

Scoping Report for the Croydon Local Plan Sustainability Appraisal

November 2019

Quality information

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1. Introduction

Background

- 1.1 AECOM is commissioned by Croydon Council ('the Council') to lead on Sustainability Appraisal (SA) in support of the emerging partial review of the Croydon Local Plan 2018.
- 1.2 The currently adopted Croydon Local Plan 2018 (CLP2018) established a spatial strategy in relation to housing and employment growth up to 2036 (as well as dealing with other land uses, e.g. retail and community), allocated sites to deliver that strategy and established policies to guide the planning application process. The partial review, takes into account and will be in accord with the draft New London Plan which amongst other matters, requires a significant amount of additional housing to be delivered in the London Borough of Croydon. This partial review responds to and seeks to accommodate this higher housing target. Once adopted, the Croydon Local Plan Partial Review will replace the adopted Croydon Local Plan 2018.
- 1.3 The draft New London Plan is at an advanced stage of preparation and has already undergone Examination in Public (EiP) in late 2018 and early 2019. The Mayor of London anticipates publication of the New London Plan in February/March 2020, at which point it will be adopted and will supersede the adopted 2016 iteration. In light of this the scoping report draws from the draft New London Plan rather than the adopted 2016 London Plan.

SA explained

- 1.4 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. The aim is to ensure that the plan contributes to the achievement of sustainable development.
- 1.5 SA must be undertaken in accordance with specific procedural requirements, as established by the Environmental Assessment of Plans and Programmes ('SEA') Regulations 2004. Two key procedural requirements of the SEA Regulations are that:
 - When deciding on 'the scope and level of detail of the information' which must be included within the key output report - namely the report published for consultation alongside the draft Local Plan Review there is a consultation with certain nationally designated authorities, namely the Environment Agency, Historic England and Natural England; and
 - A report (the 'SA Report') is published for consultation alongside the draft Local Plan Review that identifies, describes and evaluates the likely significant effects of implementing the draft Local Plan Review, and reasonable alternatives.

This scoping report

1.6 This scoping report is concerned with item 1 above. It presents a suggested scope for the SA so that the designated authorities can provide timely comment. This report is also published for consultation more widely.

Approach to scoping

- 1.7 Scoping essentially involves identifying a 'framework' of sustainability issues and objectives that should be a focus of, and provide a methodological framework for, the appraisal of the emerging plan (and reasonable alternatives).
- 1.8 In order to facilitate the identification of sustainability issues/objectives, scoping firstly involves review of the 'context' and 'baseline'. Scoping therefore involves the following steps -

- 3. Context review a review of existing policy issues/objectives established and by Government, the Council and other key organisations.
- 4. Baseline review a review of the current situation locally and a consideration of how this might evolve in the absence of the plan.
- 5. Key issues summary a summary of the key (in the sense that the plan may have an effect) problems and opportunities identified through steps (1) and (2).
- 6. SA Framework development a refinement of the key issues.

Structure of this report

1.9 Scoping steps 1 to 4 have been completed, and the outcomes are presented for consultation within this report.

- 1.10 Rather than presenting the outcomes of steps 1 to 4 sequentially within this report, the outcomes of steps 1 to 4 are presented under the following thematic headings in turn -
 - Air quality ٠
 - Biodiversity ٠
 - Climate change adaption ٠
 - Climate change mitigation •
 - Economy and employment •
 - Health •
 - Heritage •

- Housing
- Land and soils
- Landscape
- Population and communities
- Transport
- Water resources
- Water quality
- 1.11 These themes reflect the anticipated broad scope of sustainability issues/objectives likely to be of greatest relevance to the emerging Croydon Local Plan. It is intended that presenting the scoping information under these themes will help enable the reader to easily locate the information of greatest interest to them.
- 1.12 The discussion of scoping under each SA theme is presented in Sections 2 to 13. A final section then discusses 'next steps'.

Figure 1.1: The scoping process



2. Air quality

Context

National

- 2.1 Key messages from the National Planning Policy Framework¹ (NPPF) include:
 - Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
 - Opportunities to improve air quality of mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
 - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.
 - New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- 2.2 The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.
- 2.3 The government published the 'UK plan for tackling roadside nitrogen dioxide concentrations' in July 2017.² This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that "*the link between improving air quality and reducing carbon emissions is particularly important*" and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

Regional

- 2.4 Key messages on air quality from the draft New London Plan include:
 - Policy SI1 (Improving air quality) which states that development proposals should not: lead to further deterioration of existing poor air quality; create new areas which exceed air quality limits; reduce air quality benefits from activities or initiatives at Borough-level, and; create unacceptable risk of high levels of exposure to poor air quality.
 - Policy SI2 (Minimising greenhouse gas emissions) says that major development should be net zerocarbon to support London becoming a zero-carbon city.
 - Policy GG3 (Creating a healthy city) seeks to "improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution."
- 2.5 The London Environment Strategy (2018) ambitiously aims to transform London's air quality from "*illegally poor*" to "*the best air quality of any major world city*" by 2050. Key message from Chapter 4 (Air Quality) include:

¹ MHCLG (2018) National Planning Policy Framework [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_201 8.pdf [accessed 03/08/18]

² DEFRA (2017) 'UK plan for tackling nitrogen dioxide concentrations' [online], available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-planoverview.pdf

 Trends for NO₂, PM₁₀ and PM_{2.5} all show a reduction in emissions at a London-wide scale, though NO₂ emissions continue to breach mean EU limits.

Local

- 2.6 Key messages from the adopted Local Plan on air quality include:
 - Policy SP8 (Transport and communication) presents a range of strategies to reduce reliance on travel by private vehicle and achieve a meaningful modal shift to sustainable transport. This includes provision of electric vehicle charging infrastructure, limiting access to parking spaces, seeking improvements to bus services, encouraging rail infrastructure and tram infrastructure improvements and enhancing and expanding cycle infrastructure to deliver a more coherent network.
 - Policy DM23 (Development and construction) which states that the Council aim to ensure developments are air quality neutral.
- 2.7 Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate air quality management areas if improvements are necessary. Where an Air Quality Management Area (AQMA) is designated an air quality action plan (AQAP) must then be put in place with a five year time horizon. In this context, Croydon Council published its most recent AQAP in 2012 to cover the period to 2017 and is in the process of updating this to cover the period 2017 to 2022.

Baseline

Current baseline

- 2.8 Air quality monitoring in Croydon is undertaken at five continuous automatic monitoring sites to assess levels of nitrogen dioxide (NO₂) and Particulate Matter (PM₁₀ and PM_{2.5}). NO₂ is also monitored via a network of 16 non-automatic passive diffusion tubes around the Borough.
- 2.9 The 2017 Air Quality Annual Status Report (ASR) (which notes that "*NO*₂ concentrations during 2016 have generally increased at both background and roadsite sites" and identifies that "*NO*₂ concentrations exceeded the UK annual mean objective at a number of locations". On this basis the ASR concludes that "*improvements are required*" in relation NO₂ though no required action is identified in relation to particulate matter.³
- 2.10 The entire Borough has been a declared as an AQMA since 2003 in relation to (NO₂) emissions. The draft 2017-2022 AQAP presents 50 actions to address and NO₂ exceedances, grouped into the following six categories: Emissions from developments and buildings; Public health and awareness training; Delivery servicing and freight; Borough fleet actions; Localised solutions, and; Cleaner transport.
- 2.11 Additionally, there are five 'air quality focus areas' in Croydon. These are areas identified in the AQAP as having "*high levels of pollution and human exposure*". These areas are:
 - London Road, Norbury
 - Purley Cross and Russell Hill
 - Thornton Heath / Brigstock Road/ High Street / Whitehorse Lane
 - London Road between Thornton Heath Pond and St James Road
 - Wellesley Road

Future baseline

2.12 New housing and employment provision in the Borough has the potential to negatively impact air quality through increasing traffic flows and associated pollutants, particularly NO2. This in turn has potential to affect the Borough-wide AQMA through increased emissions.

³ London Borough of Croydon Air Quality Annual Status Report for 2016 (2017) [online], available from: <u>https://www.croydon.gov.uk/sites/default/files/AQstatus-report16-final.pdf</u>

2.13 However, new development will likely present opportunities to place increasing focus on sustainable means of transport, particularly through densifying development at more sustainable locations such as near to transport hubs, particularly light and heavy rail.

- 2.14 The following key issue emerges from the context and baseline review:
 - There is a widespread and long term issue with NO₂ emissions in Croydon, with the entire Borough declared an AQMA for NO₂ since 2003.
 - The most recent Annual Status Report (2017) indicates that NO₂ levels consistently exceed the UK annual mean and increased further over the 2016/17 monitoring period.
 - Croydon's multi-modal public transport network, particularly interchange hubs between transport modes (such as East Croydon) will likely present opportunities to concentrate development at sustainable locations which reduce dependence on private vehicles.
- 2.15 In light of the key issues discussed above it is proposed that the SA should include the following objectives:
 - 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.

3. Biodiversity

Context

National

- 3.1 Key messages from the NPPF in relation to Biodiveristy include:
 - One of the three overarching objectives of the NPPF to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity'.
 - Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scape across local authority boundaries.
 - Planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures.
 - To protect and enhance biodiversity and geodiversity, plans should:
 - Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
 - Take a proactive approach to mitigating and adapting to climate change, considering the long-term implications for biodiversity.
 - The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.
- 3.2 The Government's 25 Year Environment Plan (2018) sets out a strategy for managing and enhancing the natural environment, embedding 'net gain' principles as key to environmental considerations.
- 3.3 The UK Biodiversity Action Plan (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

Regional

- 3.4 Policy G1 (Green infrastructure and the Natural Environment) of the draft New London Plan notes that a green infrastructure approach recognises has a wide range of benefits, including conserving and enhancing biodiversity and ecological resilience.
- 3.5 Policy G6 (Biodiversity and access to nature) of the draft New London Plan states that Sites of Importance to Nature Conservation (SINCs) should be protected but also stresses the importance of development plan policies should "*support the protection and conservation of priority species and habitats that sit outside of the SINC network*".
- 3.6 Policy G7 (Trees and woodlands) note the importance of trees within the urban environment, with biodiversity functions being delivered through the provision of "extensive areas of habitat for wildlife, especially mature trees".

3.7 The London Environment Strategy (2018) states that the Mayor will "develop a biodiversity net gain approach for London, and promote wildlife-friendly landscaping in new developments and regeneration projects" (proposal 5.2.1.b).

Local

- 3.8 Policy SP7 (Green grid) of the adopted Local Plan seeks to deliver new and enhanced green infrastructure, enhance biodiversity and assist ecological restoration, with key messages including that the Council will:
 - Protect and safeguard local green spaces;
 - Establish a network of multi-functional open spaces;
 - Maximise opportunities for street tree planting, green roofs, green wall and green landscaping;
 - Enhance biodiversity across the Borough.

Baseline

Current baseline

3.9 The Borough is very densely urbanised in places, particularly Croydon town centre and the areas north of here towards the northern boundary, while the south of the Borough is broadly more urban-fringe in character with greater areas of woodland and open space. This is reflected in the distribution of designated biodiversity sites and habitats, with many priority habitats falling within the less densely urbanised south of the Borough along with the nationally designated sites and larger locally designated sites.

Internationally designated sites

- 3.10 There are no Special Areas of Conservation (SAC) within the Borough. The Wimbledon Common SAC and Mole Gap to Reigate Escarpment SAC are nearest to the Borough, located around 5km to the north west and south west of the plan area respectively.
- 3.11 There are no Ramsar sites or Special Protection Areas within or adjacent to the Borough, nor close enough to likely be affected by new development within the Borough.

Nationally designated sites

3.12 There are three Sites of Special Scientific Interest (SSSIs) within the Borough, namely Croham Hurst SSSI at South Croydon, Riddlesdown SSSI at Kenley and Farthing Downs and Happy Valley SSSI at Coulsdon. The condition of each of these, as recorded by Natural England in 2018, is summarised in in Table 3.1 below.

Designated site	Condition
Croham Hurst SSSI	Favourable (90.94%)
	Unfavourable – recovering (9.06%)
Farthing Downs and Happy Valley SSSI	Favourable (100%)
Riddlesdown SSSI	Favourable (43.11%)
	Unfavourable – recovering (56.89%)

Table 3.1 Sites of Special Scientific Interest (SSSIs) in Croydon⁴

- 3.13 The South London Downs National Nature Reserve (NNR) was declared in July 2019 and covers 417ha of land in Croydon and Surrey. Part of the area is already covered by the Farthing Downs and Happy Valley SSSI. The new NNR is the second largest in London after Richmond Park.
- 3.14 There are a number of Biodiversity Action Plan Priority Habitats within the Borough, though these are almost exclusively in the south away from Croydon town centre. These principally comprise:
 - Good quality semi-improved grassland;
 - Lowland Calcareous Grassland;
 - Lowland Meadows;
 - Lowland Heath;
 - Deciduous Woodland.
- 3.15 A number of small areas of ancient woodland are clustered at the south of the Borough, particularly around the border with Surrey near Selsdon and Sanderstead. Several areas of ancient woodland.

Locally designated sites

- 3.16 Sites of Importance for Nature Conservation (SINCs) are local wildlife designations collectively covering nearly 20% of London's area⁵. Within London there are three tiers of SINCs. Sites of Metropolitan Importance are the highest value, followed by Sites of Borough Importance and then Sites of Local Importance.
- 3.17 The adopted Local Plan (2018) designates 86 SINCs at the level of Borough or Local Importance via Policy DM27. The 2014 Review of SINCs in Croydon identified an additional 13 sites of Metropolitan Importance already identified through the London Plan⁶.

Future baseline

- 3.18 Habitats and species have the potential to come under increasing pressure from the provision of new housing, employment and infrastructure in the Borough, including at designated sites. This could include increased disturbance (recreational, noise and light) and atmospheric pollution as well as the loss of habitats and fragmentation of biodiversity networks. Habitat loss and fragmentation could be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.
- 3.19 However, future growth can also provide opportunities to increase understanding and integration of biodiversity habitats and networks into new development at a strategic scale. Therefore, new development could potentially unlock opportunities to protect and enhance important habitats and also enhance the connections between them, particularly through the provision and enhancement of green infrastructure.

- 3.20 The following key issue emerges from the context and baseline review:
 - The Borough contains a variety of biodiversity designations at a range of scales, namely:
 - 3 Sites of Special Scientific Interest (SSSIs).
 - 86 Sites of Importance for Nature Conservation (SINCs) of local importance and 13 SINCs of Metropolitan importance.
 - A variety of Biodiversity Action Plan habitats distributed throughout the plan area.
 - There are no Special Protection Areas, Special Areas of Conservation or Ramsar sites.
- 3.21 In light of the key issues discussed above it is proposed that the SA should include the following objectives:

⁵ https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/biodiversity

⁶ Thomson Ecology (2014), Review of Sites of Importance for Nature Conservation (Updated 2014) [online], available from: https://www.croydon.gov.uk/sites/default/files/articles/downloads/Review%20of%20Croydon%20SINC%20Sites%20%28final% 20draft%29.pdf

- 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 wellconnected, functional habitats that are resilient to the effects of climate change.



4. Climate change adaptation

Context National

- 4.1 Key messages from the NPPF in relation to climate change adaptation include:
 - Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
 - Inappropriate development in areas at high risk of flooding should be avoided by directing development away from areas of highest risk (whether existing or future).
 - Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources.
 - Plans should take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.
 - Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbate the impacts of physical changes to the coast.
- 4.2 The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report ⁷ containing six priority risk areas requiring additional action in the next five years:
 - Flooding and coastal change risks to communities, businesses and infrastructure;
 - Risks to health, well-being and productivity from high temperatures;
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
 - Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals
- 4.3 The Flood and Water Management Act (2010)⁸ sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

⁷ DEFRA (2017): 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from: <<u>https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017</u>> [last accessed 13/02/18]
⁸ Flood and Water Management Act (2010) [online] available at: <u>http://www.legislation.gov.uk/ukpga/2010/29/contents</u> Accessed Aug 2017

4.4 The Committee of Climate Change published a 2012 report entitled 'How Local Authorities can Reduce Emissions and Manage Climate Change Risk'⁹ which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from a number of local authorities.

Regional

4.5 The London Environment Strategy (2018) (Chapter 8: Adapting to Climate Change) identifies a range of issues likely to be affected by climate change, setting out key threats, including flooding, higher temperatures and water scarcity, along with potential adaptations and mitigations to these.¹⁰

Local

- 4.6 Key messages from Policy SP6 (Environment and climate change) of the adopted Local Plan include:
 - The Council will promote urban blue corridors which enable "a network of multifunctional spaces and . corridors that provide safe routes and storage for flood water within the urban environment".
 - All development will be required to utilise Sustainable Drainage Systems (SuDS) to reduce surface water runoff.
- 4.7 A Level 1 Strategic Flood Risk Assessment (SFRA) (2009) and Level 2 SFRA (2015) were commissioned jointly by the four London Boroughs of Croydon, Merton, Sutton and Wandsworth. The Level 1 SFRA provides a strategic overview of areas of risk and potential mitigations in the Borough, without descending to site specific exception and sequential testing. The Level 2 SFRA is a more detailed assessment which explores flood risk and mitigation at a site specific scale.¹¹
- 4.8 The Croydon Surface Water Management Plan (2011) sets out "the preferred surface water management strategy for London Borough of Croydon and includes consideration of flooding from sewers, drains, groundwater and runoff from land, ordinary watercourses and ditches that occurs as a result of heavy rainfall'.12
- 4.9 Local Flood Risk Management Strategy (2015) was published by the Council under their statutory obligation as Lead Local Flood Authority to "develop, maintain, apply and monitor a strategy for local flood risk managemenť'.13

Baseline

Current baseline

- 4.10 The River Wandle is Croydon's primary watercourse, though for much of its route through the Borough the river is culverted. Additional watercourses include Norbury Brook in the north of the Borough and Chaffinch Brook in the north east. Croydon does not have widespread fluvial flood risk though there are narrow areas of Flood Zone 3 along the corridors of these watercourses. This is particularly the case in relation to the River Wandle, including in some of the locations where it has been culverted.
- 4.11 However, surface water flood risk in the Borough is extensive. The adopted Local Plan (2018) notes that Defra ranks Croydon as the 4th most susceptible settlement in England to surface water flooding.
- The SFRA Level 2 identifies that groundwater flood risk is present in much of the Borough. Risk is mostly 4.12 limited, though there is notable potential for groundwater flooding to occur at the surface along much of

⁹ CCC (2012), 'How local authorities can reduce emissions and manage climate risks', [online]; available from:

https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/ ¹⁰ Mayor of London (2018), 'London Environment Strategy' [online], available from:

https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf ¹¹ AECOM (2015) 'Level 2 Strategic Flood Risk Assessment' [online], available from:

^{6202%20}SFRA%20https://www.croydon.gov.uk/sites/default/files/articles/downloa ads/Crovdon%20Leve 620Main%20Report.pdf

¹² Croydon Council (2011) 'Surface water management plan' [online], available from:

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https://www.croydon.gov.uk/environment/flood-water/flood-management

the A22 and A23 corridors as well as the Borough's western fringes and at Selsdon and Sandserstead in the south east.

4.13 The Croydon Surface Water Management Plan (SWMP) identifies 16 Critical Drainage Areas (CDAs) in the borough. The Environment Agency has identified that the following three CDAs are at greatest risk of flooding in terms of the number of receptors at risk: 1) South and Central Croydon; 2) Brighton Road; and 3) Purley.

Future baseline

- 4.14 New development could have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.
- 4.15 Widespread implementation of SuDS could help reduce the risk from surface water run off, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding where possible.
- 4.16 In the long term, climate change could increase the potential for flood events through changing rainfall patterns.

- 4.17 The following key issues emerge from the context and baseline review:
 - Fluvial flood risk is relatively limited and is mostly associated with corridors of land either side of the main watercourses in the Borough, including where they have been culverted.
 - Surface water flood risk is more widespread, though can be managed to an extent through mitigation and by directing residential development away from the areas of highest risk.
 - Groundwater flood risk is present in the Borough, with particularly vulnerability in the Borough's west and south.
 - The Borough has no vulnerability to coastal or tidal flooding.
- 4.18 In light of the key issues discussed above it is proposed that the SA framework should include the following objectives:
 - 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.





5. Climate change mitigation

Context

National

Key messages from the NPPF in relation to climate change mitigation include:

- 5.1 One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' 'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 5.2 Local Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- 5.3 Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.
- 5.4 The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It required the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report ¹⁴ containing six priority risk areas requiring additional action in the next five years:
 - Flooding and coastal change risks to communities, businesses and infrastructure;
 - Risks to health, well-being and productivity from high temperatures;
 - Risk of shortages in the public water supply, and for agriculture, energy generation and industry;
 - Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
 - Risks to domestic and international food production and trade; and
 - New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals
- 5.5 The UK Climate Change Act¹⁵ was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement.
- 5.6 The Committee of Climate Change published a 2012 report entitled 'How Local Authorities can Reduce Emissions and Manage Climate Change Risk' ¹⁶ which emphasises the crucial role councils have in helping

¹⁴ DEFRA (2017): 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:

<<u>https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017</u>> [last accessed 13/02/18]

¹⁵ HM Government (2008): 'Climate Change Act 2008', [online] accessible via

<<u>http://www.legislation.gov.uk/ukpga/2008/27/contents</u>

¹⁶ CCC (2012), 'How local authorities can reduce emissions and manage climate risks', [online]; available from: https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/

the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from a number of local authorities.

Regional

- 5.7 Policy SI2 (Minimising carbon dioxide emissions) of the draft New London Plan establishes a 'be lean, be clean, be green' energy hierarchy: 1) use less energy → 2) supply energy efficiently → 3) use renewable energy. Development will be expected to be in accordance with the hierarchy in order to minimise carbon dioxide emissions.
- 5.8 Policy SI2 also requires major development to be net zero-carbon to help London become a carbonneutral city.

Local

5.9 Policy SP6 (Environment and climate change) of the adopted Local Plan aims to "*promote the development of district energy networks*" and establishes measures to reduce reliance upon external energy generation in new high density residential development.

Baseline

Current baseline

5.10 Reducing greenhouse gas (GhG) emissions is widely acknowledged as a key element of climate change mitigation. CO₂ emissions in particular are associated with a changing climate. In this context, emissions are monitored and recorded at Local Authority level to enable high-emitting areas to identify and mitigate sources of emissions. This data is presented in Table 5.1 below:

Table 5.1 Local Authority CO₂ emissions estimates within the scope of influence of Local Authorities 2005-2016 ($kt \text{ CO}_2$)¹⁷

	Industrial and commercial (t CO2)	Domestic (t CO2)	Transport (t CO2)	Total (t CO2)	Emissions per capita (t CO2)
Croydon					
2005	571.6	826.7	360.1	1,757.0	5.2
2006	552.4	821.7	352.0	1,724.6	5.1
2007	521.5	800.8	351.0	1,671.4	4.9
2008	524.5	811.5	324.2	1,658.1	4.7
2009	464.0	731.9	311.2	1,504.8	4.3
2010	484.8	784.3	303.8	1,570.4	4.4
2011	434.5	691.7	297.3	1,420.8	3.9
2012	473.3	746.6	292.9	1,509.9	4.1
2013	433.8	734.6	290.5	1,455.9	3.9
2014	332.2	612.9	289.8	1,231.8	3.3
2015	317.3	605.4	285.9	1,205.2	3.2
2016	268.9	566.4	290.1	1,121.9	2.9
Greater London					
2005	20,243.3	17,073.8	9,727.8	47,019.3	6.3

¹⁷ Dept of Business, Energy and Industrial Strategy (2018) 'UK local authority and regional carbon dioxide emissions national statistics: 2005-2016 [online], available from: <u>https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-2016</u>

	Industrial and commercial (t CO2)	Domestic (t CO2)	Transport (t CO2)	Total (t CO2)	Emissions per capita (t CO2)
2006	21,612.0	16,979.7	9,581.4	48,144.2	6.3
2007	20,811.6	16,560.7	9,464.5	46,802.8	6.1
2008	21,062.3	16,728.6	8,941.0	46,694.5	6.0
2009	18,679.2	15,226.1	8,671.5	42,535.9	5.4
2010	19,851.2	16,327.1	8,553.2	44,687.8	5.5
2011	17,601.2	14,321.7	8,292.7	40,168.5	4.9
2012	19,376.4	15,424.1	8,197.4	42,947.7	5.2
2013	18,233.8	15,102.5	8,061.8	41,346.5	4.9
2014	15,255.2	12,589.0	8,063.4	35,856.8	4.2
2015	13,559.1	12,259.0	7,948.8	33,709.1	3.9
2016	11,679.5	11,539.9	8,017.8	31,177.9	3.6
England					
2005	149,948.8	126,263.7	87,123.2	363,335.8	7.2
2006	150,284.6	126,064.1	86,230.2	362,579.0	7.1
2007	144,513.2	122,073.0	86,814.8	353,401.0	6.9
2008	141,747.3	122,243.2	83,363.1	347,353.6	6.7
2009	124,384.5	111,289.5	80,680.7	316,354.7	6.1
2010	133,367.4	119,284.4	79,625.1	332,276.9	6.3
2011	118,644.9	104,279.7	78,137.6	301,062.1	5.7
2012	128,005.1	111,841.7	76,879.9	316,726.6	5.9
2013	122,403.9	109,226.3	76,009.2	307,639.4	5.7
2014	105,713.7	91,476.4	77,186.4	274,376.6	5.1
2015	99,155.3	89,165.3	78,224.6	266,545.3	4.9
2016	87,747.6	84,285.5	79,864.9	251,898.0	4.6

- 5.11 Table 5.1 illustrates that Croydon's CO₂ emissions since 2005 have fallen in line with trends also evident in Greater London and England as a whole. Total combined per capita emissions from all sources from Croydon are lower than the average for Greater London and for England as a whole, though the adopted Local Plan notes that on a like-for-like basis Croydon's CO₂ emission are seventh highest out of the London boroughs (paragraph 10.28).
- 5.12 The Department for Business, Energy and Industrial Strategy also publishes annual statistics on renewable energy generation, disaggregated by Local Authority. The most recently published data is for 2017 and shows that Croydon has a total renewable energy installed capacity of **5.8 megawatts**. This is entirely generated from photovoltaics (i.e. solar panels). This puts Croydon at 11th place in terms of overall renewable energy installed capacity in the 32 Greater London boroughs, though this increases to 4th place when looking at installed capacity from photovoltaics alone.¹⁸

¹⁸ DBEIS (2018), 'Renewable electricity by local authority' [online], available from: <u>https://www.gov.uk/government/statistics/regional-renewable-statistics</u>

Future baseline

- 5.13 Climate change has the potential to increase the occurrence of extreme weather events in the Borough, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. UK Climate Projections (UKCP09) estimate that under a medium emissions scenario, the central estimate of change in winter mean precipitation is an increase of 16%, while there is estimated to be an average drop in summer precipitation of 19%. This is likely to increase the risk of flooding in winter months and increase water shortages during summer months with an increased need for resilience and adaptation.
- 5.14 Per capita emissions in Croydon are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted. This relates to issues such as transport, as increased take up of more energy efficient vehicles and electric vehicles takes place.
- 5.15 Whilst Croydon's per capita emissions are already lower than those of Greater London as a whole, it will be important that new development maximises the opportunities afforded by Croydon's public transport network and this could have an important role to play in continuing to drive down emissions. Additionally, strategic new development could offer opportunities to integrate renewable energy generation at an ambitious scale into new development as well as to seek the highest level of energy efficiency measures.

- 5.16 The following key issues emerge from the context and baseline review:
 - Falling CO₂ emissions in Croydon broadly reflect a UK-wide trend, though emissions per capita in Croydon are low in relation to those of Greater London overall and of England as a whole.
 - Renewable energy generation in Croydon is entirely sourced from photovoltaics. Croydon has the fourth greatest level of installed capacity from photovoltaics of all the Greater London boroughs.
- 5.17 In light of the key issues discussed above, it is proposed that the SA framework should include the following objectives:
 - 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.

6. Economy and employment

Context

National

- 6.1 Key messages from the NPPF in relation to economy and employment include:
 - Planning policies should help build a strong, responsive and competitive economy by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
 - Local plans should:
 - a. Encourage sustainable economic growth within their clear economic vision and strategy.
 - b. Set criteria and identify sites for local investment to match the community needs.
 - c. Address investment barriers such as inadequate infrastructure, services/housing or poor environment.
 - d. Incorporate flexibility to account for unanticipated circumstances, allow new working practices and enable rapid responses to economic changes.
- 6.2 The Local Growth White Paper (2010)¹⁹ notes that government interventions should support investment that will have a long-term impact on growth, working with markets rather than seeking to create artificial and unsustainable growth. The White Paper identifies that economic policy should be judged on the degree to which it delivers strong, sustainable and balanced growth of income and employment over the long-term. More specifically, growth should be: broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings (including future generations), whilst also focused on businesses that compete with the best internationally.

Regional

- 6.3 Policy E4 (Land for industry, logistics and services to support London's economic function) of the draft New London Plan identifies the importance of "*maintaining a sufficient supply of land and premises in different parts of London to meet current and future demands*".
- 6.4 The Croydon Town Centre Opportunity Area Planning Framework (2013) was prepared collaboratively by the Greater London Authority, Croydon Council and TfL with the aim of unlocking the maximum development potential from the Croydon Opportunity Area, with indicative provision of 7,500 new jobs a key proposal.

Local

- 6.5 Key messages from the adopted Local plan include:
 - Policy SP3: The Council will encourage innovation and investment into the Borough to support enterprise and increased employment.
 - Policy SP3: The Council will promote and support the development of all B1 uses, retail, leisure, visitor accommodation in the Croydon Metropolitan Centre, District Centres and Local Centres.
 - Policy DM4: The Council will ensure that the vitality and viability of Croydon Metropolitan Centre and the Borough's District and Local Centres is maintained and increased.

¹⁹ Department for Business, Innovation and Skills, 2010, Local Growth: Realising Every Place's Potential [online] available at: <u>https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961</u> Accessed Aug 2017

Baseline

Current baseline

6.6 Croydon is the largest Metropolitan town centre in London and one of only two strategic office centres outside central London itself.²⁰ As such it is both an employment hub and a major commuter town for workers in central London. There are significant travel to work relationships with the City of London,



Westminster and Canary Wharf/Isle of Dogs, along with much smaller scale relationships with more local destinations including Bromley and Sutton. Inward commuting is much more self-contained, with Croydon town centre a major destination for residents of other residential centres in the Borough (see Figure 6.1 below).

Figure 6.1 In and out commuting to and from Croydon²¹

- 6.7 The adopted Local Plan sets out a Town Centre hierarchy as follows:
 - 1 x Metropolitan Centre (Croydon town centre)
 - 9 x District Centres (Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, Purley, Selsdon, South Norwood and Thornton Heath)
 - 9 x Local Centres
- 6.8 Maintaining the viability of each of these centres is key to the overall economic and social vitality of the Borough.

²⁰ Mayor of London (2016) 'The London Plan Annexe One: Opportunity and Intensification Areas' [online], available from: <u>https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-annexes/annex-one-opportunity-and</u>

and ²¹ GL Hearn (2015), Strategic Housing Market Assessment – London Borough of Croydon [online], available from: <u>https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20SHMA%20Final%20June%202015.pdf</u>

Figure 6.2 Occupation of residents aged 16-74 in full time employment (2011 census)



6.9 Figure 6.1 shows that the key employment sectors for Croydon residents are:

- Associate professional & technical occupations;
- Professional occupations;
- Administrative & secretarial occupations.
- 6.10 This appears to be consistent with the SHMA's findings that many residents commute to the financial, government and media hubs of Westminster, the City and Canary Wharf which host significant employers in professional and technical industries. Croydon's own status as a 'strategic office centre' is also consistent with these findings. It is notable that the proportion of Croydon residents employed in these three occupation categories Croydon residents is substantially higher than the national average.





6.11 Figure 6.2 illustrates the economic activity rate of Croydon's employment-age residents (72.35%) is marginally higher than for London (71.67%) and higher than the national rate (69.91%).

Figure 6.4 Highest level qualifications (2011 census)



- 6.12 Skills and education are a key factor in driving economic growth. As per Figure 6.4, the 2011 census indicates that Croydon has a lower proportion of residents with no qualifications (17.6%) and a greater proportion of residents with level 4 qualifications (31.8%) than the average for London (17.6% and 37.72%) and England as a whole (20.70% and 27.38%). The eight qualification levels in England are summarised below for context: The most recognisable qualifications in England at each of the eight qualification levels are summarised below: ²²
 - Level 1 includes GCSE grades 3 to 1 or D to G;
 - Level 2 includes GCSE grades 9 to 4 or grades A* to C;
 - Level 3 includes AS levels and A levels;
 - Levels 4 and 5 include NVQs at Level 4 and Level 5 respectively;
 - Level 6 includes bachelor degrees;
 - Level 7 includes masters degrees;
 - Level 8 includes doctoral degrees.

Future baseline

- 6.13 The Croydon Town Centre Opportunity Area will continue to be the focus for growth, including investment in public realm improvements, transport infrastructure enhancement and significant new employment and residential development.
- 6.14 Growth will have potential to put additional pressure on the key transport arteries between Croydon and central London. It will be important that this growth is matched by associated infrastructure enhancements as necessary, such as planned capacity upgrades to the London to Brighton mainline.

- 6.15 The following key issues emerge from the context and baseline review
 - Croydon is both a key employment destination and a major commuter hub with strong travel to work relationships with the City of London, Westminster and Canary Wharf evident.
 - There is a more self-contained travel to work pattern for inbound commuting, suggesting that residents have a range of employment options both within and beyond the Borough.
 - Educational attainment is reasonably high in relation to England as a whole, though is relatively poor in relation to average attainment within London, particularly with regard to the number of residents achieving Level 4 qualifications or above.

²² Excluding 'entry level' qualifications such as English for speakers of other languages

- 6.16 In light of the key issues discussed above it is proposed that the SA framework should include the following objectives:
 - Ensure that education and skills provision meets the needs of Croydon's existing and future labour market and improves life chances for all, including by enabling older people and people with physical and mental health conditions to stay in employment.
 - Support a strong, diverse and resilient economy that provides opportunities for all, enhances the vitality of the Borough's town and local centres including through the identification of further regeneration opportunities, particularly in the most deprived areas. This could include support for the social enterprise, voluntary and community sectors.

7. Health

Context

National

- 7.1 Key messages from the National Planning Policy Framework (NPPF) include that planning policies should:
 - Enable and support healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
 - Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
 - Help deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities.

Regional

- 7.2 Policy GG3 (Creating a healthy city) of the draft New London Plan recognises the cross-cutting and multilateral nature both of healthcare provision and of enabling healthy lifestyles, noting the significance at a London-wide scale of ensuring that "*wider determinants of health are addressed in an integrated and coordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities.*"
- 7.3 The Health Inequalities Strategy (2018) presents a London-wide strategy for tackling identified 'unfair differences' in health outcomes across the city, focussing on the five core themes of healthy children, healthy minds, healthy places, healthy communities and healthy living.²³

Local

- 7.4 Policy DM16 (Promoting healthy communities) of the adopted Local Plan presents a range of requirements expected of developments in order to deliver communities which support and enable healthy lifestyles, behaviours and choices. Policy DM2 additionally commits the Council to working with NHS partners to deliver new and improved healthcare facilities and services.
- 7.5 The Croydon Local Health Profile (2018) is produced by Public Health England and measures outcomes in the Borough against national averages on a range of metrics including life expectancy and under-75 mortality, smoking status and childhood obesity.²⁴

Baseline

Current baseline

- 7.6 Health is a cross-cutting topic and there are natural synergies with other SEA themes including climate change mitigation, population and communities and transport. This is particularly the case in relation to green infrastructure, which is a key aspect of all these themes thanks to its multi-functionality.
- 7.7 Croydon's green infrastructure network includes urban parks, playing fields, allotments, cycle paths, designated biodiversity sites such as SINCs, plus other designated open spaces, such as Metropolitan Open Land which is designated by the London Plan. These features provide a range of health benefits through enabling access to outdoor recreation and positioning walking and cycling as viable transport options in certain areas. Long standing public open spaces, such as Wandle Park in Croydon town centre, are complemented by more recent additions, such as Addiscombe Railway Park, demonstrating the potential to identify new green spaces for outdoor recreation as land uses change over time.

²³ Mayor of London (2018), Health Inequalities Strategy [online], available from: <u>https://www.london.gov.uk/what-we-do/health/health-inequalities-strategy</u>

 <u>do/health/health-inequalities-strategy</u>
 ²⁴ Public Health England (2018) 'Local Authority Health Profile 2018', [online], available from: <u>https://fingertips.phe.org.uk/profile/health-profiles/data#page/0/gid/1938132696/pat/6/par/E12000007/ati/102/are/E09000008</u>

- 7.8 The adopted Local Plan identifies a geographic split in terms of accessibility to open space, noting that there are "*significant gaps in access to nature in the northern parts of the Borough*" due to a lack of available land (as per the supporting text of Policy SP7). This appears consistent with the understanding that Croydon is more densely urbanised in the north where it faces towards central London and more suburban and urban fringe in character towards the south as the built area of Greater London begins to fragment.
- 7.9 Key strategic public healthcare assets in the Borough are the Croydon University Hospital just north of Croydon Town Centre, Purley War Memorial Hospital in Purley, Croydon Day Hospital in central Croydon and the BMI Shirley Oaks Hospital in Addiscombe which partly serves NHS patients. A number of smaller community healthcare facilities are also located within the Borough.



Figure 7.1 General Health (2011 census)

7.10 Figure 7.1 (above) shows that general health outcomes in the Borough are slightly stronger than those at an England-wide scale and are broadly on a par with outcomes of London as a whole. Overall, 83.4% of Croydon residents reported being in good or very good health, 12% reported fair health and the remaining 4.6% reported being in bad or very bad health at the 2011 census.

Table 7.1 Long term health category (2011 census)

	Croydon	London	England
Day-to-day activities limited a lot	6.71%	6.75%	8.3%
Day-to-day activities limited a little	7.91%	7.41%	9.3%
Day-to-day activities not limited	85.38%	85.84%	82.4%

7.11 Table 7.1 (above) shows that in terms of long-term health and disability Croydon has better outcomes than England as a whole and is broadly on a par with the rest of the London region.

Table 7.2 Life expectancy at birth 2009-201325

	England	Croydon	Selsdon and Ballards Census Ward	Selhurst Census Ward
Male	79.1	79.8	84.5	74.1
Female	83	83.5	88.2	80

7.12 However, Borough-wide health statistics conceal significant disparities in health outcomes within Croydon. Table 7.2 (above) illustrates this with ward-level data on life expectancy at birth. Whilst Croydon overall averages broadly similar life expectancy at birth to England as a whole, there are significant disparities within the Borough. Selsdon and Ballards census ward in the south of the Borough sees life expectancies which are nearly 5 years above than the Croydon average for both men and women, whilst Selhurst ward in the north records life expectancies over 5 years below than average for men and 3.5 years below for women. This results in a striking maximum difference in life expectancy at birth within the Borough of over 10 years for men and over 8 years for women.

Future baseline

- 7.13 A trend for relatively positive health outcomes overall in relation to regional and national averages is considered likely to continue, though existing inequalities within the Borough itself, particularly in relation to areas of entrenched deprivation, may continue without intervention.
- 7.14 Major new development, particularly at a strategic scale, could bring opportunities for integrating green infrastructure and healthy lifestyle choices into new development, particularly where the benefits of this can be extended to established areas of health deprivation.

- 7.15 The following key issues emerge from the context and baseline review:
 - There are a range of green or open spaces within the Borough, though these are not necessarily well linked within a green infrastructure network and fewer of these spaces appear accessible to residents in the more densely urbanised north.
 - Health outcomes overall broadly reflect those of the wider London region and are generally stronger than outcomes for England as a whole. Nevertheless, there is notable disparity of health outcomes within the Borough itself and life expectancies at birth could vary by up to ten years.
- 7.16 In light of the key issues discussed above it is proposed that the SA framework should include the following objectives:
 - To 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.

²⁵ ONS (2018) 'Health state life expectancy by 2011 Census wards in England and Wales' [online], available from: <u>https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/healthstatelifeexpectancyby2011censuswardsinenglandandwales</u>

8. Heritage

Context

National

- 8.1 Key messages from the National Planning Policy Framework (NPPF) include:
 - Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
 - Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
 - Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
 - Plans should set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
 - When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.
- 8.2 These messages are supported by the national Planning Practice Guidance (PPG)²⁶ which itself includes the key message that local authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment which recognises that conservation is not a passive exercise and that identifies specific opportunities for the conservation and enhancement of heritage assets.
- 8.3 The Ancient Monuments & Archaeological Areas Act (1979) legislates to protect the archaeological heritage of England, Wales and Scotland.
- 8.4 The Heritage Statement (2017)²⁷ replaces the 2010 Statement on the Historic Environment for England and sets out the Government's vision for supporting the heritage sector to help it to protect and care for heritage and the historic environment in the coming years, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

Regional

- 8.5 Policy HC1 (Heritage and culture) of the draft New London Plan sets out high level policy context for planmaking and decision making at borough-level with regards to heritage. The London Plan states that the boroughs should deliver local policies which recognise and embed the role of heritage in place-making, utilise the heritage significance of a site, integrate conservation with innovative contextual architecture and conserve and enhance the historic environment.
- 8.6 The Greater London Historic Environment Record (GLHER) is a comprehensive record of non-designated historic sites and assets. It records over 87,000 entries across Greater London and captures sites of historic interest ranging from the find locations of prehistoric implements to Victorian and 20th century sites and buildings.

²⁶ MHCLG (2019) National Planning Practice Guidance [online] available at: <u>https://www.gov.uk/government/collections/planning-practice-guidance</u>

²⁷ Department for Digital, Culture, Media and Sport (2017) Heritage Statement [online], available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_ 2017__final__web_version_.pdf

Local

- 8.7 Policy SP4 of the adopted Local Plan identifies a wide range of assets which should benefit from protection and improvement, from individual structures to larger areas to local views. This includes the promotion of accessibility and enjoyment of historic assets.
- 8.8 The Local Heritage Area Review (2016) identifies and assesses areas of local heritage significance without a statutory designation with a view to establishing a local heritage designation in areas of greatest value.²⁸
- 8.9 The Croydon Borough Character Appraisal (2015) identifies and analyses the townscape and landscape character of the Borough as part of the evidence base for the adopted Local Plan. Heritage is a key input into this, including appraising the contribution of listed buildings and other heritage assets to 16 localised character areas.
- 8.10 The Croydon Local List of Buildings of Architectural Significance Supplementary Planning Document (SPD) (2006) presents a list of buildings and structures which do not have statutory protection but are considered to be "of significance to the local community and contribute to the environmental and cultural heritage of the borough". A total of 1,113 buildings and structures are identified on this local list.²⁹
- 8.11 The London Borough of Croydon Archaeological Priority Areas Appraisal (2016) was prepared by Heritage England and recommends areas of the borough to be declared as Archaeological Priority Areas (APAs). APAs are declared where there is a significant known archaeological interest or there is understood to be potential for new archaeological discoveries.³⁰

Baseline

Current baseline

- 8.12 The Borough has a number of historic assets designated at either a local and national scale, including:
 - 3 registered historic parks and gardens;
 - 8 scheduled monuments;
 - 23 conservation areas;
 - 25 Local Heritage Areas;
 - 167 statutorily listed buildings and structures;
 - 1,113 locally listed buildings and structures.
- 8.13 The majority of Croydon's 23 conservation areas have a Conservation Area Appraisal and Management Plan (CAAMP). Historic England defines conservation area management plans as "vehicles for reinforcing the positive character of a historic area as well as for avoiding, minimising and mitigating negative impacts identified as affecting the area", noting that this may also help to "outline opportunities to better reveal or enhance significance, possibly through the location or design of new development". ³¹
- 8.14 Additionally, the adopted Local Plan informed by the 2016 Local Heritage Area Review allocates 25 Local Heritage Areas (LHAs). LHAs were therefore introduced in 2018 and supersede the previous designation of Local Areas of Special Character. LHAs are designated on the basis of their heritage significance in terms of architecture, landscape or townscape value. Although not statutory designations, Policy SP4 of the adopted Local Plan commits to "strengthen the protection of and promote improvements to" LHAs. ³²

²⁸ Croydon Council (2018) 'Local Heritage Areas' [online], available at:

https://www.croydon.gov.uk/planningandregeneration/framework/conservation/lha

²⁹ Croydon Council (2006) 'Local List of Buildings of Architectural or Historic Interest SPD No.1' [online], available at: https://www.croydon.gov.uk/sites/default/files/articles/downloads/llspda_0.pdf

³⁰ Historic England (2016), 'London Borough of Croydon Archaeological Priority Area Appraisal' [online], available from: https://historicengland.org.uk/content/docs/planning/apa-croydon-pdf/

³¹ Historic England (2019), 'Conservation Area Appraisal, Designation and Management' [online], available from:

https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/ ³² https://www.croydon.gov.uk/planningandregeneration/framework/conservation/buildings

- 8.15 The Borough contains a total of 167 statutorily listed buildings. Nine of these are Grade II* (buildings of special interest) and seven are Grade I (buildings of exceptional interest).
- 8.16 Historic England maintains a nationwide Heritage at Risk (HAR) register, updated on an annual basis. The 2018 HAR register records 14 features considered to be at risk within the Borough, including 11 listed buildings (2 x Grade II*churches; 3 x Grade II churches and one of each of the following Grade II listed features: residential building; shop; office building; air transport site; pub; water pumping station), two scheduled monuments and one conservation area. Of these features, the Lesley Arms public house in Addiscombe and the Kennedy's Sausages premises in South Norwood are recorded as Priority A, meaning they are at "Immediate risk of further rapid deterioration or loss of fabric".³³
- 8.17 The GLHER includes a total of 4,030 records in Croydon, capturing a huge variety of sites of historic interest across the borough. These do not necessarily represent constraints to development but should be taken into account in plan making and decision taking.³⁴
- 8.18 The Croydon Archaeological Priority Area Appraisal indicates that there are are a total of 30 APAs in the borough. Of these, eight are at Tier 1 (defined area known or strongly suspected to contain an asset of national importance), 21 are at Tier 2 (a local area where there is specific evidence suggesting the presence of heritage assets) and one is at Tier 3 (a landscape scale zone in which evidence indicates potential for heritage assets of interest).
- 8.19 Croydon's designated heritage assets are relatively evenly distributed throughout the plan area, though with a slightly denser cluster evident at Croydon town centre.

Future baseline

- 8.20 New development within the Borough has the potential to impact heritage assets and their settings through inappropriate design and layout. The Borough has a wide range of built heritage and this range of historic contexts presents potential for a variety of negative effects from inappropriate development.
- 8.21 Equally, however, new development will offer opportunities for enhancing the quality of the Borough's historic environment, either through regeneration of a specific asset or through improvements to an asset's setting and wider environment. Development can also offer opportunities to improve access to or better reveal the significance of a heritage asset.
- 8.22 Existing historic environment designations and the policies of the NPPF will continue to offer a degree of protection to heritage assets and their settings.

- 8.23 The following key issues emerge from the context baseline review:
 - There is a variety of designated heritage assets present within the Borough, including 8 Scheduled Monuments, 3 Conservation Areas and 166 statutorily listed buildings. Locally listed features comprise 25 Local Heritage Areas and over 1,000 locally listed buildings and structures.
 - There are 14 designated heritage assets identified by Historic England as being at risk ranging from public houses to churches to an entire conservation area.
 - The Greater London Historic Environment Record indicates a huge range of over 4,000 nondesignated assets within the plan area.
- 8.24 In light of the key issues discussed above it is proposed that the SA framework should include the following objective:
 - Protect, conserve and enhance designated and non-designated 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.

 ³³ Historic England, 'Heritage at Risk' [online], available from: <u>https://historicengland.org.uk/advice/heritage-at-risk/</u>
 ³⁴ Historic England, 'Heritage Gateway: Greater London HER' [online], available from: <u>https://www.heritagegateway.org.uk/Gateway/Results_Application.aspx?resourceID=272</u>



9. Housing

Context

National

- 9.1 Key messages from the NPPF include:
 - Support for strong, vibrant and healthy communities, by ensuring that a sufficient number and range • of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.
 - To support the Government's objective of significantly boosting the supply of housing, strategic policies 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'
 - The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met onsite where possible.
 - Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
 - In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- 9.2 In February 2017 the government published the Housing White Paper entitled 'Fixing our broken housing market'.³⁵ Key points in relation to housing delivery include the proposed new standardised methodology for calculating housing need and a drive to increase densities in the most sustainable locations, particularly near transport hubs such as train stations.

Regional

- 9.3 The London Strategic Housing Market Assess.ment (SHMA) (2017) identifies a total annual housing requirement for London to 2041 of 65,878 dwellings per annum, of which 47% should be either social rent of affordable rent and a further 18% intermediate tenure, i.e. shared ownership or London Living Rent.³⁶
- 9.4 Policy H1 (Increasing housing supply) of the draft New London Plan says that boroughs should prepared "delivery-focussed Development Plans" which "optimise the potential for housing delivery on all suitable and available brownfield sites". The policy sets Croydon a ten year (i.e. 2019/20 - 2028/29) target for net housing completion of 29,490 dwellings, the fifth-highest target of all 33 Greater London LPAs.

Local

9.5 The adopted Local Plan says that the 2015 Strategic Housing Market Assessment (SHMA) identifies a total housing need of 44,149 new dwellings over the plan period to 2036. Despite this level of need, the plan adopts a housing target of 32,890 new homes to 2036 based on identified available housing land. This equates to a target of 1,644 dwellings per annum (dpa).

³⁵ MHCLG (2017), 'Housing White Paper' [online], available from: <u>https://www.gov.uk/government/collections/housing-white-</u> paper

- 9.6 The Croydon Strategic Housing Market Assessment Update (SHMAU) (2019) updates the assessment of housing need in the Borough to 2036, including affordable housing and other specialist housing types. The 2019 SHMAU identifies that the 2014 population projection forecasts 2,473 new households per annum, with need rising to 3,574 dwellings per annum once an adjustment for affordability is made. However, as Local Housing Need is capped at 40% above whichever figure is lower out of the average housing requirement (1,644 dpa) or the affordability-adjusted housing requirement (3,574 dpa) the SHMAU concludes that the updated annual housing need in the Borough is 2,302 dpa (i.e. 1,644 + (40% x 1,644) = 1,644 + 981 = 2,302).³⁷
- 9.7 The Croydon Town Centre Opportunity Area Planning Framework (2013) was prepared collaboratively by the Greater London Authority, Croydon Council and TfL with the aim of unlocking the maximum development potential from the Croydon Opportunity Area, with provision of at least 7,300 new homes a key objective.

Baseline

Current baseline

- 9.8 The 2017/18 Annual Monitoring Report (AMR), published in 2019 records a total housing delivery of 2,123 new homes in Croydon over the monitoring period. This is far in excess of the annual delivery target of 1,646 dpa and the AMR notes that it reflects an ongoing delivery of annual completions that is well above the annual delivery target. The AMR is also clear that at the time of publication the Council has a five year housing land supply, including a buffer of 5% as per the NPPF.³⁸
- 9.9 The 2016/17 AMR records that 6% of total housing completions were affordable and 4% were for intermediate homes. This is in the context of a policy target of 25% affordable and 15% intermediate in the adopted Local Plan. Delivery of affordable housing was therefore well below the level required by adopted policy. In addition to on-site affordable housing delivery the Council collected £244,500 in commuted sums for affordable housing contributions.³⁹
- 9.10 The 2018 Housing Delivery Test (HDT) results record a total delivery over the previous three years (i.e. 2015/16, 2016/17 and 2017/18) of 6,989 new homes in the context of a total target of 4,624 homes over the same period. This means the HDT measurement for Croydon is 151%.⁴⁰



Figure 9.1 Housing tenure (2011 census)

9.11 Figure 9.1 shows that home ownership in Croydon is below the national average but far exceeds the average for London overall. Corresponding, the proportion of private rental is notably higher than the

³⁷ GL Hearn (2019), 'Strategic Housing Market Assessment Update: London Borough of Croydon'.

³⁸ Croydon Council (2019), 'Monitoring reports' [online], available from:

https://www.croydon.gov.uk/planningandregeneration/framework/localplan/monitoringreports ³⁹ Ibid

⁴⁰ MHCLG (2019) 'Housing Delivery Test: 2018 Measurement' [online], available from: https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement

national average but is lower than London. This may reflect the very high property prices evident across much of the Capital, particularly in central areas, and the relative affordability of Croydon.

- 9.12 Croydon has strong functional linkages with other areas of Greater London and the wider south east region which influence housing demand within the Borough. Housing market geography is complex and findings can vary dependant on methodology and assumptions. The 2015 SHMA locates Croydon within a linear 'South London' Housing Market Area (HMA) along with the majority of Tandridge District to the south and a very small area in Mid Sussex District (see Figure 9.2). This likely reflects the radial nature of key transport infrastructure through the Borough, particularly the London to Brighton mainline. Croydon borders the South Central London HMA and the South West London HMAs though is found to be distinct from these.
- 9.13 Additionally, the 2015 SHMA identifies functional economic relationships with a range of other major employment centres including central London, Gatwick Airport, Kingston, Bromley and Sutton. These relationships give Croydon a broad Functional Economic Market Area (FEMA), i.e. residents in the Borough find employment across a broad range of employment hubs outside the Borough.



Figure 9.2 Local Housing Market Areas (HMAs) in south London and the South East region⁴¹

Future baseline

- 9.14 Constraints on supply, including limited greenfield supply and around 25% Green Belt coverage, have not suppressed recent delivery, though in the longer term it will be necessary to continue to unlock brownfield opportunities to ensure a healthy pipeline of housing land.
- 9.15 Significant housing delivery has been achieved in the Croydon Opportunity Area in central Croydon, largely through intensification and densification. This necessarily means that supply of larger family homes is more challenging, and over the longer term it will be important to ensure that a diverse range of types and tenures continues to be delivered where possible to ensure good housing mix.

⁴¹ GL Hearn (2015), 'Strategic Housing Market Assessment: London Borough of Croydon' [online], available from: <u>https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20SHMA%20Final%20June%202015.pdf</u>

- 9.16 The following key issues emerge from the context and baseline review:
 - Croydon is in a Housing Market Area (HMA) together with much of Tandridge District to the south.
 - The Council has a healthy five year land supply and overall housing delivery is performing strongly, as indicated by the Housing Delivery Test measurement of 151%.
 - However, recent affordable housing delivery is well below policy compliance, achieving just 6% delivery in 2016/17 against a target of 25%.
 - The Croydon Opportunity Area in central Croydon has potential to be a continued focus for housing delivery at scale, particularly through densification, including at transport hubs. However, it will be important to balance this with delivery of a range of types and tenures elsewhere in the plan area to meet localised needs.
- 9.17 In light of the key issues discussed above it is proposed that the SA framework should include the following objectives:
 - 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 Croydon's residents, including older
 people, people with disabilities and families with children.

10. Land use and soils

Context

National

- Key messages from the National Planning Policy Framework⁴² (NPPF) include planning policies and 10.1 decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
 - Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
 - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
 - Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.
 - Planning policies and decisions should 'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs', and 'promote and support the development of under-utilised land and buildings.'
 - Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
 - Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
 - The government attaches great importance to Green Belts, whose fundamental aim is to prevent urban sprawl by keeping land permanently open. The general extent of Green Belts is established and can only be altered in exceptional circumstances through preparation or review of a Local Plan.
- 10.2 Since July 2017 the Government's Planning Practice Guidance (PPG) requires Local Planning Authorities to publish a Brownfield Land Register, and review it at least once per annum, in order to identify all previously developed sites with potential for delivering new development. This is to help achieve maximum planning value and efficiency from available land, whilst avoiding unnecessary land take at greenfield sites. ⁴³
- 10.3 The Government's 25 Year Environment Plan was published in 2018 and presents the 'goals for improving the environment within a generation, and leaving it in a better state than we found it".⁴⁴
- Safeguarding our Soils: A strategy for England⁴⁵ sets out a vision for soil use in England which includes 10.4 better protection for agricultural soils, protecting stores of soil carbon, improving the resilience of soils to climate change and preventing soil pollution. The essential message in relation to development is that pressure on soils is likely to increase in line with development pressure and the planning system should seek to mitigate this.

⁴² MHCLG (2018) National Planning Policy Framework [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF 2018.pdf [accessed 03/08/18]

⁴³ MHCLG (2017) Guidance: Brownfield Land Registers [online], available from: <u>https://www.gov.uk/guidance/brownfield-land-</u> registers 44 bet

https://www.gov.uk/government/publications/25-year-environment-plan

⁴⁵ Defra (2009) Safeguarding our Soils: A strategy for England [online] available at:

https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england [last accessed 29/03/18]

Regional

- 10.5 Policy G2 (London's Green Belt) of the draft New London Plan establishes clear strategic support for protecting the current extent of London's Green Belt and extending it where possible. The policy is explicit that de-designation of Green Belt "*will not be supported*".
- 10.6 Policy G3 (Metropolitan Open Land) defines MOLD as "*strategic open land within the urban area*" and says that land designated as MOL should be protected from inappropriate development. Importantly, the Policy states that "*the principles of national Green Belt policy also apply to MOL*".
- 10.7 Policy SI10 (Aggregates) of the draft New London Plan recognises the importance of ensuring an adequate supply of aggregates to support construction activities in London. There are no specific requirements of or implications for Croydon.
- 10.8 The 2018 Local Aggregate Assessment for London provides an overview of essential aggregates and minerals supply in London, identifying that only four of the 33 London boroughs (Havering, Hillingdon, Hounslow and Redbridge) have land-won aggregates.⁴⁶

Local

- 10.9 Policy SP7 of the adopted Local Plan seeks to "*protect and safeguard the extent of the Borough*'s *Metropolitan Green Belt, Metropolitan Open Land and local green spaces*" where the necessary criteria for designation continues to be met.
- 10.10 The Review of Metropolitan Green Belt and Metropolitan Open Land (2016) tested a large number of parcels of land in Croydon against the five Green Belt purposes as set out in paragraph 134 of the NPPF. The review found that three areas did not meet the criteria for Green Belt designation.
- 10.11 As of December 2017 all local planning authorities (LPAs) have been required to publish a Brownfield Land Register (BLR) identifying previously developed sites which have potential to be suitable, available and achievable for redevelopment, reducing the overall land take necessary to deliver growth. Croydon's most recent BLR was published in December 2018.

Baseline

Current baseline

- 10.12 Green Belt designation extends across 25.6% of the Borough, covering the majority of non-urban land and 'washing over' some of the built area fringes. Informed by the 2016 Green Belt review, the Council released three areas of weakly performing Green Belt land through the adopted Local Plan, resulting in a net reduction to the Green Belt in the Borough of around 100ha in 2017/18.⁴⁷ It is important to note that the three areas in question, namely Purley Downs, Croham Hurst golf course and Sanderstead Plantation, are all proposed for alternative designation as Metropolitan Open Land.
- 10.13 The Croydon Brownfield Land Register was most recently updated in December 2018. It identifies potential capacity for 5,756 new dwellings on previously developed sites in the Borough which do not currently have planning permission, and capacity for a further 5,480 dwellings which on sites which have already been granted either full or outline permission, or where permission is pending.⁴⁸
- 10.14 The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 are of poorer quality. The subdivision of Grade 3 into 3a and 3b has not been undertaken on a national scale, including within much of the Plan area, and Grade 3 land is therefore presumed to be best and most versatile unless and until evidence can be provided to demonstrate it is 3b, not 3a. The ALC spatial data dates from 1988 and is of poor resolution, limiting its effectiveness at a detailed scale.

⁴⁶ Great London Authority (2018), Local Aggregate Assessment for London [online], available from: <u>https://www.london.gov.uk/sites/default/files/london_laa_july_2018.pdf</u>

 ⁴⁷ MHCLG (2018), Local authority green belt statistics for England: 2017 to 2018 [online], available from: https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2017-to-2018
 ⁴⁸ Croydon Council (2018), Brownfield Land Register [online], available from: https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2017-to-2018

https://www.croydon.gov.uk/planningandregeneration/framework/localplan/brownfield-land-register

However, it provides a high level indication of areas which are likely to support better or poorer quality land.

- 10.15 In land use terms Croydon is predominantly urban meaning the majority of land in the Borough is therefore not in agricultural use. Despite this, the national dataset identifies a small pocket of Grade 3 agricultural land near Addington in the south east of the Borough and a further small strip of Grade 3 land near Sanderstead in the south west. In practice, however, the majority of undeveloped land is not in functional agricultural use, with land uses including parks, playing fields, golf courses and woodland.
- 10.16 The Local Aggregate Assessment for London (2018) identifies a single aggregates depot in Croydon. This is adjacent to the railway station at Purley. There are no other active aggregates depots and no minerals excavation sites in the Borough.

Future baseline

- 10.17 Existing evidence does not appear to support future release of Green Belt land in the Borough. However, if new evidence was prepared identifying additional weakly performing Green Belt land then it may be appropriate to consider further revisions to the Green Belt boundary through the preparation or revision of future Local Plans, as per the NPPF.
- 10.18 Potentially significant opportunities exist at brownfield sites within the Borough and it is anticipated that these opportunities, particularly those with extant permission, will continue to come forward for development over the plan period. However, brownfield sites are a finite resource and there can be considerable challenges in bringing them forward, particularly in instances where sites require rehabilitation from prior uses such as heavy industry.
- 10.19 There is very limited potential for development to directly affect productive agricultural land, though it could be important to ensure that the small areas in productive agricultural use at the southern fringe of the Borough are retained on the understanding that they could have potential to be BMV land. Detailed survey work would be necessary to establish whether the land is Grade 3a or 3b.
- 10.20 The existing aggregates rail depot is likely to be unaffected by future development.

- 10.21 The following key issues emerge from the context baseline review:
 - Green Belt covers 25.6% of the Borough. Around 100ha of Green Belt land was released through the adopted Local Plan, although the study which informed this found no further suitable sites for release meaning new evidence would likely be necessary to support any future Green Belt release.
 - There could potentially be substantial capacity for new development on brownfield sites within the Borough and it will be important to maximise the potential of these over the plan period.
 - The majority of land in the Borough is urban or non-agricultural use. Even undeveloped land outside the urban area is predominantly non-agricultural, supporting uses such as parks, playing fields, golf courses and woodland.
 - There are no identified minerals deposits in the Borough, though there is one aggregates rail depot at Purley supplying essential building aggregates for construction.
- 10.22 In light of the key issues discussed above it is proposed that the SA framework should include the following objective:
 - 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.





11. Landscape

Context

National

- 11.1 Key messages from the NPPF in relation to landscape include:
 - Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.
 - Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.
 - Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).
 - Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
 - remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- 11.2 National Character Area (NCA) Profiles are published by Natural England and divide England in 159 distinct natural areas based on their landscape, biodiversity, geodiversity, historic, cultural and economic characteristics.⁴⁹ NCAs follow natural features in the landscape and are not aligned with administrative boundaries. NCA profiles describe the features which shape each of these landscapes, providing a broad context to its character. The Government's 25 Year Environment Plan states the intention to work with relevant authorities to deliver environmental enhancements within all 159 NCAs across England.

Local

- 11.3 The London Borough of Croydon Character Appraisal (2015)⁵⁰ identifies and analyses the character of the Borough and its 16 different 'places'. The document was prepared to support the preparation of the adopted Local Plan.
- 11.4 The Assessment of Landmarks, Panoramas and Views (2016)⁵¹ was prepared to support preparation of the adopted Local Plan. The document tests a number of features against set criteria to determine their suitability for designation.

https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making ⁵⁰ Croydon Council (2015) Borough Character Appraisal [online], available from:

https://www.croydon.gov.uk/sites/default/files/articles/downloads/Borough%20Character%20Appraisal.pdf ⁵¹ Croydon Council (2016) Assessment of Landmarks, Panoramas and Views [online], available from: https://www.croydon.gov.uk/sites/default/files/articles/downloads/assessment-landmarks.pdf

⁴⁹ Natural England (2012) 'National Character Area profiles' [online], available from:

Baseline

Current baseline

- 11.5 There are broad differences in character between the north and south of the Borough, with the largely flat landform of the north supporting a dense pattern of development, whilst the built form of the south is informed by hills, ridgelines and valleys, supporting suburban development surrounded by grassland and woodland.
- 11.6 Croydon falls predominantly across two National Character Areas (NCAs) reflecting a notional north/south divergence in character. The northern areas of the Borough are within the north east portion of the Thames Lower Basin Lowlands NCA, an area which "*is highly urban in character*" and is characterised by being "*densely populated*" and the presence of "*numerous major road and rail networks [which] criss-cross the area*". The south of Borough is less densely populated and falls within the North Downs NCA, characterised by "*more urban-fringe influence and modern development associated with the land fringing Croydon, Purley and south London*".
- 11.7 The 2015 Borough Character Appraisal identifies a "*dense and tightly knit*" urban form in the north, though one which includes "*verdant areas* … on the hill top and slopes", whilst the south is characterised by "*attractive wooded steep sided valleys with suburban residential areas on the hillsides*" supporting "*sweeping panoramas*".
- 11.8 Pockets of open space are pepper-potted throughout the Borough, such as Purley Downs, Croham Hurst and Farthing Downs. These help break up the urban fabric and inject green space into the built area. Areas of higher ground, such as Farthing Downs, provide localised views.
- 11.9 The far south of the Borough is within around 2km of the Surrey Hills AONB, though in practice is considered unlikely to be within the AONB setting. However, the southern boundary of Croydon does abut the Surrey Hills Area of Great Landscape Value (AGLV). AGLV's have less weight as a planning constraint than AONB but attract a degree of protection from development which has potential for negative effects on landscape quality. Officer advice is that the extent of both the AONB and the AGLV may be subject to review.

Figure 11.1 Landscape topographical profile in Croydon with key views indicated (as per the Borough Character Appraisal 2015⁵²)



Future baseline

- 11.10 New development within the Borough could have potential to lead to incremental changes in landscape and townscape quality in and around the Borough, particularly if located on greenfield sites at the edges of the existing built area. This could potentially lead to the loss of landscape features, including visual impact on existing features and the potential for incremental coalescence with built areas outside the Borough.
- 11.11 However, much of the Borough is urban or urban fringe in character suggesting future development could have the greatest impact on townscape character through the densification of the currently relatively low density urban fringe in the Borough's south or the rapid transformation of the existing urban fabric in the Borough's north.

- 11.12 In light of the key issues discussed above it is proposed that the SA framework should include the following objective:
 - 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.

⁵² Croydon Council (2015), 'Borough Landscape Appraisal' [online], available from: <u>https://www.croydon.gov.uk/sites/default/files/articles/downloads/Borough%20Character%20Appraisal.pdf</u>

12. Population and communities

Context

National

- 12.1 Key messages from the National Planning Policy Framework⁵³ (NPPF) include that planning policies should:
 - Provide the social, recreational and cultural facilities and services the community needs, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship, whilst guarding against the unnecessary loss of community facilities and services.
 - Retain and develop accessible local services and community facilities in rural areas.
 - Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.
 - Enable and support health lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.
 - Ensure that there is a 'sufficient choice of school places' and taking a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

Regional

12.2 Policy SD6 (Town centres and high streets) of the draft New London Plan states that London's town centres should encourage "strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners" including civic, community and social uses. The Policy stresses the importance of town centres in "building sustainable, health and walkable neighbourhoods".

Local

- 12.3 Policy SP5 (Community facilities) of the adopted Local Plan states that there will be a presumption in favour of new development which contributes to the provision of infrastructure and new community facilities through the Community Infrastructure Levy (CIL).
- 12.4 The policy seeks to:
 - Create and safeguard opportunities for healthy, fulfilling and active lifestyles;
 - Encourage the creation of healthy and liveable neighbourhoods;
 - Support the co-location of services and facilities where this improves accessibility for all sections of the community.
- 12.5 Policy SP7 (Green grid) of the adopted Local Plan recognises the importance of improving access to *"nature, play areas and publicly accessibly recreational open space"*, particularly in areas where there is currently *"deficient access"*.

Baseline

Current baseline

12.6 Census data provides a statistical baseline for headline understandings of a population (presented below):

⁵³ MHCLG (2018) National Planning Policy Framework [online] available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_201 8.pdf [accessed 03/08/18]

Population

Table 12.1 Population growth 2001-2011

Date	Croydon	London	England
2001	330,587	7,172,091	49,138,831
2011	363,378	8,173,941	53,012,456
Population Change 2001-	9.92%	13.97%	7.9%

2011

12.7 It is notable that with a population of 363,378 (as per Table 12.1 below) Croydon was the most populous London Borough at the time of the 2011 census.

Table 12.2 Age structure (2001 census)

Age Group	Croydon	London	England	
0-15	21.91%	20.19%	20.1%	
16-24	10.80%	12.06%	10.9%	
25-44	32.52%	35.32%	29.3%	
45-59	17.73%	16.05%	18.9%	
60+	17.04%	16.38%	20.8%	
Total population	330,587	7,172,091	49,138,831	

Table 12.3 Age structure (2011 census)

Age Group	Croydon	London	England	
0-15	21.77%	19.88%	18.90%	
16-24	11.63%	12.33%	11.90%	
25-44	30.31%	35.53%	27.50%	
45-59	19.40%	17.00%	19.40%	
60+	16.90%	15.26%	22.30%	
Total population	363,378	8,173,941	53,012,456	

Table 12.4 Age Structure (2017 mid-year estimate)54

Age Group	Croydon	London	England	
0-15	22.16%	20.54%	19.13%	
16-24	9.76%	10.53%	10.89%	
25-44	29.45%	34.71%	26.38%	
45-59	20.47%	18.29%	20.20%	
60+	18.15%	15.92%	23.40%	
Total population	384,837	8,825,001	55,619,430	

12.8 Tables 12.2–12.4 illustrate that Croydon has a relatively young population, with 33.4% of the population below the age of 25 at the 2011 census compared with 30.8% of England as a whole. Correspondingly, just

⁵⁴ Table MYE2 (Population estimates: Persons by single year of age and sex for local authorities in the UK, mid-2017), available from:

https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestim atesforukenglandandwalesscotlandandnorthernireland

16.9% of Croydon's population were over the age of 60 in 2011 compared with 22.3% of England's population overall.

12.9 However, the 2017 mid-year population estimates indicate that this balance is starting to change. The adopted Local Plan identifies this shifting demographic trend saying that despite the young current profile, the Borough's residents are getting older, noting that "*by 2031 the number of people in Croydon over the age of 65 will have increased by 41%*" in contrast to an increase of just 2.5% in the 20-64 age bracket.

Household deprivation

12.10 Census statistics measure deprivation across four 'dimensions' of deprivation, summarised below:

- Employment: Any person in the household (not a full-time student) that is either unemployed or longterm sick.
- Education: No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- Health and disability: Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- Housing: The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Table 12.6 Relative household deprivation dimensions (2011)

	Croydon	London	England	
Household not deprived	40.96%	39.42%	42.5%	
Deprived in 1 dimension	34.73%	34.23%	32.7%	
Deprived in 2 dimensions	18.43%	19.19%	19.1%	
Deprived in 3 dimensions	5.14%	6.26%	5.1%	
Deprived in 4 dimensions	0.73%	0.91%	0.5%	

12.11 Table 12.6 illustrates that relative deprivation in Croydon is broadly on a par with that at both a Londonwide level and with England as a whole.

12.12 However, these headline figures conceal that there is considerable contrast within the borough, where much of the most significant deprivation is concentrated in the north of the Borough, though with the notable exception of New Addington in the south east. See Figure 12.1 below.

Figure 12.1 Index of Multiple Deprivation in Croydon⁵⁵



Access to services and facilities

- 12.13 There are clear synergies between access to services and the SEA themes of Transport and of Health, as a poor public transport offer or a lack of green infrastructure will have flow on effects on residents' ability to access key services.
- 12.14 In this context, it is noted that the main population centres of the Borough, and therefore the locations of key services and facilities, are relatively well connected by public transport, particularly train though also Tramlink. Equally, public transport connectivity with higher tier service centres closer to central London is strong, meaning need which might not be easily met within the Borough can potentially be accessed elsewhere relatively easily by public transport.
- 12.15 The green infrastructure network in the Borough is mixed. There is good recreational provision in relation to individual open spaces and other assets such as golf courses. However, green infrastructure connectivity within and between built areas, particularly deprived areas in the north, appears mixed.

Future baseline

- 12.16 Croydon town centre will likely continue to serve as a key hub for services and facilities for both the Borough and the wider sub-region. As the population grows, services and means of access to them could come under increased pressure.
- 12.17 New development could potentially provide opportunities to deliver enhancements to the Borough's green infrastructure and public transport networks, improving linkages between areas of greater deprivation and surrounding services and facilities.

⁵⁵ From the adopted Local Plan (2016)

12.18 The adopted Local Plan recognises that Croydon is currently well provided with specialist aged care facilities. However, as the Borough's population ages this could mean that certain services and facilities, such as social care, will come under pressure in the longer term.

Key issues and objectives

12.19 The following key issues emerge from the context and baseline review:

- The majority of more deprived wards are in the north of the Borough, closer to central London, and majority of least deprived in the south towards the urban fringe. This suggests a nuanced range of community needs.
- The Borough currently has a youthful population which is growing rapidly, though there are indications that the age profile is beginning to shift and the population starting to age.

12.20 In light of these key issues it is proposed that the SA framework should include the following objectives:

• 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.

13. Transport

Context

National

- 13.1 Key messages from the National Planning Policy Framework (NPPF) include:
 - Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
 - o The potential impacts of development on transport networks can be addressed
 - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
 - o Opportunities to promote walking, cycling and public transport use are identified and pursued
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account
 - Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
 - Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

Regional

- 13.2 The Mayor's Transport Strategy (2018) is the key high-level London-wide public transport strategy document setting out regional transport objectives to 2030. The key messages specifically in relation to Croydon include Proposal 70 which identifies the need for significant upgrades to the Tramlink network to *"increase its capacity by 85 per cent to/from Croydon by 2030"* and Proposal 71 which identifies East Croydon train station as a priority for capacity upgrades and bottleneck remediation.⁵⁶
- 13.3 The South London Sub-regional Transport Plan update (2016) is one of five sub-regional transport plans published by Transport for London (TfL). The plan is a middle tier of transport planning in London, acting as a 'bridge' between the Mayor's Transport Strategy and the individual Local Implementation

Local

- 13.4 Policy SP8 (Transport and communication) of the adopted Local Plan seeks to ensure growth in the Borough is supported by transport and communications networks, and establishes a presumption in favour of development of new transport schemes which meet the requirements of the development plan.
- 13.5 The adopted Local Implementation Plan (LIP) (2013) "sets out how the borough proposes to deliver the Mayor's Transport Strategy in its area". A replacement LIP was approved in late 2018.⁵⁷

⁵⁶ Mayor of London (2018), Mayor's Transport Strategy [online], available from:

https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf

⁵⁷ Transport for London (2018), 'Local Implementation Plan (LIP) allocation 2019/20' [online], available from: https://tfl.gov.uk/info-for/boroughs/croydon

Baseline

Current baseline

Figure 13.1 Croydon in its sub-regional transport context⁵⁸



Strategic road network

13.6 Croydon is reasonably well connected to the Strategic Road Network (SRN). The principal east-west route is the A232 which runs through central Croydon and provides onwards connectivity via the A21 to Junction 4 of the M25 to the east. The principal north-south routes are the A22 and A23 which run through the Borough from London to Brighton and London to Eastbourne respectively. The A22 provides connects with Junction 6 of the M25 south of the Borough, whilst the A23/M23 connects with Junction 7 of the M25 south east of the Borough, providing onward connections to the national SRN.

Rail network

13.7 Croydon is well served by national rail services and has 17 stations on the rail network. These are concentrated in a north-south alignment in the Borough's centre and west, with the east of the Borough either without direct rail connectivity or served more conveniently by stations in adjacent Boroughs. The Brighton main line is the principal rail artery through the Borough, although the Caterham Line, Oxted Line

⁵⁸ From the adopted Local Plan (2018)

and Tattenham Corner Line all branch off the Brighton main line within Croydon and each has a small number of stations within the Borough.

Light rail network

13.8 Croydon is relatively unusual in both a London and a wider UK context for having an extensive modern tram network, currently branded as Tramlink and run by TfL. When it opened in 2000 it became London's first tram system since the 1950s and currently serves 39 stops (some of which are in the neighbouring Boroughs of Merton, Sutton and Bromley) on a 28km network between Wimbledon in the west and New Addington in the east. Tramlink connects with other public transport modes at key transport hubs including East Croydon and West Croydon national rail stations along with five other overground stations and a large number of bus stops.⁵⁹

Walking and cycling network

- 13.9 National Cycle Network (NCN) Routes 20 and 21 run partially through Croydon. Route 20 follows the Wandle Trail, a 12.5 mile pedestrian and cycling route next to the River Wandle from Croydon to Wandsworth. Route 21 is much longer, running from Greenwich to Eastbourne on the south coast. Route 21 also forms part of the 'Avenue Verte' cycle link between London and Paris.
- 13.10 The Council is trialling a dockless electric bike rental scheme, known as Lime, for one year from May 2019. The scheme aims to facilitate modal shift to cycling. The Council has a programme of installing onstreet bicycle storage (or 'bike hangers') at an initial six locations around the Borough, with potential to expand this rollout in the future. This is with the intention to incentivise cycle travel through improved safety and convenience of cycle infrastructure in Croydon.



Car and van accessibility

Figure 13.1 Car and van ownership⁶⁰

⁵⁹ TFL (2018) 'London Trams' [online], available from: <u>https://tfl.gov.uk/corporate/about-tfl/what-we-do/london-</u> trams?intcmp=2647

^{13.11} Figure 13.1 shows that 33.5% of Croydon residents do not own a car or van. This is notable for being a significantly lower proportion than at a London regional level (where 41.5% of people do not own a car or van) but significantly higher than England as a whole (where 26% of people do not own a car or van). This may reflect that Croydon is well integrated into London's extensive multi-modal public transport network which reduces the need for car ownership for many, but also Croydon's location on the London fringe where some journeys are likely to be to destinations beyond the public transport network.

⁶⁰ ONS (2011), Census 2011: 'Car or Van Availability 2011', (Table QS416EW)

Figure 13.2 Method of travel to work⁶¹



- 13.12 Figure 13.2 illustrates Croydon's strong rail links into central London with commuting by train the preferred option of 16% of residents, over five times the national average at the 2011 census. This is also nearly double the rate of commuting by train at the scale of London as a whole, though this may simply reflect that national rail is a necessary choice to reach central London from Croydon given the Borough is not on the London Underground network. This is consistent with the finding that Croydon records a much lower rate of commuting specifically by underground/light rail (around 4.5%) than London as a whole (nearly 15%).
- 13.13 The proportion of commuting by bus is also notably high in Croydon at nearly double the national average. This again reflects that Croydon is well served by high-frequency public transport as part of the TfL network.
- 13.14 Correspondingly, the proportion of travel to work by car in Croydon is low at under 25% of residents. Whilst this is higher than London overall (at around 18%) it is significantly below the national average of 37%.
- 13.15 Therefore, whilst commuting by car is still the highest single mode of transport, the combined proportion of travel to work by all modes of public transport in Croydon is nearly 30%, compared with 32% for London overall and just 10.5% for England as a whole. Public transport therefore provides the most significant method of travel to work.
- 13.16 However, at 5.9%, the proportion of residents travelling to work by bicycle and on foot is lower than both the London average (8.4%) and the average for England as a whole (9%). This may reflect a lack of suitable infrastructure, particularly green infrastructure networks, though could also point to longer commutes (i.e. beyond reasonable walking and cycling distance) for Croydon residents.
- 13.17 It is important to note that this data should be viewed in the context of Croydon's location within, though at the southern extent of, Greater London. Statistical comparison with England as a whole should be caveated by the understanding that the public transport model in London, as well as the extent, capacity and modal variety of the network is unique in England. In this context it is likely to be more instructive to compare public transport use in Croydon to that of Greater London rather than to England as a whole.
- 13.18 Additionally, it is noted that there has been rapid change in many parts of Croydon, particularly central Croydon, since the 2011 census and walking and cycling infrastructure is now more extensive and of a higher quality.

⁶¹ ONS (2011), Census 2011: 'Method of Travel to Work 2011' (Table QS701EW)

Future baseline

- 13.19 The high baseline rate of commuting by public transport is considered highly likely to be sustained and potentially increase over time. Transport for London (TfL) forecasts that Tramlink users will double to 60m per annum by 2030⁶², whilst the high rate of commuting by bus and very high rate of commuting by rail, point to sustained demand over time which will likely be bolstered further by new growth in the Borough, provided it is in a location which is accessible to public transport. Additionally, the introduction of the Ultra Low Emissions Zone (ULEZ) in central London in April 2019 will further disincentivise commuting by car and could see additional demand flow to public modes of transport.
- 13.20 As the Borough develops over time it is likely that built densities will increase, particularly around transport hubs which are often the most sustainable locations for high density growth. This will inevitably introduce new demand for services through an increased population. Improved capacity of suburban rail services over the long term, as proposed in the Mayor's Transport Strategy, could help to meet increased demand though there could be potential for services to come under pressure from the cumulative effect of growth both in Croydon and in South London more widely. Or need extended or new routes all together.
- 13.21 The existing low rates of walking and cycling offer an opportunity to boost sustainable transport, including through the provision of new and enhanced walking and cycling infrastructure through new development. Future strategic growth could offer opportunities to better integrate new and existing development with services and facilities within the Borough via sustainable transport.

Key issues and objectives

13.22 The following key issues emerge from the context and baseline review:

- Although public transport provision and use in Croydon is high relative to the rest of England, it is comparatively low in relation to Greater London, which is a more appropriate scale of comparison given that Croydon is integrated into London's extensive and multi-modal public transport offer.
- A range of factors, including densification of development around transport hubs in the Borough, the introduction and future expansion of the Ultra Low Emissions Zone in central London and proposed increases in suburban rail services will likely increase demand for public transport into central London.
- Census data indicates a relatively low take up of walking and cycling as travel to work options, potentially indicating that walking and cycling infrastructure is not suitable to support travel to work patterns in the Borough or that commuting distances are too great for walking and cycling to be viable for many.
- There could be potential for congestion to increase over time should modal shift fail to be widely adopted, with potential for disincentivising bus use through associated delays to bus services.
- 13.23 In light of the key issues discussed above it is proposed that the SA framework should include the following objectives:
 - 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 where practicable, including to key services.

⁶² https://tfl.gov.uk/modes/trams/the-future-of-trams

14. Water resources

Context

National

- 14.1 NPPF Key messages from the National Planning Policy Framework⁶³ (NPPF) include that Local Plans should:
 - Take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
- 14.2 The Water Framework Directive (2000) requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage.
- 14.3 The Water White Paper 2011⁶⁴ sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

Regional

- 14.4 Policy SI5 (Water infrastructure) of the draft New London Plan presents a strategic approach to protecting water supply in London through a number of measures including minimising leakage, reducing the water supply deficit, promoting rainwater harvesting and upgrading water supply infrastructure.
- 14.5 Water Resource Management Plans (WRMP) are prepared by water companies to ensure supply continues to meet demand into the future, even under water stressed conditions. WRMPs cover 25-year planning periods to ensure that long term needs, trends and changes are considered appropriately at a strategic level. Croydon is covered by the Thames Water WRMP 2015–2040.

Baseline

Current baseline

- 14.6 The River Wandle is Croydon's most significant watercourse. The Wandle is a tributary of the River Thames and flows through the Borough on its way to joining the Thames at Wandsworth, though for much of its route through the Borough the Wandle is culverted. Additional watercourses include Norbury Brook in the north of the Borough and Chaffinch Brook in the north east.
- 14.7 Croydon's is split between three Water Resource Zones (WRZs) with 59% of the Borough in the London WRZ, 35% in the East Surrey WRZ and 6% in the Sutton WRZ.⁶⁵ The Borough's potable water supply and its waste water services are both supplied by Thames Water.
- 14.8 The adopted Thames Water WRMP notes that the Thames Water supply area is "*designated as seriously water stressed*" meaning that demand is very high in relation to available supply. The resilience of supply could potentially be affected by extreme weather events and climate change patterns as well as technical challenges such as leakage.
- 14.9 Croydon is partially affected by source protection zones (SPZs), particularly in the southern half of the Borough. Around 11 distinct SPZ1s are evident in the Borough, with surrounding areas of SPZ2 largely merging together. There are only very minor areas of SPZ3. SPZ1 is defined as the 50-day travel time from any point below the water table to the source. SPZ2 is defined by a 400-day travel time from a point

⁶⁵ Environment Agency (2010), 'London's environmental infrastructure needs: a strategic study' [online], available from: https://www.gov.uk/government/publications/londons-environmental-infrastructure-needs-a-strategic-study

⁶³ MHCLG (2018) National Planning Policy Framework [online] available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_201 8.pdf [accessed 03/08/18]

⁶⁴ Defra (2011) Water for life (The Water White Paper) [online] available from: <u>http://www.official-</u>

documents.gov.uk/document/cm82/8230/8230.pdf> [last accessed 09/02/18]

below the water table. SPZ3 is defined as the area around a source within which all groundwater recharge is presumed to be discharged at the source.

Future baseline

14.10 Water availability both within Croydon and in the wider region has potential to be affected by projected growth and by an increased risk of drought as a result of climate change. Poorly planned development could potentially lead to unsustainable pressure on water resources through intensifying demand without providing additional supply.

- 14.11 The following key issues emerge from the context and baseline review:
 - Croydon is supplied by Thames Water for both potable and waste water services and is partly within each of the London, East Surrey and Sutton Water Resource Zones (WRZs).
 - Croydon is located within an area of water stress where demand is high and supply subject to constraints.
 - There are a number of Source Protection Zones (SPZs) in the Borough, meaning development in some locations could have potential to contaminate water supplies without mitigation.
- 14.12 In light of the key issues discussed above it is proposed that the SA framework should include the following objective:
 - 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.

15. Water quality

Context

National

- 15.1 NPPF Key messages from the National Planning Policy Framework⁶⁶ (NPPF) include that Local Plans should:
 - Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
 - Ensure that, wherever possible, development helps to improve local environmental conditions including water quality, taking into account relevant information such as river basin management plans.
- 15.2 The Water Framework Directive (2000) requires a management plan to be prepared for water catchment areas to inform planning and help meet objectives and obligations in areas such as water efficiency and sustainable drainage.
- 15.3 In this context, River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can help improve the quality of the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021. Croydon falls within the Thames River Basin District. The Thames River Basin District River Basin Management Plan (RBMP) (2015) identifies priority issues for the Wandle catchment are addressing weirs which prevent fish passage, combating pollution from road run-off and misconnected pipes and tackling high nutrient levels from phosphate introduced by Beddington sewage treatment works.

Local

15.4 The River Wandle Catchment Plan (2014) was published by the Wandle Trust to present a strategy to restore the river and its ecosystem services with the goal of achieving Good Ecological Potential as per the Water Framework Directive.⁶⁷

Baseline

Current baseline

- 15.5 Wastewater services for Croydon are provided by Thames Water. The Borough is served by sewage treatment works (STWs) at Beddington in the neighbouring Borough of Sutton as well as Long Reach STW in Dartford, Kent and Crossness STW in the Borough of Bexley. Beddington receives around 65% of flows with Long Reach receiving around 30% and Crossness the remainder.⁶⁸
- 15.6 Nitrate Vulnerable Zones (NVZs) are areas designated as being at risk from agricultural nitrate pollution, in accordance with the 2015 Nitrate Pollution Prevention Regulations. Waters are defined as polluted if they contain nitrate concentrations greater than 50mg/l. Croydon is affected by one NVZ, NVZ464, which is covers the entire western third of the Borough, as well as all of the neighbouring London Borough of Sutton and parts of a number of other Local Authority areas. NVZ464 is declared in relation to surface water.
- 15.7 Drinking Water Safeguard Zones (DWSZs) are designated at locations where pollution control measures are required to prevent potential contamination of drinking water supplies. The only DWSZ in Croydon is

⁶⁶ MHCLG (2018) National Planning Policy Framework [online] available from:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728643/Revised_NPPF_201 8.pdf [accessed 03/08/18]

⁶⁷ Wandle Trust (2014) A Catchment Plan for the River Wandle [online], available from: <u>https://www.wandletrust.org/wp-content/uploads/2014/12/Wandle Catchment Plan - Sept 2014 - full document.pdf</u>

⁶⁸ Croydon Council (2017) Infrastructure Delivery Plan [online], available from:

https://www.croydon.gov.uk/sites/default/files/articles/downloads/IDP%202017.pdf

in the Borough's south west at Coulsdon, where the Sutton/Sutton Court Road DWSZ is declared in relation to nitrate pollution.

Future baseline

- 15.8 Future growth will potentially add additional pressure to the Beddington WwTW through increased demand. However, the Beddington facility is of a significant scale and serves a wider catchment than Croydon alone, meaning its headroom capacity may not be significantly altered through development in Croydon alone. However, cumulative growth of Croydon together with growth in other South London LPAs which also flow to Beddington could potentially be significant in time.
- 15.9 Future development is unlikely to directly affect the designated Nitrate Vulnerable Zone and Drinking Water Safeguard Zone in the Borough on the basis that agricultural activity is a key source of nitrate pollution and development in Croydon is unlikely to introduce new or intensified agricultural activity.

Key issues and objectives

15.10 In light of the key issues discussed above it is proposed that the SA framework should combine the water resources and water quality SA themes under a single comprehensive 'Water' objective.

16.Next steps

Subsequent steps for the SA process

- 16.1 Scoping is the first stage in a five-stage SA process:
 - Scoping (NPPG Stage A)
 - Appraising reasonable alternatives, with a view to informing preparation of the draft plan, and subsequent assessment of the draft plan (NPPG Stage B)
 - Preparation of the SA Report with a view to informing consultation (NPPG Stage C)
 - Consultation on the SA Report (NPPG Stage D)
 - Publication of a statement at the time of plan adoption which 'tells the story' of plan-making/SA (NPPG Stage E)
- 16.2 Accordingly, the next stage after scoping will therefore involve the development and assessment of reasonable alternatives for the Local Plan. An SA Report will accompany a Local Plan Issues and Options Document for public consultation in due course.

Consultation on the scoping report

- 16.3 Public involvement through consultation is a key element of the SA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.
- 16.4 The statutory consultation bodies are the Environment Agency, Historic England and Natural England. The Scoping Report was released to these three statutory consultees for comment between September and November 2019, with particular focus on the evidence base for the SA, the identified key issues and the proposed SA Framework.
- 16.5 All comments received on the Scoping Report have been reviewed and will influence the scope and development of the SA as appropriate.

Appendix A – the SA Framework

Торіс	SA objectives
Air quality	 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	 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	 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	 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.
Economy and employment	 To 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	To 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.
Heritage	 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	 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 Croydon's residents, including older people, people with disabilities and families with children.
Land and soils	 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	 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.
Population and communities	• 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.
Transport	 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	 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.