Section 6. In order to address poor air quality there is a need to minimise car movements and particularly car movements through known air pollution and traffic congestion hotspots. The matter of noise pollution is also closely related.

9.2.2 In this light, the first point to make is that the proposed spatial strategy might reasonably be described as transport-led, noting the focus of Brighton Mainline, the wider Croydon OA with the NEQ at its heart, the Purley Way (where there are a range of existing issues, and potentially an opportunity for housing growth to unlock a tram extension), Purley (which is set to benefit from 'metroisation' of the rail service, following BML upgrades) and other district and local centres (with identified opportunities to support walking/cycling and public transport, e.g. the A235 corridor).

9.2.3 It seems clear that PTAL has been a significant consideration when assigning development capacity to site allocations and when defining the location of Focused Intensification (FI) and Moderate Intensification (MI) areas. By way of an example, it is appropriate to consider the allocations / proposed allocations at Shirley, which is a part of the Borough that is less well connected by public transport, being distant from a railway and located in-between tram corridors. There are three new proposed allocations, of which Site 87 (Shirley Community Centre) is the stand-out site, with the proposal for 18 homes (as part of a mixed use scheme), which is fewer than at the I+Os stage (20 - 25 homes). With regards to the three retained allocations from CLP 2018, the stand-out site is Site 502, which is a previously developed site in the Green Belt. The current allocation is for 90 homes; however, the proposal is now for 9 homes (PTAL rating is 0). Site 504 is also of note as the new proposed capacity (24 homes) is fewer than CLP 2018 (26 - 68 homes).

9.2.4 However, there are nonetheless a range of issues and tensions, notably:

- Strategic road network - Table 5.1 highlights 42 allocations / proposed allocations (henceforth simply 'sites') with a total capacity of c.9,200 homes as being in proximity to the SRN. However, 15 of these (c.4,500 homes) are in proximity to the A23 Purley Way, where the ambition is for reduced traffic over time (albeit there is a need to be mindful of possible increased HGV traffic associated with warehousing and distribution uses). The other two concentrations are at Purley (nine sites; c.890 homes) and within the Croydon OA (ten sites, c.3,200 homes).
- Noise pollution – aside from sites in proximity to the SRN, there are a number of sites in proximity to a rail line or other potential source of noise pollution. Two sites currently in use as office buildings within the Fairfield sub-area of the Croydon OA serve as notable examples:
 - Site 245 - the proposed allocation is for 133 homes, which is a notable increase on the 30 to 85 homes within CLP 2018, although current site specific policy requires *“acoustic measures to reduce noise impact on the development.”*
 - Site 182 - the proposed allocation for 33 homes is an increase on the 7 to 20 homes within CLP 2018, although it is also noted that the proposal is to add a policy requirement regarding acoustic measures.

Two other new proposed sites potentially associated with noise pollution, but not associated with a policy criterion regarding acoustic measures are: Site 40 (West Croydon Bus Station); and Site 143 (South Croydon Ambulance Station and Youth Centre sites).

- Purley Way – it is important to emphasise that there are significant air, noise and wider environmental quality issues. On balance the high growth strategy is considered to represent an opportunity, mindful of the proposed strict measure to ensure that housing growth does not out-pace transport infrastructure upgrades; however, certain risks do remain.

The proposed growth strategy for Waddon Way, is of particular note, as this part of the Transformation Area is less well connected by public transport, and new homes will not be within easy walking distance of a District centre. The I&Os document identified one modest allocation (Site 11) for 35 to 94 homes, whilst the proposal is now for 965 homes. Focusing on Site 11, the new proposed capacity of 152 homes is notably higher than the previously proposed capacity of 35 to 94 homes.

- Purley – similarly, the proposed high growth strategy – both through allocations and the proposed designation of a Focused Intensification area - should support regeneration, to include improvement of the public realm and street environment, certain concerns do remain, noting the Central Purley Air Quality Focus Area. The following vision is of note: *“Purley District Centre will be an inclusive place to dwell and socialise, with the High Street providing space for outdoor sitting, strolling and events. Its existing open spaces... will be safeguarded and new development will help transform hostile main roads into urban streets that give less space to traffic and more space to people.”*

9.2.5 A further consideration is the proposed redevelopment of car parking land. Around 40 sites include significant car parking, either as part of the current use or as the current primary use, with a total capacity of c.7,800 homes. Of these, 16 are new proposed allocation, with a total capacity of c.3,700 homes, primarily located within the Purley Way Transformation Corridor.

9.2.6 A further site of note, in respect of car parking, is Site 200 within the Croydon OA, close to East Croydon Station. This site was proposed allocation for up 384 homes in CLP 2018 and at the I&Os stage; however, the latest proposal is to support 66 homes on part of the site (0.44 ha = 150 dph), with the remainder of the site used for car-parking (the site is currently a multi-storey car park), in line with the Croydon OAPF (2013), which allows for the loss of 200 parking spaces across the New Town and East Croydon.

9.3 Biodiversity

9.3.1 From Table 5.1 it can be seen that whilst a number of proposed allocations are adjacent or close to a SINC there are none that significantly intersect a SINC. Stand-out sites are:

- Site 502 (Shirley) - is a previously developed site in the Green Belt. The current allocation is for 90 homes “so long as the development has no greater footprint, volume or impact on openness on the... Green Belt than the existing buildings...”; however, the proposal is now for 9 homes. The adjacent SINC is primarily a golf course, and so presumably at relatively low risk of problematic recreational pressure.
- Site 416 (Broad Green and Selhurst) and Site 504 (Shirley) - are both located adjacent to cemeteries designated as a SINC, where there is presumably low risk of problematic recreational pressure. In both cases the sites are existing allocations, and the current proposed capacity is very close to the lower end, or just below the lower end (Site 504) of the range set out in CLP 2018.
- Sites 48 and 946 – are existing allocations within the Waddon Marsh sub-area within the Purley Way Transformation Corridor. Both sites are strongly associated with the River Wandle, which is culverted / underground. Site 48 is adjacent to Waddon Ponds, which was historically associated with a large mill, whilst Site 956 is adjacent to Wandle Park, which was historically at the western edge of Croydon. It is recognised that policy for the Transformation Area as a whole is set to require: *“The development of the Wandle Valley Regional Park; b) De-culverting the River Wandle and integrating the open river with new development, routes and spaces...”* However, it is nonetheless **recommended** that policy should be developed specific to the Waddon Marsh area and potentially one or both of these sites.” At Site 48 it is important to note that the current proposed capacity (331 homes) is higher than the proposed capacity at the Issues and Options stage (115 to 233 homes) and much higher than the figure in CLP 2018 (17 homes), although the proposed density is still low, at 130 dwellings per hectare (dph).

9.3.2 Focusing on the Purley Way as a whole, it is clear that there are significant biodiversity issues and opportunities, particularly to the north (River Wandle) and to the south (rising land towards Roundshaw Down) of the area. There is limited detail in area-wide policy (see above), but supporting text explains:

“The council supports the continued development of the Regional Park concept and will work with the Trust, the Environment Agency and other stakeholders to play its part in delivering the Wandle Valley Area Green Grid Framework developing a connected, cross-borough network of green spaces. As part of this commitment, the council will manage Wandle Park and Waddon Ponds and look for opportunities to connect these with other open spaces and de-culvert stretches of the River Wandle as and when development opportunities arise to secure connectivity, flood risk and biodiversity enhancements.”

- 9.3.3 Also, the proposed areas of focused and moderate intensification warrant scrutiny. Perhaps most notably, the proposed area of moderate intensification at the northern edge of Selsdon is surrounded by woodland SINCs on three sides. The large rear gardens here clearly contain mature trees such that they are largely indistinct from the adjacent woodlands when viewed from above, hence it is recommended that this matter should be addressed through the area specific policy (which currently focuses primarily on ‘character’).
- 9.3.4 With regards to the proposed FI and MI areas within Purley and Coulsdon, these are closely associated with the river corridor, but there are few concerns in respect of adjacent or nearby SINCs.
- 9.3.5 Finally, there is a need to consider borough-wide policy, particularly:
- Policy SP1 (Growth in Croydon) – is proposed to be re-written, with a new requirement for: *“An enhanced Green Grid with creating a biodiversity network contributing towards better health and well-being of the residents and help address climate change.”*
 - Policy SP7 (Green Grid) – is also proposed to be significantly bolstered, for example requiring:
 - *“Encourage the development of a Green Grid structured around a network of strategic blue and green corridors across the borough ensuring interconnectivity with adjacent boroughs green spaces using transport corridors...”*
 - *“Enable the Green Grid to be established in areas at risk from flooding.”*
- 9.3.6 At the time of writing a map of the proposed Green Grid is yet to be finalised, but there is a helpful table setting out: Final Green Locations; Green spaces to link together; Green/Blue Opportunities; and Possible Linking Routes. There is also a clear focus on links to health objectives, with supporting text setting out: *“In the north of the borough where there are less green spaces the improvement of biodiversity is more of a challenge but it can be achieved through the existing parks, back gardens and pockets of green in places such as roads.”*
- 9.3.7 Finally, there is a need to note the following new and significantly amended DM policies:
- New in DM26 (Very Special Community Green Spaces) - sets out that the Council will protect and safeguard the extent of the borough’s Very Special Community Green Spaces.
 - New Policy DM30 (Other Important Green Space) – explains that other important green spaces “add to character and wellbeing of the residents. These spaces will be protected unless...”
 - Policy DM27 (Protecting and enhancing our biodiversity and Urban Greening) – includes a new focus on the urban greening factor, building on the London Plan setting out that: *“To secure urban greening a borough specific [UGF]... identifies the appropriate amount of urban greening developments required for new build developments with 5 units or more as follows...”*

9.4 Climate change adaptation

- 9.4.1 Whilst climate change adaptation objectives have wide ranging implications for the Partial Review, the key matter for consideration here is avoiding areas of flood risk, and fluvial flood risk in particular.
- 9.4.2 A number of the proposed new allocations, as well as existing allocations where the proposal is now to support higher density development (relative to CLP 2018), intersect the flood risk zone (see Table 5.1). Furthermore, two of the proposed Focused Intensification Areas (Purley and Purley Oaks) significantly intersect the area of flood zone 3 associated with the River Wandle. However, it is not uncommon, in the London context, for proposed locations for residential development or intensification to intersect the fluvial flood risk zone, including because it is often areas within river valleys (which are also invariably associated with transport corridors) where the last remaining areas of relatively low intensity land uses (e.g. industrial areas) can be found. Furthermore, it is important to recognise that there are wide range of well-established approaches and methods for avoiding and mitigating flood risk through master planning, design and other measures at the development management / planning application stage.
- 9.4.3 Key locations are:

- Waddon Marsh – which has been discussed above, under Biodiversity. Flood risk zone 2 significantly intersects a number of the sites, and almost entirely covering the two northern-most sites. The cluster as a whole comprised seven sites at the I+Os stage, and the latest proposal involves nine sites. Focusing on the seven sites retained from the I+Os stage, the latest proposal is to increase the capacity of all seven. In most cases the proposal is to support a capacity modestly above the upper range figure identified at the I+Os stage; however, Site 125 is an outlier, with the latest proposal for 632 homes a very significant increase on the 38 to 141 homes range from the I+Os stage. 33% of this site intersects fluvial flood risk zone 2. The final proposed allocation is to the east of the main cluster, namely Site 946 (Stubbs Mead), which comprises designated SIL, is a South London Waste Plan safeguarded waste site and almost entirely comprises flood risk zone 2 (also a small area of flood risk zone 3). This was a proposed allocation in CLP 2018 for 157 to 440 homes, and is now proposed for 385 homes as part of a mixed use scheme to include industrial and warehousing uses.
- Purley / Purley Oaks– is a key focus of growth, via both allocations and proposed FI and MI areas, but is subject to a range of constraints associated with the River Wandle valley, including flood risk. There are three clusters of sites, as discussed in Section 5.4. Stand-out sites within flood risk zone 3 are:
 - Site 54 has consent for 42 homes;
 - Site 101 - is a new site proposed for 41 homes (13 to 35 homes at the I+Os stage);
 - Site 114 - is a new site proposed for 8 homes (20 to 50 homes at the I+Os stage);
 - Site 347 – is proposed for 479 homes as part of a mixed use scheme (172 to 990 homes in CLP 2018);
 - Site 405 – is proposed for 99 homes (59 to 221 homes in CLP 2018); and
 - Site 495 – is an existing allocation for light industrial units and studio space.

9.5 Climate change mitigation

- 9.5.1 The focus of discussion here is minimising per-capita emissions from the built environment, given that matters relating to per capita transport emissions are discussed below under ‘Transportation’.
- 9.5.2 A key consideration is that higher density development can give rise to opportunities to design-in and deliver new heat networks, linking heat sources (e.g. waste heat from industry or tube-train breaking or ambient heat from the ground or water sources, captured via heat pumps) and heat users, e.g. offices and residential areas, which together will have a good constant demand for heat across a 24 hour period. For example, London Borough of Lewisham has recently completed work to explore the potential for delivery of a fifth generation heat network as part of the regeneration of Catford town centre.
- 9.5.3 In this light, there is support for: three transformation areas; other areas for high density development in the Croydon OA (see discussion in Section 5.4); and the areas of focused intensification (including linked to district centres, namely at Purley and Selsdon). Area specific opportunities are identified:
- Purley Way – *“Growth within the transformation area will be expected to take advantage of the area’s proximity to the Beddington Energy Recovery Facility to allow the use of a low carbon heat source to its future residents and commercial users.”*
 - Purley – *“Purley District Centre and the surrounding area may be suitable for a district heat network.”*
- 9.5.4 However, it is not clear that heat network opportunities are set to be fully realised. It is important to recognise that this is a fast moving policy area (e.g. since CLP 2018 the view of combined heat and power (CHP) as a low carbon solution has changed dramatically, due to recent decarbonisation of the national grid, which leads to support for the use of electricity for heat production). Clusters of sites, including within the Purley Way (noting the possibility of drawing heat from the River Wandle and/or linking to heat production and/or heat demand within SIL), could potentially be suited to delivering a heat network in combination, particularly where higher density and or mixed use.
- 9.5.5 Finally, there is a need to consider Policy SP6 (Environment and Climate Change Sustainable Design and Construction), which is proposed for very limited updates. As per CLP 2018, the proposal is to set policy for schemes involving fewer than 10 homes, given that policy for larger (‘major’) schemes is set through the London Plan. It is **recommended** that consideration is given to way of supplementing the London Plan requirements, for example in respect of whole lifecycle carbon emissions (i.e. an approach whereby account is taken of non-operational emission, in addition to operational emissions).

9.6 Communities

9.6.1 Firstly, it is clear that the three new proposed transformation areas aim to support community objectives:

- Brighton Mainline – perhaps the key consideration is the proposal to deliver a new station square over the railway line, without any associated housing. Supporting text explains:

“The station re-location presents the opportunity to create a high quality transport interchange that is uniquely ‘Croydon’ in character and that creates strong connections to surrounding areas and local communities. To do so, the streets and spaces connecting the station to its surrounding environment will need to encourage more people walking and cycling and provide the opportunity for seamless interchange with other modes of transport. Significant opportunity exists to set this interchange function within an exemplary station environment, with a high quality public realm integrated with its surrounding street and open space network.”

- North End Quarter – *“will revive central Croydon’s bold and visionary heritage with innovation, social value and wellbeing at its heart. It will be a vibrant biodiverse, high quality neighbourhood that complements and supports the surrounding masterplan areas in the town centre, and includes retail as a balanced part of a more diverse mix of uses that safeguard its future vitality and viability.”* It is clear that there is a major opportunity, with a key consideration being the degree to which new housing is supported alongside town centre uses and employment, as discussed in Sections 5 and 6.
- Purely Way – *“will be transformed from a hostile and divisive road in to a green city street. It will integrate new development with important retail and industrial areas and existing communities in Broad Green & Selhurst and Waddon. Transformation will be organised around a cluster of three, new district centres and one neighbourhood centre, each with a clear purpose and character which responds and enhances positive elements of local character and the setting of heritage assets, and complements Croydon Metropolitan Centre, Purley Town Centre, the Beddington Lane industrial area and other places in Croydon and Sutton.”* Challenges are focused on: integrating new communities and SIL (including from a perspective of maintaining employment opportunities in SIL); the risk of continued high levels of traffic, including HGV traffic; and ensuring new communities have good access to a district centre.

9.6.2 Secondly, there is a need to consider the proposal to direct growth – both through site allocations and windfall – to the borough’s district and local centres. There are significant proposed changes to Policy SP3 (Employment), which deals with the hierarchy of centres; for example:

“Each of Croydon’s District and Local Centres collectively form the Borough’s town centres as defined in Annex 2 of the NPPF. Each has a diverse community and unique culture. To encourage local opportunities to live, work and play development in these centres should support the consolidation of uses to target toward the local community...”

9.6.3 Thirdly, there is a need to consider schools capacity, with supporting text explaining:

“Projections suggest that two new primary schools may be required, one to serve the Croydon Opportunity Area and another in the Purley/Coulsdon area after 2026. Two sites have been allocated to meet this projected need; Allocation 201 and Allocation 490. Any long-term future need for primary school places in the south of the borough will be taken into account in the review of this plan. Currently, the growth in the Purley Way Transformation Area is not projected to create a need for additional primary school places due to over-capacity within the existing schools in the area. The majority of the planned housing developments in the Purley Way Transformation Area are due to be delivered after 2026. To safeguard against a future rise in demand for primary school places, a site has been allocated in the Purley Way Transformation Area for a new 2FE primary school. Pupil projections suggest that the borough currently has enough secondary school places to meet the demand from the proposed housing numbers for the next 5-10 years...”

9.6.4 Other area and site-specific considerations include:

- New Addington - both proposed allocations are associated with New Addington, which is one of the most deprived areas in Croydon. Site 1 is a new proposed allocation, comprising an area of amenity land associated with Council built housing. The proposed capacity of 46 homes is in the middle of the range proposed at the I+Os stage (18-64 homes). Site 44 is located within the District Centre, and is a CLP 2018 allocation. The proposed capacity of 376 homes is a significant increase on the proposal in CLP 2018 (50-290 homes), and it is noted that the proposal is also to amend area specific policy such that there is support for *“opportunities to create buildings with a larger footprint to the west of Central Parade that have a height of up to 8-11 storeys”*.

- Crystal Palace & Upper Norwood – Site 126 is a new proposed allocation since the I+Os stage. The site currently comprises a school, and the proposal is for education facilities and 72 homes. Also, within the district centre, Site 357 is proposed for a 135 home mixed use scheme (CLP 2018 supports 39 to 223 homes) and adjacent Site 28 is proposed for a Cultural and Creative Industries Enterprise Centre, as per CLP 2018.
 - Norbury - Site 106 is a new proposed allocation currently comprising a community centre. The proposal is for a mixed use residential and community (to retain equivalent floor space or functionality of the community use), to include 18 homes.
 - Sanderstead - Site 306, within the local centre, is a retained allocation from CLP 2018 proposed for a 41 home residential scheme, with the CLP2018 allocation for a 8 to 24 home mixed use scheme.
 - Selsdon - Site 85 is a new site for: *“Residential development incorporating a new shopping parade with retail, finance, and food & drink.”* The proposed capacity of 86 homes is notably higher than the proposed 16 to 41 homes at the I+Os stage.
 - Shirley - there are three new proposed allocations, of which Site 87 (Shirley Community Centre) is the stand-out site, with the proposal for: *“Mixed use development with residential [18 homes] and replacement community facility that provides at least equivalent functionality to the existing centre.”* The proposed number of homes is fewer than at the I+Os stage (20-25 homes).
 - Thornton Heath – three sites are clustered in the district centre:
 - Site 149 – is a new site proposed for 118 homes (125 dph), with the I+Os stage proposal for 45 to 254;
 - Site 136 – is proposed for a 124 home mixed use scheme, with the CLP allocation (also the I+Os proposal) for 25 to 55 homes, and the proposal is to remove the requirement for employment; and
 - Site 326 – is proposed for 66 homes, with the CLP 2018 allocation for 26 to 145 homes. A change of circumstances is that the site has been identified by the NHS as being in an area with a need for additional healthcare facilities, hence the new proposed site specific policy states: *“The inclusion of healthcare facilities should be explored with the NHS before development takes place.”*
- The other stand out large site is 499 Croydon University Hospital Site, London Road, which is an 8.2 ha site proposed for 372 homes, which is notably more than the current allocation (also the proposal at the I+Os stage) for 77 to 290 homes. The proposal is *as per* CLP 2018, namely consolidation of the hospital uses on a smaller area of the site with enabling residential development on remaining part subject to there being no loss of services provided by the hospital in terms of both quantity and quality. However, there is a change of circumstances in that the site has been identified by the NHS as being in an area with a need for additional healthcare facilities, hence the new proposed site specific policy states: *“The inclusion of healthcare facilities should be explored with the NHS before development takes place.”*
- Other notable sites include:
 - Site 201 – in the Croydon OA is an existing proposed allocation for a school alongside housing. The proposal is for 216 homes, with CLP 2018 supporting 51 to 293 homes.
 - Site 937 - comprises a former children’s home. The proposal is now not to deliver a community use onsite, in line with a pending planning application.

9.7 Economy and employment

9.7.1 Firstly, there is a need to consider significant changes to Policies SP1 (Growth in Croydon) and SP3 (Employment):

- Policy SP1 - sets out that:
 - *“The local economy will be supported by retaining and intensification of employment land, primarily in the Croydon Opportunity Area and District Centres for all sectors that support sustainable economic growth and job creation.”*
 - *“The Purley Way transformation area is an opportunity for mixed use redevelopment using large areas of brownfield land. It will include three new local centres, a neighbourhood centre, renewed and intensified light industry and warehousing providing jobs to support residential growth alongside much improved public realm...”*

- Policy SP3 – sets out the need to *“future proof the borough’s industrial and employment land... in accordance with ‘4-Tier’ approach provides the hierarchy for the retention and redevelopment of land and premises relating to industrial/employment activity.”*

With regards to office space, supporting text explains that there is a need for between 33,000m² and 44,000m² over the plan period, which is a notable departure from the equivalent range in CLP 2018. Within the Croydon Metropolitan Centre the proposal is to support 30,500m², in contrast to 92,000m² in CLP, and the proposal is also to delete the office space target for district centres.

- There is also a major new focus on *“a healthy mix of uses at a variety of scales with the provision and retention of affordable units and opportunities such as provision of studios or managed workspace.”*

9.7.2 Secondly, there is a need to consider each of the proposed transformation areas in turn:

- Brighton Mainline – the proposal is to support East Croydon Station as the borough’s key transportation hub, including by development and refurbishment of office floor space, including with a focus on affordable workspace around the station.
- North End Quarter – the vision is as follows: *“With a regenerated and revitalised North End/Retail Core at its heart, the Croydon Metropolitan Centre will develop as a unique mixed-use destination in the borough and the region, with retail, office, arts and culture... leisure and sports, entertainment, learning and workspace activity. It will also be a strategic commercial centre in South London.”*
- Purley Way – it is within the Valley Park area that the proposed new community will integrate most closely with SIL, with the extensive Beddington SIL in LB Sutton to the west. Also, within the Five Ways area, it is important to note that one of the two new sites since the I+Os stage (Site 153) comprises a small isolated SIL, adjacent to the Five Ways roundabout. The proposal is for a scheme involving 91 homes and town centre uses.

9.7.3 Other area and site-specific considerations include:

- Broad Green & Selhurst - Site 13 is of note as a vacant industrial site closely associated with Thornton Heath and Croydon Hospital (a proposed allocation, discussed below), with the proposal for a mixed use scheme to include industrial/warehousing.
- Thornton Heath - Site 136 is proposed for a 124 home mixed use scheme, with the CLP allocation (also the I+Os proposal) for 25 to 55 homes, and the proposal is to remove the requirement for employment;
- Site 50 – within the Croydon OA, is also of note, with the latest proposal being to increase the number of homes onsite, but to add a criterion specifying that the existing factory use onsite must be able to relocate to elsewhere in the Borough.

9.8 Health

9.8.1 One important consideration is ensuring access to health facilities, with site specific policy set to include a considerable focus on identifying sites with the potential to deliver new facilities (subject to further discussions with providers), although there are also certain issues and potential tensions, e.g. proposed redevelopment at Croydon University Hospital (discussed above).

9.8.2 Aside from access to health facilities, another important consideration is access to green and blue infrastructure and space standards. In these respects, key considerations include:

- New Policy DM 1A (Amenity standards for residential developments) – sets out minimum requirements, with supporting text explaining: *“Amenity space is an important and essential element of a residential development, providing an outdoor space that is practical and can be used as a utility, social and recreation area. The health and wellbeing of local residents is a key consideration on the quantum of outdoor space, child’s play space and communal open space to be provided for developments.”*
- New policy DM2A (Large scale purpose built shared living) – sets out the facilities that each private unit shall include or have exclusive access to, including living space separate from the communal facilities.
- Policy SP7 (Green Grid) – there is a new focus on the north of the Borough within the supporting text: *“In the north of the borough where there are less green spaces the improvement of biodiversity is more of a challenge but it can be achieved through the existing parks, back gardens and pockets of green in places such as roads.”* Within the policy itself, there is a new focus on Very Special Community Green Spaces (Local Green Spaces) and other Important Green Spaces.

9.8.3 Other notable site allocations include:

- Site 1 – in New Addington is a new proposed allocation that currently comprises amenity land associated with local authority built housing.
- Site: 44 – is notably associated with New Addington District Centre, with the proposal being to support 376 homes, in contrast to the 50 to 290 homes figure in CLP 2018. Policy DM34 (Addington) sets out the need to: *“Make use of opportunities to create buildings with a larger footprint to the west of Central Parade that have a height of up to 8-11 storeys”*.
- Site 133 - currently comprises various low rise residential blocks and associated parking and amenity land, and the proposal is to deliver a 505 home redevelopment.
- Site 34 – is a large new proposed allocation within the Croydon OA that currently includes public realm.
- Numerous sites – are discussed as potential locations for a health facility. For example, Site 945 was previously earmarked as a potential site for a health centre, but that is no longer anticipated.

9.9 Heritage

9.9.1 Beginning with proposed transformation areas, the historic environment is a particular consideration for the North End Quarter, which is closely associated with the Central Croydon Conservation Area (see discussion in Section 5.4). The proposed densities specifically aim to avoid impacts to the setting of the conservation area, particularly the context to historic buildings as viewed from North Street.

9.9.2 With regards to the proposed areas for focused and moderate intensification, it is clear that careful account has been taken of heritage assets when defining these areas; however, there remain some tensions:

- Beginning with the extensive proposed intensification areas in the vicinity of rail stations in the south west of the Borough, an immediate consideration is the topography and landform, and how this relates to the location of historic assets and historic character. Only three grade 2 listed buildings fall within an intensification area here, but there are other assets that are adjacent. Perhaps most notable is the Webb Estate Conservation Area, which is located on raised land to the west of the Purley/Reedham transport corridor, and where the proposed intensification area extends to include housing estates on two sides. These two housing estates do not contain any listed buildings, but pre-date WWI (according to OS maps) and so presumably are associated with a degree of historic character.

Also notable in this area is the lack of a proposed moderate intensification area to the south east of Purley station / east of Reedham station, presumably reflecting the rising topography and, in turn, townscape/landscape factors. The land rises quite steeply here to Foxley Wood, although there are no listed buildings and this land is mostly undeveloped on the 1913 OS map.

- The proposed Addiscombe MI area is also of note, because it contains one grade 2 listed building (a farm cottage). Land here was developed post WWI.
- The Thornton Heath focused intensification area is relatively unconstrained, but proposed policy sets out: *“The landmark Clock Tower and its setting will be protected and it will continue to act as a key wayfinding element in the public realm.”*
- Finally, with regards to the proposed MI area at the northern edge of Selsdon, this is a sensitive location between locally listed estates adjacent to the north and south, including the Heathfield Estate, at the centre of which is grade 2 listed Heathfield. However, this is a heavily wooded area, which will presumably help to enable effective visual screening.

9.9.3 Other area and site-specific considerations include:

- Mid Croydon - is strongly associated with the Central Croydon Conservation Area, as well as Queen’s Gardens open space. Of the three proposed allocations, two are retained from CLP 2018, namely Sites 194 and 231. The former is a large and constrained site (the grade 2* listed clock tower is adjacent, and the view cone intersects the site), where the proposal is for 874 homes (431 dph), which is a notable increase on the equivalent figure from CLP 2018 (88 to 504 homes). The latter is a small site comprising a listed office building, where the proposal is for 38 homes alongside a cultural facility, which is a slight reduction on the 40 homes figure from CLP 2018. Site 47 is then a new proposed allocation for 18 homes, and comprises a vacant building in the conservation area.
- South of the A232, within the Croydon OA - this area, at the southern extent of the Opportunity Area, lies to the east of the River Wandle floodplain and the Laud Street local heritage area, and to the west of a

residential conservation area. There are four sites, one of which (Site 190) is consented for 357 homes (541 dph), which is a figure notably higher than the CLP 2018 capacity figure (56 to 162 homes). Site 222 is then a retained allocation from CLP 2018, where the anticipated capacity (158 homes; 282 dph) aligns with CLP 2018. The other two sites (41 and 952x) are both new allocations of note, including due to proximity to listed buildings, including (in the case of Site 952x) a grade 2* listed building.

- Site 374 – is another notable site in the Croydon OA. It is a small site in the Old Town, and within a conservation area. The proposal is to support 21 homes (263 dph), a slight decrease on the 23 to 64 range from CLP 2018.
- Purley Way – is a historic transport corridor, plus there is a need to consider the heritage value of the River Wandle corridor. In the Five Ways area, one of the two new sites since the I+Os stage (Site 153) is adjacent to grade 2 listed tithe barn. This could represent a heritage opportunity, given existing uses.
- Broad Green & Selhurst - Site 416 is closely associated with Croydon cemetery, which is a local heritage area. The proposed capacity of 40 homes is at the low end of the CLP 2018 range (36 to 136).
- Crystal Palace & Upper Norwood - the stand-out large site is Site 357, which is located within the district centre and within the Upper Norwood Triangle Conservation Area. The proposal is for a 135 home mixed use scheme, with CLP 2018 having proposed 39 to 223 homes.
- Purley - Site 683 is adjacent to the designated local heritage area. It is proposed for 99 homes, with the current allocation for up to 91 homes.
- South Norwood and Woodside - Site 51 is a new proposed allocation, and has consent for 102 homes plus community uses (144 dph). This site is located within a conservation area.
- Coulsdon - Site 372 is adjacent to the Surrey Iron Railway embankment Scheduled Monument. It has consent for a 157 home residential scheme, with the CLP 2018 proposal for a mixed use development comprising leisure, community facilities and retention of car parking spaces.
- Site 948 – is an existing proposed allocation for 11 homes, with the new proposal for 26 homes. It is described as a disused art deco dance hall, last used as a car repair garage.
- Site 504 comprises a locally listed building, with the current proposed capacity of 24 homes below the range set out in CLP 2018 (26 to 68 homes). New site specific policy is proposed: *“The locally listed building should be converted in a sensitive manner that responds to its special interest. Development in the grounds would need to demonstrate that it can be accommodated in a manner that responds to the locally listed building and preserves or enhances its setting.”*
- Many site allocations – reference the need to account for heritage constraints, primarily conservation areas and listed buildings, but also local heritage areas. For example, policy for Site 951 states: *“The buildings fronting on to London Road contribute to the Local Heritage Area and should be retained and converted as part of the proposal.”*

9.10 Housing

- 9.10.1 Regardless of the housing requirement that is set, the proposal is to take a proactive approach to housing growth, in the sense that the London Plan target/requirement figure for the first ten years of the plan period (2019 to 2029) would be met, and then there would be additional planned supply for the latter ten years of the plan period (2029 to 2039). Sites with planning permission have been included in the first five years of the Plan, those sites with developer interest the second five years of the Plan, and those which could be developed but are not available now have been phased after 2034 (.i.e. 15yrs+). There would naturally then be the potential to boost supply through a Local Plan Review (or another Partial Review). It is also important to recognise the potential for additional capacity to be identified through the planning application process, for example Site 31 has consent for 573 home scheme (to include a 49 storey tower), which is a figure much higher than the 159 homes anticipated in CLP 2018 (plus the site is reduced in extent).
- 9.10.2 Focusing on affordable housing, a strategic policy target for affordable homes based on the level of annual need would be unrealistic and undeliverable. For this reason the strategic target is 40% (minimum) of overall supply, which has regard to development viability and the need to deliver balanced communities with a mixture of tenures and dwelling types. However, the Council will seek to increase the provision of affordable housing, above this (where viable) to meet the London Plan Strategic target of ensuring 50 per cent of all new homes delivered across London to be genuinely affordable.

- 9.10.3 With regards to the need for family housing, the key consideration is proposed changes to Policy DM1 (Housing choice for sustainable communities). The policy intends to ensure that the redevelopment of larger homes, including 4 or 5 bedroom homes, incorporates a replacement unit of that size to retain existing stock. This policy is intended to ensure that any loss of three bed (or more) homes should as a minimum be replaced by an equivalent quantity of three bed homes within schemes.
- 9.10.4 Further considerations include: a new focus in Policy SP2 on supporting a range of housing delivery methods, including self-build, custom-build and community-led housing; and new support for Gypsies and Traveller pitches within 'Tier 1' industrial sites.

9.11 Land and soils

- 9.11.1 Whilst the proposal is to develop some small areas of amenity land, there is no proposed loss of greenfield land within the Green Belt, or MOL.
- 9.11.2 A further consideration is Site 946 (Stubbs Mead), which is a South London Waste Plan safeguarded waste site. It was a proposed allocation in CLP 2018 for 157 to 440 homes, and is now proposed for 385 homes as part of a mixed use scheme to include industrial and warehousing uses.
- 9.11.3 A final consideration is the potential to make further use of brownfield land within the Purley Way, subject to transport infrastructure upgrades and wider issues being address. For example, the Purley Way Masterplan explored options for the Gas Works site, and the site is discussed in Section 5.3, above, as an omission site. Three further Purley Way omission sites are also discussed in Section 5.3.

9.12 Landscape

- 9.12.1 A key consideration is the implications of the proposed intensification areas for suburban character, and there is a need to consider the close links between suburban areas in the south of the Borough and surrounding wooded hillsides. Coulsdon is one area that is very sensitive, with the supporting text explaining: *“Coulsdon is a small suburban settlement surrounded by areas of Green Belt. The Green Belt in this area is characterised by uninterrupted views of open spaces including Farthing Downs and wooded mature tree belts. Coulsdon lies on the southernmost boundary of the borough and its built environment is located within the valleys alongside railway lines and main roads.”*

9.13 Transport

- 9.13.1 As discussed, under Air quality, the proposed spatial strategy might reasonably be described as transport-led, noting the focus of Brighton Mainline, the wider Croydon OA with the NEQ at its heart, the Purley Way (where there are a range of existing issues, and potentially an opportunity for housing growth to unlock a tram extension), Purley (which is set to benefit from 'metroisation' of the rail service, following BML upgrades) and other district and local centres (with identified opportunities to support walking/cycling and public transport, e.g. the A235 corridor). Furthermore, as discussed above under Air quality, it seems clear that PTAL has been a significant consideration when assigning development capacity to site allocations and when defining the location of FI and MI areas.
- 9.13.2 With regards to the proposed intensification areas, considerations include:
- Purley - the plan document explains: *“The Purley Cross gyratory arrangement creates notable severance through the centre of Purley and restricts connectivity for pedestrians and cyclists. Significant improvements to the gyratory will focus on safe pedestrians and cycling routes, as well as improvements for buses. These improvements will enhance the District centre and allow for a possible extension of the tram network (either along Purley Way or from Croydon Metropolitan Centre to Coulsdon along Brighton Road). The Council will work with TfL and other stakeholders to develop a holistic strategy which significantly improves the road network, allows for necessary access and servicing, avoids displacing traffic on to local streets, reduces severance and transforms the public realm by stitching together the District Centre on both sides of a reconfigured Godstone Road. This will also include a review of local bus routing and standing provision within the Purley District Centre to retain bus efficiency and connectivity whilst being able to accommodate public realm improvements. Purley station is the 5th busiest station in Croydon with over 3 million journeys made each year to or from the station¹¹². The Council will work with Network Rail, the train operating company and other stakeholders to maximise opportunities to improve train frequency and reliability (including the Brighton Mainline Upgrade*

programme). The introduction of other storage and delivery collection facilities is also proposed for convenience and to reduce delivery vehicle trips. A network of mobility hubs will be delivered around the District centre, including at Purley station, to accommodate shared transport services such as electric car clubs, e-bikes and e-scooter hire schemes. 'Mobility Hubs' will support promotion of active travel, particularly from other areas that provide significant commuter demand for rail services at Purley Station."

- Broad Green – the focused intensification area is notably associated with only PTAL 3, despite proximity to Croydon OA, potentially suggesting the possibility of growth (both through allocations and the FI area) supporting enhanced bus services along the A235. It is understood that the London Road Corridor Scheme is already in place to improve the street environment, including with a view to supporting public transport.
- Selsdon - car dependency is high in Selsdon due to the lack of public transport and convenient rail stations, as well as the hilly nature of the area. The proposed area of focused intensification has relatively high PTAL (levels 3 and 4) on account of the adjacent tram stop.

9.13.3 A further consideration are the proposed significant changes to Policy SP8 (Transport and Communication), notably:

- A new focus on East Croydon station – *"East Croydon station and the surrounding area is the borough's main transport hub. Development should enhance the station's sub-regional transport role as a major business, hotel and conferencing destination serving London's airports and the Coast to Capital economic area. This enhancement should support the establishment of cycle hubs at East and West Croydon stations, including safeguarding land."*
- Revised support for trams – for example, support for *"potential development of a tram depot in New Addington or other locations in the borough."*
- Notable changes to supporting DM policies, including: new Policy DM 28 (Ensuring the safe and effective movement of the network); notable changes to Policy DM29 (Promoting sustainable travel and reducing congestion); and notable changes to Policy DM30 (Car and cycle parking in new development).

9.14 Water

9.14.1 A key consideration for Local Plans is capacity at wastewater treatment works (WwTW), which in the Croydon context means considering capacity at Beddington WwTW (in LB Sutton), Crossness WwTW (in LB Bexley) and within Dartford Borough. It is understood that no major concerns were raised by Thames Water through the 2019 Issues and Options consultation, but there will be a need for further scrutiny through consultation. Wastewater treatment work capacity is high on the agenda nationally at the current time, hence there is a need to avoid risks of capacity breaches as far as possible. This can mean directing growth to locations served by WwTW with existing capacity, as opposed to relying on capacity upgrades, which can be subject to delays.

9.14.2 A further consideration is Sustainable Drainage Systems (SUDS) measures, which are important from both a flood risk and water quality perspective. New proposed supporting text within the Broad Green and Selhurst section of the Partial Review notably explains:

"Development will be required to incorporate [SUDS] measures. Developers will need to liaise with the Council Local Lead Flooding Authority team and the Environmental Agency, to investigate the suitability of SUDS to manage surface water runoff and flooding issues (where necessary), as well as whether other measures may need to be implemented due to the geological characteristic, to reduce the risk of groundwater flood risk. The Council will continue to work with Thames Water (the sewerage undertaken) and other stakeholders, to ensure sewerage water flooding events are reduced, to protect and enhance the ecological status of Norbury Brook, in line with the Water Framework directive."

Part 3: What are the next steps?

10 Plan finalisation

- 10.1.1 Once the period for representations on the Partial Review / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the Partial Review can still be deemed 'sound'. If this is the case, it will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.2 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Partial Review these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.3 Once found to be 'sound' the Partial Review will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 The SA Report must present 'measures envisaged concerning monitoring'.
- 11.1.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- North End Quarter – there will be a need to be mindful of ongoing changes to retail trends and understanding of best practice in respect of reimagining town centres and high streets.
 - Purley Way – there will be a need for very close monitoring of infrastructure upgrades, and the needs businesses within the SILs. Also project-specific green and blue infrastructure measures could be monitored to ensure that the 'sum of parts' aligns with the vision for a River Wandle Regional Park.
 - Suburban intensification – there could be merit to monitoring shifting character over time, with a view to avoiding cumulative impacts to townscape, landscape and the setting of heritage assets.
 - Built environment decarbonisation – is a rapidly evolving policy area, and so it will be important to monitor the sufficiency of Local Plan policy closely, potentially with a view to preparing supplementary planning guidance, in order to ensure that opportunities are fully realised, including in respect of heat networks.