

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Aug 2017	SA Report Addendum published alongside proposed modifications to the Croydon Local Plan: Strategic Policies - Partial Review (CLP1.1) and Croydon Local Plan: Detailed Policies and Proposals (CLP2)	Mark Fessey Principal Consultant	Steven Smith Technical Director	Steven Smith Technical Director

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NON-TECHNICAL SUMMARY

Introduction

Background

In February 2017 London Borough of Croydon submitted two plan documents - the Croydon Local Plan: Strategic Policies - Partial Review (CLP1.1) and Croydon Local Plan: Detailed Policies and Proposals (CLP2) - for independent examination in public by a Planning Inspector appointed by the Secretary of State. A Sustainability Appraisal (SA) Report was submitted alongside both plans.

Examination hearings in public were held in May 2017, subsequent to which the Council prepared a list of proposed modifications to the submitted plans, and provided these to the Planning Inspector. The Planning Inspector has now proposed a number of Proposed modifications, which are now published for consultation.

This SA Report Addendum

The aim of this SA Report Addendum is to present an appraisal of the proposed modifications, with a view to informing the current consultation. The focus is the proposed modifications to both CLP1.1 and CLP2.

In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of 'the plans as modified', thereby updating the appraisal findings presented within the SA Reports.

Screening the proposed modifications

The first task is to consider the proposed modifications in turn, with a view to identifying those that need to be given detailed consideration, through appraisal. In summary -

- 17 of the 36 proposed modifications to CLP1.1 are screened-in, i.e. progressed to the appraisal stage; and
- 103 of the 147 proposed modifications to CLP2 are screened-in, i.e. progressed to the appraisal stage.

N.B. the focus here is proposed **'main' modifications only**. Proposed 'minor' modifications are screened out automatically as, being minor, will not have any sustainability impacts.

Appraising proposed modifications

The main task is to appraise the screened-in proposed modifications against the SA framework, and also discuss the 'submission plans plus proposed modifications' (thereby updating the SA Reports).

The appraisal is structured under 18 sustainability topic headings, with the following overall conclusion -

The appraisal of the proposed modifications has served to highlight a range of minor positive effects, but the following notable drawbacks to the proposed modifications –

- Economic development and employment objectives - there is a question-mark regarding the reduced office supply target; however, the proposal is still to provide for a total quantum in accordance with established need / demand.
- Biodiversity objectives - delaying policy protection for local greenspace could potentially have negative implications for the achievement of biodiversity objectives.
- Health objectives - the proposal to increase policy support for hot food takeaways not supported.
- Education objectives – the proposal to support fewer new schools is not supported; however, it is noted that forecasts of demand for school places do not indicate with certainty that capacity will be breached.

As for 'the plan as modified', effects are broadly as per 'the plan', i.e. broadly as per those discussed within the conclusions of the SA Report (2016); however, in respect of 'Biodiversity' objectives, the conclusion of 'positive effects' recorded in the SA Report is now called into question somewhat, as a result of the proposed modification relating to local greenspace.

Next steps

The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the 'soundness' of the two plans.

Assuming that the Inspector is able to find the plans 'sound', they will then be formally adopted by the Council. At the time of adoption 'SA Statements' will be published that explain the process of plan-making / SA in full and presents 'measures decided concerning monitoring'.

1 INTRODUCTION

1.1 Background

1.1.1 In February 2017 London Borough of Croydon submitted two plan documents - the Croydon Local Plan: Strategic Policies Partial Review (CLP1.1) and Croydon Local Plan: Detailed Policies and Proposals (CLP2) - for independent examination in public by a Planning Inspector appointed by the Secretary of State. A Sustainability Appraisal (SA) Report was submitted alongside both plans.

1.1.2 Examination hearings in public were held in May 2017, subsequent to which the Council prepared a list of proposed modifications to the submitted plans, and provided these to the Planning Inspector. The Planning Inspector has now submitted a number of Proposed modifications, which are now published for consultation.

1.2 This SA Report Addendum

1.2.1 The aim of this SA Report Addendum is to present an appraisal of the proposed modifications, with a view to informing the current consultation. The focus is proposed modifications to both CLP1.1 and CLP2.

1.2.2 In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of 'the plans as modified', thereby updating the appraisal findings presented within the SA Reports.

1.2.3 It is important to emphasise that this is an *addendum* to the SA Reports.

Reasonable alternatives?

1.2.4 As required by Regulations,¹ the SA Reports present detailed information in relation to reasonable alternatives, in that they present an appraisal of reasonable alternatives and also 'an outline of the reasons for selecting the alternatives dealt with'. More specifically -

- the CLP1.1 SA Report presents information on reasonable 'spatial strategy alternatives'; and
- the CLP2 SA Report presents information on reasonable alternatives for select development management issues.

1.2.5 When developing the proposed modifications, the Council (working with the Inspector) was not presented with a need to appraise alternatives, given the alternatives appraisal work completed prior to submission. As such, this report does not contain information on alternatives.

N.B. At the time of plan adoption 'SA Statements' will be published alongside both plans to explain how the plan (as modified) is justified on the basis of alternatives appraisal.

¹ The Environmental Assessment of Plans and Programmes Regulations (2004)

2 SCREENING PROPOSED MODIFICATIONS

2.1.1 The first task is to consider the proposed modifications in turn, with a view to identifying those that need to be given detailed consideration, through appraisal (see Chapter 3).

2.1.2 This chapter gives consideration to each proposed modification to CLP1.1 and CLP2 in turn, concluding on whether the modification has the potential for notable implications in terms of sustainability objectives, and hence necessitates formal appraisal (Chapter 3).

N.B. the focus here is proposed **‘main’ modifications only**. Proposed ‘minor’ modifications are screened out automatically, as by their very nature they will not lead to significant effects / have a significant bearing on the achievement of sustainability objectives. All references in this report to proposed modifications are, therefore, to the main modifications only.

Table 2.1: Screening CLP1.1 Main Modifications

Main Modification(s)	Description	Screened in?
MMS1	Minor change to introductory text.	No
MMS2	Cross reference	No
MMS3	Strategy in respect of the quantity and location of new homes	Yes
MMS4 to MMS14	Affordable housing and other aspects of the required housing mix	Yes
MMS15	Adds Beulah Road to the list of local centres	No
MMS16 to MMS22	Employment land strategy and skills and training	Yes
MMS23	Amendment to Policies map to include 4, 6 and 8 Woodplace Lane within boundary of The Dutch Village Local Heritage Area.	No
MMS24	Cross reference	No
MMS25 to MMS26	Low carbon built development	Yes
MMS27 to MMS29	Flood risk - minor amendment (cross reference to CLP2)	No
MMS30 to MMS33	Factual and consequential changes to Table 6.1, which lists “Amendments to Green Grid designations”.	No
MMS34	Cross reference	No
MM35 and MMS36	Changes to the glossary and Appendix 3	No

Table 2.2: Screening CLP2 Main Modifications

Main Modification(s)	Description	Screened in?
MMD1 to MMD3	Housing mix	Yes
MMD4	Protecting back garden land	Yes
MMD5 to MMD8	Residential care and nursing homes - minor amendments	No
MMD9 to MMD10	Vacant building credit - minor amendments	No
MM11 to MM13	New development proposals and changes of use in Croydon Metropolitan Centre and District and Local Centres - minor amendments	No
MMD14 to MMD16	Neighbourhood Centres, including hot food takeaways	Yes
MMD17 to MMD18	Shopping Parades, in particular hot food takeaways	Yes
MMD19	Restaurant Quarter parades - minor amendments	No
MMD20 to MMD23	Town centre uses, in particular hot food takeaways and Arts, culture and tourism development	Yes
MMD24 to MMD57	Design and character, shop fronts and advertising hoardings	Yes
MMD58	Cross reference	No
MMD59 to MMD60	Refuse and recycling	Yes
MMD61 to MMD63	Tall buildings	Yes
MMD64 to MMD66	Views and landmarks	Yes
MMD67 to MMD70	Heritage assets and conservation	Yes
MMD71 to MMD76	Providing and protecting community facilities	Yes
MMD77 to MMD78	Protecting Public Houses	Yes
MMD79	Local greenspace / cemeteries and burial grounds	Yes
MMD80	'Sustainable and innovative' development and construction	Yes
MMD81 to MMD85	Flood risk and sustainable drainage	Yes
MMD86	Local Green Spaces	Yes
MM87	Supporting text introducing Green Belt and MOL designations	No
MMD88 to MMD89	Factual amendment to the list of Sites of Nature Conservation Importance (SNCIs)	No
MMD90	Ecological Assessment	Yes
MMD91 to MMD92	Trees	Yes

Main Modification(s)	Description	Screened in?
MMD93 to MMD94	Sustainable travel and reducing congestion - minor amendment	No
MMD95 to MMD100	Car parking	Yes
MMD101	Rail and tram improvements - minor amendment	No
MMD102	Local greenspace / telecommunications equipment	Yes
MMD103 to 106	Design and character (linked to MMD24 to MMD57)	Yes
MMD107	Sites 120 / 636 (Addington) - Delete residential uses, leaving secondary school use.	Yes
MMD108	Description of the area north of Broad Green Local Centre	No
MMD109	Site 119 (Broad Green and Selhurst) - Delete (primary school)	Yes
MMD110	Site 764 (Coulsdon) - Delete (secondary school)	Yes
MMD111	Site 945 (Coulsdon) - Amend use (added retail and car parking)	No
MMD112	Tall buildings in the Croydon Opportunity Area	Yes
MMD113	Site 21 (COA) - Amend use (added residential emphasis)	No
MMD114	Site 138 (COA) - Amend use - minor amendments	No
MMD115	Site 142 (COA) - Amend use - minor amendments	No
MMD116	Site 162 (COA) - Amend use (delete reference to 'food and drink' / add reference to 'leisure')	No
MMD117	Site 178 (COA) - Amend use (delete employment)	No
MMD118	Site 175 (COA) - Amend use (delete primary school)	Yes
MMD119	Site 194 (COA) - Amend use - minor amendments	No
MMD120	Site 950 (COA) - Amend use - minor amendment	No
MMD121	Site 82 (Crystal Palace and Upper Norwood) - Delete (new hall and residential dwellings)	Yes
MMD122	Site 324 (Crystal Palace and Upper Norwood) - minor amendment	No
MMD123	Site 405 (Purley) - minor amendment	No
MMD124	Tall buildings in Thornton Heath - minor amendment	No
MMD125	Site 301 (Waddon) - Amend use (delete community use)	Yes
MMD126	Correcting a typo omission of a site	No

Main Modification(s)	Description	Screened in?
MMD127 to MMD147	Changes to appendices	No

3 APPRAISING PROPOSED MODIFICATIONS

3.1 Introduction

- 3.1.1 This chapter presents an appraisal of the screened-in proposed modifications, and also discusses the ‘submission plans plus proposed modifications’ (thereby updating the SA Reports).
- 3.1.2 The appraisal is structured under the 18 sustainability topics identified through SA scoping (and used to structure appraisal findings within the SA Reports).²

3.2 Economic development and employment

- 3.2.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within ‘Part 2’ of both SA Reports, concluded the following -

“Supporting an increase in the rate of housing growth within the borough will help to ensure that employment / economic growth opportunities are realised; and given the decision to largely role forward the adopted spatial strategy, the effect should be to ensure that opportunities at Croydon Metropolitan Centre are fully realised. However, it is noted that the Council’s Strategic Housing Market Assessment (SHMA) suggests a need to deliver a yet higher level of growth. It could be the case that a higher housing growth strategy would support the achievement of economic growth objectives, given Croydon’s strategic position within the sub-region; however, this is somewhat uncertain.

A number of other notable changes are set to be made to policy, essentially in response to national policy and local evidence. Designation of an Office Retention Area is a positive step on the Council’s part, with no draw-backs having been identified. The proposal to modify the policy approach to protecting industrial/warehouse capacity is more contentious; however, it is recognised that London Plan Policy parameters limit the Council’s options. There is currently active debate regarding the London-wide trend towards redeveloping industrial areas for mixed-use development, and so a ‘watching brief’ may be necessary. In particular, it will be necessary to consider the potential for redevelopment affecting employment sites within Waddon and Broad Green & Selhurst to have an effect on local communities (recognising that there will be those within local communities who are reliant on light industrial employment, and may find it difficult to transition to other employment).”

- 3.2.2 MMS3 deals with housing numbers, explaining that the windfall assumption has increased significantly, by 9% - see **Table 3.1**. As a result, and after having taken account of the loss of two housing sites from the strategy (both outside the Croydon Opportunity Area), and an increase in the number of homes at several sites, the proposal is now to provide for 32,880 homes in total, over the plan period. This 3% increase in number of new homes is supported, from an ‘economy and employment’ perspective, recognising the findings of the SHMA (as discussed above).

Table 3.1: Summary of MMS3

	Old	New	% change
Completions / under construction	4,620	4,890	6%
Allocations outside COA	7,300	6,800	-6%
Allocations within the COA	10,650	10930	3%
Windfall	9,210	10060	9%
CLP1.1 housing target	31,850	32880	3%

- 3.2.3 MMS16 and MMS17 deal with employment land within the Croydon Opportunity Area. The

² Scoping is the first stage in the SA process. For the Croydon Local Plan, .

proposed modifications: set a slightly lower target for growth in office floorspace (95,000m² to 92,000m²; 3% decrease); alter the policy wording in respect of protection for existing office floorspace; and increase support for lower quality floorspace for which there remains a demand. The latter point is potentially most notable, as this is in response to an identified need to secure a diverse mix of employment land supply, including types of supply suited to growing sectors.

- 3.2.4 MMS18 increases support for employment and skills training, clarifying that measures will be considered through section 106 agreements for major developments; and also that the council will seek to secure a minimum of 20% of the total jobs created by the construction of new development (above a set threshold) to be advertised exclusively to local residents.
- 3.2.5 Also of note is the modified approach to supporting tall buildings in the Croydon Opportunity Area (MMD112). There is now a distinction between policy support within the 'Central Area' and within the 'Edge Area' (replicating the approach established through the Croydon Opportunity Area Planning Framework).
- 3.2.6 Finally, at Site 178 (Croydon Opportunity Area), the proposal is no longer to support employment, on the basis that the site now has planning permission for residential use.
- 3.2.7 In **conclusion**, the proposed modifications are mostly supported. There is a question-mark regarding the reduced office supply target; however, the proposal is still to provide for a total quantum in accordance with established need / demand (which is understood to lie in the range 29,440m² and 91,840m²). The conclusion reached on the submission plans (within the submitted SA Reports) broadly holds true for the 'submission plans plus proposed modifications'.

3.3 Transport

- 3.3.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of both SA Reports, concluded the following -

“Supporting an increase in the rate of housing growth within the borough does not in itself lead to notable implications for transport/traffic related objectives; however, it is noted that the proposed fairly minor shift in spatial strategy (in particular, the proposed increased emphasis on sustainable growth of the suburbs) is less than ideal.

Introducing a new 'Neighbourhood Centres' designation is a very positive step from a transport/traffic perspective, with no draw-backs having been highlighted (in terms of transport/traffic objectives, or any others). It will be important to ensure that the policy approach to these areas is flexible, and is monitored closely / reviewed regularly to ensure that opportunities to develop these locations as 'community hubs' are fully realised.

As for the performance of site specific proposals, it is the case that the strategy of focusing growth within the Croydon Opportunity Area means that the average Public Transport Accessibility (PTAL) level of proposed allocations is high. However, it is still the case that a number of sites will be allocated at locations with a low PTAL score, particularly in Broad Green & Selhurst and Thornton Heath. Some of these sites are also located beyond easy walking distance of a local centre (i.e. an area where retail and potentially services/facilities can be accessed). Mitigation, in the form of accompanying public transport improvement or development of a local centre etc, should be considered.”

- 3.3.2 MMD96 deals with Table 10.1 of the Detailed Policies document, which supports Policy DM31: Car and cycle parking in new development. The proposal is to increase provision for car clubs and vehicle electrical charging points.

3.3.3 No other proposed modifications have direct implications for the achievement of ‘Transport’ objectives; however, a number will result in indirect effects, including those dealing with tall buildings / density, and provision of community facilities. These matters are discussed further below, under other topic headings.

3.3.4 In **conclusion**, the proposed modifications potentially have minor positive implications, but the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the ‘submission plans plus proposed modifications’.

3.4 Energy consumption

3.4.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within ‘Part 2’ of both SA Reports, concluded the following -

“The intention is to reinforce the adopted strategy of concentrating growth within the Croydon Opportunity Area, which should help to ensure that opportunities to design in low carbon energy infrastructure are realised; however, it is not clear that the plan - at least through development management policy, which primarily defaults to London Plan policy - is going as far as it might to ensure that opportunities are realised. It is potentially appropriate to avoid setting overly restrictive policy at this stage (given the uncertainties that exist); however, this does highlight the need for careful monitoring (and in this respect it is noted that the Council will commit to monitoring % of major developments incorporating a site wide communal heating system and network connection).”

3.4.2 MM80 supplements DM Policy 24 (Development and construction), requiring innovative ‘techniques’ in addition to ‘materials’; however, the corollary is deletion of equivalent wording from Policy SP6: Environment and Climate Change (MMS26).

3.4.3 MMS25 removes the requirement for “conversions and changes of use” to achieve high standards, in respect of energy consumption.

3.4.4 Finally, in respect of the spatial strategy, there are two points to note -

- MMS3 proposes a very slight increase the quantum of growth to be supported in the Croydon Opportunity Area, plus there is a new targeted approach to tall buildings (MMD12), which could help to ensure that opportunities to deliver low carbon energy infrastructure (e.g. combined heat and power, with a network of district heating) are realised.
- The proposal to deliver a new secondary school alongside an adjacent housing development of up to 200 homes has been amended, such that the proposal is now to deliver a new secondary school only, without the housing (Site 120: Timebridge Community Centre, Field Way). It is unlikely that the larger scheme (i.e. the scheme also involving housing) could have supported any form of decentralised energy generation; however, there might have been some opportunity (recognising that mixed used schemes can create opportunities, given balanced demand for heat and electricity across the day).

3.4.5 In **conclusion**, the proposed modifications have minor negative implications, but the conclusion reached on the submission plans (within the submitted SA Reports) broadly holds true for the ‘submission plans plus proposed modifications’.

3.5 Biodiversity, flora and fauna

3.5.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of both SA Reports, concluded the following -

“Supporting an increase in the rate of housing growth within the borough could potentially have implications for biodiversity related objectives; however, this is uncertain. Analysis of the preferred site allocations shows that they tend to perform well (relative to non-preferred sites) in terms of the need to avoid development in locations where there is the potential for impacts to sites designated as being sensitive from a biodiversity perspective (although the preferred approach does not perform as well in terms of the objective to locate development in areas where there is good access to the natural environment). It is also noted that strict development management policy is set to be put in place to ensure the protection of urban green space (including garden land) and support the Green Grid. Application of development management policy could potentially lead to positive effects on the biodiversity baseline; however, this is uncertain.”

3.5.2 Of greatest note is the proposal to remove protection for local greenspace (MMD86). This is on the basis that: *“A specific review of Local Open Land and the potential for designating Local Green Spaces should be conducted separately. Alternatively, reliance can be placed on London Plan policy 7.18, which already forms part of the development plan for Croydon and which seeks to protect all open space within London.”* The submission plan had sought to designate 89 Local Green Spaces, equating to 1 for every 4,000 people.

3.5.3 Also prominent, within the schedule of proposed modifications, is MMD4, which proposes the deletion of Policy DM2: Protecting back garden land. However, in fact the proposal is to move the policy wording to an expanded Policy DM11 Design and Character. This is of note, as poorly planned piecemeal development of garden land can have significant negative impacts on local biodiversity, amenity, and character.

3.5.4 There is also a reduced requirement on developers, in respect of providing ecological assessments in support of applications (MMD89), and slightly reduced protection for trees with a Tree Preservation Order (MMD91); however, there are unlikely to be significant implications, in respect of the achievement of biodiversity objectives overall.

3.5.5 In **conclusion**, delaying policy protection for local greenspace could potentially have negative implications for the achievement of biodiversity objectives. As such the conclusion reached on the submission plans (within the submitted SA Reports) - i.e. that there is the potential for positive effects on the biodiversity baseline - is now called into question somewhat.

3.6 Water Use

3.6.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of both SA Reports, concluded the following -

“It is not necessarily the case that support for an increased scale of growth leads to implications in terms of placing additional strain on already stretched water resources. This is on the basis that Croydon is not thought to be any more 'water stressed' than other locations in London or the South East, and it is fair to assume that if housing need is not met in Croydon then it will have to be met elsewhere in the region. With regards to supporting efficiency of water use, the Strategic Policies Partial Review is set to implement a new policy; however, the ambition of the policy is necessarily limited. In general, the intention is to support sustainable design and construction measures in-line with London Plan policy.”

3.6.2 MM80 supplements DM Policy 24 (Development and construction), requiring innovative 'techniques' in addition to 'materials'; however, the corollary is deletion of equivalent wording from Policy SP6: Environment and Climate Change (MMS26).

3.6.3 In **conclusion**, the proposed modifications have limited implications, and the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the ‘submission plans plus proposed modifications’.

3.7 Drainage, flooding and water quality

3.7.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within ‘Part 2’ of both SA Reports, concluded the following -

“Croydon suffers from significant flood risk, having been ranked the fourth most susceptible authority in the country. On this basis, the decision to increase the rate of housing growth in the urban area (where flood risk is focused) does lead to some concerns, and it is appropriate to highlight the potential for significant negative effects. However, it is recognised that flood risk will be mitigated to a large extent through design measures - most notably by ensuring that residential uses are not located on the ground floor. Furthermore, it is understood that work is ongoing to explore flood risk in more detail, and that this work may yet have an influence on site allocations. Specifically, a Strategic Flood Risk Assessment (SFRA) is currently underway, which is applying a ‘sequential test’ to all proposed site options, with a view to ensuring that sites at risk of flooding are only allocated where absolutely necessary.”

3.7.2 MMD81 to MMD85 deal with flood risk, most notably supplementing DM Policy 26 with added reference to the need to avoid built development within the flood risk zone, where it is the case that a development site intersects a flood risk zone. Within the policy and supporting text, there are added references to taking a ‘sequential approach’ whereby sites/areas of low flood risk are developed ahead of sites/areas with higher flood risk, as far as possible.

3.7.3 In **conclusion**, the proposed modifications have minor positive implications, but the conclusion reached on the submission plans (within the submitted SA Reports) broadly holds true for the ‘submission plans plus proposed modifications’.

3.8 Air quality

3.8.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within ‘Part 2’ of both SA Reports, concluded the following -

“The entire borough is designated as an Air Quality Management Area (AQMA), and hence this is potentially an argument against increasing the population within the borough, and the density of housing development within the urban area; however, air quality problems are fairly widespread in London and it is not clear that restricting growth in Croydon (with a resulting need for higher growth elsewhere nearby) would be a preferable option. The strategy of reaffirming the adopted Strategic Policies commitment to concentrating growth in the Croydon Opportunity Area is a positive (see discussion above under ‘Transport’) and the proposed increased emphasis on sustainable growth of the suburbs does not lead to major concerns.”

3.8.2 None of the proposed modifications have direct implications for the achievement of ‘Air quality’ objectives; however, a number will result in indirect effects, including the proposal to support a slightly increased number of new homes across the plan period (MM3; see Table 3.1); and also proposed modifications dealing with tall buildings / density, notably MMD112.

3.8.3 In **conclusion**, the proposed modifications potentially have minor negative implications, but the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the ‘submission plans plus proposed modifications’.

3.9 Waste

3.9.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of both SA Reports, concluded the following -

"Suitable policy is set to be put in place to ensure good waste management, but the development management stage of decision-making is set to be more important for the achievement of sustainability objectives relating to good waste management. This is appropriate, given the need to avoid being overly restrictive through high-level policy."

3.9.2 MMD59 to MMD60 deal with refuse and recycling, specifying that facilities should be integrated as part of conversions, in addition to new developments, where possible.

3.9.3 In **conclusion**, the proposed modifications have minor positive implications, but the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the 'submission plans plus proposed modifications'.

3.10 Noise

3.10.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of both SA Reports, concluded the following -

"Implications for traffic congestion are discussed above, under the 'Transport' and 'Air quality' headings. Whilst there might potentially be some negative implications, it is not possible to conclude any potential for these to translate into increased noise pollution. It should be possible to suitably avoid and mitigate noise pollution through development management."

3.10.2 None of the proposed modifications have direct implications for the achievement of 'Noise' objectives; however, a number will result in indirect effects, including those dealing with the quantum of growth and support for tall buildings within the Croydon Opportunity Area.

3.10.3 In **conclusion**, the proposed modifications have limited implications, and the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the 'submission plans plus proposed modifications'.

3.11 Conservation of the built environment

3.11.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of both SA Reports, concluded the following -

"The proposed increase in the rate of growth in the urban area, and also the proposed increased emphasis on sustainable growth of the suburbs, potentially leads to some tensions with built environment and heritage objectives; however, the proposed allocations tend to be in locations where there appears little potential to impact on designated assets (at least nationally designated assets; it is noted that 26 preferred sites intersect with a locally listed building). With the development management policy in place there will be good potential to work with Historic England to ensure that design measures avoid/mitigate negative effects and result in new development that reinforces existing historic built character where possible."

3.11.2 MMD67 to MMD70 deal with heritage assets and conservation, most notably deleting support for 'enabling development', i.e. development that would otherwise be unsuitable in planning terms, if not for the benefits that would be achieved in historic environment terms.

3.11.3 In **conclusion**, the proposed modifications have limited implications, and the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the 'submission plans plus proposed modifications'.

3.12 Materials

3.12.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of

both SA Reports, concluded the following -

“Sustainable design and construction measures are not a major focus of policy attention, as it is deemed generally appropriate to default to standards established through the London Plan. Loss of agricultural land can also be considered under this heading, and in this respect the plan performs well, although there is set to be some loss of ‘grade 3’ land.”

3.12.2 MM80 supplements DM Policy 24 (Development and construction), requiring innovative ‘techniques’ in addition to ‘materials’; however, the corollary is deletion of equivalent wording from Policy SP6: Environment and Climate Change (MMS26).

3.12.3 In **conclusion**, the proposed modifications have limited implications, and the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the ‘submission plans plus proposed modifications’.

3.13 Human health and wellbeing

3.13.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within ‘Part 2’ of both SA Reports, concluded the following -

“Given the adopted Strategic Policies, the current plans are set to have few direct implications for health and wellbeing; although there will be indirect effects as a result of the new policy approach to affordable housing (a matter given further consideration below, under the ‘Housing’ heading). Also of note is the new policy support for Neighbourhood Centres, with the intention of ensuring that they play an enhanced role as community hubs. The plans are generally supportive of efforts to address the determinants of good health, although it is noted that there is set to be some loss of Metropolitan Open Land (MOL).”

3.13.2 MMD71 to MMD76 deal with ‘providing and protecting community facilities’. Perhaps most notable is the proposal to remove the following policy statement from Policy DM 20 (Providing and protecting community facilities) - *“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.”* However, it is not clear that this will have implications for the protection/delivery of facilities, given the remaining policy requirements. The exact same statement appears in Policy SP5 of CLP1.

3.13.3 MMD61 deals with a proposal to supplement Policy DM16 Tall and Large Buildings, such that there is a requirement for access to open space at ground level and above ground level.

3.13.4 Also of note is the proposal to increase support for hot food takeaways (A5 use class). However, for Shopping Parades (Policy DM7) the proposal is that A5 uses should not result in a situation whereby there is less than 50% A1 uses, or ‘a range’ of A2 to A4 uses.

3.13.5 In **conclusion**, the proposed modifications have mixed effects, with increased policy support for hot food takeaways not supported from a ‘health’ perspective; however, effects are relatively minor, so the positive conclusion reached on the submission plans (within the submitted SA Reports) holds true for the ‘submission plans plus proposed modifications’.

3.14 Crime and Safety

3.14.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within ‘Part 2’ of both SA Reports, concluded the following -

“Broad strategy and development management policy does have some implications for the urban realm (see discussion above, under ‘Conservation of the built environment’), but any implications for crime and safety will be indirect and marginal.”

3.14.2 None of the proposed modifications have direct implications for the achievement of ‘Crime’ objectives; however, a number will result in indirect effects, including those dealing with the

quantum of growth and support for tall buildings within the Croydon Opportunity Area.

N.B. whilst significant changes are proposed to Policy DM11 Design and Character, it is in fact the case that policy wording is simply being moved between locations, within the plan document.

- 3.14.3 In **conclusion**, the proposed modifications have limited implications, and the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the 'submission plans plus proposed modifications'.

3.15 Social inclusion and equality

- 3.15.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of the SA Reports, concluded the following -

"The 2011 appraisal of the Strategic Policies highlighted that, whilst the broad growth strategy is set to support regeneration in many locations, there are other locations (e.g. Addington) where it is less clear that regeneration objectives will be realised. The proposal at the current time is to reduce the concentration of growth to a small extent, and so it should be the case that the effect is to ensure that more locations benefit from growth. A number of sites are set to be allocated in those parts of the borough, outside the Croydon Opportunity Area, that suffer from relative deprivation. This is a positive, and it will be important to seek to capitalise on regeneration opportunities through development management policy."

- 3.15.2 MMD77 deals with Policy DM22: Protecting public houses. The proposal is to strengthen policy protection, through requiring measures to improve the viability of the public house before loss is entertained. However, the ability to demolish a public house under permitted development has not been addressed.

- 3.15.3 In **conclusion**, the proposed modifications have minor positive implications, but the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the 'submission plans plus proposed modifications'.

3.16 Housing

- 3.16.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of both SA Reports, concluded the following -

"In total the proposal is to meet 73% of the need for homes and gypsy and traveller pitches in the borough. The remaining need will have to be met under the Duty to Co-operate by other boroughs in London and the wider South East. There are also some question-marks regarding the specific approach that is proposed in relation to Gypsy and Traveller accommodation, with the single proposed site allocation being associated with certain issues. Finally, it is noted that important changes to affordable housing policy are set to be implemented, which are on the whole positive (recognising that viability constraints remain, e.g. mean that the ambition of meeting affordable housing needs in full, by delivering 91% of new housing as affordable, is entirely unrealistic)."

- 3.16.2 MMS3 deals with housing numbers, explaining that the windfall assumption has increased significantly, by 9% - see **Table 3.1**. As a result, and after having taken account of the loss of two housing sites from the strategy (both outside the Croydon Opportunity Area), and an increase in the number of homes at several sites, the proposal is now to provide for 32,880 homes in total, over the plan period. This 3% increase in number of new homes is supported, recognising the findings of the Strategic Housing Market Assessment (SHMA).

3.16.3 MMS4 to MMS14 deal with affordable housing and other aspects of the required housing mix. With regards to affordable housing, of greatest note is the added reference to ‘viability’ as a key consideration, when determining whether affordable housing should be provided at a given site, and what proportion of the total housing should be affordable. With regards to housing mix, of greatest note is the proposal to reduce the “three or more bedroom” strategic target from 50% to 30%. Also of note is MMD1, which proposes an amendment to Policy DM1 such that, for the first three years of the plan, larger homes can be provided in a scheme through two bed four person units.

3.16.4 In **conclusion**, the proposed modifications have positive implications on balance, with the proposal to support a higher number of new homes across the plan period particularly supported. However, the increased quantum of homes is not very significant, and so the broad conclusion reached on the submission plans (within the submitted SA Reports) holds true for the ‘submission plans plus proposed modifications’.

3.17 Archaeological heritage

3.17.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within ‘Part 2’ of both SA Reports, concluded the following -

“A large number of preferred site options intersect with a designated archaeological priority zone; however, it is not thought that this leads to any major concerns. Appropriate development management policy is set to be put in place to ensure that archaeological assets are given due consideration at the development management stage.”

3.17.2 None of the proposed modifications have direct implications for the achievement of ‘Archaeological heritage’ objectives.

3.17.3 In **conclusion**, the proposed modifications have limited implications, and the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the ‘submission plans plus proposed modifications’.

3.18 Education, skills and training

3.18.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within ‘Part 2’ of both SA Reports, concluded the following -

“Education, skills and training is not set to be a focus of new policy, with adopted Strategic Policies deemed to remain fit for purpose. With regards to site allocations, it is noted that a number of sites for new schools are set to be allocated, which is a positive step; however, it is difficult to appraise this strategy in any detail. It is noted that in three instances the decision has been taken to accept school development within the Green Belt, which is an indication of the importance that is placed on the achievement of education objectives.”

3.18.2 Two proposed modification propose deletion of a school - MD109 - Site 119 (Broad Green and Selhurst) proposes de-allocation of a primary school; and MMD110 - Site 764 (Coulsdon) - proposes de-allocation of a primary school. In both instances the proposed deletion results from the failure to demonstrate an ‘exceptional circumstance’ necessary to justify the removal of land from the Green Belt. Whilst forecasts of demand for school places to provide some justification, they are judged to provide insufficient justification.

3.18.3 In **conclusion**, the proposed modifications have negative implications, and so the conclusion reached on the submission plans (within the submitted SA Reports) must now be called into question. However, it is not necessarily the case that ‘significant negative effects’ are now predicted for ‘the proposed plan plus modifications’, as forecasts of demand for school places do not indicate with certainty that capacity will be breached.

3.19 Culture, Sport & Recreation

3.19.1 The appraisal of submission policies within CLP1.1 and CLP2, as presented within 'Part 2' of both SA Reports, concluded the following -

"Planning for a 'creative city' is an important consideration locally, and it would seem that the adopted Strategic Policies establish an ambitious policy approach. Only minor changes are proposed through policy at the current time."

3.19.2 None of the proposed modifications have direct implications for the achievement of 'Culture, Sport & Recreation' objectives.

3.19.3 In **conclusion**, the proposed modifications have limited implications, and the conclusion reached on the submission plans (within the submitted SA Reports) holds true for the 'submission plans plus proposed modifications'.

4 CONCLUSIONS AT THIS CURRENT STAGE

4.1.1 The appraisal of the proposed modifications has served to highlight a range of minor positive effects, but the following notable drawbacks to the proposed modifications –

- Economic development and employment objectives - there is a question-mark regarding the reduced office supply target; however, the proposal is still to provide for a total quantum in accordance with established need / demand.
- Biodiversity objectives - delaying policy protection for local greenspace could potentially have negative implications for the achievement of biodiversity objectives.
- Health objectives - the proposal to increase policy support for hot food takeaways not supported.
- Education objectives – the proposal to support fewer new schools is not supported; however, it is noted that forecasts of demand for school places do not indicate with certainty that capacity will be breached.

4.1.2 As for 'the plan as modified', effects are broadly as per 'the plan', i.e. broadly as per those discussed within the conclusions of the SA Report (2016); however, in respect of 'Biodiversity' objectives, the conclusion of 'positive effects' recorded in the SA Report is now called into question somewhat, as a result of the proposed modification relating to local greenspace.

4.2 Monitoring

4.2.1 The SA Report proposes monitoring indicators in-light of appraisal findings. Given the appraisal findings presented in this SA Report Addendum, it is suggested that particular emphasis be given to monitoring of impacts on the matters discussed at para 4.1.1 above, perhaps most notably matters relating to schools capacity.

5 NEXT STEPS

5.1.1 The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this "Addendum" report, before deciding whether he is in a position to write his report on the Plan's soundness.

5.1.2 Assuming that the Inspector is able to find the plans 'sound', they will then be formally adopted by the Council. At the time of adoption 'SA Statements' will be published that explain the process of plan-making / SA in full and present 'measures decided concerning monitoring'.