

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

## **Technical Paper – Proposal Sites**

**2016**

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# 1. Introduction

1.1 This technical note aims to set out and discuss the evidence on the sites allocated for development within the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission). The evidence has informed the preparation of the proposals for uses of land of specific sites in the 16 places of Croydon under the following policies: DM36 (Addington), DM37 (Addiscombe), DM38 (Broad Green and Selhurst), DM39 (Coulsden), DM40 (Croydon Opportunity Area), DM41 (Crystal Palace and Upper Norwood), DM42 (Kenley and Old Coulsdon), DM43 (Norbury), DM44 (Purley), DM45 (Sanderstead), DM46 (Selsdon), DM47 (Shirley), DM48 (South Croydon), DM49 (South Norwood and Woodside), DM50 (Thornton Health), and DM51 (Waddon).

1.2 The note sets out the policy context for the allocated sites for development, and outlines how the evidence has been used to inform the allocation of the sites.

1.3 This note is not designed to explain each specific piece of evidence in detail. It is only designed to explain how the evidence has been used to inform the allocated sites for development. For further information on individual pieces of evidence it is recommended that you look at the evidence documents themselves which can be found at <https://www.croydon.gov.uk/planningandregeneration/framework/lpevidence/>

## 2. Where we are now

### National and London Planning Policy

#### Housing Supply

2.1 The National Planning Policy Framework (NPPF) states that local planning authorities should deliver a wide choice of high quality homes. Paragraph 47, in relation to boosting the supply of housing, reads:

*To boost significantly the supply of housing, local planning authorities should:*

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and update annually a supply of specific **deliverable**<sup>1</sup> sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.*
- *Identify a supply of specific, **developable**<sup>2</sup> sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing, describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.*

2.2 The London Plan (2016) identifies (in Table 3.1) a minimum 10 year target for provision of 14,348 homes in London Borough of Croydon (LB Croydon), with an annual monitoring target of 1,435 homes per annum. However it is clear in Policy 3.3. that this “should be augmented where possible with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF”. The implication is that the FALP requirement for 1,435 homes per annum is a minimum figure and the Council should seek to maximise housing delivery taking account of the Borough's ‘sustainable capacity’.

#### Health and education

2.3 Paragraph 70 of the NPPF, in relation to provision for facilities to meet community needs, reads:

*To deliver social, recreation and cultural facilities and services the community needs, planning policies and decisions should:*

- *Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public*

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<sup>1</sup> *To be considered deliverable, sites should be **available** now, offer a **suitable** location for development now, and be **achievable** with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.*

<sup>2</sup> *To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be developed at the point envisaged.*

*houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.*

- *Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the communities ability to meet its day-to-day needs.*
- *Ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community.*
- *Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.*

2.4 Policy 3.16 of the London Plan states that boroughs should ensure that adequate social infrastructure provision is made to support new developments (e.g. health provision, nurseries, schools, colleges and universities, community, cultural).

2.5 Policy 3.17 of the London Plan states that boroughs should work with the local NHS, social care services and community organisations to regularly assess the need for health and social care facilities at the local and sub-regional levels, and secure sites and buildings for, or to contribute to, future provision.

2.6 Paragraph 72 of the NPPF, in relation to provision for schools, reads:

*The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:*

- *Give great weight to the need to create, expand or alter schools; and*
- *Work with schools promoters to identify and resolve key planning issues before applications are submitted.*

2.7 Policy 3.18 of the London Plan states that local development frameworks and borough strategies should provide the framework to secure sites for future provision recognising local needs and the particular requirements of the education sector.

## **Flood risk**

2.8 Paragraph 100 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment, and should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property. This includes application of the sequential test to steer new development to areas with the lowest probability of flooding.

2.9 The London Plan states that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF. When preparing Local Plans, boroughs should use Strategic Flood Risk Assessments to identify areas where particular flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Sustainable drainage systems should be used unless there are practical reasons for not doing so and should aim to achieve greenfield run-off rates in line with the London Plan drainage hierarchy.

## **Local Planning Policy**

2.10 The Local Plan: Strategic Policies reflects the presumption in favour of sustainable development contained within the National Planning Policy Framework. In relation to growth in homes, jobs and services, Policy SP1.3 reads:

*Growth in homes jobs and services that constitutes sustainable development will be welcomed; provided growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further sustainable infrastructure investment within the plan period to 2036. Croydon Opportunity Area will be the primary location for growth, including approximately a third of the borough's residential growth, with the Places of Waddon, Purley, Broad Green & Selhurst, and Thornton Heath and Coulsdon accommodating medium and moderate residential growth.*

2.11 Policy SP2.2, in relation to quantities and locations of housing, states:

*In order to provide a choice of housing for people in Croydon the Council will seek to deliver a minimum of 31,850<sup>3</sup> homes between 2016 and 2036. This will be achieved by:*

- (a) Concentrating development in the places with the most capacity to accommodate new homes whilst respecting the local distinctiveness of the Places and protecting the borough's physical, natural and historic environment, whilst recognising that Places change and in particular suburbs will sustainably grow; and*
- (b) Allocation of 7,300 homes in the Croydon Local Plan: Detailed Policies and Proposals DPD beyond the Croydon Opportunity Area.*
- (c) Within the Croydon Opportunity Area, the Croydon Local Plan: Detailed Policies and Proposals DPD has been informed by the Croydon Opportunity Area Planning Framework and allocates sites for at least 10,650<sup>4</sup> net additional homes; and*
- (d) 9,210 homes being delivered across the borough on windfall sites; and*
- (e) Seeking to return 190 vacant homes back into use by 2026; and*
- (f) Ensuring land is used efficiently, and that development addresses the need for different types of homes in the borough and contributes to the creation or maintenance of sustainable communities; and*
- (g) Not permitting developments which would result in a net loss of homes or residential land.*

## **Local objectively assessed need for development**

### **Homes**

2.12 Within the policy context set by the NPPF, The London Plan is clear that boroughs remain responsible for assessing their own housing requirements. Under Paragraph 47 of the NPPF, boroughs need to demonstrate that relevant Local Plan documents are based on evidence of capacity, which is deliverable and developable. Boroughs are advised to draw upon the most recent population and household projections developed by the Greater London Authority.

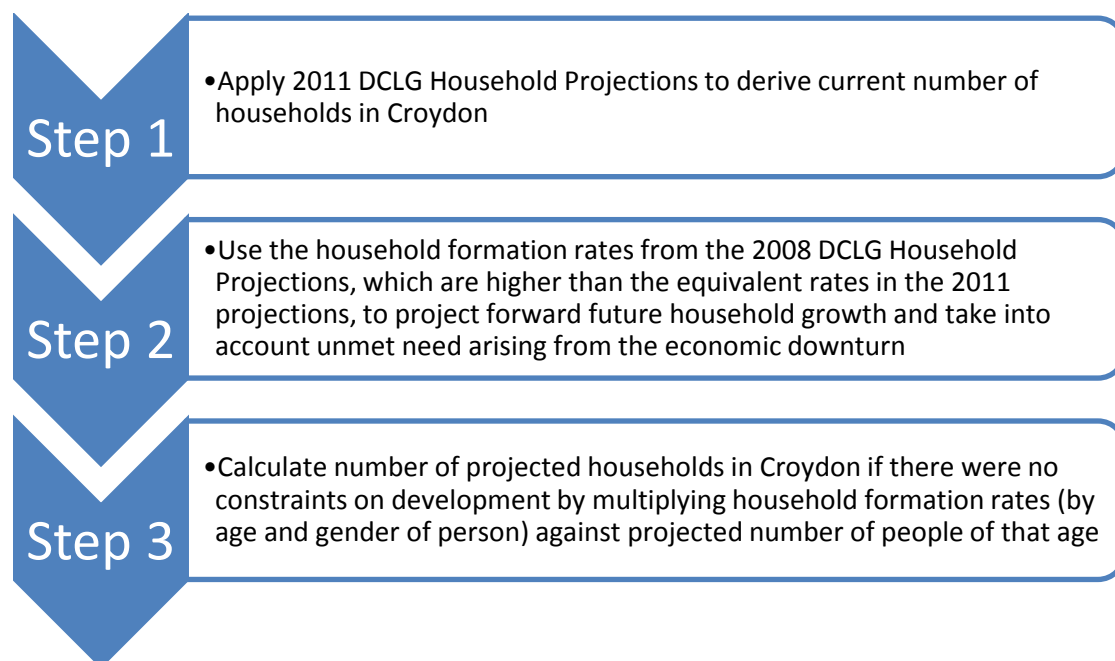
2.13 In accordance with paragraph 129 of the NPPF and paragraph 3.2.11 of the Housing Supplementary Planning Guidance, a Strategic Housing Market Assessment (SHMA) June 2015, has been prepared for the Borough of Croydon to serve as a key piece of evidence in determining housing needs. The preparation of the SHMA and addendum has followed relevant national policy and guidance, specifically the NPPF and National Planning Practice Guidance on Housing and Economic Needs Assessments.

2.14 Ultimately, the SHMA established the objectively assessed housing need of Croydon. Several variants of this figure were produced. The two key variants were based on the 2012 Office of National Statistics Sub-national Population Projections (as set out in the National Planning Policy Guidance); and the GLA's 2014 Population Projections for London (which aligns with the London Plan and its objectively assessed housing need).

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<sup>3</sup> Of which 4,620 are under construction

2.15 To work out the number of homes needed to house these projected populations the following methodology was applied to both the Office of National Statistics and the GLA's population projections:



2.16 The methodology above produces the following figures of housing need:

Year(s)	2012-based SNPP with 2008-based DCLG headship rates	2014 round GLA projections with 2008-based DCLG headship rates
2013-2026	2,437	-
2014-2026	-	2,321
2026-2036	2,437	1,972
Average per year 2016-2036	2,437	2,147
Completions 2013-2016	4,709	-
Completions 2014-2016	-	3,423
Unmet housing need (2013-2016)	$(2,437 * 3) - 4,709$ = 2,602	-
Unmet housing need (2014-2016)	-	$(2,321 * 2) - 3,423$ = 1,219

Year(s)	2012-based SNPP with 2008-based DCLG headship rates	2014 round GLA projections with 2008-based DCLG headship rates
Total 2016-2036 (including unmet housing need)	$(2,437 * 20) + 2,602$ = 51,342	$(2,321 * 10) + (1,972 * 10) + 1,219$ = 44,149
Objectively assessed housing need 2016-2036	51,342	44,149

2.17 Considering these figures, the Local Plan: Strategic Policies acknowledges that there is a need for over 44,149<sup>5</sup> homes in Croydon by 2036.

### Gypsy and Traveller pitches

2.18 The need for Gypsy and Traveller pitches is covered by a separate technical paper that specifically looks at provision of homes for Gypsies and Travellers.

### Primary Schools

2.19 There are six planning areas for primary schools in Croydon (Central, East, North West, South, South East and South West) for pupil place planning at primary school level.

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<sup>5</sup> This figure is incorrectly stated as 42,930 in both the Croydon Local Plan: Strategic Policies (Partial Review) and the Croydon Local Plan: Detailed Policies and Proposals as the unmet need from 2014-2016 was not factored in.





**Figure 1 Primary School Pupil Place Planning Areas**

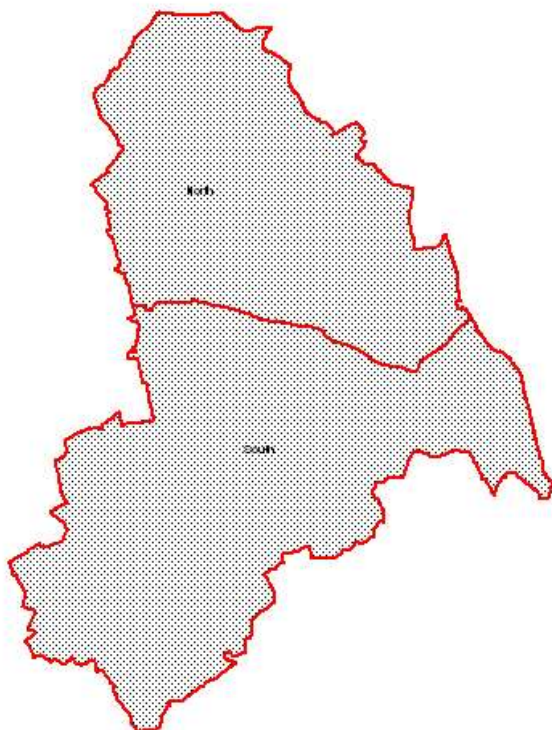
2.20 The Council's Pupil Place Planning team have identified the need for additional primary school places for each of the planning areas up to 2023/24. They have calculated the need using the Greater London Authorities ward level population projections. These are in turn are influenced by projected birth and migration rates, the location of planned development and in particular, how these vary from past trends in different areas of the borough. The need for additional primary school places is shown in the table below.

**Table 2.1 Additional Forms of Entry (1FE = 30 pupils) required in Year Reception**

Planning Areas	Academic Year					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
Central	0FE	1FE	1FE	2FE	3FE	4FE
East	1FE	0FE	0FE	0FE	0FE	0FE
North West	5FE	6FE	7FE	8FE	8FE	9FE
South	0FE	0FE	0FE	0FE	0FE	0FE
South East	1FE	0FE	0FE	0FE	0FE	0FE
South West	1FE	2FE	2FE	3FE	4FE	5FE

## Secondary Schools

2.21 There are two planning areas for secondary schools in Croydon (North and South) for pupil place planning at primary school level.



**Figure 2 Secondary School Pupil Place Planning Areas**

2.22 The Pupil Place Planning team have identified the need for additional secondary school places for these two areas up to 2024. They are derived from statistics on the proportion of existing and projected primary school pupils in schools in Croydon who move on at age 11 to a secondary school in the borough. The need for additional primary school places is shown in the table below.

**Table 2.2 Additional Forms of Entry required in Year Reception**

Planning Areas	Academic Year					
	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24
North	0FE	3FE	7FE	11FE	16FE	20FE
South	1FE	4FE	1FE	5FE	6FE	7FE

## Healthcare facilities

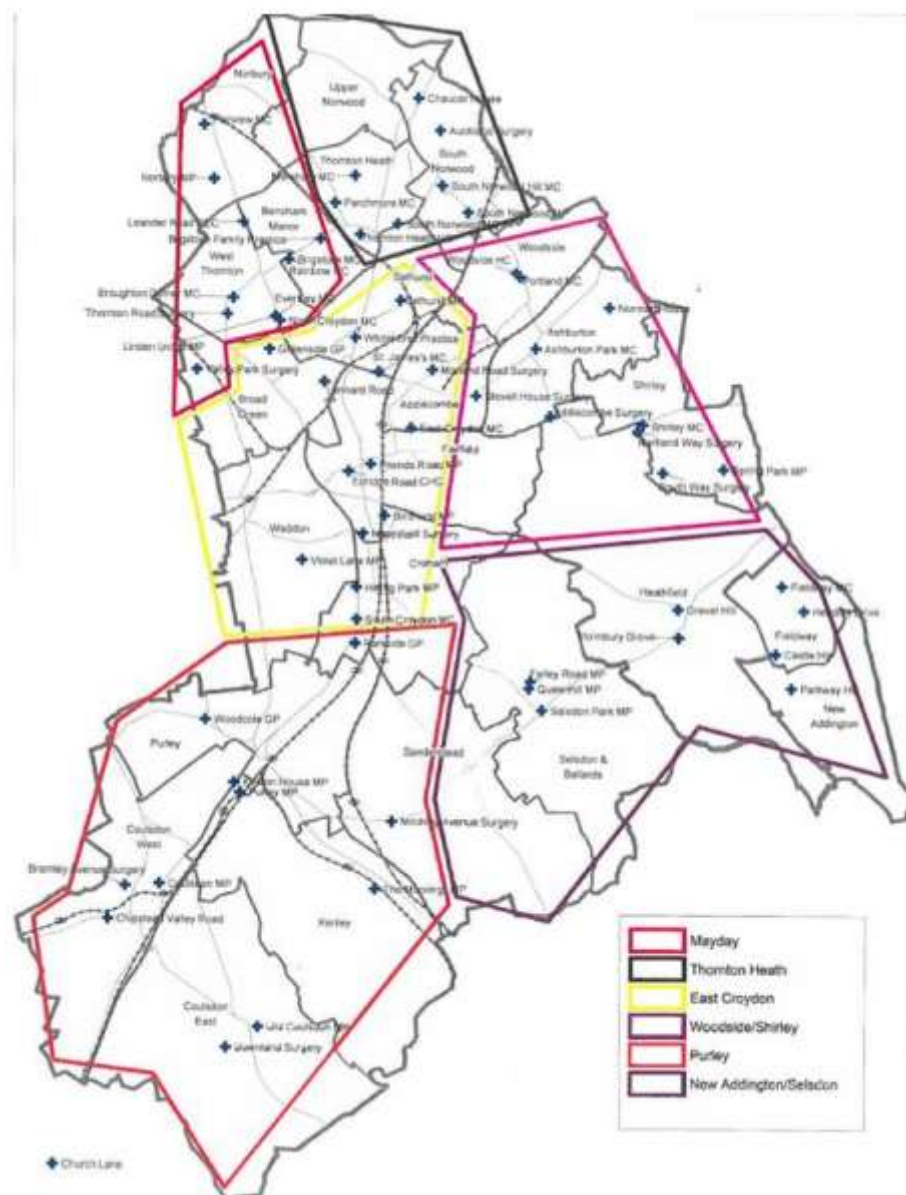
2.23 The Council has worked with NHS partners to identify the need for additional healthcare facilities in the borough. This included Croydon Clinical Commissioning Group (CCG), NHS Property Services, NHS England, Croydon Healthcare Services NHS Trust, London Healthy Urban Development Unit and Croydon Public Health.

2.24 The CCG currently has six GP networks. To assess the impact of planned growth on existing healthcare facilities and to identify whether new facilities are required a number of mapping exercises took place. Proposed housing sites, housing numbers and the phasing of developments was mapped alongside existing GPs and pharmacies. From this information,

NHS partners were able to identify the shortfall in GP practice floorspace and identify additional requirements for each of the six GP networks.

**Table 2.3 Additional healthcare floorspace requirements**

GP Network	Future healthcare floorspace requirements (m <sup>2</sup> )
Mayday	1802
Thornton Heath	2363
Woodside/Shirley	2561
New Addington/Selsdon	2218
Purley	3172
East Croydon	3832



**Figure 3 GP Networks**

### 3. Selection of Proposal Sites and Key Evidence

3.1 Policies DM36-DM51 within the Croydon Local Plan: Detailed Policies and Proposals (Proposed Submission) contain allocated sites for new homes, new Gypsy and Traveller pitches, new primary and secondary schools, new healthcare facilities, Creative and Cultural Industrial Enterprise Centres and also land to be safeguarded for transport improvements in the Borough.

3.2 This section of the technical paper explains the factors that were taken into consideration when assessing possible proposal sites. Each site was considered for different uses. As each different land use has different needs the factors that were taken into consideration for each proposed land use are discussed below, including the key evidence in line with relevant national or local policies.

3.3 The sites allocated for development are set out in the following tables of the Detailed Policies and Proposals: Tables 11.5 (Addington), 11.6 (Addiscombe), 11.7 (Broad Green and Selhurst), 11.8 (Coulsdon), 11.9 (Croydon Opportunity Area), 11.10 (Crystal Palace and Upper Norwood), 11.11 (Kenley and Old Coulsdon), 11.12 (Norbury), 11.13 (Purley), 11.14 (Sanderstead), 11.15 (Selsdon), 11.16 (Shirley), 11.17 (South Croydon), 11.18 (South Norwood and Woodside), 11.19 (Thornton Heath), and 11.20 (Waddon).

3.4 The location and boundary of each detailed proposal is contained on the Policies Map and further details including indicative phasing and indicative number of homes (if applicable) is contained in Appendix 5 to the Croydon Local Plan: Detailed Policies and Proposals. In addition, more detailed information on each site can be found in the [Background evidence for each Detailed Proposal](#).

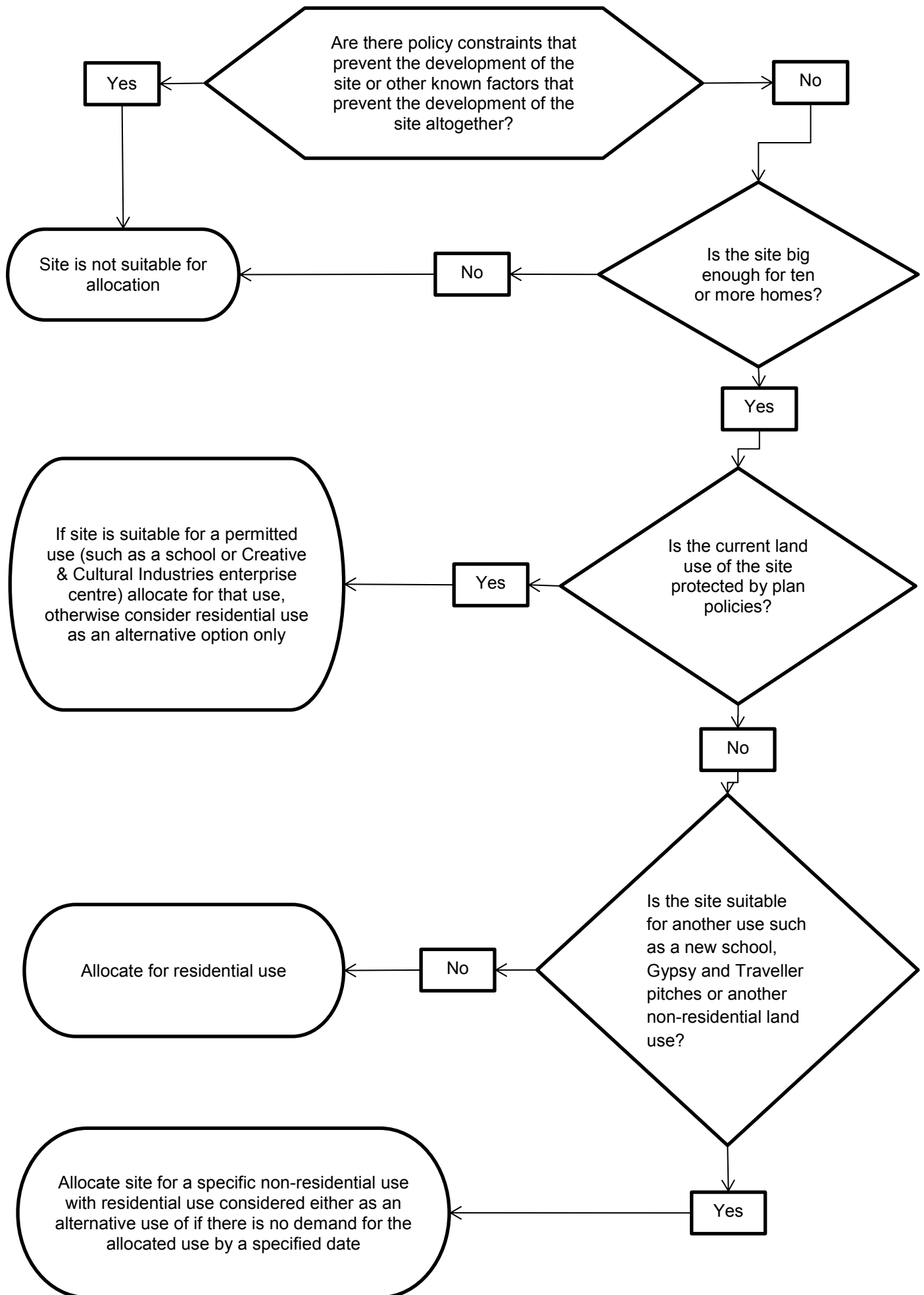
3.5 The possible proposal sites for all land uses were identified from the following sources:

- The Call for Sites that took place in February 2012 and February 2014<sup>6</sup>;
- The Strategic Housing Land Availability Assessment prepared by the Mayor of London in 2013;
- Planning permissions and records of pre-application advice; and
- Sites identified by Council officers as having potential for development.

3.6 Secondly, work was undertaken to screen out site options through consideration of the locational needs of particular land uses (for which a site might be allocated), and then screen out site options with no potential to deliver. The flowchart on the next page shows this process.

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<sup>6</sup> The Call for Sites allowed private, public and voluntary sector bodies and individuals to submit potential housing sites for consideration for consideration in the Local Plan: Detailed Policies and Proposals.



3.7 The outcome of this step-wise process was the identification of 283 reasonable site options that were considered in the Sustainability Appraisal.

## **New homes**

### **Selection of sites for housing**

3.8 In assessing potential sites to meet housing demand, the basic criteria that was considered is as follows:

- a) Whether the site is large enough for 10 or more new homes;
- b) Whether there are any existing or proposed policy constraints that would prevent the development of the site altogether;
- c) Whether the existing land use is protected from development unless certain criteria are met (such as demonstrating lack of demand for an industrial premises or community use);
- d) Whether there are any factors that would prevent the site being developed (such as legal covenants or viability issues); and
- e) Whether better use could be made of the site for another use such as a new school based on the criteria for schools or other uses set out in the relevant section/s below.

3.9 If a site met the above criteria, it was included in the Detailed Policies and Proposals (Preferred and Alternative Options) for consultation. On sites where c) or e) applied, residential use was considered a potentially reasonable alternative option for the site and was consulted upon as such.

### **Deliverable Sites**

3.10 To increase housing supply, the NPPF (paragraph 47) set out that local authorities are required to maintain a 5 year supply of specific deliverable sites, and to include an allowance of 5% to ensure choice and competition in the market for land. However any local planning authority that has persistently undersupplied (not met its housing targets) must identify an additional 20% supply (and not 5%), again brought forward from later years. To be deliverable a site must be available to develop now, be suitable for residential development in terms of location and sustainability terms, and be achievable, in that there is a reasonable prospect that housing will be delivered (completed) on the site within five years. In the event of not being able to demonstrate a five-year supply of deliverable housing sites then the Council would be required to consider favourably planning applications for housing, having regard to the policies in National Planning Policy Framework.

3.11 Croydon has a record of persistently delivering on its housing target. Over the lifetime of the previous London Plan (adopted in 2004) Croydon exceeded its housing target in every year except one and at the end of the last full financial year of the former plan (2010/11) there was a surplus of 1,047 units (nearly one year's supply) against the target. The impact of the economic downturn saw a decrease in completions in the borough but now the economy is beginning to recover, so too are completion rates in the borough, which in the most recent three years have again exceeded housing delivery targets. Therefore, a 5% buffer applies in Croydon.

3.12 Within the Croydon Local Plan: Detailed Policies and Proposals, the proposal sites are indicatively phased (within Appendix 5 of the Plan) to provide an indication of when they can be expected to be completed. Broadly the sites in the first five years of the Plan already have planning permission and there are no known reasons (such as the site being unviable to develop) that prevent the site being developed out. In addition there are a small number of sites promoted by landowners or developers who specifically said that they expected to develop their site before 2021.

3.13 The table below shows the breakdown of sites phased in the first five years of the Plan:

Reason for inclusion in first five years of the Plan	Number of sites	Total expected yield
In Council ownership	2	87 to 243
Site has planning permission and landowner is likely to develop the site themselves	4	441 to 1,051
Site has planning permission and there is nothing preventing the site from being developed	9	1,196 to 1,427
Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	2	39 to 61
Site is subject to developer interest	1	7 to 8
Site is subject to developer interest and a planning application is likely soon with the landowner looking to develop the site themselves	6	176 to 608
Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	4	179 to 216
Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed	1	50 to 290

### Developable Sites

3.14 Those sites which could be developed for residential use but are not available now (i.e. developable) have been phased after 2021 but before 2026. Sites were considered developable if they had developer interest (either through promotion of the site through the Local Plan or pre-application discussions had taken place) but had issues to overcome (such as overcoming viability constraints or negotiating and concluding a more complex planning permission).

3.15 The table below shows the breakdown of sites phased between 2021 and 2026 in the Plan:

Reason for inclusion in second five years of the Plan	Number of sites	Total expected yield
In Council ownership	1	157 to 440
Site has no known developer interest and the Council will need to work with landowner to bring it forward	6	370 to 940
Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	7	1,838 to 2,412
Site is part of a partners' Estate Strategy	1	77 to 290
Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	18	573 to 1,560
Site is subject to developer interest with a planning application likely soon and subject to granting of planning permission there is nothing preventing the site from being developed	7	265 to 947

## Beyond 2026

3.16 Sites with no developer interest but capable of being redeveloped have been phased after 2026 within the Plan. The table below shows the breakdown of sites phased after 2026:

Reason for inclusion after 2026 in the Plan	Number of sites	Total expected yield
In Council ownership	2	31 to 84
Site has no known developer interest and the Council will need to work with landowner to bring it forward	44	2,216 to 8,277
Site has planning permission and there is nothing preventing the site from being developed	1	40 to 288
Site has planning permission but there are a number of issues that need to be overcome before the site can be developed	1	26 to 145
Site is subject to developer interest but there are a number of issues that need to be overcome before the site can be developed	10	616 to 1,685

## Gypsy and Traveller pitches

3.17 The allocation of land for Gypsy and Traveller pitches is covered by a separate technical paper that specifically looks at provision of homes for Gypsies and Travellers.

## Schools

3.18 As detailed in paragraph 72 of the NPPF, the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. In accordance with the NPPF, Croydon Council has taken a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education by giving great weight to the need to create, expand or alter schools in the allocation of sites for development.

### New primary schools

**Table 3.1 How will the need be addressed in the Local Plan?**

Planning Area	What is the need?	How will the need be met?
Central	Up to 4FE	1 3FE school and one possible 1FE permanent expansion
East	1FE	1FE permanent expansion
North West	Up to 9FE	2 new 4FE or 3 new 3FE schools
South	-	No sites projected to be required in this timeframe
South East	1FE	1FE permanent expansion
South West	Up to 5FE	1 new 4FE school and one possible 1FE permanent expansion

3.19 Where the need has been identified as being 1FE, this can be usually met by extending existing primary schools. Where this is required this is identified in the Council's supply strategy ([January 2015 Cabinet Report](#)). For all other need this requires the identification of new school sites which have been allocated in the Detailed Policies and Proposals.



3.20 In order to identify new primary school sites in the Local Plan the following criteria was developed:

- The site must be big enough with 0.25ha being the smallest site a new primary school could be built on, noting that sometimes site bigger than 0.25ha may still be too small due to either the configuration of the site or its relationship with neighbouring properties;
- The site must be in an area with an identified need for new primary school places;
- The existing land use is not protected;
- There are no policy constraints that would prevent the development of the site altogether; and
- There are no known factors that prevent the site being developed.

3.21 Based on these criteria a long list of sites was identified. These sites were assessed for the suitability for use as a school and whether they would be deliverable. This assessment included input from Development Management, Pupil Place Planning and Estates and Assets.

**Table 3.2 Assessment of potential primary school allocations**

Site Number	Site area (ha)	Address	Planning Area	Comments	RAG
452	0.74	Westways Centre, 49 St James Road, CR9 2RR	Central	Pre-app stage at time of assessment, now almost complete on site	
157	0.10	Canterbury Mill	North West	Pre-app stage	
174	0.35	30-38 Addiscombe Road, CR0 5PE	Central	Too small	
190	0.40	Car park to rear of Leon House, Edridge Road, CR0 9XT	Central	Too small	
194	2.3	St George's Walk, Katharine House and Park House, Park Street, CR0 1YE	Central	No outdoor play space and issues of deliverability with mixed use scheme	
201	1.0	Lidl and Easy Gym, 99-101 London Road, CR0 2RF	Central	Link to secondary school on General Hospital site. Big enough to be a mixed use development	
248	0.20	10-28 Thornton Heath, CR7 6BA	North East	Too small	
243	0.45	Surface car park, 43 Lansdowne Road, Croydon, CR0 2BE	Central	Suitable but challenge of providing outdoor play space and noise from railway	
348	2.84	Homebase and Matalan Store, 60-66 Purley Way	North West	Undeliverable to current leases	
30	0.63	Purley High Street, CR8 2AA	South West	Undeliverable for school	

Site Number	Site area (ha)	Address	Planning Area	Comments	RAG
456	0.42	Shirley Garden Centre Cranwell Court, 60 Wickham Road, CR9 8AG	South	Too small and issue with play space and overlooking from neighbouring properties	
196	0.13	Stonewest House 1 Lamberts Place	Central	Too small	
416	0.56	Challenge House 618 Mitcham Road, CR0 3AA	North West	Too small	
398	0.25	2-4 South End, CR0 1DL	Central	Not suitable due to lack of outdoor space but could be done under permitted development	
400 319	0.25 0.42	Day Lewis House 324-338 Bensham Lane, CR7 7EQ and 304 Bensham Lane, CR7 7EQ	North West	Tight site. Problems with overlooking and provision of playspace	
403	0.35	Roman House 13-27 Grant Road, CR9 6BU	East/North	Pre-app for residential on some of the site. Too small and overlooking if just Roman House was taken forward.	
404	0.25	Vistec House and 14 Cavendish Road 185 London Road, CR0 2RJ	Central	Undeliverable and no outdoor space	
406	0.80	Capella Court 725 Brighton Road, CR8 2PG	South West	No access- may not be safe and not in an area of demand	
468	0.27	55 Pawsons Road, CR0 2QA	East	Too small	
50	0.30	Meat processing factory 44-60 Cherry Orchard Road, CR0 6BA	Central	Undeliverable due to current use of site	
120	2.3	Timebridge Community Centre Fieldway, CR0 9AZ	South East	No demand for primary school in this area. Preferred use	
127	0.50	Former Ashburton library Tenterden Road, CR9 7AL	Central	No access. Designation of site would only allow conversion- potentially undeliverable	

Site Number	Site area (ha)	Address	Planning Area	Comments	RAG
131	0.25	Vacant former care home 224 Beulah Hill, SE19 3UX	East	Locally listed and too small	
175	0.69	Stephenson House Cherry Orchard Road, CR0 6BA	Central	Could be part of mixed use development but play space is a problem	
179	0.37	Multistorey car park Rear of 12-19 Surrey Street, CR0 1TR	Central	Undeliverable due to current use	
184	0.34	Shops and garage next to West Croydon 1-19 Derby Road, CR0 3SE	Central	Too small and undeliverable- site is in West Croydon Masterplan	
186	0.35	Croydon Jobcentre 17-21 Dingwall Road, CR0 9XF	Central	Too small and undeliverable	
192	0.25	Suffolk House George Street, CR0 1PE	Central	Undeliverable due to site value	
197	0.39	Emerald House 7-15 Lansdowne Road, CR0 2BX	Central	Undeliverable due to site value	
200	0.95	Multistorey car park Lansdowne Road, CR0 2BX	Central	Undeliverable due to site value	
218	0.35	Lunar House Wellesley Road, CR0 9YD	Central	Undeliverable due to site value	
222	0.54	Multistorey car park and gym 1 Whitgift Centre, CR0 1DA	Central	Undeliverable due to site value	
227	0.32	Surrey House and Exchange Buildings 1-9 surrey Street, CR0 1RG	Central	Undeliverable due to site value	
234	0.58	Southern House Wellesley Road, CR9 1TR	Central	Undeliverable due to site value	
236	0.58	Apollo House Wellesley Road, CR0 9YA	Central	Undeliverable due to site value	
271	0.50	Fishers Farm North Downs Road, CR0 0LD	South East	Constrained site. Not in an area of demand	
278	0.87	Garage units at rear of Wharfedale Gardens 1109 London Road, SW16 4XD	North West	No access	

Site Number	Site area (ha)	Address	Planning Area	Comments	RAG
297	0.41	University Hospital car park 87-91 Bensham Lane, CR7 7ES	North West	Transport and traffic may be problem due to location next to hospital. Challenging site in terms of layout.	
326	0.56	Ambassador House 3-17 Brigstock Road, CR7 7YL	Central	Undeliverable due to being on railway line	
337	0.71	Zodiac Court 161-183 London Road, CR0 2RJ	Central	Impact on neighbours and provision of play space a design challenge	
339	0.36	1264-1266 London Road, SW16 4EJ	Central	Prior approval for office to residential	
485	0.52	Land adjacent to 116 Sloane Walk, CR0 7NX	South	Constraint site difficult to deliver school	
490	0.42	95-111 Brighton Road, CR8 4HD,	South West	Potential if part of wider site including car park	
375	0.91	5 Cairo New Road, CR0 1XP	Central	Undeliverable due to site value	
503	0.377	Units 1-6 Pilton Industrial Estate, Pitlake, CR0 3RY	Central	Undeliverable due to current use	
497	1.179	Land adjacent to Kenley Pumping Station Godstone Road, CR8 5AE	South West	Not in area of need	
136	0.55	Iceland store 54 Brigstock Road, CR7 8RX	North-West/North	Constraint due to access	
117	0.80	Cavendish House & Spices Yard 51-55 South End, CR0 1BS	Central	Unlikely to be in an area of need due to existing provision of a school on Aberdeen Road	

3.22 An additional site, Site 119 is proposed as a primary school on Metropolitan Open Land. This land is correctly designated as Metropolitan Open Land. However, due to the need for primary school places in the north west planning area and the shortage of other suitable sites means this site is required to meet the need. It has been allocated but will require retention of some of the playing fields for community access as part of the development.

**Table 3.3 Primary Schools (Preferred and Alternative Options)**

Site number	FE
452	3FE

Site number	FE
119	3FE
157	3FE
201	3FE
243	2FE
175	3FE
490	2FE

3.23 Following the consultation Site 243 was removed as it was considered to no longer be deliverable. Two other sites were assessed. Two additional sites were considered based on representations received during the consultation but these were rejected due to the lack of access and due to the loss of Local Green Space and site size. Sites 452 and 157 were removed as they are under construction.

**Table 3.4 Primary Schools Proposed Submission**

Site number
119
201
243
175
490

### New secondary schools

3.24 As part of the Council's supply strategy ([January 2015 Cabinet Report](#)) the increase in secondary school can be met through the Council planning for

- 1 6FE school in 2014/15 (Former General Hospital Site)
- 1 6FE school in 2015/16 (Croydon Arena site)
- 2FE expansion in 2016/17 (Archbishop LanFranc)
- 1 6FE free school in 2016/17

3.25 Taking the above into account, an additional 24FE has been identified as being required between 2018/19 and 2023/24.

**Table 3.5 Secondary School need by planning area**

Planning Area	FE
North	20
South	5

3.26 To identify new sites large enough to accommodate a secondary school the following criteria was used:

- The site must be big enough, with the minimum site size for a new secondary school being 1.1ha;

- The existing land use is not protected;
- There are no policy constraints that would prevent the development of the site altogether; and
- There are no known factors that prevent the site being developed.

**Table 3.6 Assessment of potential secondary school allocations**

Site Number	Site Area (ha)	Address	Planning Area	Comments	RAG
108	1.05	Former general hospital site, 86-150 London Road, CR0 2FG	North	Pre-app stage. As this site was already in the Supply Strategy they do not contribute to the additional need.	
121	5.0	Croydon Arena, 243 Albert Road, South Norwood, SE25 4RN	North	Pre-app stage. As this site was already in the Supply Strategy they do not contribute to the additional need.	
116	0.46	Rees House	North	Pre-app stage. As this site was already in the Supply Strategy they do not contribute to the additional need.	
194	2.3	St George's Walk, Katharine House and Park House, Park Street, CR0 1YE	North	No outdoor play space and issues of deliverability with mixed use scheme	
348	2.84	Homebase and Matalan Store, 60-66 Purley Way	North	Undeliverable to current leases	
16	3.24	Heath Clark, Duppas Hill Road, CR0 4NG	North	Would be difficult unless access is improved. Currently Local Open Land but does not meet the criteria for Local Green Space. Could be mixed use with residential as large enough	
11	1.03	Croydon Garden Centre, Waddon Way, CR0 4HY	South	Would be expensive to acquire but good site and access to Purley Way playing fields	

3.27 The shortlisting exercise resulted in 4 sites that were of a suitable size for a secondary school. This meant there was a shortage of approximately 14FE needed to meet the need identified for the North planning area.

3.28 To meet this need sites in Metropolitan Green Belt were considered.

3.29 For the Green Belt review, the sites were not assessed against the five purposes of the Green Belt. This is because all of the Green Belt land in Croydon (with the exception of three areas) meet the criteria for designation because they all check the unrestricted sprawl of urban areas and they all assist in urban regeneration by encouraging the recycling of derelict and other urban land.

3.30 As the majority of the borough's Green Belt met the criteria, the assessment identified the sites which would have the least impact if they were to be developed. Any site that met at least one of the following criteria was considered unsuitable for de-designation:

- An Historic Park and Garden (either of national or local importance);
- A Site of Special Scientific Interest;
- A Site of Nature Conservation Importance;
- A Regionally Important Geological and Geomorphological site;
- An allotment;
- A community garden;
- A cemetery, church yard or burial ground;
- There are known factors that prevent the site being developed (such as legal covenants, viability issues);
- The site is too small to allocate because it wouldn't provide ten or more new homes; or
- A parcel of land completely detached from the built environment

3.31 The sites that didn't meet any of the above criteria then were assessed on site against the criteria below. If they met any of the criteria they were considered to be unsuitable to be de-designated:

- Site is a sports facility or playing field which would be difficult to replace;
- Site not suitable for major residential development due to poor access along local roads as they are narrow, unlit and have no pavements and due to a lack of local amenities to serve a larger residential community;
- Site is very prominent and there would be significant impacts on openness if it was developed;
- The existing land use is protected;
- Site would be difficult (in terms of character) to integrate with the built up area of the borough;
- Site is unlikely to come forward for development due to difficulty in replacing the existing function provided by the site or building; or
- Already in residential use

3.32 Any Green Belt site that met the criteria to be suitable for de-designation and was large enough to accommodate a secondary school was then assessed. These sites were screened and any site that was less than 15 minutes to an existing secondary school or without public transport connections (more than 10 minute walk to a tram stop or 15 minute walk to a bus stop) were rejected.

3.33 The remaining sites were assessed with colleagues in Development Management, Pupil Place Planning and Estates and Assets.

**Table 3.7 Assessment of Green Belt sites for secondary schools**

Site number	Address	Site Area (ha)	Comments	RAG
440	Land at Mitchley Hill CR2 9HJ	10.39	Too close to another secondary school	

Site number	Address	Site Area (ha)	Comments	RAG
531	Land opposite 71-109 Mitchley Avenue, CR2 9HH	9.69	Too close to another secondary school	
635	Land east of Addington Village Roundabout, Kent Gate Way, CR0 5AR	25.13	New access would need to be created limited impact on conservation area due to slope	
636	Land west of Timebridge Community Centre, Lodge Lane, CR0 0QA	7.44	Located next to primary school so could make use of shared facilities. Development already within a developed area	
638	Land east of Timebridge Community Centre, Field Way, CR0 9AZ	3.96	No transport connections	
651	Land south of Heathfield, Riesco Drive, CR0 5RS	4.91	Access would be difficult. Not adjacent to any other development. Would be isolated	
653	Land east of Heathfield, Gravel Hill, CR0 5RH	6.56	Access would be difficult. Setting of a grade II listed building. Impact on designated views.	
654	Field adjacent to Bramley Bank Nature Reserve, CR2 8HP	1.69	No transport connections	
655	Field on Gravel Hill, CR0 5BE	4.36	Too separated and isolated from the built up area. Negative impact on designated views	
657	Land north of The Quest Academy, CR0 5BE	6.46	No access from current built up area. Would need to create access from Gravel Hill but difficulty due to tram track	
658	Land south of Gravel Hill Tram Stop, Gravel Hill, CR0 5BJ	4.89	Too close to another secondary school	
661	Coombe Lodge Nurseries, CR0 5RQ	4.27	No transport connections	



Site number	Address	Site Area (ha)	Comments	RAG
662	Coombe Road Playing Fields, Coombe Road, CR0 5RB	10.80	Would make good use of site without significantly impacting on the availability of green spaces in the area. Could be built on whilst still keeping some playing fields. Screening is possible. Access from tram stop	
676	Woodcote Recreation Ground, Meadow Hill, CR5 2EL	3.98	Too close to another secondary school	
677	Field adjacent to Woodcote Park Golf Club, Meadow Hill, CR5 2EL	5.18	Too close to another secondary school	
712	Land adjacent to 69 Mitchley Hill, CR2 9HJ	1.98	No transport connections	
713	Field at rear of 116-122 Mitchley Avenue, CR2 9HH	1.1	Too close to another secondary school	
763	Addington Court Golf Club, Featherbed Lane, CR0 9AA	49.95	Would depend on where the school is located. Low PTAL and not all of the site is accessible. Too close to existing secondary school	
764	Land to the east of Portnalls Road, Portnalls Road, CR5 3DE	6.81	A need for primary school in this area. Close proximity to Cane Hill. Limited impact on character. Reasonable public transport.	
767	Land to the north of Hollymeoak Road opposite 128-146 Portnalls Road, CR5 3QA	6.07	Unlikely to be screened by Cane Hill development. Isolated location	
768	Land to the north of Hollymeoak Road opposite 33-45 Hollymeoak Road, CR5 3QA	2.92	No transport connections	

Site number	Address	Site Area (ha)	Comments	RAG
769	Land north of Hollymeoak Road and west of Brighton Road to the rear of Stoney Cottages, CR5 3QA	5.39	Remote from developed areas. Sloping. Access would be difficult to create	
905	Field adjacent to Woodcote Recreation Ground, Meadow Hill, CR8 3NS	1.15	No transport connections and too close to another secondary school	
914	Land opposite 17-31 Hollymeoak Road, CR5 3QA	3.69	No access	

3.34 The shortlisting of Green Belt sites meant that three sites were identified as being suitable for a secondary school. These sites are in the South planning area. However, they have been allocated to meet the need in the North of the borough as secondary school pupils are able to travel further.

**Table 3.8 Secondary Schools Detailed Policies and Proposals (Preferred and Alternative Options)**

Site number	FE	Planning Area
108	6FE	North
16	6FE	North
116	6FE	North
11	6FE	South
636	6FE	South for the North
764	6FE	South for the North
662	6FE	South for the North

3.35 Following the consultation site number 11 was re-allocated as residential as the landowner stated the site was undeliverable as a school. Sites 121 and 108 are now under construction and have been removed as an allocation. The remaining sites continue to be allocated as school sites in the Proposed Submission version of the Local Plan.

**Table 3.9 Secondary Schools Proposed Submission**

Site number
16
116
636
764
662

## Healthcare Facilities

3.36 DM17.2 of the Croydon Local Plan: detailed Policies states that Council will work with NHS partners to support the provision of new healthcare facilities and improvements to existing facilities which provide services important for the physical health, mental health and general wellbeing of communities.

3.37 The Council has worked with NHS England, the Croydon Commissioning Group, the South London and Maudsley NHS Trust, the Croydon University Hospital NHS Trust, the London Healthy Urban Development Unit and NHS Property Services to identify sites that would be suitable for new healthcare facilities and are in areas of demand.

3.38 Once an estimate of future requirements was identified, a Social Infrastructure Asset workshop took place which involved Spatial Planning, Estates and Assets, Regeneration, Public Health, NHS partners and community facility groups and providers. The purpose of this workshop was to identify opportunities for new healthcare facilities, utilising the Council and NHS partners' estates and looking for potential for the co-location of facilities.

3.39 Following the workshop, a number of sites were identified as being suitable for an allocation for healthcare as part of a mixed use development. This included an opportunity in the regeneration. The following sites include the possibility of healthcare facilities being provided on the site.

**Table 3.10 Allocations for healthcare facilities**

Site	GP Network
30	Purley
44	New Addington/Selsdon
123	East Croydon
176	East Croydon
186	East Croydon
187	East Croydon
197	East Croydon
218	East Croydon
234	East Croydon
236	East Croydon
311	East Croydon
312	East Croydon
314	East Croydon
332	East Croydon
347	Purley
355	East Croydon
392	East Croydon
489	East Croydon
493	East Croydon
499	Mayday
945	Purley

3.40 In tandem with identifying sites in the Detailed Policies and Proposals, the Croydon Clinical Commissioning Group has developed its Estates Strategy which provides a better understanding of the estate's needs. Through the development of the Estates Strategy, NHS partners have been undertaking feasibility studies of the different options contained in the Estates Strategy and will look at in detail the future level of growth, the future health needs and affordability.

## Creative and Cultural Industries Enterprise Centres

3.41 Paragraph 70 of the NPPF states that Council should plan positively for the provision and use of shared space and community facilities, including cultural buildings. The Croydon Local Plan: Strategic Policies sets out in Policy SP3.3 that it will create a network of Creative

and Cultural Industries Enterprise Centres with one each in Croydon Metropolitan Centre, Crystal Palace, Purley and South Norwood/Portland Road. Sites in these locations have been considered as potential locations for a Creative and Cultural Industries Centre where there is an existing policy designation protecting the existing use, but where the site could be realistically used to support creative and cultural industries in the borough.

3.42 The sites allocated to support creative and cultural industries in the borough are located in Croydon Opportunity Area, Purley (30, 495) and Waddon (430).