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# Habitats Regulations Assessment Screening Report - Croydon Local Plan 2 (CLP2) (Preferred Options)

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# 1 Introduction

# 1.1 Background to the project

- 1.1.1 AECOM has been appointed by London Borough of Croydon (referred to as "Croydon Council" and "the Authority") to assist in undertaking a Habitats Regulations Assessment (HRA) of the potential effects of the Croydon Local Plan: Detailed Policies and Proposals (Preferred Options only) (known henceforth as CLP2) and a partial review of the Croydon Local Plan: Strategic Policies (known henceforth as CLP1.1) on the Natura 2000 network and Ramsar sites. The current document only assesses CLP2. Changes to CLP1 in the form of CLP1.1 are assessed in a separate report.
- 1.1.2 The Croydon Local Plan: Strategic Policies (CLP1) was adopted in April 2013 and sets out the framework for the planning and management of development in the borough up to 2031. CLP1 was subject to Habitats Regulations Assessment in 2011, which was able to conclude no likely significant effect on any European sites<sup>1</sup>. CLP1.1 aims to prolong the period of the CLP1 through to 2036 and to reflect changes to the London Plan being introduced through the Further Alterations of the London Plan. CLP2 provides further detail to the Strategic Polices and also contains site allocations and will replace the currently saved policies of the Unitary Development Plan (2006).
- 1.1.3 The objective of this assessment is to:
  - identify any aspects of the Croydon Local Plan: Detailed Policies and Proposals (CLP2) that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites<sup>2</sup>), either in isolation or in combination with other plans and projects; and
  - to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.

# 1.2 Current legislation

- 1.2.1 The need for Habitats Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2010. The ultimate aim of the Directive is to "maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest" (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.2.2 Within the UK, Protected Areas for nature conservation include, those established under National legislation (e.g. Sites of Special Scientific Interest (SSSI)), areas established under European Union Directives/European initiatives (including the Natura 2000 network of sites), and protected areas established under Global Agreements (e.g. Ramsar sites).
- 1.2.3 With relevance to this report, Special Protection Areas (SPAs) are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species. Special Areas of Conservation (SAC) are strictly protected sites designated under Article 3 of the EC Habitats Directive, which requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive (as amended)<sup>3.</sup> The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds). Ramsar sites are wetlands of international importance designated under the Ramsar Convention.
- 1.2.4 The Conservation of Habitats and Species Regulations 2010 require that land use plans are subject to Appropriate Assessment (AA) where they are likely to have a significant effect on a Natura 2000 site.

<sup>&</sup>lt;sup>1</sup> Hyder. (2011). London Borough of Croydon. Proposed Submission Core Strategy. Habitats Regulations Assessment Screening

<sup>&</sup>lt;sup>2</sup> Wetlands of International Importance designated under the Ramsar Convention 1979

<sup>3</sup> http://jncc.defra.gov.uk/

- 1.2.5 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. In the case of the Habitats Directive, potentially damaging plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network is maintained.
- 1.2.6 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

#### **Habitats Directive 1992**

Article 6 (3) states that:

"Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."

#### Conservation of Habitats and Species Regulations 2010 (as amended)

The Regulations state that:

"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".

#### Figure 1: The Legislative Basis for Appropriate Assessment

1.2.7 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'appropriate assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

## 1.3 Scope of the Project

- 1.3.1 There is no pre-defined guidance that dictates the physical scope of a HRA of a Local Plan. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:
  - All sites within the Local Plan area boundary; and
  - Other sites shown to be linked to development within the Borough boundary through a known 'pathway'.

- 1.3.2 Briefly defined, pathways are routes by which a change in activity within the Local Plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, guidance from the former Department of Communities and Local Government states that the HRA should be 'proportionate to the geographical scope of the [plan policy]' and that 'an AA need not be done in any more detail, or using more resources, than is useful for its purpose' (CLG, 2006, p.6).
- 1.3.3 No Internationally designated sites are located within Croydon Council boundary.
- 1.3.4 The following internationally designated sites are located within 20km of the Croydon authority boundary, and as such could potentially have impact pathways present resulting from CLP2:
  - Mole Gap to Reigate Escarpment SAC located 5.9km from Croydon Council boundary
  - Wimbledon Common SAC located 6.5km from Croydon Council boundary
  - Richmond Park SAC located 9.2km from Croydon Council boundary
  - Lee Valley SPA and Ramsar site located 17km from Croydon Council boundary
  - South West London Waterbodies SPA and Ramsar site located 17.5km from Croydon Council boundary
  - Epping Forest SAC located 18.5km from Croydon Council boundary
  - Thames Basin Heaths SPA located 19.1km from Croydon Council boundary
- 1.3.5 During an initial sieving exercise to screen out internationally designated sites (e.g. no realistic impact pathways present), the following internationally designated sites can be sieved out from further assessment due to the distances involved.
  - Lee Valley SPA and Ramsar site located 17km from Croydon Council boundary
  - South West London Waterbodies SPA and Ramsar site located 17.5km from Croydon Council boundary
  - Epping Forest SAC located 18.5km from Croydon Council boundary
  - Thames Basin Heaths SPA located 19.1km from Croydon Council boundary
- 1.3.6 These sites are not considered further within this document.
- 1.3.7 There are three internationally designated sites that are located within a sufficiently close distance that there could be impact pathways linking to the Croydon Local Plan (CLP2). These are:
  - Mole Gap to Reigate Escarpment SAC;
  - Wimbledon Common SAC: and
  - · Richmond Park SAC.
- 1.3.8 European site details can be found in Appendix A. Appendix B, Figure 1 illustrates the locations of the European sites in relation to Croydon Council boundary.
- 1.3.9 Richmond Park SAC is located 9.2km from Croydon authority boundary. The Site Improvement Plan for the SAC<sup>4</sup> does not identify any threats or pressures upon the SAC feature (stag beetle)<sup>5</sup>. It is noted within the SAC Citation<sup>6</sup> that this site is located within Greater London, and as such is subject to high levels of recreational activity. However, the primary requirement for stag beetle habitat is a plentiful supply of partially-buried dead wood, which will not be affected by recreational pressure. As such, this impact pathway can be screened out and this site is not discussed further within this report.
- 1.3.10 The remainder of this document considers potential for likely significant effects from impact pathways resulting from CLP2 upon the following internationally designated sites:
  - Mole Gap to Reigate Escarpment SAC; and
  - Wimbledon Common SAC.

# 1.4 This Report

1.4.1 Section 2 of this report summarises the methodology for the assessment. Section 3 identifies the possible pathways by which adverse effects on European protected sites could arise. Section 4

<sup>&</sup>lt;sup>4</sup> http://publications.naturalengland.org.uk/file/4641498714865664 [Accessed 29/07/2015]

<sup>&</sup>lt;sup>5</sup> http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?eucode=UK0030246 [Accessed 29/07/2015]

<sup>&</sup>lt;sup>6</sup> http://incc.defra.gov.uk/protectedsites/sacselection/sac.asp?eucode=UK0030246 [Accessed 29/07/2015]

considers each policy within CLP2, assessing possible pathways upon European sites that may be vulnerable, determine likely significant effects, based on key environmental conditions required to maintain the integrity of these sites. The screening exercise concludes by either screening out any possible impacts or by determining that mitigation or avoidance measures are required. Where mitigation strategies are deemed necessary, potential approaches are discussed. In combination effects with other plans on each European site are also considered within Section 4. Background information on all the European sites discussed in this report is presented within Appendix A. Figure 1 of Appendix B presents a map showing all internationally important wildlife sites discussed.

# 2 Methodology

#### 2.1 Introduction

- 2.1.1 The HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist<sup>7</sup>. The former Department for Communities and Local Government released a consultation paper on the Appropriate Assessment of Plans in 2006<sup>8</sup>. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance<sup>9</sup> as has the RSPB<sup>10</sup>. Both of these have been referred to alongside the guidance outlined in Section 1.2 in undertaking this HRA.
- 2.1.2 Figure 2 below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

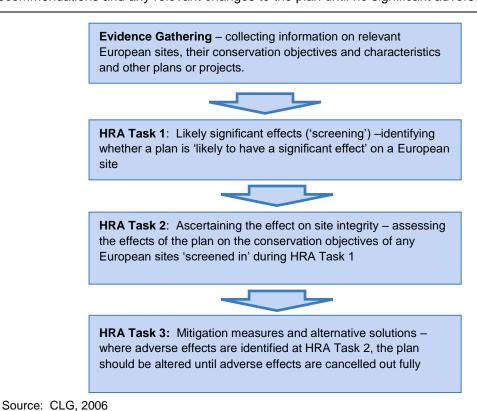


Figure 2- Four-Stage Approach to Habitats Regulations Assessment

# 2.2 HRA Task 1 - Likely Significant Effects (LSE)

2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

2.2.2 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is the subject of Chapter 4

<sup>&</sup>lt;sup>7</sup> European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

<sup>&</sup>lt;sup>8</sup> CLG (2006) Planning for the Protection of European Sites, Consultation Paper

<sup>&</sup>lt;sup>9</sup> http://www.ukmpas.org/pdf/practical\_guidance/HRGN1.pdf

<sup>&</sup>lt;sup>10</sup> Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it.* The RSPB, Sandy.

- of this report (See Appendix C, Table 1 and Table 2 for screening tables), and goes a step further than a scoping report that was able to scope out sites listed in section 1.3.5. Those particular sites could be scoped out regardless of the nature and scale of any proposed development, whereas screening is needed where there is a potential pathway of impact and the scale, nature and location of development determines whether this actually exists.
- 2.2.3 In evaluating significance, AECOM have relied on our professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites listed in 1.3.3 1.3.5.
- 2.2.4 The level of detail in land use plans concerning developments that will be permitted under the plans will never be sufficient to make a detailed quantification of adverse effects. Therefore, we have again taken a precautionary approach (in the absence of more precise data) assuming as the default position that if an adverse effect cannot be confidently ruled out, avoidance or mitigation measures must be provided. This is in line with the former Department of Communities and Local Government guidance that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

# 2.3 Confirming Other Plans and Projects That May Act In Combination

- 2.3.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question.
- 2.3.2 It is neither practical nor necessary to assess the 'in combination' effects of the Local Plan within the context of all other plans and projects within this area of England. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing, transportation and commercial/industrial allocations proposed for neighbouring and nearby authorities over the lifetime of the Local Plan. A good place to start is the London Plan (2015)<sup>11</sup>
- 2.3.3 In considering the potential for regional housing development on European sites, the primary consideration for many sites is the impact of visitor numbers i.e. recreational pressure. Other pathways of impact described in more detail in Chapter 3 include air quality. Whilst these are also strongly related to housing provision, the actual geographic impact must also be considered within the context of relevant infrastructure.

Table 1: Housing Levels to be Delivered in Neighbouring Authorities

Local Authority	Total housing (taken from the London Plan, 2015) Minimum ten year target 2015 2025	Total housing (taken from the London Plan, 2015) Annual monitoring target 2015 2025
Lambeth Borough	15,594	1,559
Merton Borough	4,107	411
Sutton	3,626	363
Reigate & Banstead <sup>12</sup>	6,900 (2012 to2027)	-
Tandridge <sup>13</sup>	2,500 (2006 to 2026)	-
Bromley	6,413	641
Lewisham	13,847	1,385
Southwark	27,362	2,736
Wandsworth	18,123	1,812
Richmond upon Thames	3,150	315
Kingston upon Thames	6,434	643
Mole Valley <sup>14</sup>	3,760 (2006 to 2026)	-

<sup>&</sup>lt;sup>11</sup> Mayor of London (March, 2015). The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations Since 2011.

<sup>&</sup>lt;sup>12</sup> Reigate & Banstead Borough Council (July 2014) Adopted Local Plan: Core strategy. Policy CS13

<sup>&</sup>lt;sup>13</sup> Tandridge District Core Strategy. (2008) Adopted October 2008. Policy CSP 2

<sup>&</sup>lt;sup>14</sup> Mole Valley District Council (2009). Core Strategy. Adopted October 2009. Policy CS

2.3.4 There are other plans and projects that are relevant to the 'in combination' assessment and the following have all been taken into account in this assessment:

#### **Plans**

- London Borough of Croydon. Core Local Plan 1 (CLP1). Adopted April 2013.
- The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations Since 2011. Published March 2015.
- The London Plan. Sub Regional Development Framework South London. Published May 2006.
- South London Waste Plan. Adopted March 2012
- Surrey Minerals and Waste Development Scheme. Published 2015
- London Borough of Sutton Core Planning Strategy. Adopted December 2009.
- London Borough of Merton Core Planning Strategy. Adopted July 2011
- London Borough of Lambeth Core Strategy. Adopted January 2011.
- London Borough of Wandsworth Council Core Strategy. Adopted October 2010
- Mole Valley Council Core Strategy. Adopted October 2009
- Tandridge District Council Core Strategy. Adopted October 2008
- Richmond upon Thames Council Core Strategy. Adopted April 2009
- Reigate and Banstead Council Local Plan: Core Strategy. Adopted July 2014
- Bromley Council Local Plan Draft Policies and Designations Consultation document.
- Kingston upon Thames Council Core Strategy. Adopted April 2012.
- 2.3.5 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

# 3 Pathways of Impact

#### 3.1 Introduction

3.1.1 In carrying out an HRA it is important to determine the various ways in which land use plans can impact on European sites by following the pathways along which development can be connected with European sites, in some cases many kilometres distant. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon a European site.

#### Other Relevant Supporting Studies

- 3.1.2 In determining pathway-receptor potential for impacts of CLP2 document on European sites, the following data sources have been interrogated:
  - The UK Air Pollution Information System (www.apis.ac.uk) and Sussex Air Pollution dataset;
  - www.magic.gov.uk and its links to SSSI citations and the JNCC website (www.natureonthemap.org.uk);
  - Habitats Regulation Assessments of Core Strategies and Local Plans, where available

## 3.2 Recreational Pressure

- 3.2.1 Recreational use of a European site has the potential to:
  - Prevent appropriate management or exacerbate existing management difficulties;
  - Cause damage through erosion and fragmentation;
  - Cause eutrophication as a result of dog fouling; and
  - Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl.
- 3.2.2 Different types of European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

#### Mechanical/abrasive damage and nutrient enrichment

- 3.2.3 Most types of terrestrial European site can be affected by trampling, which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species.
- 3.2.4 There have been several papers published that empirically demonstrate that damage to vegetation in woodlands and other habitats can be caused by vehicles, walkers, horses and cyclists:
  - Wilson & Seney (1994)<sup>15</sup> examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
  - Cole et al (1995a, b)<sup>16</sup> conducted experimental off-track trampling in 18 closed forest, dwarf scrub
    and meadow and grassland communities (each tramped between 0 500 times) over five
    mountain regions in the US. Vegetation cover was assessed two weeks and one year after
    trampling, and an inverse relationship with trampling intensity was discovered, although this

<sup>&</sup>lt;sup>15</sup> Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

<sup>&</sup>lt;sup>16</sup> Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.

- Cole (1995c)17 conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier tramplers caused a greater reduction in vegetation height than lighter tramplers, but there was no difference in effect on cover.
- Cole & Spildie (1998)18 experimentally compared the effects of off-track trampling by hiker and horse (at two intensities 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance, but recovered rapidly. Higher trampling intensities caused more disturbance.
- 3.2.5 The total volume of dog faeces deposited on sites can be surprisingly large. For example, at Burnham Beeches National Nature Reserve over one year, Barnard19 estimated the total amounts of urine and faeces from dogs as 30,000 litres and 60 tonnes respectively. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces<sup>20</sup>.

#### Disturbance

- 3.2.6 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding<sup>21</sup>. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds<sup>22</sup>.
- 3.2.7 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer <sup>10</sup>. In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces<sup>23</sup>.
- 3.2.8 However the outcomes of many of these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their

<sup>&</sup>lt;sup>17</sup> Cole, D.N. (1995c) Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

<sup>&</sup>lt;sup>18</sup> Cole, D.N., Spildie, D.R. (1998) Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

<sup>&</sup>lt;sup>19</sup> Barnard, A. (2003) Getting the Facts - Dog Walking and Visitor Number Surveys at Burnham Beeches and their Implications for the Management Process. *Countryside Recreation*, 11, 16 - 19

<sup>&</sup>lt;sup>20</sup> Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) – Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, **74**, 77-82.

<sup>&</sup>lt;sup>21</sup> Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

<sup>&</sup>lt;sup>22</sup> Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

<sup>&</sup>lt;sup>23</sup> Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) – Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, **74**, 77-82.

- population<sup>24</sup>. A literature review undertaken for the RSPB<sup>25</sup> also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on European sites.
- 3.2.9 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 3.2.10 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.
- 3.2.11 It should be emphasised that recreational use is not inevitably a problem. Many European sites are also nature reserves managed for conservation and public appreciation of nature. At such sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.
- 3.2.12 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at European sites involves location of new development away from such sites; Local Development Frameworks (and other strategic plans) provide the mechanism for this. Where avoidance is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space.
  - Access management restricting access to some or all of a European site is not usually within
    the remit of the District Council and restriction of access may contravene a range of Government
    policies on access to open space, and Government objectives for increasing exercise, improving
    health etc. However, active management of access may be possible, for example as practised on
    nature reserves.
  - Habitat management is not within the direct remit of the Council. However the Council can help to set a framework for improved habitat management by promoting cross-authority collaboration and S106 funding of habitat management.
  - Provision of alternative recreational space can help to attract recreational users away from sensitive European sites, and reduce pressure on the sites. For example, some species for which European sites have been designated are particularly sensitive to dogs, and many dog walkers may be happy to be diverted to other, less sensitive, sites. However the location and type of alternative space must be attractive for users to be effective.
- 3.2.13 Mole Gap to Reigate Escarpment SAC and Wimbledon Common SAC are subject to recreational pressure due to their locations in and in close proximity to Greater London. Within the HRA for CLP1 and CLP1.1 (subject to consultation), all impacts upon both Mole Gap to Reigate Escarpment SAC and Wimbledon Common SAC resulting from an increases in recreational pressure as linked to the new residential development within CLP1 and CLP1.1 were screened out alone and in combination with other projects or plans. It is assumed that the quantity of new residential development within CLP2 is encompassed within the updated CLP1.1. The impact of the CLP 2 (Preferred Options only) upon the two SACs is discussed within the following chapter.

## 3.3 Atmospheric Pollution

3.3.1 The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>). NOx can have a directly toxic effect upon vegetation. In addition, greater NOx or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of seminatural, nitrogen-limited terrestrial habitats.

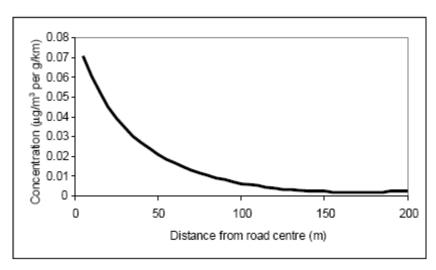
<sup>&</sup>lt;sup>24</sup> Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, **97**, 265-268

<sup>&</sup>lt;sup>25</sup> Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

#### Local air pollution

3.3.2 According to the Department of Transport's Transport Analysis Guidance, "Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"<sup>26</sup>. This is therefore the distance that has been used throughout this HRA in order to determine whether European sites are likely to be significantly affected by development under the Local Plan.

Figure 3: Traffic Contribution to Concentrations of Pollutants at Different Distances from a Road (Source: Dft)



3.3.3 Given that sites detailed in Table 2 lie within 200m of major roads that may be regularly used by vehicle journeys within the Local Plan area as a result of the increased population, and potentially other development plans, it was concluded that air quality should be included within the scope of this assessment. The location of these roads in relation to the European sites is illustrated in Appendix B, Figure 1.

Table 2: Major Roads Within 200m of the European Sites

Site	Proximity to major roads
Mole Gap to Reigate Escarpment SAC	Within 200m of the M25 (for approximately 500m), and adjacent to the A24 for small sections.
Wimbledon Common SAC	Adjacent to the A219 and A3 for sections

Table 3: Critical Loads of SAC Features and Existing Nitrogen Deposition Rates Upon SAC Features.

If hi-lighted in red, the feature is already in exceedance of its Critical Load. If hi-lighted in orange, the feature is within its Critical Load limits.

<u>Site</u>	Site Feature	Critical Load <sup>27</sup>	Current levels of N deposition <sup>28</sup>
	Stable xerothermophilous formations with Buxus sempervirens on rock slopes (Berberidion p.p.)	15-25kg N/ha/ya	N depositions 29.54 to 36.12kg N/ha.yr
Mole Gap to Reigate Escarpment SAC	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites)	15-25kg N/ha/ya	N deposition 16.24to 19.32kg N/ha.yr
	Taxus baccata woods of the British Isles	5-15kg N/ha/ya	N depositions 29.54 to 36.12kg N/ha.yr
	European dry heaths	10-20kg N/ha/ya	N deposition 16.24to 19.32kg N/ha.yr

<sup>&</sup>lt;sup>26</sup> http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013; accessed 13/04/12

<sup>&</sup>lt;sup>27</sup> www.APIS.ac.uk [accessed 30/07/2015]

<sup>&</sup>lt;sup>28</sup> www.APIS.ac.uk [accessed 30/07/2015]

	Asperulo-Fagetum beech forests	10-20kg N/ha/ya	N depositions 29.54 to 36.12kg N/ha.yr
	Great crested Newt	no critical loads available for this feature	N deposition: 15.68 to 17.22 kg N/ha/yr
	Bechstein's bat	10-20kg N/ha/ya	N depositions 29.54 to 36.12kg N/ha.yr
	Northern Atlantic wet heaths with Erica tetralix•	10-20kg N/ha/ya	14.56kg N/ha/yr
Wimbledon Common SAC	European dry heaths	10-20kg N/ha/ya	14.56kg N/ha/yr
	Stag beetle	10-20kg N/ha/ya	28.42kg N/ha/yr

3.3.4 Whilst the above table demonstrates that much of the SACs are in exceedance of their critical loads, the SACs are not located within the Croydon authority boundary and are far beyond 200m from Croydon authority boundary. It is approximately 8km by road from the urban area of Croydon to Mole Gap to Reigate Escarpment SAC and Wimbledon Common SAC. This is deemed sufficient distance that traffic originating from Croydon is likely to have dispersed As such; it is considered that there are no realistic pathways present. Air quality issues relating to direct deposition upon either Mole Gap to Reigate Escarpment SAC or Wimbledon Common SAC is not considered further.

# 4 Screening Assessment

- 4.1.1 As a first step, an initial screening exercise was undertaken in order to identify any policies that required more detailed screening and discussion. This exercise is set out in Appendix C. Appendix C, Table 1 is the Development Management (DM) Policy Screening Table; Appendix C, Table 2 is the Strategic Site Allocation Screening Table (including Alternative Sites) as detailed within the DM policies. The initial screening of the DM policies of CLP2 identified 16 policies that contain a potential linking pathway that could result in a likely significant effect upon Mole Gap and Reigate Escarpment SAC, and Wimbledon Common SAC. This impact pathway is recreational pressure. The following DM policies of CLP2 have potential to result in likely significant effects upon the SACs and are therefore subject to a more detailed discussion of likely significant effects in this chapter:
  - Policy DM34: Addington
  - Policy DM35: Addiscombe
  - Policy DM36: Broad Green and Selhurst
  - Policy DM37: Coulsdon
  - Policy DM38: Croydon Opportunity Area
  - Policy DM39: Crystal Palace and Upper Norwood
  - Policy DM40: Kenley and Old Coulsdon
  - Policy DM41: Norbury
  - Policy DM42: Purley
  - Policy DM43: Sanderstead
  - Policy DM44:Selsdon
  - Policy DM45: Shirley
  - Policy DM46: South Croydon
  - Policy DM47: South Norwood and Woodside
  - Policy DM48: Thornton Heath
  - Policy DM49: Waddon
- 4.1.2 These policies provide for new residential development within Croydon via Site Allocations (Preferred Options and Alternative Sites). A total of 148 Site Allocations (including 10 Alternative Sites) provide for new residential development that could result in an increase in recreational pressure upon Mole Gap and Reigate Escarpment SAC, and Wimbledon Common SAC.
- 4.1.3 CLP1.1 provides for 31,765 new residential dwellings to the end of the lifetime of the Plan (2016 to 2036) with 10,575 of these new homes to be delivered across the borough at windfall sites. Included within this it is proposed that 36 new Gypsy and Travellers pitches will be provided, some as Site Allocations, and some as windfall throughout the borough. The HRA for CLP1.1 (subject to consultation) determined no likely significant effect upon any internationally designated site either alone or in combination with other projects or plans. This was because the internationally designated sites in question are not located within the Croydon Council boundary, which is at least 6km (in a straight line) from the Council boundary and alternative greenspace provision is available within Croydon. The following paragraphs discuss the impact pathway of recreational pressure resulting from the Site Allocations identified in DM policies DM32 through to DM47 noted above.

# 4.2 Mole Gap to Reigate Escarpment SAC

#### 4.2.1 **Alone**

4.2.2 The nearest settlement to Mole Gap to Reigate Escarpment SAC identified to provide new residential development within the DM policies of CLP2 is Coulsden (DM37). This policy provides for two Preferred Option Site Allocations that identify new residential development. The closest is Car Park, Lion Green Road (site number 372). This is located 8.1km from the SAC in a straight line. All other new residential Site Allocations are located beyond 8.1km from the SAC. Due to the considerable distances involved, it is considered that alone, this proposed new residential development within Croydon or others identified within CLP2 would not result in a likely significant effect upon the SAC.

#### 4.2.3 In-Combination

- 4.2.4 The Appropriate Assessment of Mole Valley's LDF Core Strategy was published in 2008<sup>29</sup> and led to Mole Valley Core Strategy Policy CS15 which safeguards a buffer zone extending 800m beyond the boundary of the SAC, within which there is "a presumption against any increase in residential or employment related development ... unless its impact can be mitigated".
- 4.2.5 Natural England confirmed that recreational pressure at the Mole Gap to Reigate Escarpment is focused mainly around 'honeypot' sites, primarily visited by tourists although some local and regular visits are made. These include Box Hill located within the SAC. The Appropriate Assessment states:
- 4.2.6 'Survey information on visitor numbers and origin is scant but Professor Calver at Bournemouth University undertook a survey of on behalf of the National Trust during the summer of 2006. Survey locations included car parks at Box Hill, Headley Heath and Gatton Park, immediately adjacent to the Mole Gap to Reigate Escarpment SAC. The vast majority of visitors surveyed at the car parks had travelled from further afield, via the M25 and that there was a large visitor impact within 100m of the car parks, but beyond approximately 1km the impact was very low. He reported that the Wray Lane Car Park was hardly used by local people...
- 4.2.7 Further survey data from the National Trust also appears to support the work of Professor Culver. In 2004 visitors to Box Hill were asked to note down the postcode from which they had travelled. There were over 5,300 responses. The results showed that there was a considerable spread in terms of visitor origin but that the main sources were Leatherhead and South London including Sutton, Carshalton and Croydon.' The National Trust survey determined that 107 (2%) of the respondents from the 2004 survey at Box Hill came from within the Croydon postcode CR0.
- 4.2.8 The HRA for CLP1.1, (which provided for 31,765 net new dwelling to 2036) was considered to not result in any likely significant effects upon Mole Gap to Reigate Escarpment SAC alone or incombination with any other project or plans. Housing Site Allocations within CLP2 do not identify the numbers of new dwellings within each Site Allocation. It is assumed that housing levels within CLP2 reflect those identified within CLP1.1. The HRA for CLP1.1 determined that the worst case population growth resulting from CLP1.1 (76,236<sup>30</sup> people), would result in an increase in recreational pressure upon the SAC of 0.42%<sup>31</sup> during the lifetime of the Plan (to 2036). This is a small percent increase and can be deemed insignificant even in-combination with other projects or plans.
- 4.2.9 As a safeguard, to ensure no likely significant effects upon European designated sites Policy SP7 (Green Grid) of CLP1.1, ensures that the pace of delivery of new accessible greenspace will match that of population growth by committing to 'new and enhanced green infrastructure commensurate with growth' and stating that the Council will 'protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and local green spaces'. It makes additional provisions for improving the connectivity of and access to green infrastructure. Policy SP7 (Green Grid) is a commitment to the enhance biodiversity. It includes the following text: 'Reducing the pressures on wildlife and sensitive sites by improving the wider environment around wildlife sites by establishing buffer areas; and... Promoting the naturalisation of landscapes and the enhancement of Croydon's natural landscape signatures'

<sup>&</sup>lt;sup>29</sup> http://www.molevalley.gov.uk/media/pdf/4/8/Appropriate Assessment.pdf (Accessed 30/07/2015)

<sup>&</sup>lt;sup>30</sup> 31,765 (proposed new dwellings within CLP1) x 2.4 (average number of people per household). This is a worst case figure as it is expected that not all new residential development will be occupied by new resident to Croydon.

<sup>&</sup>lt;sup>31</sup> This assumes that the balance between different points of visitor origin to the SAC remains similar (i.e. that approximately 2% of visitors are expected to arise from Croydon) and that patterns of behaviour from Croydon residents remain broadly similar to the present. It also assumes that he limited parking opportunities are not a restriction on visits to the SAC, whereas in reality they are likely to be a considerable constraint to increased visits from places as far afield as Croydon where driving is the only realistic method of access.

- 4.2.10 In addition to CLP1.1, CLP 2 (Policy DM25: Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces), includes text that provides for the protection of green spaces as follows:
- 4.2.11 'DM25.1 The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces as designated on the Policies Map by applying the same level of protection afforded to Metropolitan Green Belt in national planning policy to Metropolitan Open Land and Local Green Spaces in the borough'.

## 4.3 Wimbledon Common SAC

- 4.3.1 Wimbledon Common SAC is located 6.7km from Croydon (in a straight line), within the London Boroughs of Merton and Wandsworth. Within CLP2, the nearest settlement to Wimbledon Common SAC identified to provide new residential development is Norbury (DM41). This policy provides for four Preferred Option Site Allocations that identify new residential development. The closest is Windsor House, 1270 London Road (site number 413). This is located 7.2km from the SAC (in a straight line). All other new residential Site Allocations are located beyond 7.2km from the SAC.
- 4.3.2 There is no information available that indicates visitors to the SAC or the key points of visitor origin. However, the site can be compared to other designated sites with similar habitat features (albeit sites located within a less urban environment). Wimbledon Common SAC is a large heathland site surrounded by urban development. This is broadly similar to other SACs such as the more rural Thames Basin Heaths SAC, and Wealden Heaths Phase II SPA (Woolmer Forest SAC) and these sites have had visitor surveys conducted. However, Wimbledon Common is a much more urban site than these other heathland sites and is time consuming to reach if one does not live very locally. It is therefore probable that its core catchment for Wimbledon Common SAC is more local than that of the two SPAs.
- Visitor studies undertaken at the rural Thames Basin Heaths SPA32 and Wealden Heaths Phase II 4.3.3 SPA<sup>33</sup> identified that whilst some local visitors arrived by foot, the majority originated within 5km of the SPAs. This 5km core catchment was agreed by Natural England, indicating that any new housing beyond 5km of these SPAs would not result in a likely significant effect alone or in combination with any project or plan. Whilst it is acknowledged that this does not identify the core catchment for Wimbledon Common SAC, it gives a broad indicator of core catchment for heathland habitats within the south of England. In addition, it can be considered that the urban setting of Wimbledon Common SAC (lack of ease of access to the SAC from a wider area) will reduce the catchment of the site further. The HRA for CLP1.1 (subject to consultation) screened out the impact pathways of recreational pressure upon Wimbledon Common SAC resulting from the proposed 31,765 new residential dwellings proposed within CLP1.1 as the Borough of Croydon is considered to fall outside of the conservative 5km catchment area for visitors to Wimbledon Common SAC. It was concluded that there would be no likely significant effects upon the SAC as a result of CLP1.1. As noted before, it is assumed that housing levels within CLP2 reflect those identified within CLP1.1. The HRA for CLP1.1 does not asses locations for new housing (as identified within CLP2). As all site allocations within CLP2 fall far beyond 5km from the SAC (as noted above, the closest is 7.2km), individual Site Allocations will not result in likely significant effects upon the SAC. In addition, it can be concluded that in-combination with other projects and plans, Site Allocations within CLP2 will not result in likely significant effect upon Wimbledon Common SAC.
- 4.3.4 In support of this conclusion, the HRA for part of Merton's Submission Local Plan<sup>34</sup> identified that, although vulnerable to increases in recreational pressure, the management of Wimbledon Common by the Wimbledon Common and Putney Heath Conservators with the use of bylaws such as dog control orders, mitigate against the potential impacts from increased recreational use, thus resulting in no likely significant effects upon the SAC. The emerging Wandsworth Local Plan Habitats Regulations Assessment (2015)<sup>35</sup> screened out any impacts from the emerging Wandsworth Local Plan. Correspondence with Natural England confirmed that they agreed with this determination based on

<sup>&</sup>lt;sup>32</sup> Liley, D. et al. 2005. Visitor access patterns on the Thames Basin Heaths. *English Nature Research Report,* English Nature, Peterborough

<sup>&</sup>lt;sup>33</sup> This comes from two separate studies – the Whitehill & Bordon visitor surveys undertaken by UE Associates and a separate piece of work undertaken by Footprint Ecology for The National Trust in relation to the Hindhead Common/Devil's Punchbowl section of the SPA

<sup>&</sup>lt;sup>34</sup> Merton Sites and Policies and Policies Map (Part of Merton's local plan) Submission (September 2013) http://www.merton.gov.uk/sp4.10\_hra.pdf [Accessed 12/08/2015]

<sup>&</sup>lt;sup>35</sup> Wandsworth LDF/ Local Plan Document Habitats Regulations Assessment (2015) http://www.wandsworth.gov.uk/download/downloads/id/10743/lpr422 habitats regulations assessment 2015.pdf [Accessed 12/08/215]

the fact that 'other suitable open/green spaces are available, there are new open/green spaces due to be provided in the area and that alternative methods of transport, such as walking and cycling, are to be promoted as far as possible'36. Based on the fact that the authorities containing Wimbledon Common SAC were able to screen out any likely significant effects upon the SAC from increases in recreational pressure resulting from increases in housing numbers within their authority boundaries and in-combination with other project or plans, and the fact that the SAC is considered to have a core catchment of 5km or less, it is determined that Croydon's CLP2 will not result in any likely significant effects upon Wimbledon Common SAC resulting from an increase in recreational pressure.

4.3.5 Those policies identified in paragraph 4.1.1 can remain screened out from further consideration alone and in combination with other projects and plans. This is in line with Strategy/Plan level Habitats Regulations Assessment Screening for neighbouring authorities.

<sup>&</sup>lt;sup>36</sup> Natural England Correspondence (2015) <a href="http://www.wandsworth.gov.uk/downloads/id/10745/lpr424">http://www.wandsworth.gov.uk/downloads/id/10745/lpr424</a> natural england comments on wandsworth hra 2 <a href="https://www.wandsworth.gov.uk/downloads/id/10745/lpr424">9-5-15.pdf</a> [Accessed 12/08/2015]

# 5 Conclusion

5.1.1 CLP1.1 provides for 31,765 new dwellings within the lifetime of the Plan (to 2036). These dwellings will be provided for within Allocated Sites as outlined within CLP2 and windfall sites (CLP1.1). The potential impact pathway of recreational pressure upon Mole Gap to Reigate Escarpment SAC and Wimbledon Common SAC was identified within CLP2 and assessed within this report. All potential impact pathways linked to CLP2 were deemed to not result in likely significant effects upon these SACs due to the distances involved alone or in-combination with other projects and plans.

# Appendix A. Background of European Designated Sites

# A.1 Mole Gap to Reigate Escarpment SAC

#### A.1.1 Introduction

The site is located partially within the Mole Valley District Council and Reigate & Banstead Borough Council, located in Surrey. It is approximately 888ha in size. It contains Mole Gap to Reigate Escarpment SSSI. The SSSI site contains the largest part of the North Downs in Surrey which has remained relatively undisturbed. It includes a range of outstanding wildlife habitats representative of the best of those found on the North Downs. Woodland, chalk grassland, chalk scrub and heathland form an interrelated mosaic which supports a wide diversity of characteristic plants and animals, of which many are local or rare. The site includes the Mole Gap, Box Hill and Headley Heath areas by the pressures of modern farming and building37.

## A.1.2 Qualifying Features<sup>38</sup>

The site is designated as an SAC for the following Annex I habitats:

- Stable xerothermophilous formations with Buxus sempervirens on rock slopes (Berberidion p.p.)
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia)
   (\* important orchid sites)
- Taxus baccata woods of the British Isles
- European dry heaths
- Asperulo-Fagetum beech forests

The site is designated as an SAC for the following Annex II species:

- Great crested newt Triturus cristatus
- Bechstein's bat Myotis bechsteini

# A.1.3 Conservation Objectives<sup>39</sup>

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

#### A.1.4 Environmental Vulnerabilities

- Box disease a threat/ pressures to: Natural Box Scrub
- Inappropriate scrub control a pressure to: Dry grasslands and scrublands on chalk or limestone (important orchid sites)
- Change in land management a threat to: Dry grasslands and scrublands on chalk or limestone (important orchid sites)
- Public access/ disturbance a threat to: Dry grasslands and scrublands on chalk or limestone (important orchid sites), Great crested newt, Bechstein's bat

<sup>37</sup> http://www.sssi.naturalengland.org.uk/citation/citation\_photo/1000977.pdf [Accessed 29/07/15]

<sup>&</sup>lt;sup>38</sup> http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0012804 [Accessed 29/07/15]

<sup>39</sup> http://publications.naturalengland.org.uk/file/5374121487630336 [Accessed 29/07/]

 Air pollution: nitrogen deposition – a threat to: European dry heaths, Natural box scrub, Dry grasslands and scrublands on chalk or limestone (important orchid sites), Beech forests on neutral to rich soils, Yew-dominated woodland, Bechstein's bat

# A.2 Wimbledon Common SAC

#### A.2.1 Introduction

The site is located within the London Boroughs of Wandsworth and Merton, located in Greater London. It is approximately 350ha in size. It contains Wimbledon Common SSSI. Wimbledon Common supports the most extensive area of open, wet heath on acidic soil in Greater London. The site also contains a variety of other acidic heath and grassland communities reflecting the variations in geology, drainage and management. Associated with these habitats are a number of plants uncommon in the London area.<sup>40</sup>

# A.2.2 Qualifying Features<sup>41</sup>

The site is designated as an SAC for the following Annex I habitats:

- Northern Atlantic wet heaths with Erica tetralix
- European dry heaths

The site is designated as an SAC for the following Annex II species:

Stag beetle Lucanus cervus

## A.2.3 Conservation Objectives<sup>42</sup>

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

#### A.2.4 Environmental Vulnerabilities<sup>43</sup>

- Public access/ disturbance a pressure on: Wet heathland with cross-leaved heath, European dry heaths, Stag beetle
- Habitat fragmentation a threat to: Stag beetle
- Invasive species a threat to: Wet heathland with cross-leaved heath, European dry heaths, Stag beetle
- Air pollution: nitrogen deposition a pressure on: Wet heathland with cross-leaved heath, European dry heaths

#### A.3 Richmond Park SAC

#### A.3.1 Introduction

The site is located within the London Borough of Richmond on Thames in Greater London. It is approximately 850ha in size. It contains Richmond Park SSSI. Richmond Park has been managed as a royal deer park since

<sup>&</sup>lt;sup>40</sup> http://www<u>.sssi.naturalengland.org.uk/citation/citation\_photo/1004317.pdf</u> [Accessed 29/07/2015]

<sup>41</sup> http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0030301 [Accessed 29/07/2015]

<sup>42</sup> http://publications.naturalengland.org.uk/file/6449586067472384 [Accessed 29/07/2015]

<sup>43</sup> http://publications.naturalengland.org.uk/file/5097829219434496 [Accessed 29/07/2015]

the seventeenth century, producing a range of habitats of value to wildlife. In particular, Richmond Park is of importance for its diverse deadwood beetle fauna associated with the ancient trees found throughout the parkland. In addition the Park supports the most extensive area of dry acid grassland in Greater London<sup>44</sup>

## A.3.2 Qualifying Features<sup>45</sup>

The site is designated as an SAC for the following Annex II species:

Stag beetle Lucanus cervus

#### A.3.3 Conservation Objectives<sup>46</sup>

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- · The populations of qualifying species, and,
- The distribution of qualifying species within the site.

<sup>44</sup> http://www.sssi.naturalengland.org.uk/citation/citation\_photo/1002388.pdf [Accessed 29/07/2015]

<sup>45</sup> http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?eucode=UK0030246 [Accessed 29/07/2015]

<sup>46</sup> http://publications.naturalengland.org.uk/file/6608768628424704 [Accessed 29/07/2015]

Appendix B. Figures

Figure 1: Locations of European Designated Sites

Figure 2: Locations of Site Allocations

Appendix C. Screening Tables

Table 1: Screening of Development Management (DM) Policies (Preferred Options)

Table 2: Screening of Site Allocations (including Alternative Sites)

Policies identified in green have been screened from any further assessment due to a lack of realistic impact pathways.

Policies identified in orange have been screened in for further assessment as there is potential for impact pathways to affect internationally designated sites, resulting in likely significant effects.

Table 1: Development Management (DM) Policies Screening Table

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects			
Chapter 4: Homes					
Policy DM1: Housing choice for sustainable communities	The Council will seek to enable housing choice for sustainable communities by:	No HRA implications			
	a) Requiring the minimum provision of homes designed with 3 or more bedrooms on sites of 10 or more dwellings as shown in Table 4.1; and	This is a development management policy, outlining the requirement for three bedroom homes.			
	b) Permitting the sub division of the residential units where the sub division does not result in the net loss of 3 bedroom homes (as originally built) or the loss of homes smaller than 130 m2.	There are no impact pathways present			
Policy DM2: Development on garden land	The Council will only permit new dwellings or other development within the curtilage or garden of an existing dwelling or the redevelopment of existing dwellings and their curtilage or gardens where:  a) It is in keeping with and subservient to the original dwelling and the surrounding character of the area;	No HRA implications  This is a development management policy providing for development (including housing) within the curtilage or garden of existing dwellings.			
	b) A minimum length of 10m and no less than ½ of the existing garden area is retained after the subdivision of the garden of the original dwelling; and	This is a positive policy in that it provides explicit protection for biodiversity.			
	c) There would not be a detrimental impact on existing and future occupants in terms of overlooking and outlook				
Policy DM3: Residential care and nursing homes	Planning permission for new residential care or nursing homes will only be granted if there is a need for the particular services provided by the home in supporting with the care of residents of Croydon.	No HRA implications  This is a development management policy relating to the provision of care home provided that there is a need for them.			
		There are no impact pathways present			

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects			
Chapter 5: Employment					
Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres	DM4.1 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 by not permitting new developments or changes of use which would result in a net loss of ground floor Class A uses within Main Retail Frontages (unless it relates to the expansion of an existing community use).  DM4.2 Within Croydon Metropolitan Centre and the borough's District and Local Centres development proposals and changes of use on the ground floor must: accord with Table 5.1.  DM4.3 Outside of Main and Secondary Retail Frontages, but within centres, developments for mixed use developments will be required to either:  a) Demonstrate that a specific end user will be occupying the ground floor unit upon completion; or  b) Provide a free fitting out of all ground floor units for the eventual end occupier to ensure that the unit is capable of occupation and operation by the end user and ensure that the ground floor units are capable of conversion to the same use as the remainder of the building if after two years, subsequent to completion, no end user has been found for the ground floor unit.	No HRA implications  This is a development management policy relating to development within Croydon Metropolitan Centre, District and Local Centres. It does not outline any location, type or quantity of development.  There are no impact pathways present			
Policy DM5: Development in Neighbourhood Centres	<ul> <li>DM5.1 The Council will ensure that the vitality and viability of Neighbourhood Centres are maintained and enhanced and that they continue to provide a level of service of neighbourhood significance.</li> <li>DM5.2 In the vicinity of Neighbourhood Centres, development proposals must: <ul> <li>a) Accord with Table 5.7;</li> <li>b) Demonstrably relate to the Neighbourhood Centre, be in scale and be within reasonable walking distance to other retail and community uses within the centre; and</li> <li>c) Not have a detrimental impact on neighbouring amenity or traffic safety.</li> </ul> </li> </ul>	No HRA implications  This is a development management policy relating to development within Neighbourhood Centres. It does not outline any location, type or quantity of development.  There are no impact pathways present			
Policy DM6: Development in Shopping Parades	The Council will ensure that the vitality and viability of the borough's Shopping Parades is maintained and increased and that they continue to serve local communities by ensuring new	No HRA implications  This is a development management policy relating to			

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects		
	development proposals and changes of use on the ground floor are in accordance with Table 5.3.	development within Shopping Parades. It does not outline any location, type or quantity of development.		
		There are no impact pathways present		
Policy DM7: Development in Restaurant Quarter Parades	The Council will designate and ensure that the vitality and viability of the borough's Restaurant Quarters is maintained and increased and that they continue to serve local communities by ensuring new development proposals and changes of use are in accordance with Table 5.5.	No HRA implications  This is a development management policy relating to development within Restaurant Quarter Parades. It does not outline any location, type or quantity of development.  There are no impact pathways present`		
Policy DM8: Development in edge of centre and out of centre locations	The Council will ensure the vitality and viability of the borough's town centres is maintained and increased by:  a) Ensuring new development proposals for main town centre uses in edge of centre and out of centre locations are in accordance with Table 5.7; and  b) Applying planning conditions to control the subdivision of units, extensions (including mezzanines), and the range and mix of convenience and comparison goods sold.	No HRA implications  This is a development management policy relating to development within edge of centre and out of centre locations. It does not outline any location, type or quantity of development.  There are no impact pathways present`		
Policy DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations	Within the Strategic, Separated and Integrated Industrial Locations identified in Table 4.3 of the Croydon Local Plan: Strategic Policies, the Council will encourage the redevelopment of low density industrial and warehousing premises with higher density industrial and warehousing premises.	No HRA implications  This is a development management policy relating to redevelopment of low density industrial and warehousing premises with higher density industrial and warehousing premises.  There are no impact pathways present		
Chapter 6: Urban Design and Local Character				
Policy DM10: Design and character	<ul> <li>DM10.1 To ensure that development enhances and sensitively responds to the predominant built form, proposals should be of high quality and respect:</li> <li>a) The development pattern, layout and siting;</li> <li>b) The scale, height, massing, and density;</li> </ul>	No HRA implications  This is a development management policy relating to design and character.		

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	c) The appearance, existing materials and built and natural features of the surrounding area, and	There are no impact pathways present
	d) Where an extension or alteration is proposed, comply with SPD2 Residential Extensions and Alterations or equivalent.	
	<b>DM10.2</b> To improve the quality of the borough's public, private and semi-public spaces, proposals should create clear, well defined and designed public and private spaces.	
	<b>DM10.3</b> To ensure the important contribution that historic street furniture plays in reinforcing local character and distinctiveness is recognised, the Council will seek to support proposals that restore and incorporate historic street furniture within the development.	
	<b>DM10.4</b> All proposals for new residential development will need to provide private amenity space that.	
	a) Is of high quality design, and enhances and respects the local character;	
	b) Complies with SPD3 'Designing for Community Safety' or equivalent;	
	c) Is sited to ensure private outdoor amenity space can be adequately screened;	
	d) Provides functional space;	
	e) Provides a minimum amount of private amenity space of 5 m2 per 1-2 person unit and an extra 1m2 per extra occupant thereafter; and	
	f) All flatted development and developments of ten or more houses must provide a minimum of 10m2 per child of new play space, calculated using the Mayor of London's population yield calculator and as set out in Table 6.1 below. The calculation will be based on all units being for affordable or social rent unless a signed Section 106 Agreement states otherwise.	
	<b>DM10.5</b> In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive.	
	<b>DM10.6</b> The Council will support proposals for development that ensure that the amenity of the occupiers of adjoining buildings are protected and that they do not result in direct overlooking of	

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	private outdoor space (with the exception of communal open space) or significant loss of existing sunlight or daylight levels of adjoining occupiers.	
	<b>DM10.7</b> To create a high quality built environment, proposals should demonstrate that:	
	a) The architectural detailing will result in a high quality building;	
	b) High quality durable materials that respond to the local character are incorporated; and	
	c) Services, utilities and rainwater goods will be discreetly incorporated within the building envelope.	
	<b>DM10.8</b> To ensure the design of roof-form positively contributes to the character of the local and wider area; proposals should ensure the design is sympathetic with its local context.	
	<b>DM10.9</b> To ensure a cohesive approach is taken to the design and management of landscape within the borough the Council will require proposals to:	
	a) Incorporate hard and soft landscaping in accordance with SPG12 (Landscape) and the Croydon's Public Realm Design Guide, or equivalent;	
	b) Provide spaces which are visually attractive, easily accessible and safe for all users, and provide a stimulating environment;	
	c) Seek to retain existing landscape features that contribute to the setting and local character of an area;	
	d) Retain existing trees and vegetation including natural habitats; and	
	e) In exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form.	
	<b>DM10.10</b> To ensure a creative, sensitive and sustainable approach is taken to incorporating architectural lighting on the exterior of buildings and public spaces the Council will require proposals to:	
	a) Respect enhance and strengthen local character;	
	b) Be designed in accordance with Croydon's Public Realm	

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	Design Guide; c) Seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; or seek to encourage the use of public spaces and make them feel safer by incorporating lighting within public spaces; and d) Ensure lighting schemes do not cause glare and light pollution.	
Policy DM11: Shop front design and security	<b>DM11.1</b> To ensure shop fronts are attractive, secure and of a high quality design, the Council will support proposals for new shop fronts and related alterations that respect the scale, character, materials and features of the buildings of which they form part.	
	<b>DM11.2</b> To ensure shop fronts are attractive, secure and of a high quality design, the Council will support proposals for new shop fronts and related alterations in the Metropolitan Centre, District and Local Centres, Shopping Parades and Restaurant Quarter Parades that do not include solid, perforated/pinhole external shutters; or consist of a mix of solid and open grille which conform to Supplementary Planning Guidance No.1 Shopfronts and Signs and the Shop Front Security Addendum to SPG No.1 or its equivalent.	
	<b>DM11.3</b> To ensure shop fronts are sympathetically incorporated and to provide future flexibility, developments that convert shops into residential accommodation should:	
	a) Respect the scale, character, proportions, materials and features of the buildings of which they form part;	
	b) Retain and incorporate historic shop fronts, including signboards, roller blind boxes, corbels, stall risers, cornices, fanlights, console brackets, transoms, pilasters and lobbies into the design;	
	c) For new elements, adopt and reinterpret the language of shop front design; and	
	d) Optimise window and door openings whilst designing for privacy.	
Policy DM12: Advertisement hoardings	<b>DM12.1</b> To ensure advertisement hoardings positively contributes to the character and appearance of existing and new streets, the Council will require advertisement hoardings to:	No HRA implications  This is a development management policy relating to
	a) Be designed to improve the public realm;	, programme grammer programming to

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	b) Demonstrate that the rear of the signs are well designed;	advertising hoardings.
	c) Reinforce the special character of heritage assets and other visually attractive parts of the borough; and	There are no impact pathways present
	d) Ensure the location and size of hoardings does not harm amenity or conflict with public safety.	
	<b>DM12.2</b> To ensure advertisement hoardings positively contribute to the character and appearance of the building on which they are attached:	
	a) The design and proportions should complement the symmetry and proportions of the host structure;	
	b) They should be located where they do not obscure of destroy interesting architectural features and detailing; and	
	c) They should be located where they do not cover windows or adversely impact on the functioning of the building.	
Policy DM13: Refuse and recycling	<b>DM13.1</b> To ensure that the location and design of refuse and recycling facilities are treated as an integral element of the overall design, the Council will require developments to:	
	a) Sensitively integrate refuse and recycling facilities preferably within the building envelope;	
	b) Ensure facilities are visually screened;	
	c) Provide adequate space for the temporary storage of waste materials generated by the development; and	
	d) Provide layouts that ensure facilities are conveniently located and easily accessible by residents.	
	<b>DM13.2</b> To ensure refuse and recycling facilities are easily accessible by operatives, the council will require developments to provide access roads that:	
	a) Are constructed to highway adopted standards;	
	b) Are capable of allowing access for refuse vehicles of at least 10.75 m long, 2.5 m wide and 3.5 m high; and	
	c) Facilitate the safe manoeuvring of refuse vehicles.	
Policy DM14: Public art	To enhance and express local character, the Council will support the inclusion of public art and require all major schemes to include public art that:	No HRA implications
	a) Is integrated into proposals at an early stage of the	This is a development management policy relating to public art.

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	design process; b) Enhances and creates local distinctiveness and reinforces a sense of place; c) Responds to local character; d) Makes a positive contribution to the public realm; and e) Engages the local community in its creation.	There are no impact pathways present
Policy DM15: Tall and large buildings	DM15.1 To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they:  a) Are located in areas identified for such buildings in Policies DM32 to DM47, in masterplans and in the Croydon Opportunity Area Planning Framework;  b) Are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4 with direct public transport connections to the Croydon Opportunity Area; and  c) The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale.  d) To improve the quality and access to open space buildings taller than 25 storeys will need to incorporate amenity space such as sky gardens, atriums and roof terraces that is accessible to the public as well as residential of the development.  DM15.2To ensure tall and large buildings are well integrated with the local area, the ground and first floors should incorporate a mix of publically accessible uses and spaces.	No HRA implications  This is a development management policy relating to tall and large buildings.  There are no impact pathways present
Policy DM16: Views and Landmarks	The Council will consider the proposed development in relation to its impact on protected Local Designated Views. Developments should enhance the Croydon Panorama as a whole and should seek to avoid buildings that tightly define the edges of the viewing corridors. They should not create a crowding effect around, or obstruct, or appear too close or high in relation to the Local Designated Landmark(s) identified in the Croydon Panoramas and Local Designated Views.	No HRA implications  This is a development management policy relating to views and landmarks.  There are no impact pathways present
Policy DM17: Heritage assets and conservation	<b>DM17.1</b> To preserve and enhance the character, appearance and setting of heritage assets within the borough, the Council will	No HRA implications

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	determine all development proposals that affect heritage assets in accordance with the following:	This is a development management policy relating to heritage assets and conservation.
	<ul> <li>a) Development affecting heritage assets will only be permitted if their significance is preserved or enhanced;</li> </ul>	There are no impact pathways present
	b) Proposals for development will only be permitted if they will enhance the setting of the heritage asset affected or have no adverse impact on the existing setting;	
	c) Proposals for changes of use should retain the significance of a building and will be supported only if they are necessary to keep the building in active use;	
	d) Where there is evidence of intentional damage or deliberate neglect to a heritage asset its current condition will not be taken into account in the decision-making process; and	
	e) Proposals for enabling development must have benefits that outweigh the detriment of departing from other planning policies and the proposed development must be the minimum necessary to secure the heritage asset's long-term future.	
	<b>DM17.2</b> Applications for development proposals that affect heritage assets or their setting must demonstrate:	
	a) How particular attention has been paid to scale, height, massing, historic building lines, the pattern of historic development, use, design, detailing and materials;	
	b) That it is of a high quality design that integrates with and makes a positive contribution to the historic environment; and	
	c) How the integrity and significance of any retained fabric is preserved.	
	<b>DM17.3</b> To preserve and enhance listed buildings, scheduled ancient monuments and registered parks and gardens within the borough, the Council will determine all development proposals that affect these heritage assets in accordance with the following:	
	<ul> <li>a) Substantial harm to or loss of a Grade II listed building or park or garden should be exceptional;</li> </ul>	
	b) Substantial harm to or loss of a Grade I or II* listed building or a scheduled ancient monument should be wholly exceptional; and	
	c) All alterations and extensions should enhance the character, features and setting of the building or monument and	

Policy (Preferred Options only)	Description	Screening Assessment Effects	Potential for Likely Significant
	must not adversely affect the asset's significance.		
	<b>DM17.4</b> To preserve and enhance the character, appearance and setting of conservation areas within the borough, the Council will determine all development proposals that affect conservation areas in accordance with the following:		
	a) The demolition of a building that makes a positive contribution to the special character and appearance of a conservation area will be treated as substantial harm;		
	b) Where the demolition of a building in a conservation area is considered to be acceptable, permission for its demolition will only be granted subject to conditions linking demolition to the implementation of an approved redevelopment scheme; and		
	c) All proposals for development must have regard to the development principles in the Conservation Area General Guidance SPD and Conservation Area Appraisal and Management Plan SPDs.		
	<b>DM17.5</b> To protect and enhance the character, appearance and setting of locally listed buildings within the borough, the Council will determine all development proposals that affect locally listed buildings in accordance with the following:		
	a) Substantial weight will be given to protecting and enhancing locally listed buildings; where demolition is proposed, it should be demonstrated that all reasonable attempts have been made to retain all or part of the building;		
	b) All alterations and extensions should enhance the building's character, setting and features and must not adversely affect the significance of the building; and		
	c) All proposals for development must have regard to Croydon's Local List of Buildings of Historic or Architectural Importance SPD.		
	<b>DM17.6</b> To preserve and enhance the character, appearance and setting of Local Heritage Areas within the borough, the Council will determine all development proposals that affect a Local Heritage Area in accordance with the following:		
	a) Substantial weight will be given to protecting and enhancing buildings, townscape and landscape features that make a positive contribution to the special character and appearance of a Local Heritage Area; and		

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	b) All proposals for development must have regard for the development principles in the Conservation Area General Guidance SPD and the Local Heritage Area evidence base.	
	<b>DM17.7</b> Substantial weight will be given to conserving and enhancing landscape features or planting that makes a positive contribution to the special historic character and original layout of statutorily registered and locally listed historic parks and gardens.	
	<b>DM17.8</b> All development proposals must preserve and enhance War Memorials and other monuments, and their settings.	
	DM17.9 In consultation with the Greater London Archaeological Advisory Service, or equivalent authority, the Council will require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Croydon's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service or equivalent authority.	

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
Chapter 7: Community Facilities		
Policy DM18: Providing and protecting community facilities including pubs	DM18.1 The Council will ensure the provision of a network of community facilities, providing essential public services throughout the borough by protecting existing community sites that still serve, or have the ability to serve, the needs of the community.  DM18.2 The Council will permit the loss of existing non-commercial community facilities where:	
	a) It can be demonstrated that there is no need for the existing premises or land for a community use and that it no longer has the ability to serve the needs of the community;	
	b) The existing use is located on the ground floor within a Main Retail Frontage, a Secondary Retail Frontage, a Shopping Parade or a Restaurant Quarter Parade; or	
	c) Community facilities for a specific end user (either on site or off site as part of a comprehensive redevelopment) that meet current or future needs are provided.	
	<b>DM18.3</b> The Council will support applications for community use where the proposals:	
	a) Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion;	
	b) Is accessible to local shopping facilities, healthcare, other community services and public transport or provides a community use in a location and of a type that is designed to meet the needs of a particular client group; and	
	c) Have regard to the cumulative effect of similar uses within the area, the impact on the street scene, traffic generation and parking provision; and the level of noise, disturbance and intrusion.	
Policy DM19: Crystal Palace Football Club	<b>DM19.1</b> The Council will continue to support Selhurst Park as the home stadium of Crystal Palace Football Club and ensure that any redevelopment would enhance the club's position with a football stadium which makes a significant contribution to the Borough.	No HRA implications  There are no impact pathways present
Policy DM20: Protecting Public Houses	DM20.1 Planning permission will not be granted for the demolition or change of use of a public house, unless	No HRA implications

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	a) The Council is satisfied that there is not a defined need for the public house and	This is a development management policy relating to the protection of Public Houses.
	b) The loss of the public house would not result in a shortfall of local public house provision of this type and	There are no impact pathways present
	c) Any proposed development would not have a detrimental effect on the design, character and heritage of the existing public house and /or wider street scene and,	
	d) that the public house is no longer considered economically viable when considered against the CAMRA's Public House Viability Test and	
	a) e) The public house has been marketed as a public house at market rate, for a consistent period of 18 months	
Policy DM21: Cemeteries and burial grounds	The Council will support applications for new cemeteries and burial grounds where the proposals:	No HRA implications
	a) Have good means of access from roads and are near bus routes or other transport nodes;	This is a development management policy relating to cemeteries and burial grounds.
	b) Are located in areas of with low risk of flooding from all potential sources of flooding;	There are no impact pathways present
	c) Are not located in a Groundwater Protection Zone;	There are no impact pathways present
	d) Would not have unacceptable adverse impact on the biodiversity of the borough; and	
	e) Are not located in Metropolitan Green Belt or on Metropolitan Open Land unless it has been demonstrated that there are no suitable sites that are not in Metropolitan Green Belt or on Metropolitan Open Land, there is no impact on openness and existing provision of public access is maintained.	
Chapter 8: Environment and Clima	te Change	
Policy DM22: Sustainable Design and Construction	The Council will promote high standards of development and construction throughout the borough by:	
	a) Ensuring that future development, that may be liable to cause or be affected by pollution through air, noise, dust, or vibration, will not be detrimental to the health, safety and amenity of users of the site or surrounding land; and	
	b) Ensuring mitigation measures are put in place to reduce the adverse impacts to acceptable levels. Where necessary, the Council will set planning conditions to reduce the impact on	

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	adjacent land uses to acceptable levels, relative to ambient noise levels and the character of the locality.	
	c) All major development proposals seek to reduce carbon dioxide emissions by at least 20 per cent through the use of onsite renewable energy generation	
Policy DM23: Land contamination	<b>DM23.1</b> The Council will permit development proposals located on or near potentially contaminated sites, provided that detailed site investigation is undertaken prior to the start of construction in	No HRA implications  This is a development management policy relating to land
	order to assess:  a) The nature and extent of contamination; and	contamination.
	b) The production of landfill gases and the potential risks to human health, adjacent land uses and the local environment.	There are no impact pathways present
	<b>DM23.2</b> Where the assessment identifies unacceptable risks to human health, adjacent land uses or the local environment, site remediation and aftercare measures will be agreed or secured by condition to protect the health of future occupants or users.	
	<b>DM23.3</b> All development proposals on contaminated sites should be accompanied by a full risk assessment, which takes into account existing site conditions.	
Policy DM24: Sustainable Drainage Systems and Reducing	<b>DM24.1</b> The Council will ensure that development in the borough reduces flood risk and minimises the impact of flooding by:	No HRA implications
Flood Risk	a) Steering development to the areas with a lower risk of flooding;	This is a development management policy relating to sustainable drainage systems and reducing flood risks.
	b) Applying the Sequential Test and Exception Test in accord with Table 8.1; and	There are no impact pathways present
	c) Taking account of all sources of flooding from fluvial, surface water, groundwater, sewers, reservoirs and ordinary watercourses	
	<b>DM24.2</b> In areas at risk of flooding development should be safe for the lifetime of development and should incorporate flood resilience and resistant measures into the design, layout and form of buildings to reduce the level of flood risk both on site and elsewhere.	
	<b>DM24.3</b> Sustainable drainage systems are required in all development and should:	
	a) Ensure surface run-off is managed as close to the source	

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	as possible; b) Accord with the London Plan Sustainable Drainage Hierarchy; c) Achieve better than greenfield runoff rates; d) Be designed to be multifunctional and incorporate water sensitive urban design to provide opportunities to improve amenity and biodiversity; e) Achieve improvements in water quality through an appropriate sustainable drainage system management train and f) Be designed with consideration of future maintenance	
Chapter 9: Green Grid		
Policy DM25: Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces	DM25.1 The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces as designated on the Policies Map by applying the same level of protection afforded to Metropolitan Green Belt in national planning policy to Metropolitan Open Land and Local Green Spaces in the borough.  DM25.2 Extensions to existing buildings in Metropolitan Green Belt, Metropolitan Open Land and Local Green Spaces should not be more than 20% of their original floor space or volume, or 100m2 (whichever is the smaller) unless they are for agricultural use, forestry, or facilities for outdoor sport, outdoor recreation or cemeteries. In determining whether extensions smaller than 20% of the original floor space and less than 100m2 in extent are disproportionate, a new replacement dwelling is materially larger or, if the or if an ancillary structures harm openness, the Council will have regard to:  a) Changes in the floor space and volume of buildings;  b) The floor space and volume of all previous extensions (since 1948), alterations and developments within the curtilage of the dwelling;  c) Use of basements and roof spaces as living areas;  d) Whether there is an increase in the spread of buildings across the site, in particular where visible from public vantage points;  e) The size of the curtilage and character of the surrounding	This is a development management policy relating to green belts, open land and green spaces. This is a positive policy. It protects green assets for recreational uses, reducing the need for residents to travel to internationally designated sites to partake in recreational activities.  There are no impact pathways present

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	area; and f) Whether ancillary structures have an urbanising effect.	
Policy DM26: Biodiversity	To enhance biodiversity across the borough and improve access to nature, development proposals should:  a) Incorporate biodiversity on development sites to enhance local flora and fauna and aid pollination locally;  b) Incorporate biodiversity within and on buildings in the form of green roofs, green walls or equivalent measures;  c) Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments;  d) Have no adverse impact on land with biodiversity or geodiversity value as designated on the Policies Map; and  e) Have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a protected species would be affected.	No HRA implications  This is a development management policy relating to biodiversity. This is a positive policy. It aims to improve access to nature within the borough (no internationally designated sites are located within Croydon borough), which will be used for recreation, reducing the need for residents to travel to internationally designated sites to partake in recreational activities.  There are no impact pathways present
Policy DM27: Trees	The Council will seek to protect and enhance the borough's woodlands, trees and hedgerows by:  a) Ensuring that all development proposals accord with the recommendations of BS5837 2012 (Trees in relation to design, demolition and construction) or equivalent;  b) Not permitting development that results in the loss or the excessive pruning of preserved trees or retained trees where they make a contribution to the character of the area;  c) Not permitting development that could result in the future loss or excessive pruning of preserved trees or trees that make a contribution to the character of the area;  d) Not permitting development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland, hedgerows and veteran trees; and  e) Producing a tree strategy outlining how the local authority will manage its tree stock and influence the management of those trees subject to a Tree Preservation Order.	No HRA implications  This is a development management policy relating to trees, woodlands and hedgerows. This is a positive policy. It seeks to protect these features.  There are no impact pathways present

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
Policy DM28: Promoting sustainable travel and reducing congestion	To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:  a) Promote measures to increase the use of public transport, cycling and walking;  b) Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and  c) Not result in a severe impact on the transport networks local to the site.	
Policy DM29: Car and cycle parking in new development	To promote sustainable growth in Croydon and reduce the impact of car parking new development must:  a) Reduce the impact of car parking in any development located in areas of good public transport accessibility or areas of existing on-street parking stress;  b) Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;  c) Ensure that highway safety is not compromised by the provision of car parking;  d) Provide car and cycle parking spaces as set out in Table 10.1; and  e) Provide car parking for affordable homes at an average rate not less than 2/3 that of other tenures.	
Policy DM30: Temporary car parks	To enhance a sense of place and improving the character of an area, permission will only be granted for temporary uses other than temporary car parks.	No HRA implications  This is a development management policy relating to temporary car parks.  There are no impact pathways present
Policy DM31: Safeguarding Land for Rail Improvements	DM31.1 Within land identified on the Policies Map as being safeguarded for rail improvements no development that will be permitted unless it is related to works on the railway.  DM31.2 Within land identified on the Policies Map as being temporarily safeguarded to support rail improvements Network	

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	Rail (or a successor organisation) must be consulted on all planning applications and any application which would have a negative impact on the upgrading of the Brighton Mainline railway.	
Policy DM32: Telecommunications	<b>DM32.1</b> Proposals for telecommunications development will be permitted provided that:	No HRA implications
	a) If proposing a new mast it has been demonstrated that there are no existing buildings, masts or other structures on which the proposed apparatus can be sited;	This is a development management policy relating to telecommunications.
	b) If proposing telecommunications development in Metropolitan Green Belt it has been demonstrated that there are no suitable sites that are not in Metropolitan Green Belt and there is no impact on openness; and	There are no impact pathways present
	c) If proposing telecommunications development on Metropolitan Open Land it has been demonstrated that there are no suitable sites that are not on Metropolitan Open Land and there is no impact on the existing purpose of the site and its reason for it being designated as Metropolitan Open Land; and	
	d) The siting and appearance of the proposed apparatus and associated structures minimises the impact on the visual amenity, character and appearance of the surrounding area and the operation of other electronic devises within the surrounding area.	
	<b>DM32.2</b> Telecommunication development on a building or other existing structure should be sited and designed to minimise impact to the external appearance of the host building or structure.	
Chapter 11: The Places of Croydor	1	
Policy DM33: Positive character of the Places of Croydon	<b>DM33.1</b> To ensure that Council's aspirations and objectives for each of Croydon's 16 Places is clearly reflected in the built environment proposals should complement and enhance the predominant positive character types identified in each of the 16 Places.	No HRA implications  This is a development management policy relating to character of Place within Croydon.
	<b>DM33.2</b> The Council encourages the increase of height to three storey of developments across the borough, subject to high quality design, other policies' compliance and cumulative impact on community and transport infrastructure.	There are no impact pathways present

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	<b>DM33.3</b> In specific locations identified on the Policies Map development should also refer to and be informed by the Place-specific policy.	
	<b>DM33.4</b> To maximise the potential for sustainable growth in the 16 Places, the Council will support the intensification of areas which are developable, where there is adequate provision of community infrastructure, good accessibility to public transport and open space and schools, excluding areas with highest level of deprivation in the borough.	
Policy DM34: Addington	<ul> <li>DM34.1 Within the New Addington District Centre, to ensure that the District Centre characteristics are respected and enhanced proposals should:</li> <li>a) Make use of opportunities to create buildings with a larger footprint to the west of Central Parade; or</li> </ul>	HRA implications  This policy provides for new residential development (DM32.2).
	b) Create buildings with smaller footprints that complement existing predominant building heights of 3 storeys up to 12 storeys within Central Parade.  DM34.2Within Addington allocate sites for development as set out in Table 11.5.	Potential impact pathways present:  • Recreational pressure
Policy DM35: Addiscombe	<ul> <li>DM35.1 Within the Addiscombe District Centre, to ensure that the Distinct Centre characteristics are respected and enhanced proposals should: <ul> <li>a) Complement existing predominant building heights of 2 storeys up to 4 storeys and a maximum of 5 storeys around the Lower Addiscombe Road and Blackhorse Lane Junction;</li> <li>b) Retain the rhythm, size and the continuity of ground floor active frontages;</li> <li>c) Allow flexibility at first floor and above for mixed use;</li> <li>d) Retain, enhance and positively reference corner features such as the articulation of corner buildings and architectural features such as domed projecting bays with finials and the projecting double gable ends running at 90 degree angles interrupting the running cornices;</li> <li>d) Incorporate or retain traditional shop front elements such as stall riser's fascias and pilasters; and</li> <li>e) Incorporate multi-stock brick as the predominant facing</li> </ul> </li> </ul>	HRA implications  This policy provides for new residential development (DM33.3).  Potential impact pathways present:  • Recreational pressure

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	materials of the whole building.  DM35.2 In the area between Addiscombe Railway Park & Lower Addiscombe Road (Section between Leslie Park Road & Grant Road), to ensure changes to the character of this area are carried out in a way that strikes a balance between enhancing the existing character and facilitating growth, proposals should:  a) Retain the predominant residential building lines and the open character of front gardens;  b) Respond to the fine grain of the existing residential developments;  c) Complement the existing predominant building heights of 3 storeys up to 4 storeys;  d) Incorporate multi-stock brick and white render as the predominant facing materials of the whole building;  e) Enhance existing and provide new direct public walking and cycling routes to Addiscombe Railway Park by working with the Council and its partners to incorporate sections of the route as part of schemes.  DM35.3 Within Addiscombe allocate sites for development as set out in Table 11.6.	
Policy DM36: Broad Green and Selhurst	DM36.1 Within the Broad Green Local Centre, to ensure that proposals positively enhance and strengthen the character of Broad Green Local Centre, and facilitate growth, developments should:  a) Sympathetically relate to the predominant building massing within the Local Centre boundaries;  b) Positively reference, respect and enhance architectural features such as the consistent rhythm and articulation of windows and doors;  c) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and  d) Incorporate multi-stock brick as the predominant facing materials of the whole building.  DM36.2 Within the area of the potential new Local Centre at Valley Park, to ensure development opportunities including public realm improvements are undertaken in a cohesive and coordinated manner and that they result in the creation of a Local	HRA implications  This policy provides for new residential development (DM34.6).  Potential impact pathways present:  • Recreational pressure

Policy (Preferred Options only)	Description	Screening Assessment Effects	Potential for Likely Significant
	Centre with a sense of place and distinct character, a masterplan with elements of design code will be developed.		
	<b>DM36.3</b> In the area of the Lombard Roundabout, to facilitate growth and to enhance the distinctive character of the Lombard Roundabout Area proposals should:		
	<ul> <li>a) Complement the existing predominant building heights of 3 storeys up to a maximum of 6 storeys;</li> </ul>		
	b) Create a sense of continuity by setting back buildings from the street and create building lines and frontages which positively reference and respond to the junction;		
	c) Address the deficiency in green infrastructure within the area by incorporating tree planting and greenery within the development; and		
	d) Retain the extent and enhance the quality of the existing public realm within the development, including introducing large trees and other vegetation to balance the impact of large or tall buildings.		
	<b>DM36.4</b> In the area north of Broad Green Local Centre, to ensure that proposals enhance and strengthen the character of the area north of the Broad Green Local Centre, and facilitate growth, developments should:		
	<ul> <li>a) Retain and create glimpses and separation distances between buildings in order to improve the openness of London Road;</li> </ul>		
	b) Incorporate main pedestrian entrances onto London Road;		
	c) Complement the existing predominant building heights of 3 storeys up to a maximum of 8 storeys; and		
	d) Retain the extent and enhance the quality of the existing public realm within the development, including introducing large trees and other vegetation to balance the impact of large and tall buildings.		
	<b>DM36.5</b> In the area of the junction of Windmill Road and Whitehorse Road, to create a sense of place of this area proposals should:		
	a) Create building lines and frontages which positively reinforce and respond to the form of the junction;		

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	b) Use tree planting to reinforce the street alignment; and c) Complement the existing massing of the immediate area around the Windmill/ Whitehorse Road Junction, by ensuring that the overall height of the building does not exceed 5 storeys; or complement the existing predominant building heights of 2 storeys up to a maximum height of 3 storeys; or ensure the ridge line is no taller than those adjacent to it.  DM36.6Within Broad Green and Selhurst allocate sites for development as set out in Table 11.7.	
Policy DM37: Coulsdon	Within Coulsdon allocate sites for development as set out in Table 11.8.	HRA implications  This policy provides for new residential development.  Potential impact pathways present:  • Recreational pressure
Policy DM38: Croydon Opportunity Area	DM38.1 To enable development opportunities; including public realm improvements, to be undertaken in a cohesive and coordinated manner a Croydon Opportunity Area Planning Framework complemented by masterplans with elements of design code for Fair Field, Mid Croydon, West Croydon, East Croydon and Old Town have been adopted.  DM38.2 To ensure development opportunities positively transform the local character and include public realm improvements that are undertaken in a cohesive and coordinated manner, a masterplan with elements of design code will be considered for the area within New Town and the Retail Core.  DM38.3 In the London Road area to ensure that proposals positively enhance and strengthen the local character and setting of locally listed buildings, the development should:  a) Complement the existing maximum height of 4 storeys;  b) Incorporate multi-stock brick as the predominant facing material;  c) Retain, enhance and positively reference existing setbacks of the major massing above ground floors; and  d) Retain, enhance and positively reference	HRA implications  This policy provides for new residential development (DM36.5).  Potential impact pathways present:  • Recreational pressure

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	architectural detailing on locally listed buildings.  DM38.4 In the area along Sydenham and Lansdowne Road, to facilitate growth and enhance the sense of place, developments should retain and create glimpses and separation distances between buildings in order to improve openness within the edge of the town centre.  DM38.5 Within Croydon Opportunity Area allocate sites for	
	development as set out in Table 11.9.	
Policy DM39: Crystal Palace and Upper Norwood	Within Crystal Palace and Upper Norwood allocate sites for development as set out in Table 11.10.	HRA implications  This policy provides for new residential development.
		Potential impact pathways present:  • Recreational pressure
Policy DM40: Kenley and Old Coulsdon	Within Kenley and Old Coulsdon allocate sites for development as set out in Table 11.11.	HRA implications  This policy provides for new residential development.  Potential impact pathways present:  • Recreational pressure
Policy DM41: Norbury	DM41.1 Within Norbury District Centre, to facilitate growth and to enhance the distinctive character, developments should:  a) Complement the existing predominant building heights of 2 storeys up to a maximum of 5 storeys;  b) Ensure proposal for large buildings are visually consistent with the predominant urban grain; and  c) Seek opportunity to provide direct access from the south of London Road to Norbury railway station.  DM41.2.Within Pollards Hill Local Centre, to ensure that proposals positively enhance and strengthen the character developments should:  a) Retain the edge and separation of Pollards Hill Local Centre from other adjoining character areas by limiting the urban grain within its boundaries;	HRA implications  This policy provides for new residential development (DM39.3).  Potential impact pathways present:  • Recreational pressure

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	b) Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;	
	c) Incorporate multi-stock brick as the predominant facing materials of the whole building, and	
	d) Retain the extent and enhance the quality of the existing public realm within the development, including reinforcing a consistent building line.	
	<b>DM41.3</b> Within Norbury allocate sites for development as set out in Table 11.12.	
Policy DM42: Purley	<b>DM42.1</b> Within Purley District Centre and its environs, to ensure that proposals positively enhance and strengthen the character and facilitate growth, developments should:	HRA implications  This policy provides for new residential development
	a) Reinforce the continuous building line which responds to the street layout and include ground floor active frontages;	(DM40.4).
	b) Complement the existing predominant building heights of 3 to 8 storeys, with a potential for a new landmark of up to a maximum of 16 storeys; and	Potential impact pathways present: Recreational pressure
	c) Demonstrate innovative and sustainable design, with special attention given to the detailing of frontages.	
	<b>DM42.2</b> In the environs of Reedham station, to create the sense of place and facilitate growth proposals should:	
	a) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys;	
	b) Reinforce the predominant building lines and frontages which positively respond to the form of the Brighton Road/Old Lodge Lane junction;	
	c) Improve pedestrian and cycle permeability, accessibility and connectivity across the railway between Brighton Road, Watney Close, Aveling Close and Fairbairn Close; and	
	d) Enhance the suburban shopping area character of this section of Brighton Road.	
	<b>DM42.3</b> In the area of the junction of Brighton Road and Purley Downs Road, to reduce the impact of Brighton Road as a linear route, clearly differentiate the area from Purley District Centre and Brighton Road (Sanderstead Road) Local Centre and strengthen the sense of place, proposals should:	

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	<ul> <li>a) Retain and create open glimpses and vistas between buildings;</li> <li>b) Introduce building with landscapes that respond and reflect the layout of the 1930s blocks of Lansdowne Court and Purley Court; and</li> <li>c) Complement the existing predominant building heights of 2 storeys up to a maximum of 5 storeys.</li> <li>DM42.4 Within Purley allocate sites for development as set out in Table 11.13.</li> </ul>	
Policy DM43: Sanderstead	pM43.1Within Sanderstead Local Centre, to respect and enhance the distinctive qualities proposals should:  a) Reinforce the suburban shopping area character;  b) Reference, respect and enhance architectural features such as the consistent rhythm of pairs of buildings with identical frontages and the articulation of openings;  c) Retain features such as the projecting bay windows;  d) Retain wide vistas and strengthen visual connections to green open spaces; and  e) Improve walking and cycling connectivity and access to open space.  DM43.2Within Hamsey Green Local Centre, to respect and enhance the distinctive "Suburban Shopping Area" character of Hamsey Green, proposals should:  a) Reinforce the suburban shopping area character:  b) Positively reference, respect and enhance architectural features such as the consistent rhythm and articulation of window and doors;  c) Ensure the extent of the public realm within the vicinity of the development is retained and improved; and  d) Incorporate multi-stock brick or white render as the predominant facing material.  DM43.3Within Sanderstead allocate sites for development as set out in Table 11.14.	HRA implications  This policy provides for new residential development (DM41.34).  Potential impact pathways present: Recreational pressure
Policy DM44:Selsdon	Within Selsdon District Centre, to enhance the character of Selsdon District Centre proposals should:	HRA implications

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	<ul> <li>a) Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;</li> </ul>	This policy provides for new residential development.
	b) Ensure large buildings are sensitively located and of a massing no larger than buildings within this area;	Potential impact pathways present: Recreational pressure
	c) Ensure that the front elevation of large buildings are broken down to respect the architectural rhythm of the existing street frontages; and	Trestoational procedure
	d) Should incorporate red multi-stock brick as the predominant facing material.	
Policy DM45: Shirley	<b>DM45.1</b> Within Shirley Local Centre, to retain the unique qualities development should:	HRA implications
	<ul> <li>a) Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;</li> </ul>	This policy provides for new residential development (DM43.4).
	b) Reference, respect and enhance architectural features such as the consistent rhythm and articulation of fenestration and retain features such as the triangular bay windows;	Potential impact pathways present:
	c) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and	Recreational pressure
	d) Incorporate or retain traditional shop front elements such as stall riser's fascias pilasters and stall risers.	
	<b>DM45.2</b> In the area between 518 and 568 Wickham Road, to improve the character proposals should reference the "Suburban Shopping Area" character type.	
	<b>DM45.3</b> In the area of the Wickham Road Shopping Parade, to retain the distinctive character of the 794-850 Wickham Road proposals should:	
	a) Complement the existing predominant building heights up to a maximum of 2 storeys; and	
	b) Retain the "Suburban Shopping Area" character.	
	<b>DM45.4</b> Within Shirley allocate sites for development as set out in Table 11.16.	
Policy DM46: South Croydon	<b>DM46.1</b> Within the Brighton Road (Selsdon Road) Local Centre, to encourage a balance to be struck between strengthening and enhancing the character and facilitating growth, proposals should:	HRA implications  This policy provides for new residential development
	a) Complement the existing predominant building heights up to a maximum of 3 storeys;	(DM44.2).

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	<ul> <li>b) Positively reinforce, strengthen and enhance characteristic features such as the articulation of corner buildings and continuous building line;</li> <li>c) Incorporate main entrances onto Brighton Road; and</li> <li>d) Positively reference, respect and enhance the articulation of shop fronts, including consistent rhythm and size of windows and doors.</li> <li>DM46.2Within South Croydon allocate sites for development as set out in Table 11.17.</li> </ul>	Potential impact pathways present: Recreational pressure
Policy DM47: South Norwood and Woodside	DM47.1 Along the section of Portland Road between the South Norwood Conservation Area and Watcombe Road, to facilitate growth and strengthen the edge of the South Norwood District Centre proposals should:  a) Relate to the predominant character in adjacent residential areas;  b) Complement the existing predominant height up to a maximum height of 3 storeys with accommodation in roof space;  c) Incorporate main pedestrian entrances onto Portland Road; and  d) Maintain the rhythm and size of ground floor windows and doors.  DM47.2 Along the section of Portland Road between Watcombe Road and Woodside Avenue, to create a cohesive sense of place in this area, proposals should complement the existing predominant building heights of 2 storeys up to a maximum of 3 storeys.  DM47.3 Within South Norwood and Woodside allocate sites for development as set out in Table 11.18.	HRA implications  This policy provides for new residential development (DM45.3).  Potential impact pathways present:  • Recreational pressure
Policy DM48: Thornton Heath	<ul> <li>DM48.1 Within the Thornton Heath District Centre and its environs, to ensure a balance is struck between strengthening and enhancing the character and enable growth, proposals should:</li> <li>a) Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;</li> <li>b) Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;</li> </ul>	HRA implications  This policy provides for new residential development (DM46.3).  Potential impact pathways present: Recreational pressure

Policy (Preferred Options only)	Description	Screening Assessment Potential for Likely Significant Effects
	c) Ensure tall or large buildings, located in the local vicinity of Thornton Heath Railway Station do not exceed 9 storeys;	
	d) Promote the expansion and enhancement of the shared public realm within the curtilage of the development;	
	e) Ensure that the setting of Thornton Heath's local landmark: Clock Tower is respected; and	
	f) Incorporate red multi-stock brick as the predominant facing material.	
	<b>DM48.2</b> Within the Thornton Heath Pond Local Centre and its environs, to ensure a balance is struck between strengthening and enhancing the character and facilitating growth, proposals should:	
	a) Ensure building lines and frontages positively reference and respond to the form of the Thornton Heath Pond junction;	
	b) Incorporate red multi-stock brick as the predominant facing material;	
	c) Retain the extent and enhance the quality of the existing public realm;	
	d) Complement the existing predominant building heights of 3 storeys up to a maximum of 6 storeys; and	
	e) Ensure transitions between buildings of different sizes create sense of continuity at the street level.	
	<b>DM48.3</b> Within Thornton Heath allocate sites for development as set out in Table 11.19.	
Policy DM49: Waddon	DM49.1 To enable development opportunities including public realm improvements to be undertaken in a cohesive and	HRA implications
	coordinated manner, a masterplan with elements of design code will be considered for the area within Waddon's potential new Local Centre.	This policy provides for new residential development (DM47.2).
	<b>DM49.2</b> Within Waddon allocate sites for development as set out in Table 11.20.	Potential impact pathways present:
		Recreational pressure

Preferred Options allocated sites and Alternative sites identified in green have been screened from any further assessment due to a lack of realistic impact pathways.

Preferred Options allocated sites and Alternative sites identified in orange have been screened in for further assessment as there is potential for impact pathways to affect internationally designated sites, resulting in likely significant effects.

Table 2: Preferred Options Allocated Sites Screening Table (including Alternative Sites where listed).

Reference Number	Site name	Proposed Use	Screening outcome potential for likely significant effects
Policy DM 34: Addingte	on		
44	Central Parade West, Central Parade	Mixed development including residential, community, healthcare facility, leisure, retail and open space.	Potential HRA implications. Proposed for mixed use including residential. Potential impact pathways present:  • Recreational pressure
120	Timebridge Community Centre, Field Way	Residential development including replacement community facilities	Potential HRA implications. Proposed for residential use. Potential impact pathways present:  • Recreational pressure
636	Land west of Timebridge Community Centre, Lodge Lane	Secondary school	No HRA implications. Proposed for academic uses. There are no impact pathways present.
755	Pear Tree Farm & Pear Tree Farm Cottage, Featherbed Lane	Gypsy and traveller site	Potential HRA implications. Proposed for residential use. Potential impact pathways present:  • Recreational pressure
Policy DM35: Addiscor	mbe		
68	130 Oval Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
116	Rees House & Morland Lodge, Morland Road	Secondary School	No HRA implications. Proposed for academic uses. There are no impact pathways present.
403	Roman House, 13-27 Grant Road	Redevelopment or change of use to residential	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure

353	Red Court Nursing Home, 27 Stanhope Road	Change of use to residential or redevelopment	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
Alternative Sites			
A333	Harris and Bailey Ltd, 50 Hastings Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications.  Proposed for employment uses. There are no impact pathways present.
A399	109-117 Cherry Orchard Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications. Proposed for community uses. There are no impact pathways present.
A402	106 Lower Addiscombe Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed for employment uses. There are no impact pathways present.
A476	Garages to the rear of, 1- 19 Craven Road	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	No HRA implications.  Proposed for commercial uses. There are no impact pathways present.
Policy DM36: Broad (	Green and Selhurst		
78	114-118 Whitehorse Road	Residential conversion and extension	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
157	Canterbury Mill, 103 Canterbury Road	New primary school	No HRA implications. Proposed for academic uses. There are no impact pathways present.
302	30-32 Bensham Lane	Residential	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
314	Valley Park (B&Q and Units A-G	Redevelopment of this area to a mixture	Potential HRA implications.

	Daniell Way), Hesterman Way	of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre	Proposed development to include residential use. Potential impact pathways present: Recreational pressure
334	Valley Leisure Park, Hesterman Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS), community and leisure to form the basis of a new residential community and local centre.	Potential HRA implications. Proposed development to include residential use. Potential impact pathways present: Recreational pressure
337	Zodiac Court, 161-183 London Road	Residential redevelopment	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
348	Homebase & Matalan stores, 60-66 Purley Way	Mixed use residential and retail development	Potential HRA implications. Proposed development to include residential use. Potential impact pathways present: Recreational pressure
396	Praise House, 145-149 London Road	Redevelopment for mixed use residential and community use	Potential HRA implications. Proposed development to include residential use. Potential impact pathways present: Recreational pressure
404	Vistec House & 14 Cavendish Road, 185 London Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
416	Challenge House, 618 Mitcham Road	Residential redevelopment or conversion. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
417	Stonemead House, 95 London Road	Residential	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
452	Westways Resource Centre, 49 St James's Road	Primary School	No HRA implications. Proposed for academic uses. There are no impact pathways present.
468	Grass area adjacent to, 55 Pawsons Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present:

			Recreational pressure
471	Masonic Hall car park, 1- 1B Stanton Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
517	Milton House, 2-36 Milton Avenue	Residential and employment uses	Potential HRA implications. Proposed development to include residential use. Potential impact pathways present: Recreational pressure
946	Stubbs Mead Depot, Factory Lane	Mixed residential and employment use	Potential HRA implications. Proposed development to include residential use. Potential impact pathways present: Recreational pressure
Alternative Sites			
A170	24 Oakwood Place	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed for employment uses. There are no impact pathways present.
A298	Rear of, 31-73 Wortley Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed for employment uses. There are no impact pathways present.
A342	20-24 Mayday Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed for employment uses. There are no impact pathways present.
A433	76-78 Canterbury Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed for employment uses. There are no impact pathways present.
A446	32 Mayday Road	Retain existing use	No HRA implications. Proposed for employment uses. There are no impact pathways

		(The site is an operational scattered employment site and there is a presumption against non-employment uses)	present.
A503	Units 1 - 6, Pilton Industrial Estate, Pitlake	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed for employment uses. There are no impact pathways present.
A509	Rear of, 59-77 Gloucester Road	Retain existing use  (The site is an operational integrated industrial site and there is a presumption against the loss of employment floor space)	No HRA implications.  Proposed for industrial uses. There are no impact pathways present.
A513	Peal Road Industrial Estate, Peall Road	Retain existing use  (The site is an operational integrated industrial site and there is a presumption against the loss of employment floor space)	No HRA implications.  Proposed for industrial uses. There are no impact pathways present.
Policy DM37: Cou	Isdon		
60	Cane Hill Hospital Site, Farthing Way	Residential development with new community, health and educational facilities	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
372	Car park, Lion Green Road	Mixed use development comprising leisure and community facilities. Also retail so long as the current planning permission is extant.	No HRA implications. Proposed for leisure and community uses. There are no impact pathways present.
764	Land to the east of Portnalls Road, Portnalls Road	Secondary school	No HRA implications. Proposed for academic uses. There are no impact pathways present.
945	Waitrose, 110-112 Brighton Road	Residential and healthcare facilities	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
Alternative Sites			
A329	Coulsdon Youth and Social Centre,	Retain existing use	No HRA implications.

	254 Chipstead Valley Road	(Unlikely to come forward for development in the plan period)	Proposed for community uses. There are no impact pathways present.
Policy DM38: C	roydon Opportunity Area		
21	Former Royal Mail Sorting Office, 1-5 Addiscombe Road	Mixed use development incorporating residential, hotel and/or office. Also retail so long as the current planning permission is extant.	Potential HRA implications. Proposed for mixed use including residential. Potential impact pathways present: Recreational pressure
31	Croydon College car park, College Road	Mixed use redevelopment comprising hotel & residential	Potential HRA implications. Proposed for mixed use including residential. Potential impact pathways present: Recreational pressure
32	4-20 Edridge Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
104	Former Taberner House site, Fell Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
108	Former Croydon General Hospital Site, 86-150 London Road	Secondary School	No HRA implications. Proposed for academic uses. There are no impact pathways present.
123	Prospect West and car park to the rear of, 81-85 Station Road	Residential (with healthcare facility if required by NHS)	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
138	Cherry Orchard Gardens and vacant site between railway line and Cherry Orchard Road, Cherry Orchard Road	Mixed use development comprising residential, offices, restaurant/café, hotel and community facilities	Potential HRA implications. Proposed for mixed use including residential. Potential impact pathways present: Recreational pressure
142	1 Lansdowne Road	Mixed use development comprising residential, offices, leisure and hotel	Potential HRA implications. Proposed for mixed use including residential. Potential impact pathways present: Recreational pressure
155	St Anne's House & Cambridge House, 20-26 Wellesley Road	Conversion of building to residential and hotel	Potential HRA implications. Proposed for mixed use including residential. Potential impact pathways present: Recreational pressure

162	St George's House, Park Lane	Conversion and extension of existing building to provide retail and other Class A activities (such as food and drink) on the ground floor with residential accommodation on upper floors	Potential HRA implications. Proposed for retail use including residential. Potential impact pathways present: Recreational pressure
172	Ruskin Square, 61 Dingwall Road	Mixed use development comprising residential, offices, restaurant/café, fitness centre and replacement 200 seat theatre	Potential HRA implications. Proposed for mixed use including residential. Potential impact pathways present: Recreational pressure
173	28-30 Addiscombe Grove	Redevelopment to provide more homes	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
174	30-38 Addiscombe Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
175	Stephenson House, Cherry Orchard Road	Primary school with residential and/or office on upper floors	Potential HRA implications. Proposed for academic use with the possibility for residential use. Potential impact pathways present: Recreational pressure
176	Exchange Court, 3 Bedford Park	Offices and/or hotel (with healthcare facility if required by the NHS)	No HRA implications.  Proposed for employment use, including the provision of a hotel. There are no impact pathways present.
178	Arcadia House, 5 Cairo New Road	Residential development and Class B business use	Potential HRA implications. Proposed for business use including residential. Potential impact pathways present: Recreational pressure
182	St Mathews House, 98 George Street	Redevelopment for residential and/or offices and/or retail (on George Street frontage)	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present: Recreational pressure
184	1-19 Derby Road	Residential development above, community uses on lower floors	Potential HRA implications. Proposed for community use including possible residential use. Potential impact pathways present: Recreational pressure
186	Jobcentre, 17-21 Dingwall Road	Offices and/or residential and/or hotel and/or replacement Class A2 (Finance) premises (with healthcare facility if	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present:

		required by the NHS)	Recreational pressure
187	28 Dingwall Road	Offices and/or residential and/or hotel (with healthcare facility if required by the NHS)	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present: Recreational pressure
189	Car park, Drummond Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
190	Car park to the rear of Leon House, 22-24 Edridge Road	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
192	Suffolk House, George Street	Mixed use redevelopment with offices or residential dwellings above retail units at ground level	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present: Recreational pressure
193	100 George Street	Mixed use development with offices or residential dwellings above retail units at ground level	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present: Recreational pressure
194	St George's Walk, Katharine House and Park House, Park Street	Residential and retail with new civic space	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present: Recreational pressure
195	Leon House, 233 High Street	Conversion to residential or mixed use residential/office with retention of retail on the ground floor	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present: Recreational pressure
196	Stonewest House, 1 Lamberts Place	Residential development	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
197	Emerald House, 7-15 Lansdowne Road	Office and/or residential and/or hotel (with healthcare facility if required by the NHS)	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present: Recreational pressure
199	20 Lansdowne Road	Residential development with light industrial workshops and studio spaces	Potential HRA implications. Proposed for mixed use including possible residential use. Potential impact pathways present:

			Recreational pressure
201	Lidl, Easy Gym and car park, 99- 101 London Road	Primary school with residential development on upper floors	Potential HRA implications. Proposed for academic use including possible residential use. Potential impact pathways present: Recreational pressure
203	West Croydon Station and shops, 176 North End	Remodelling of station and redevelopment to provide an improved transport interchange, cycle hub, retail & office units with residential development above	Potential HRA implications. Proposed Station redevelopment/ remodelling with mixed use including possible residential use. Potential impact pathways present:  Recreational pressure
211	16-44 Station Road	A more intensive use of the site with retail on the ground floor and residential use on other floors	Potential HRA implications. Proposed for retail use including possible residential use. Potential impact pathways present: Recreational pressure
212	Car Park, Poplar Walk	Residential development subject to the replacement of the car park which provides disabled car parking spaces for the Metropolitan Centre	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
218	Lunar House, Wellesley Road	Office and/or residential and/or hotel and/or office (with healthcare facility if required by the NHS)	Potential HRA implications.  Proposed for mixed use including possible residential use.  Potential impact pathways present:  Recreational pressure
220	9-11 Wellesley Road	Residential and/or hotel and/or retail and/or finance	Potential HRA implications. Potentially proposed for residential use. Potential impact pathways present: Recreational pressure
222	Multi-storey car park, 1 Whitgift Street	Residential with community facilities commensurate in size and functionality to that currently on the site	Potential HRA implications. Proposed for community use including possible residential use. Potential impact pathways present: Recreational pressure
231	Seagas House, Park Lane	Residential conversion	Potential HRA implications. Proposed for residential use. Potential impact pathways present: Recreational pressure
234	Southern House, Wellesley Grove	Office and/or residential and/or hotel (with healthcare facility if required by the NHS)	Potential HRA implications. Proposed for office and/ or hotel use including possible residential use. Potential impact pathways present: Recreational pressure
236	Apollo House, Wellesley Road	Offices and/or residential and/or hotel	Potential HRA implications.

		(with healthcare facility if required by the NHS)	Proposed for office and/ or hotel use including possible residential use.  Potential impact pathways present:  Recreational pressure
242	Davis House, Robert Street	Residential development with limited retail to replace existing floor space	Potential HRA implications. Partially proposed for residential use. Potential impact pathways present: Recreational pressure
243	Surface car park, Lansdowne Road	Primary School	No HRA implications. Proposed for academic uses. There are no impact pathways present.
245	Mondial House, 102 George Street	Office and/or residential development or hotel and/or retail (on George Street frontage)	Potential HRA implications. Potentially proposed for office and/ or hotel use including possible residential use. Potential impact pathways present: Recreational pressure
247	Norwich Union House, 96 George Street	Residential development or offices or hotel and/or retail (on George Street frontage)	Potential HRA implications.  Potentially proposed for office and/ or hotel use including possible residential use.  Potential impact pathways present:  Recreational pressure
294	Croydon College Annexe, Barclay Road	Residential redevelopment with community uses and Creative and Cultural Industries Enterprise Centre	Potential HRA implications. Proposed for residential use and community use. Potential impact pathways present: Recreational pressure
311	Mott Macdonald House, 8 Sydenham Road	Offices and/or residential and/or hotel (with healthcare facility if required by the NHS)	Potential HRA implications. Potentially proposed for office and/ or hotel use including possible residential use. Potential impact pathways present: Recreational pressure
312	Cygnet House, 12-14 Sydenham Road	Offices and/or residential and/or hotel (with healthcare facility if required by the NHS)	Potential HRA implications.  Potentially proposed for office and/ or hotel use including possible residential use.  Potential impact pathways present:  Recreational pressure
374	Reeves Corner former buildings, 104-112 Church Street	Mixed use with residential to upper storeys and retail on ground floor	Potential HRA implications. Proposed for mixed use including residential use. Potential impact pathways present: Recreational pressure
375	7 Cairo New Road	Residential redevelopment above	Potential HRA implications.

		community use	Proposed for residential use with community use. Potential impact pathways present: Recreational pressure
392	Carolyn House, 22-26 Dingwall Road	Offices and/or residential and/or hotel (with healthcare facility if required by the NHS)	Potential HRA implications.  Potentially proposed for office and/ or hotel use including possible residential use.  Potential impact pathways present:  Recreational pressure
393	Whitgift Centre, North End	Expansion of shopping centre, improved transport infrastructure, public realm and residential development	Potential HRA implications.  Proposed retail and infrastructure use including residential use.  Potential impact pathways present:  Recreational pressure
398	Coombe Cross, 2-4 South End	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways present: Recreational pressure
450	Lennard Lodge, 3 Lennard Road	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways present: Recreational pressure
488	Canius House, 1 Scarbrook Road	Residential conversion	Potential HRA implications. Proposed residential use. Potential impact pathways present: Recreational pressure
489	Corinthian House, 17 Lansdowne Road	Retention of offices and/or residential conversion, and/or hotel (with healthcare facility if required by the NHS)	Potential HRA implications.  Potentially proposed for office and/ or hotel use including possible residential use.  Potential impact pathways present:  Recreational pressure
492	5 Bedford Park	Residential conversion	Potential HRA implications. Proposed residential use. Potential impact pathways present: Recreational pressure
493	Pinnacle House, 8 Bedford Park	Mixed use of residential with offices (or a healthcare facility if required by the NHS) on the ground floor	Potential HRA implications. Proposed for mixed use including residential use. Potential impact pathways present: Recreational pressure
520	Dingwall Road to Lansdowne Road	Land to be safeguarded for Tramlink including a new stop in Lansdowne Road and a single tram track along Dingwall	No HRA implications. Site to be safeguarded for Tramlink. There are no impact pathways present.

		Road and Lansdowne Road	
522	Surface car park, Wandle Road	Bus stand underneath the flyover and a district energy centre and residential development on the remainder of the car park	Potential HRA implications. Proposed for transport use including residential use. Potential impact pathways present: Recreational pressure
Alternative Sites			
A27	Old Palace School & Grounds, Old Palace Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications. Proposed for academic uses. There are no impact pathways present.
A50	44-60 Cherry Orchard Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed for employment uses. There are no impact pathways present.
A76	Bickler House, 37 Tamworth Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications. Proposed for community uses. There are no impact pathways present.
A117	Cavendish House & Spices Yard, 51-55 South End	Retain existing use  (Site is unlikely to come forward for development due to difficulty in replacing the existing function provided by the site)	No HRA implications. Currently for community use. It is assumed the use type will not change. There are no impact pathways present.
A179	Multistorey car park to the rear of, 12-19 Surrey Street	Retain existing use  (Site is unlikely to come forward for development due to difficulty in replacing the existing function provided by the site)	No HRA implications. Currently a car park. It is assumed the use type will not change. There are no impact pathways present.
A181	45-81 Church Street	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	Potential HRA implications. Proposed to retain existing use. From reviewing aerial photography, this currently appears to include residential use above retail. Potential impact pathways present: Recreational pressure
A198	10 Lansdowne Road	Retain existing use	No HRA implications. To retain employment use. It is assumed the use type will not

		(The site is an operational town centre employment site and there is a presumption against non-employment uses;Unlikely to come forward for development in the plan period)	change. There are no impact pathways present.
A200	Multi-storey car park, Lansdowne Road	Retain existing use  (Site is unlikely to come forward for development due to difficulty in replacing the existing function provided by the site)	No HRA implications.  To retain existing car park. It is assumed the use type will not change. There are no impact pathways present.
A213	T A Centre, 115 Sydenham Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain existing community use. It is assumed the use type will not change. There are no impact pathways present.
A216	Saxon Lodge, 1 Tavistock Road	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	Potential HRA implications. From reviewing aerial photography, this appears to be existing residential use. It is assumed the use will remain as residential. Potential impact pathways present if development leads to a net increase in dwellings:  Recreational pressure
A224	Lantern Hall, 190-192 Church Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain existing community use. It is assumed the use type will not change. There are no impact pathways present.
A226	33-45 Howley Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain existing community use. It is assumed the use type will not change. There are no impact pathways present.
A228	Rylands House, 9 Church Road	Retain existing use  (Site is unlikely to come forward for development due to difficulty in replacing the existing function provided by the building)	No HRA implications. From reviewing aerial photography, this site appears to be existing commercial use. It is expected that the use of the site will not change. No impact pathways present.
A238	22 Lansdowne Road	Retain existing use  (The site is an operational town centre employment site and there is a	No HRA implications. Proposed to retain existing employment use. It is assumed the use type will not change. There are no impact pathways present.

		presumption against non-employment uses)	
A240	Court Buildings, Barclay Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain existing community use. It is assumed the use type will not change. There are no impact pathways present.
A244	Bedford, Woburn and The Elms Courts, Tavistock Road	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	No HRA implications. From reviewing aerial photography, this site appears to be existing commercial use. It is expected that the use of the site will not change. No impact pathways present.
A381	Croydon Minster Church Hall, Church Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain existing community use. It is assumed the use type will not change. There are no impact pathways present.
A422	Centrale, North End	Retain existing use  (Unlikely to come forward for development in the plan period as this is a high value retail location)	No HRA implications.  Proposed to retain existing high value retail use. It is assumed the use type will not change. There are no impact pathways present.
Policy DM39: Cry	stal Palace and Upper Norwood		
28	Bowyers Yard, Bedwardine Road	Cultural and Creative Industries Enterprise Centre	No HRA implications. Proposed for community use (Culture and Creative Industries Enterprises Centre). There are no impact pathways present.
80	Victory Place	Ground floor retail, restaurant and studio space with hotel, office/or and residential uses on other floors	Potential HRA implications. Proposed mixed use including residential. Potential impact pathways:  Recreational pressure
82	St John The Evangelist Vicarage, Sylvan Road	Redevelopment to provide new hall and residential dwellings	Potential HRA implications. Proposed new hall and residential. Potential impact pathways:  Recreational pressure
357	Norwood Heights Shopping Centre, Westow Street	Retail, replacement community use and residential	Potential HRA implications. Proposed community, retail and residential use. Potential impact pathways: Recreational pressure
420	87-91 Biggin Hill	Residential development	Potential HRA implications.

			Proposed residential use. Potential impact pathways: Recreational pressure
Alternative Sites			
A330	Windermere House, 1 Coxwell Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain existing community use. There are no impact pathways present.
Policy DM40: Ker	nley and Old Coulsedon		
937	Kempsfield House, 1 Reedham Park Avenue	Residential development with community use	Potential HRA implications. Proposed residential and community use. Potential impact pathways: Recreational pressure
Alternative Sites			
A145	314-324 Old Lodge Lane	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	Potential HRA implications. From reviewing aerial photography, the site appears to contain retail and residential use. Potential impact pathways occur if development results in a net increase in dwellings. Potential impact pathways:  Recreational pressure
A341	T A Centre, 102 Marlpit Lane	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain existing community use. There are no impact pathways present.
Policy DM41: Nor	bury		
284	Asharia House, 50 Northwood Road	Residential development including replacement community facility	Potential HRA implications. Proposed residential and community use. Potential impact pathways: Recreational pressure
320	S G Smith, 409-411 Beulah Hill	Retail supermarket on ground floor with residential above	Potential HRA implications. Proposed residential and retail use. Potential impact pathways:  Recreational pressure
413	Windsor House, 1270 London Road	Conversion of upper floors to residential use. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure

		development.	
414	Astral House, 1268 London Road	Conversion to residential use. Conversion would need to adhere to Local Plan and London Plan Standards to improve the sustainability of the development.	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
Alternative Sites			
A278	1109 London Road	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	Potential HRA implications. From reviewing aerial photography, the site appears to contain retail and residential use. Potential impact pathways occur if development results in a net increase in dwellings. Potential impact pathways:  Recreational pressure
A279	274 Parchmore Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed to retain existing employment use. There are no impact pathways present.
A280	14-20 Northwood Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed to retain existing employment use. There are no impact pathways present.
A281	22 Northwood Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed to retain existing employment use. There are no impact pathways present.
A282	28 Northwood Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. Proposed to retain existing employment use. There are no impact pathways present.
A283	40 Northwood Road	Retain existing use  (The site is an operational community	No HRA implications. Proposed to retain existing community use. There are no impact pathways present.

		facility and there is a presumption against	
		non-community uses)	
A339	1264-1266 London Road	Retain existing use  (The site is an operational scattered	No HRA implications.  Proposed to retain existing employment use. There are no impact pathways present.
		employment site and there is a presumption against non-employment uses)	
A460	Rear of, 69-71 Ryecroft Road	Retain existing use  (Site is in multiple ownership and is	HRA implications. From reviewing aerial photography, the site appears to be existing residential use. If new development results in a net
		unlikely to come forward for development as one site)	increase in dwellings, the following impact pathway is present:  • Recreational pressure
A463	125-135 Pollards Hill South	Retain existing use	HRA implications. From reviewing aerial photography, the site appears to be
		(Site is in multiple ownership and is unlikely to come forward for development as one site)	existing residential use. If new development results in a net increase in dwellings, the following impact pathway is present:  • Recreational pressure
A466	Rear of, 12-28 Ryecroft Road	Retain existing use	HRA implications. From reviewing aerial photography, the site appears to be
		(Site is in multiple ownership and is unlikely to come forward for development as one site)	existing residential use. If new development results in a net increase in dwellings, the following impact pathway is present:  • Recreational pressure
A467	Grounds to rear of St Phillip's church and gardens to rear of 72	Retain existing use	HRA implications. If any development results in a net increase in dwellings, the
	and 82, Pollards Hill North	(Site is in multiple ownership and is unlikely to come forward for development as one site)	following impact pathway is present:  • Recreational pressure
Policy DM42: Purley			
30	Purley Leisure Centre, car park & former Sainsbury's Supermarket, High Street	Mixed use redevelopment incorporating new leisure facilities and/or other community facilities, healthcare facility, creative and cultural industries enterprise centre, retail, residential accommodation and public car park	Potential HRA implications. Proposed residential use, also including mixed use. Potential impact pathways:  Recreational pressure
35	Purley Baptist Church, 2-12 Banstead Road	Mixed use redevelopment comprising new church, community facility and residential	Potential HRA implications. Proposed mixed use redevelopment including residential use. Potential impact pathways: Recreational pressure
61	Car park, 54-58 Whytecliffe Road	Residential use with potential to retain	Potential HRA implications.

	South	some parking for Purley Station	To include proposed residential use. Potential impact pathways: Recreational pressure
66	1-3 Pampisford Road	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
130	1-9 Banstead Road	Residential	Potential HRA implications. Proposed residential use. Potential impact pathways:  Recreational pressure
324	Purley Oaks Depot, 505-600 Brighton Road	None	No HRA implications There is no development outlined for this site. It is advised that if this site is bought forward for residential development, an increase in recreational pressure resulting from new residential development could result in likely significant effects
325	Telephone Exchange, 88-90 Brighton Road	Conversion of existing building to residential use if no longer required as a telephone exchange in the future	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
347	Tesco, 2 Purley Road	Mixed use residential, healthcare facility (if required by the NHS) and retail development	Potential HRA implications. Proposed residential and mixed use. Potential impact pathways:  Recreational pressure
405	Capella Court & Royal Oak Centre, 725 Brighton Road	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways: • Recreational pressure
409	Beech House, 840 Brighton Road	Conversion of the office building to residential uses.	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
410	100 Brighton Road	Mixed use residential and retail development	Potential HRA implications. Proposed residential and retail use. Potential impact pathways:  Recreational pressure
411	Palmerston House, 814 Brighton Road	Residential redevelopment	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure

490	95-111 Brighton Road	Primary school	No HRA implications.  Proposed academic use. There are no impact pathways present.
495	Dairy Crest dairy, 823-825 Brighton Road	Conversion of buildings fronting Brighton Road to studio space (with potential for a Creative and Cultural Industries Enterprise Centre serving Purley) with new light industrial units to the rear	No HRA implications.  Proposed studio space and light industrial units. There are no impact pathways present.
683	Purley Back Lanes, 16-28 Pampisford Road	Residential development including new industrial units to replace those currently on the site	Potential HRA implications. Proposed residential and industrial use. Potential impact pathways: Recreational pressure
Alternative Sites	1		·
A23	128 Brighton Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain community use. There are no impact pathways present.
A36	856 Brighton Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications.  Proposed to retain community use. There are no impact pathways present.
A63	1-22 Whytecliffe Road South	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	HRA implications.  From reviewing aerial photography, this site appears to be retail with residential If any development results in a net increase in dwellings, the following impact pathway is present:  • Recreational pressure
A168	129-131 Brighton Road	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	HRA implications.  From reviewing aerial photography, this site appears to be retail with residential If any development results in a net increase in dwellings, the following impact pathway is present:  • Recreational pressure
A318	Railways Training Centre Depot, Wilmot Road	Retain existing use  (Replacement of access bridge and decontamination of site would likely render it unviable to develop; The site is an operational scattered employment site and there is a presumption against non-	No HRA implications. It is assumed if development does occur at this site, it will not be for residential use. No impact pathways present

		employment uses)	
A359	1-27 High Street	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	HRA implications.  From reviewing aerial photography, this site appears to be retail with residential If any development results in a net increase in dwellings, the following impact pathway is present:  • Recreational pressure
Policy DM43: Sar	nderstead		
306	The Good Companions Public House site, 251 Tithe Pit Shaw Lane	Mixed use development of residential and retail	Potential HRA implications. Proposed residential and mixed use. Potential impact pathways:  Recreational pressure
Alternative Sites			
A336	Waitrose, 87 Limpsfield Road	Retain existing use  (Site is a high value retail use and intensification of the site would be out of keeping with the character of the area)	No HRA implications. Proposed retail use. No impact pathways present
Policy DM44: Sel	sdon		
Alternative Sites			
A72	The Forum Community Centre, Bardolph Avenue	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications. Proposed community use. No impact pathways present
A317	Sainsbury's, 148 Addington Road	Retain existing use  (Site is a high value retail use and intensification of the site would be out of keeping with the character of the area)	No HRA implications. Proposed retail use. No impact pathways present
A481	Land to the rear of, 17-21 Beech Way	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	HRA implications.  From reviewing aerial photography, this site appears to be residential gardens. If any development results in a net increase in dwellings, the following impact pathway is present:  • Recreational pressure
Policy DM45: Shi	rley		
128	Land at, Poppy Lane	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure

456	Shirley Garden Centre, Cranwell Court, 60 Wickham Road	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
474	Rear of The Cricketers, 47 Shirley Road	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
502	Coombe Farm, Oaks Road	Gypsy and travellers site	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
504	Stroud Green Pumping Station, 140 Primrose Lane	Residential development (including the conversion of the locally listed pumping station) if the site is no longer required for its current use in the future	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
541	Land east of Shirley Oaks Road and to the rear of Beech House and Ash House, Shirley Oaks Road	Residential development (possibly for self build)	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
542	Land to west of Shirley Oaks Road, Shirley Oaks Road	Residential development (possibly self build)	Potential HRA implications. Proposed residential use. Potential impact pathways:  Recreational pressure
548	Land to rear of, 5-13 Honeysuckle Gardens	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
938	Land at Shrublands Estate,	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
Alternative Sites			
A469	Land adjacent to, 234 The Glades	Retain existing use  (Site is unlikely to come forward for development due to difficulty in replacing the existing function provided by the site)	No HRA implications. From reviewing aerial photography, this site appears to be open green space. It is assumed the use of this site will remain unchanged. No impact pathways present.
A485	Land adjacent to, 116 Sloane Walk	Retain existing use	No HRA implications. It is assumed this site will not be developed.

		(Site is heavily wooded and the trees would be difficult to replace in any redevelopment)	No impact pathways present.
A519	Rear of, 32-64 Verdayne Avenue	Retain existing use  (Site is heavily wooded and the trees would be difficult to replace in any redevelopment)	No HRA implications. It is assumed no development will occur within this site. No impact pathways present
Policy DM46: So	outh Croydon		
54	BMW House, 375-401 Brighton Road	Mixed use residential and supermarket	Potential HRA implications. Proposed residential and mixed use. Potential impact pathways: Recreational pressure
345	Normanton Park Hotel, 34-36 Normanton Road	Residential development	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
661	Coombe Lodge Nurseries, Conduit Lane	Gypsy and traveller site	Potential HRA implications. Proposed residential use. Potential impact pathways: Recreational pressure
662	Coombe Road Playing Fields, Coombe Road	Secondary school	No HRA implications. This site is for academic use. No impact pathways present
Alternative Sites			
A26	85 Brighton Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for employment use No impact pathways present
A42	Cedar View Care Centre, 1 Stanhope Road	New nursing home	No HRA implications. This site is for a new nursing home No impact pathways present
A52	Coombe Cliffe, Coombe Road	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications. This site is for community use No impact pathways present

A323	Bus garage, 241-253 Brighton Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment	No HRA implications. This site is for employment use No impact pathways present
A418	Headline House, 445 Brighton Road	uses)  Retain existing use  (Already in residential use; Site is in multiple ownership and is unlikely to come forward for development as one site; The site is an operational community facility and there is a presumption against non-community uses)	Potential HRA implications. Proposed residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
A478	18- 20 Haling Park Road	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	HRA implications.  No specific development type is outlined. If any development results in a net increase in dwellings, the following impact pathway is present:  • Recreational pressure
Policy DM47: South No	orwood and Woodside		
97	24 Station Road	Residential development with a retail unit.	Potential HRA implications. Includes proposed residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
121	Land Adjacent to Croydon Sports Arena, 243 Albert Road	Secondary School	No HRA implications. This site is for academic use No impact pathways present
137	Paxton House, 9 Cargreen Road	Residential development	Potential HRA implications. Proposed residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
486	Land and car park at rear of The Beehive Public House, 45A Woodside Green	Residential development	Potential HRA implications. Proposed residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
Alternative Sites			
A151	South Norwood Methodist Church, Suffolk Road	Retain existing use  (The site is an operational community facility and there is a presumption against	No HRA implications. This site is for community use No impact pathways present

		non-community uses)	
A263	2-8 Woodside Green	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for scattered employment use No impact pathways present
A354	Rear of, 118-148 Tennison Road	Retain existing use  (Site is unlikely to come forward for development due to difficulty in replacing the existing function provided by the site)	No HRA implications. From reviewing aerial photography, this site appears to be an electrical substation. It is expected that this site will not be developed. No impact pathways present
A358	Selhurst Park Stadium Car Park, Whitehorse Lane	Retain existing use  (Site is unlikely to come forward for development due to difficulty in replacing the existing function provided by the site)	No HRA implications. From reviewing aerial photography, this site appears to be car park associated with Selhurst Park Stadium. It is expected that this site will not be developed. No impact pathways present
Policy DM48: Th	nornton Heath		
115	Cheriton House, 20 Chipstead Avenue	Residential redevelopment	Potential HRA implications.  Proposed residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
129	843 London Road	Primary school	No HRA implications. This site is for academic use No impact pathways present
136	Supermarket, car park, 54 Brigstock Road	Mixed use of residential, retail along Brigstock Road, and employment use	Potential HRA implications.  Proposed mixed use including residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
248	18-28 Thornton Road	Residential development	Potential HRA implications.  Proposed residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
266	3B Torridge Road	Residential redevelopment	Potential HRA implications.  Proposed residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
286	35-47 Osborne Road	Residential development	Potential HRA implications. Proposed residential use. Any net new dwellings could result in potential impact pathways:

			Recreational pressure
295	2 Zion Place	Residential development	Potential HRA implications. Proposed residential use. Any net new dwellings could result in potential impact pathways: Recreational pressure
326	Ambassador House, 3-17 Brigstock Road	Mixed use conversion comprising residential, retail and community facilities	Potential HRA implications.  Proposed mixed use including residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
407	797 London Road	Conversion or redevelopment to residential use	Potential HRA implications. Proposed residential use. Any net new dwellings could result in potential impact pathways: Recreational pressure
499	Croydon University Hospital Site, London Road	Consolidation of the hospital uses on a smaller area of the site with enabling residential development on remaining part subject to there being no loss of services provided by the hospital in terms of both quantity and quality	Potential HRA implications. Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
Alternative Sites			
A91	187 Parchmore Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for scattered employment use No impact pathways present
A285	54 Northwood Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for scattered employment use No impact pathways present
A287	6-7 Beulah Crescent	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for scattered employment use No impact pathways present
A288	Shiloh Worship Centre, 61-69 Bensham Grove	Retain existing use	No HRA implications. This site is for community use

		(The site is an operational community facility and there is a presumption against non-community uses)	No impact pathways present
A291	52-88 Bensham Grove	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site; The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for scattered employment use No impact pathways present
A300	753 London Road	Retain existing use  (The site is an operational town centre employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for employment use No impact pathways present
A319	Lyntons, 304 Bensham Lane	Retain existing use  (The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications. This site is for community use No impact pathways present
A400	Day Lewis House, 324-338 Bensham Lane	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses; The site is an operational community facility and there is a presumption against non-community uses)	No HRA implications. This site is for community and scattered employment use No impact pathways present
A462	15-19 Burlington Road	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	No HRA implications. From reviewing aerial photography, this site appears to be private garages. It is expected that this site will not be developed. No impact pathways present
A507	Coughlans Bakery, 2129 Sandringham Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment	No HRA implications. This site is for scattered employment use No impact pathways present

		uses)	
A508	Coughlans Bakery, 2 Sandringham Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for scattered employment use No impact pathways present
A511	International Coachlines, 19A Nursery Road	Retain existing use  (The site is an operational scattered employment site and there is a presumption against non-employment uses)	No HRA implications. This site is for scattered employment use No impact pathways present
Policy DM49: Wa	addon		
11	Croydon Garden Centre, 89 Waddon Way	Secondary School	No HRA implications. This site is for academic use No impact pathways present
16	Heath Clark, Stafford Road	Secondary School and residential development subject to access from Stafford Road	Potential HRA implications.  Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
25	Morrisons Supermarket, 500 Purley Way	Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community	Potential HRA implications.  Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
48	294-330 Purley Way	Mixed use development comprising retail store, commercial space and residential units	Potential HRA implications.  Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
301	Sea Cadet Training Centre, 34 The Waldrons	Residential use with community use	Potential HRA implications.  Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
316	PC World, 2 Trojan Way	Redevelopment of this area to a mixture of residential, retail and commercial use, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community.	Potential HRA implications. Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
332	Superstores, Drury Crescent	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if	Potential HRA implications. Proposed development includes residential use. Any net new

		required by the NHS) and community uses to form the basis of a new residential community	dwellings could result in potential impact pathways:  Recreational pressure
349	Harveys Furnishing Group Ltd, 230- 250 Purley Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community	Potential HRA implications. Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
350	Wing Yip, 544 Purley Way	Redevelopment of a mix of residential, retail, commercial and community uses to form the basis of a new residential community.	Potential HRA implications.  Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
351	Comet (now Furniture Village), 222 Purley Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community	Potential HRA implications.  Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
355	Sainsbury Supermarket, 2 Trafaglar Way	Redevelopment of this area to a mixture of residential, retail, healthcare facility (if required by the NHS) and community uses to form the basis of a new residential community	Potential HRA implications.  Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
430	Grafton Quarter, Grafton Road	Creative and Cultural Industries Enterprise Centre and residential development	Potential HRA implications. Proposed development includes residential use. Any net new dwellings could result in potential impact pathways:  Recreational pressure
Alternative Sites			
A81	139-141 Haling Park Road	Retain existing use  (Site is in multiple ownership and is unlikely to come forward for development as one site)	No HRA implications.  From reviewing aerial photography, this site appears to be private gardens. It is expected that this site will not be developed.  No impact pathways present

## About AFCOM

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