

Sustainability Appraisal (SA) of the Croydon Local Plan Review

Interim SA Report

December 2019

Quality information

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Non-technical Summary

Background

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Croydon Local Plan review (“the Local Plan review”).

Once in place, the Local Plan Review will establish a spatial strategy for growth and change for the period 2019 to 2039, building on that established by the adopted Croydon Local Plan for the period 2016 to 2036, allocate sites to deliver the strategy and present development management policy, again building on those policies presented within the adopted Croydon Local Plan.

SA is a mechanism for considering and communicating the likely effects of an emerging plan (or revised plan in this case), and alternatives, with a view to minimising adverse effects and maximising the positives.

The Local Plan Review is at an early stage of preparation, with an ‘Issues and Options’ consultation document currently published for consultation, and this Interim SA Report published alongside.

Structure of the Interim SA Report

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to ‘reasonable alternatives’.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly there is a need to set the scene further by answering the question ‘What’s the scope of the SA?’

What is the scope of the SA?

The scope of the EA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SA and provide a methodological ‘framework’ for assessment. In short, the SA scope covers:

- Air quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Economy and employment
- Health
- Heritage Housing
- Land and soils
- Landscape
- Population and communities
- Transport
- Water

Plan-making / SA up to this point?

The focus of the current consultation, and the focus of the appraisal presented within this Interim SA report, is a series of Strategic Options, which involve alternative spatial approaches to growth and change in the Borough. As such, the role of the first 'part' of this report is to explain the process of arriving at the Strategic Options.

Specifically, Part 1 of this report: A) presents a review of strategic (or 'top down') and site / area specific (or 'bottom up') issues and options; B) draws matters together in a section that considers each element the Local Plan Review land supply in turn; and then C) defines the Strategic Options.

In respect of (B), the conclusion reached was that most elements of the land supply can reasonably be held constant across the Strategic Options, but that there is a need to vary the Strategic Options in respect of:

- Purley Way transformation area - there is a need to explore two options: A) low growth involving 2,900-4,470 homes; and B) high growth involving 9,430-12,000 homes.
- Allocations in the Green Belt - there is a need to explore two options: A) nil allocation; or B) allocation of three sites for 4,540-5,350 homes.
- Windfall in the suburbs - there is a need to explore two options: A) targeted intensification broadly as per CLP 2018 to deliver 9,660-12,070 homes; and B) a more ambitious strategy to deliver 15,160-18,950 homes.

In respect of (C), the Council determined that, given a tentatively established housing target of 46,040 homes over the plan period (2019-2039), it is reasonable to define three Strategic Options, where each would involve higher growth in respect of just one of the three elements of the land supply listed above.

This led to the three Strategic Options presented in the table below.

The Strategic Options

Element of supply	Number of homes under each Strategic Option		
	Option 1: Suburbs	Option 2: Purley Way	Option 3: Green Belt
Sites under construction		5,370	
Sites with planning permission		5,480	
Allocations in Central Croydon		8,990-10,440	
Allocations elsewhere in the urban area		3,260-4,960	
Purley Way transformation area	2,900-4,470	9,430-12,000	2,900-4,470
Allocations in the Green Belt	0	0	4,540-5,350
Windfall in the suburbs	15,160-18,950	9,660-12,070	9,660-12,070
Total homes	46,040	46,040	46,040

SA findings at this current stage?

Part 2 of this report answers the question – *What are SA findings at this current stage?* – by presenting an appraisal of the Strategic Options under the 'SA framework' that was established through scoping.

Summary appraisal findings are presented below. In respect of methodology: Within each row of the table (i.e. for each of the topics that comprise the 'backbone' of the SA framework) the columns to the right hand side seek to both A) rank the alternatives in order of relative performance; and B) categorise the performance of each option in terms of 'significant effects' (using **red / green**).¹

Table 7.1: Summary appraisal conclusions

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

Summary discussion:

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

¹ Red is used to denote a predicted 'significant negative' effect, whilst green is used to denote 'significant positive' effect. N.B. more detailed effect characteristics are described as part of the detailed appraisal presented in Appendix VI.

Next steps?

Part 3 of this report answers the question – *What happens next?*

Plan finalisation

Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further detailed evidence gathering and further appraisal work.

The SA Report will be published for consultation alongside the Proposed Submission Plan, providing all of the information required by the SEA Regulations 2004.

Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (alongside SA) and then subjected to consultation (with an SA Report Addendum published alongside).

Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Monitoring

The SA Report must present 'measures envisaged concerning monitoring'.

At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on -

- Affordable housing delivery, particularly under an 'Option 1' scenario
- Community infrastructure delivery / capacity, particularly under an 'Option 1' scenario
- Effective functioning of industrial land, particularly under an 'Option 2' scenario

1. Introduction

Background

- 1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Croydon Local Plan Review (“the Local Plan Review”).
- 1.2 Once in place, the Local Plan Review will establish a spatial strategy for growth and change for the period 2019 to 2039, building on that established by the adopted Croydon Local Plan for the period 2016 to 2036, allocate sites to deliver the strategy and present development management policy, again building on those policies presented within the adopted Croydon Local Plan.
- 1.3 SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. It is a legal requirement that Local Plans are subject to SA.²

SA explained

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

This Interim SA Report

- 1.7 At the current stage of plan-making the Council is consulting on an *early* draft plan, under Regulation 18 of the Local Planning Regulations. This ‘Interim’ SA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the final draft (‘proposed submission’) version of the plan.

Structure of this report

- 1.8 Despite the fact that this is an ‘Interim’ SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the three questions above.
- 1.9 Before answering the first question, there is a need to further set the scene by answering two initial questions: *What is the plan seeking to achieve?*; and *What is the scope of the SA?*

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document

2. What is the plan seeking to achieve?

Introduction

2.1 The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

Legislative and policy context

2.2 The Local Plan Review is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current government policy as set out in the National Planning Policy Framework (NPPF, 2018) and Planning Policy for Traveller Sites (2015), and must also be prepared mindful of Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed development needs, otherwise known as local housing needs (**LHN**), as far as is consistent with sustainable development.

2.3 The Local Plan Review is also being prepared in the context of the emerging London Plan, which is at an advanced stage of preparation and should be adopted well ahead of the Local Plan Review. A draft version of the new London Plan was published by the Mayor for consultation in December 2017, and then an Examination in Public was held in early 2019 overseen by a panel of Planning Inspectors. The Panel published their report and a series of non-binding recommendations in October 2019, which are currently being considered by the London Mayor. The next step is for the Mayor to update the plan, as necessary, and then send it to the Secretary of State for further scrutiny. If the Mayor proposes not to accept any recommendation contained in the Panel Report he must state his reasons.

2.4 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic policies of:

- the Greater London Authority (GLA);
- Transport for London;
- The Croydon Clinical Commissioning Group;
- London Economic Action Partnership (LEAP) and the Coast to Capital Local Enterprise Partnership (LEP); and
- Government's environmental agencies, namely the Environment Agency, Historic England and Natural England; and

2.5 LB Croydon must also cooperate with neighbouring areas, particularly the immediately adjacent authorities, namely Sutton, Merton, Lewisham, Bromley, Tandridge and Reigate and Banstead.

2.6 Finally, it is important to note that the plan will be prepared mindful of any 'made' or emerging Neighbourhood Development Plans; however, at the current time none are made, nor are any in preparation. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging Neighbourhood Plans will be a consideration when preparing the Local Plan.

The plan area

2.7 Chapter 1 of the Issues and Options consultation document includes a detailed narrative discussion introducing the Borough, which, amongst other things, explains that Croydon...

“... is London’s biggest borough and has the largest youth population in London. It is one of the top retail and commercial centres in London and enjoys some of the best transport connections in the UK, with London’s only tram system; 15 minute rail connections from East Croydon Station to central London, only 20 minutes to Gatwick and connections to London Overground at West Croydon.”

2.8 The narrative introduction to the Borough also covers:

- the historic context – *“from historic market town... to dynamic Victorian County Borough and booming 1960s commercial centre, a strong sense of civic identity and ambition runs through Croydon’s history”*;
- the rich cultural history and extensive current cultural offer - including fostering the birth of Punk, Dubstep and Grime, and with institutions such as The Fairfield Halls, Croydon Art College, and the Brits School;
- Croydon Town Centre - which has more shops in one location than anywhere else in London apart from the West End, but which faces major challenges, including dated office spaces from the 1950s and 1960s;
- the Purley Way - home to two of the Borough’s three Strategic Industrial Locations (SILs) and extensive out of town shopping areas (following support for such schemes in the 1980s and 1990s);
- variation in deprivation - with greater concentrations in the north of the borough and in the Places of Addington and Shirley and, in general, some of the least deprived areas of London in the south and east;
- the growing population and key demographic trends - Croydon is a young borough, however, by 2031 the number of people in Croydon over the age of 65 will have increased by 41%; and
- the importance of Croydon’s extensive Green Belt and network of open spaces - which together cover over a third of the Borough, albeit with a major concentration in the south.

The context provided by the Local Plan 2018

2.9 The Croydon Local Plan was adopted in 2018, setting out: eight strategic policies, each with an associated suite of detailed development management policies; and a detailed development management policy for each of the 16 ‘Places’ that make up the Borough (see Figure 2.1).

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

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

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

Figure 2.1: The Places of Croydon



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

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

“The Council recognises the need to proactively plan for the population growth. The challenge for the Croydon Local Plan is to respect local character and distinctiveness whilst accommodating growth. Croydon’s aspiration is for this to be done in a way that contributes to the improvement of each of Croydon’s 16 places and accommodated in the following ways as set out in Table 6.4, Figure 6.3 and Figure 6.4 below.”

- 2.13 Table 6.4 from the adopted Local Plan is presented below as Table 2.1. Key points to note are that: DM34 to DM49 - are the 16 policies that each relate to one of the 16 defined ‘Places’; DM10.11 - lists four areas as suitable for focussed intensification, namely around Kenley station, around Forestdale Neighbourhood Centre, Brighton Road (Sanderstead Road) Local Centre with its setting and the settings of Shirley Local Centre and Shirley Road Neighbourhood Centre; DM36.2 - identifies the area of the potential new Local Centre at Valley Park, within the Broad Green and Selhurst area, as suitable for redevelopment; DM38.1 - relates to the Croydon Opportunity Area; and DM49.1 – relates to a potential new Local Centre at Waddon.
- 2.14 The net effect of the various elements of the spatial strategy explained above - namely redevelopment within the Croydon Opportunity Area; redevelopment at Waddon and Valley Park; focused intensification at four locations; allocations elsewhere; and ‘guided intensification’ through windfall development elsewhere - is reflected in Figure 4.1 from the CLP 2018, which shows:

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

Table 2.1: Table 6.4 from the CLP 2018

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

Aims and objectives of the Local Plan Review

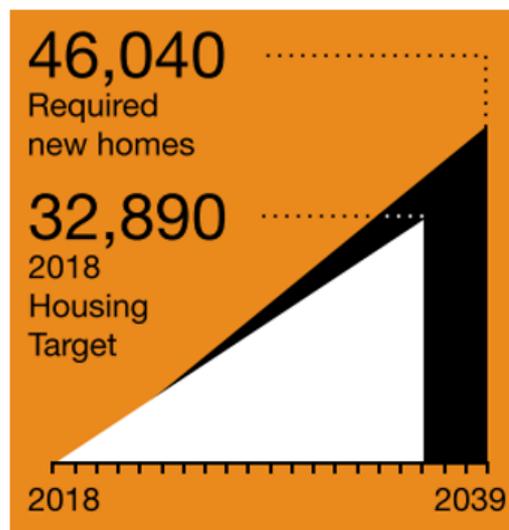
2.15 The foreword to the current consultation document sets out *that “we need a 20-year plan to address climate change and tackle the housing crisis.”* Taking these two aims in turn:

- Climate change – this is now a priority following declaration of a climate emergency by the Council.
- Housing crisis - understanding of housing needs has moved-on since adoption of the CLP 2018. Firstly, the Draft London Plan (2017) identified a *ten year* (2019 to 2029) housing target of 29,490 homes, although at the current time the Panel Recommendations (October 2019) being considered by the Mayor of London recommend that this figure is reduced to 20,790 homes. Secondly, application of the Government’s standard methodology, which was first introduced in September 2017, identifies a Local Housing Need (LHN) figure for Croydon of 46,040 new homes over the plan period.³

Figure 2.3 compares current understanding of housing need over the plan period (on the assumption that housing need reflects the LHN figure) to the housing target supported by the CLP 2018.

2.16 However, the vision and objectives of the Local Plan Review also extend more broadly than these two discrete matters, with the consultation document explaining that the Local Plan Review will need to reflect the ‘Croydon Vision’ established by the Corporate Plan 2018-2022 - see Figure 2.3.

Figure 2.2: Housing required (2019-2039) compared to the Local Plan target (2016-2036)



What is the Plan not seeking to achieve?

- 2.17 There is a need to be clear that the Local Plan Review will be strategic in nature, and hence naturally omit consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, namely at the planning application stage. The strategic scope of the Local Plan Review is reflected in the scope of the SA.
- 2.18 Also, there is a need to note that the Local Plan Review will only seek to update those aspects of the Local Plan 2018 that require updating. Where policies within the CLP 2018 remain up-to-date they will be retained.

³ See the Strategic Housing Market Assessment (SHMA, 2019) at: <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/croydon-local-plan-review>

Figure 2.3: The Croydon Vision



3. What is the scope of the SA?

Introduction

- 3.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan.
- 3.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix III** presents further information; however, it is not possible to define the scope of the SA comprehensively. Rather, there is a need for the SA scope to be flexible and adaptable, responding to the nature of emerging preferred and alternative plan options, and the latest evidence-base.

Consultation on the scope

- 3.3 The Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, these authorities were consulted on the SA scope in 2019.

Key issues and objectives

- 3.4 Table 3.1 presents the sustainability topics and objectives that are the ‘backbone’ to the SA framework.

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

Table 3.1: The SA framework

Topic	SA objectives
Air quality	<ul style="list-style-type: none"> Take action to reverse the trend for increasing emissions by supporting and enabling the use of low emission technologies and actively encouraging sustainable modes of transport such as walking and cycling, particularly where it is possible to leverage the opportunities presented by new development. Locate and design development so that current and future residents will not regularly be exposed to poor air quality.
Biodiversity	<ul style="list-style-type: none"> Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of national and local significance. Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.
Climate change adaptation	<ul style="list-style-type: none"> Adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.
Climate change mitigation	<ul style="list-style-type: none"> Continue to drive down CO₂ emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.
Economy and employment	<ul style="list-style-type: none"> Improve the physical and mental health and wellbeing of Croydon residents, including through enhancing access to outdoor recreational spaces, and reduce health inequalities between local communities within the Borough.
Health	<ul style="list-style-type: none"> Improve the physical and mental health and wellbeing of Croydon residents, including through enhancing access to outdoor recreational spaces, and reduce health inequalities between local communities within the Borough.
Heritage	<ul style="list-style-type: none"> Protect, conserve and enhance heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.
Housing	<ul style="list-style-type: none"> Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of Croydon's residents, including older people, people with disabilities and families with children.
Land and soils	<ul style="list-style-type: none"> Promote the efficient and sustainable use of land and natural resources, including supporting development which makes effective use of previously developed land and avoids the best and most versatile agricultural land where applicable.
Landscape	<ul style="list-style-type: none"> Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps and key views.
Population and communities	<ul style="list-style-type: none"> Support good access to existing and planned services, facilities and community infrastructure, including green infrastructure, for new and existing residents, mindful of the potential for community needs to change over time.
Transport	<ul style="list-style-type: none"> Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change whilst helping to reduce congestion and travel times. This includes providing infrastructure that maximises accessibility for all and connects new housing developments to the public realm, including key services.
Water	<ul style="list-style-type: none"> Promote sustainable forms of development which minimises pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive.

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

4. Introduction to Part 1

- 4.1 The aim of this part of the report is to explain the reasons for arriving at the three alternative **Strategic Options** that are a focus of the current consultation. In doing so, the aim is to present “an outline of the reasons for selecting the alternatives dealt with”, in accordance with regulatory requirements.⁵

Who’s responsibility?

- 4.2 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker, namely LBC; appraising the reasonable alternatives is the responsibility of the SA consultant, namely AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Strategic options in respect of what?

- 4.3 As discussed above (paragraph 2.15), addressing the housing crisis is one of the two headline priority issues that ‘drive’ the need for the Local Plan Review. It follows that there is a strong argument for exploring Strategic Options that involve different ways of meeting housing needs.
- 4.4 Furthermore, the second headline priority issue discussed at paragraph 2.15, namely addressing climate change, is closely related to the matter of addressing housing needs, as explained within the foreword to the current consultation document: *“We need more carbon neutral buildings, and we need new developments to be less reliant on the private car than ever before.”*
- 4.5 There are a range of important choices to be made in respect of housing through the Local Plan review, including in respect of type, size, tenure mix and design; however, a key choice to be made through any Local Plan is in respect of spatial strategy, i.e. the question of how many homes should be delivered and how those homes are distributed. It is this matter that tends to generate a high degree of interest as part of Local Plan-making, reflecting the fact that a decision on spatial strategy leads to clear ‘on the ground’ impacts, both positive (e.g. focused development in one area can facilitate upgrades to local infrastructure) and negative (e.g. development can lead to tensions with environmental and character/heritage objectives).⁶
- 4.6 It follows that it is reasonable for the Strategic Options to deal with the **spatial strategy**, i.e. to comprise alternative approaches to planning for a deliverable housing land supply sufficient to meet housing needs.

N.B. the intention is to maintain a focus on alternatives in respect of the spatial strategy as part of SA work undertaken subsequent to this current consultation / prior to preparing the Proposed Submission Plan; however, there will also be the potential to define and appraise alternatives in respect of other matters addressed through the plan. Views on this subject are welcome at the current time.

⁵ Schedule 2(8) of the Environmental Assessment of Plans and Programmes (SEA) Regulations 2004

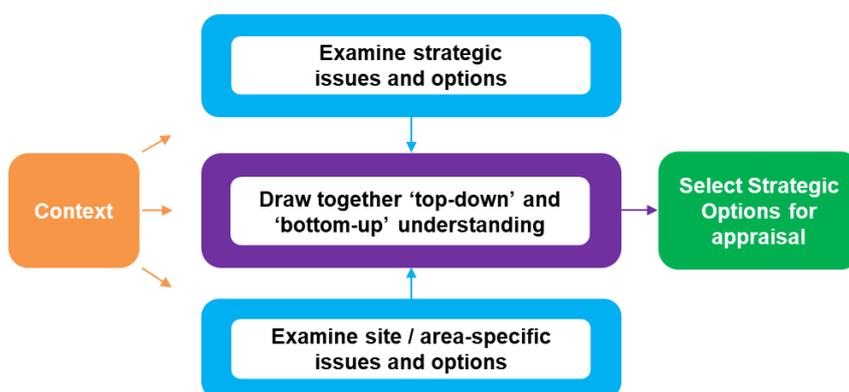
⁶ It follows that it is decision-making in respect of the spatial strategy that is most likely to generate ‘significant effects’ on the sustainability baseline (in respect of the sustainability objectives that comprise the SA framework - see Table 3.1). The PPG is clear that SA “should only focus on what is needed to assess the likely significant effects of the plan”.

5. Selecting the Strategic Options

Overview

- 5.1 The legal requirement is to explore reasonable alternatives “taking account of the objectives... of the plan”,⁷ hence there is a need to explore only Strategic Options that arguably (recognising that this is not an exact science) align with the Local Plan Review aims and the Croydon Vision discussed above. The objectives of the CLP 2018 are also relevant.
- 5.2 From this starting point the Council went through a process of exploring strategic issues/options alongside issues/options associated with specific sites and areas within the Borough, before drawing upon this understanding to arrive at reasonable Strategic Options. Figure 5.1 summarises the process.

Figure 5.1: Selecting Strategic Options



Strategic issues and options

- 5.3 The first step in the process of seeking to select reasonable strategic growth options involved the consideration of issues/options in terms of:
- Quantum – how many additional new homes must the Local Plan Review provide for?
 - Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum

- 5.4 The Draft London Plan (2017) identified a *ten year* (2019 to 2029) housing target of 29,490 homes for the Borough; however, the Panel Recommendations (October 2019) currently being considered by the Mayor of London recommend that this figure is reduced to 20,790 homes. This reduction reflects a view that the Draft London Plan was too ambitious regarding the number of homes that can be delivered through small sites, which tend to be infill and redevelopment sites in more suburban areas.
- 5.5 The Council supports the lower ten year (2019 to 2029) housing target of 20,790 homes. As explained within the ‘Matter Statement’ submitted by the Council to Matter 12 of the London Plan Examination:⁸

“The Council has demonstrated that it is a borough with a pedigree for the delivery of growth. The adopted Croydon Local Plan 2018 is ambitious regarding growth, with a housing target of 32,890 (2016 – 2036) and in excess of the borough’s current London Plan target. The strategy to deliver the housing target of the circa 33,000 homes is based on three sources. A third in Croydon Opportunity Area, a third on other allocated sites and the final third in the suburbs through suburban intensification / evolution (windfalls). The fundamental point is that Croydon is already planning for suburban intensification / evolution, in advance of the considerable requirement from this form of development outlined in the Draft London Plan.”

⁷ N.B. the legal requirement applies to the Local Plan-making / SA process as whole, as opposed to SA work completed at the Regulation 18 stage of Local Plan-making. The key legal requirement is to explore reasonable alternatives ahead of finalising the Proposed Submission Plan for publication under Regulation 19 of the Local Planning Regulations.

⁸ See https://www.london.gov.uk/sites/default/files/m12_lb_croydon_5662.pdf

... the Council has strong concerns regarding the deliverability of the target. The focus of this strong concern is the policy decision to deliver a significant amount of the housing needed for the whole of London in the suburbs of Croydon and outer London. The Council continues to stress the Mayor has to be confident that the capacity of all boroughs to accommodate new homes has been objectively assessed... and that boroughs like Croydon, that have a history of delivery, have not had their target increased on this basis.

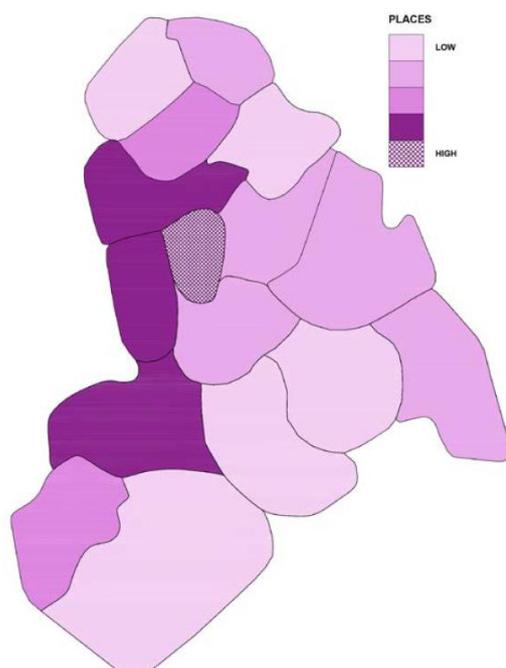
... the Council [is] concerned about three key aspects of implementation. Firstly, small and medium sized builders are delivering in Croydon, however it is questionable whether they have the capacity to deliver the Mayor's ambitious target. Secondly, the Mayor risks a situation of Planning by Appeal across London due to the lack of Five Year Supply of Housing Land and, therefore, not being able to implement Local Plan and London Plan policies in their entirety and with full weight. Thirdly, the Council are very concerned that the necessary commensurate sustainable transport and social infrastructure will not be delivered to mitigate the impact of the proposed development, especially when considered over a 20 year period as opposed to the 10 year London Plan period."

- 5.6 In light of these points, a decision was taken to only explore Strategic Options involving delivery of the lower target (20,790 homes over the period 2019 to 2029) only, but to mitigate any risk (of the Mayor of London rejecting the Panel Recommendation, supporting a higher housing target in-line with the Draft London Plan (2017) and this approach being accepted by the Secretary of State) by exploring distribution options involving a significant focus on the suburbs, as discussed below.
- 5.7 Finally, there was a need to extend the preferred ten year housing target (20,790 homes) to cover a further ten years, i.e. to cover the entire twenty year plan period of 2019 to 2039. Means of doing so were considered through a Strategic Housing Market Assessment (SHAMA) study,⁹ with the conclusion reached that it is appropriate to apply the Government's standard methodology for identifying Local Housing Need (LHN), which leads to a total housing target of **46,040 new homes** (net) over the plan period.

Broad distribution

- 5.8 A starting point, when considering broad distribution, is the approach taken by the CLP 2018, as more or less 'rolling forward' this approach is certainly an option open to the Council. The CLP 2018 approach has already been discussed above, across paragraphs 2.11 to 2.13, and at paragraph 5.5, which summarises the adopted approach as: "A third in Croydon Opportunity Area, a third on other allocated sites and the final third in the suburbs through suburban intensification / evolution (windfalls)." The adopted strategy is summarised in two key figures within the CLP 2018, which are reproduced below.

Figure 5.2: Housing growth supported by the CLP 2018



⁹ See the Strategic Housing Market Assessment (SHMA, 2019) at: <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/croydon-local-plan-review>

Figure 5.3: The CLP 2018 Key Diagram



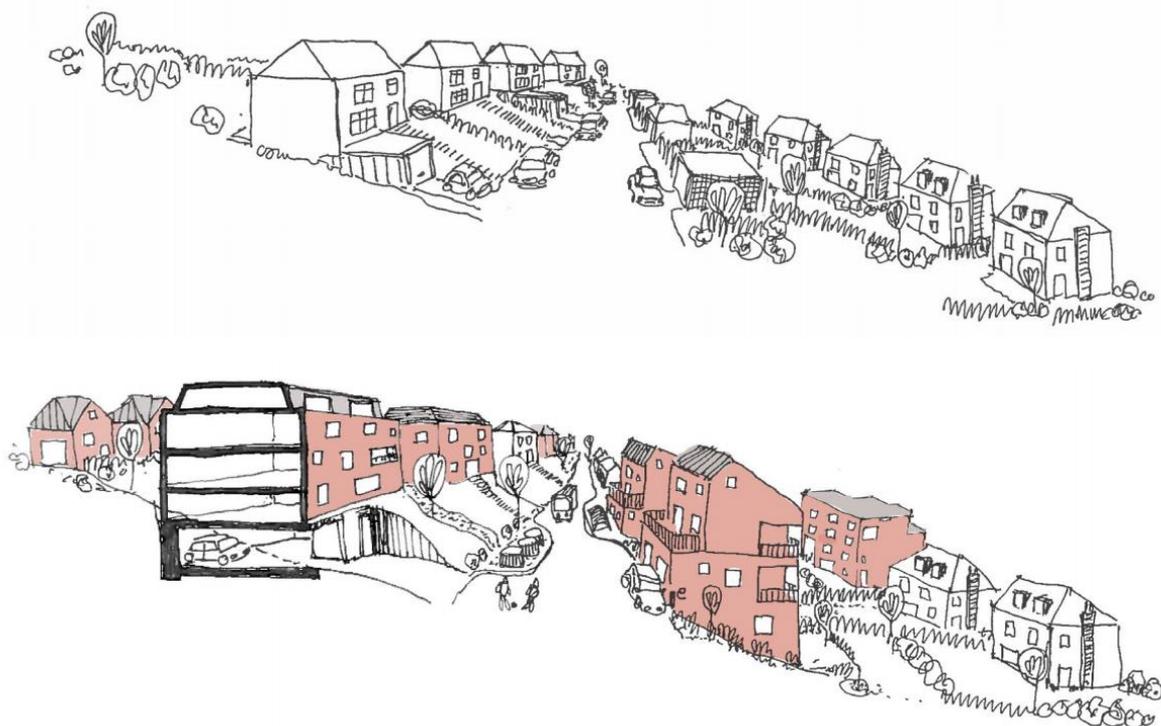
5.9 The first point to note from the two figures is the clear focus on the **Croydon Opportunity area** and the north south corridor along the western edge of the Borough, which is associated with the **A23 Purley Way**. Taking these areas in turn:

- Central Croydon – work has been ongoing to understand the growth potential, with opportunities identified over-and-above those understood to exist when preparing the CLP 2018. In particular, new opportunities have been identified in the vicinity of Croydon East Station, associated with upgrade works along the Brighton Mainline.
- Purley Way - the latest situation is that the Purley Way has been identified by the Council as a potential location for transformational change, with major residential and mixed use development alongside protection and intensification of strategic industrial areas. Work is at a relatively early stage; however, there are known to be wider opportunities in respect of improving the existing commercial offer and urban realm, supporting transport infrastructure upgrades (see Figure 5.4) and enhancing green infrastructure (including links to Croydon Cemetery the River Wandle and Roundshaw Downs).

5.11 Thirdly, there is a need to examine policy in respect of supporting windfall development and, in turn, targeted intensification within the **suburbs**. The situation is as follows:

- 2018 - as discussed above, the CLP 2018 directed 'focused intensification' to four locations and supported 'guided intensification' elsewhere, namely intensification guided by the place-specific development management policies, and also the Borough Character Appraisal (2015). Overall, the CLP 2018 was adopted on the assumption that around 10,000 homes would be delivered through windfall sites in the suburbs and neighbourhoods outside of Central Croydon.
- 2019 – the Design Guide SPD was adopted by the Council in 2019, introduced as follows: *“The evolution of the suburbs to provide homes that will meet the needs of a growing population has the potential to add new vitality to the places of Croydon... It must, however, be recognised that delivering approximately 10,000 homes in the suburban places of Croydon will result in an evolution of the existing character of suburban streets and that the increased density of homes can impact on the amenity of existing residents if not properly managed. This guide provides technical design guidance that seeks to both limit any negative impact on places, including the amenity of existing residents, and frame opportunities where increased densities can present significant opportunities to enhance places and bring benefits to communities.”* Figure 5.6 is taken from the introduction to the SPD.
- Current situation –there is an understanding that windfall sites in the suburbs may need to deliver significantly in excess of c.10,000 homes in light of the increased housing target (which is assumed to be 46,040 homes 2019-2039; which contrasts to the CLP2018 target of 32,890 homes 2016-2036).

Figure 5.6: Before and after - Possible development within an Area of Focussed Intensification (Figure 1.2a from the Design Guide SPD, 2019)



5.12 Finally, there is a need to note that the Local Plan 2018 allocates only one site in the **Green Belt**, which is an 11ha site for a school allocated on the basis that the land is owned by the Council and there is an urgent need for a school in this area (see discussion at paragraphs 222 and 223 of the Local Plan Inspector's Report).¹⁰ The latest situation, in respect of Green Belt, is that the Draft London Plan (2017) stated support for retaining the current extent of the Green Belt in the strongest terms, but the Panel Report (October 2019) proposes a change to policy wording that bring protection for Green Belt within London Boroughs into line with protection for Green Belt nationally, in that development proposals that would harm the Green Belt can be acceptable "in very special circumstances".

¹⁰ See <https://www.croydon.gov.uk/planningandregeneration/framework/localplan/clppolicies>

5.13 In addition to the above strategic considerations, in respect of broad distribution, the current consultation document lists the following broad distribution **principles**:

- Promote and facilitate sustainable and active modes of travel;
- Develop a high quality public realm that is welcoming, safe and accessible to all;
- Protect the Borough's most special green spaces as Local Green Spaces, and apply policy protection to other green spaces as well; facilitate their enhancement;
- Seek to create a connected network of green spaces and biodiversity corridors (a Green Grid including but not limited to a biodiversity network, walking network and cycling network) from north to south in the east of the borough, and another in the west (including along the Purley Way);
- Supporting Network Rail to deliver the Croydon Area Remodelling Scheme which seeks to increase rail capacity through East Croydon by removing one of the most challenging bottlenecks on the British rail network (at Selhurst Triangle);
- Promote the expansion of Croydon's tram network to help reduce dependence on the use of the private car in the borough, improve connectivity and quality of life and to support the growth in homes;
- Find a site for a new tram depot to support expansion of the network;
- Seek the following potential tram extensions/rapid transit routes to the existing network:
 - New Addington from its current terminus towards the southern end of New Addington and Biggin Hill;
 - Croydon Town Centre – Brighton Road – Purley;
 - Purley – Coulsdon;
 - Ampere Way – Purley Way – Purley;
 - Croydon Town Centre – London Road – Norbury;
 - Croydon Town Centre – Crystal Palace
 - Sandilands – Sanderstead;
 - South Croydon – Selsdon – Addington Village – Hayes;
 - Sandilands – Bromley; and
 - Croydon Town Centre – Sutton;
- Deliver increasingly carbon neutral homes and promote the use of alternatives to the private car, in order to address the climate emergency in the borough;
- Promote more digital connectivity and faster broadband to enable more home working;
- Continue to promote the redevelopment and regeneration of Croydon's Town Centre, and in particular the development of its retail core;
- Protect and future proof Croydon's industrial areas, through resisting the loss of quality floor space, and promoting the redevelopment and intensification of lower quality spaces; and
- Protect the highest quality office spaces in Croydon Town Centre, and seeking the provision of new Grade A offices in developments around East Croydon station.

Site / area-specific issues and options

5.14 The second step in the process of establishing Strategic Options involved examining the issues and options that exist in respect of specific areas / sites within the Borough. More specifically, there was a need to examine:

- Central Croydon;
- Purley Way;
- Site options within the urban area;
- Site options within the Green Belt.

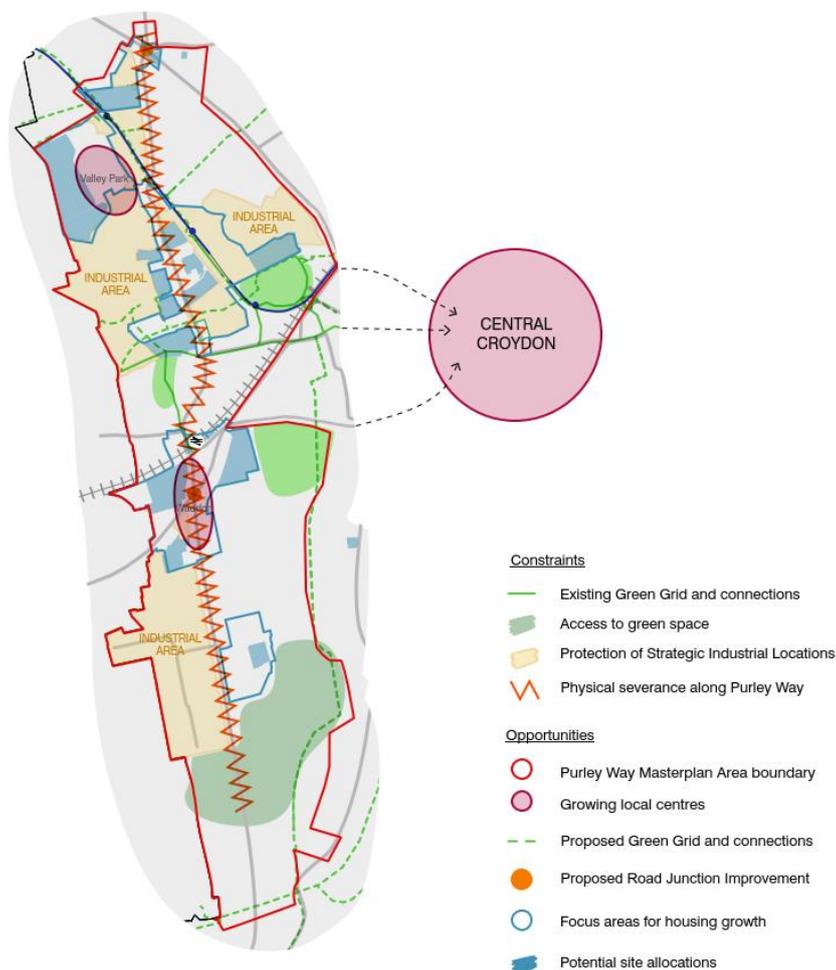
Central Croydon

5.15 As discussed, work is underway to examine the extent of the growth opportunity within the Central Croydon over-and-above the baseline growth provided for through the CLP 2018, of 10,760 homes (2016 to 2036). At the current time, taking account of sites under construction, sites with planning permission allocations, there is confidence in the ability to deliver 14,060-15,510 homes in Central Croydon (2019 to 2039).

Purley Way

5.16 As discussed, Purley Way has been identified by the Council as a potential location for transformational change, with major residential and mixed use development alongside protection and intensification of strategic industrial areas. Work is at a relatively early stage; however, at the current time the assumption is that the proposed masterplan area (see Figure 5.7) is suited to delivering between 2,900-4,470 and 9,430-12,000 homes over the plan period.

Figure 5.7: The proposed Purley Way Masterplan area

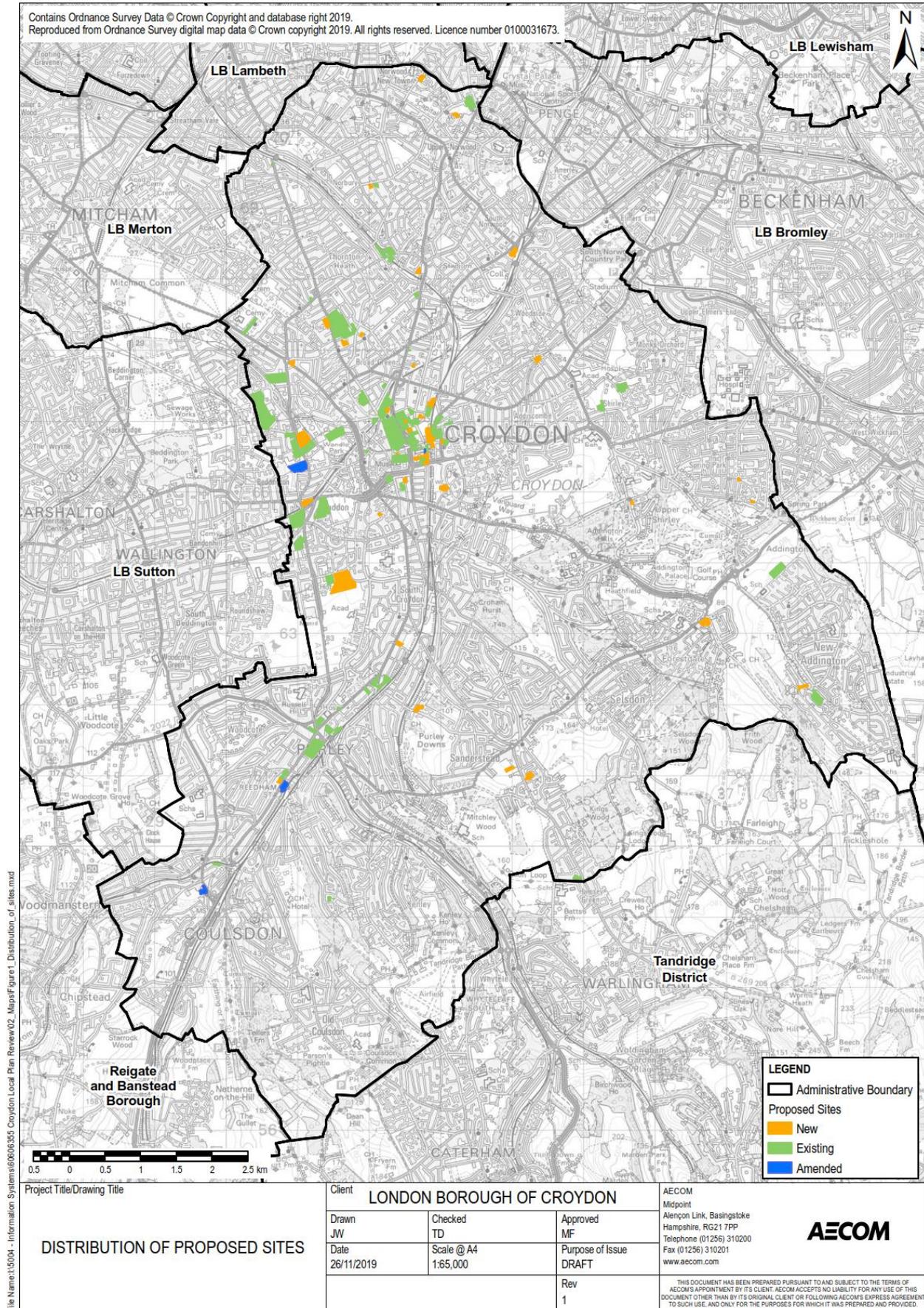


Site options elsewhere within the urban area

- 5.17 In addition to sites with planning permission, and sites without planning permission but with an allocation within the CLP 2018, the Council has identified a range of additional sites suitable for allocation within the urban area, following a Call for Sites exercise and taking account of the Strategic Housing Land Availability Assessment prepared by the Mayor of London in October 2017 – see Figure 5.8. N.B. some of these sites intersect with, and supersede a CLP 2018 allocation.
- 5.18 For each proposed site a numerical range of housing units is provided. This is calculated using the current London Plan's density matrix, a GLA metric which generates a minimum and maximum housing number based on site-specific factors including the PTAL (Public Transport Accessibility level), the character setting of the site and the site size.¹¹ However, it is important to note that this range is indicative, and that the actual number of homes which may come forward on site will be based on, amongst other factors, the design and viability of a scheme, and will be subject to scrutiny through the development management (planning application) process, in accordance with the 'design-led' approach advocated by the London Plan.
- 5.19 Ultimately, having taken account of these various factors, the Council currently assumes that 9,040-10,760 homes will come forward over the plan period through sites under construction, sites with planning permission and through allocations.

¹¹ Although the density matrix is not included within the draft London Plan (which anticipates higher densities in new development), it remains a useful proxy to estimate the potential housing capacity of sites.

Figure 5.8: Proposed site allocations (outside of the Central Croydon and the Purley Way masterplan area)



Site options within the Green Belt

- 5.20 The Council has identified a shortlist of three Green Belt urban extension options, with a total capacity of 4,540-5,350 homes, specifically:
- New Addington - 2,560 to 3,030 homes
 - Sanderstead - 680 to 780 homes
 - Selsdon - 1,300 to 1,540 homes
- 5.21 These sites comprise locations shown to contribute to the defined purposes of the Green Belt only to a limited extent and/or locations that benefit from very good accessibility to a train or tram stop and/or a town or district centre. Two of the sites also benefit from being in the ownership of the Council, which could assist with development viability and, in turn funds available for new and upgraded infrastructure.
- 5.22 There are a number of further Green Belt strategic urban extension options available at the current time – see Figures 5.9 and 5.10 – however, these sites are currently judged to perform less well on balance, taking account of the factors discussed above.

Figure 5.9: Green Belt site options (west)

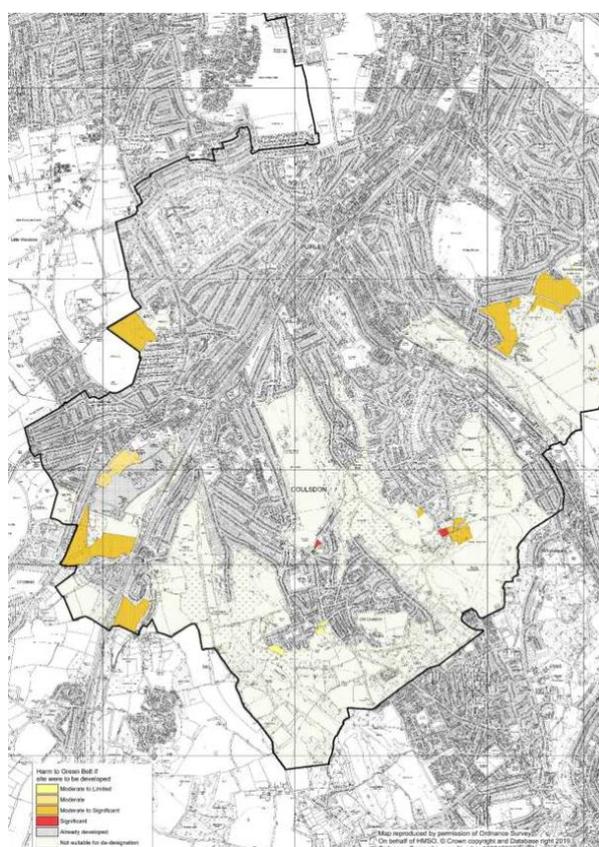
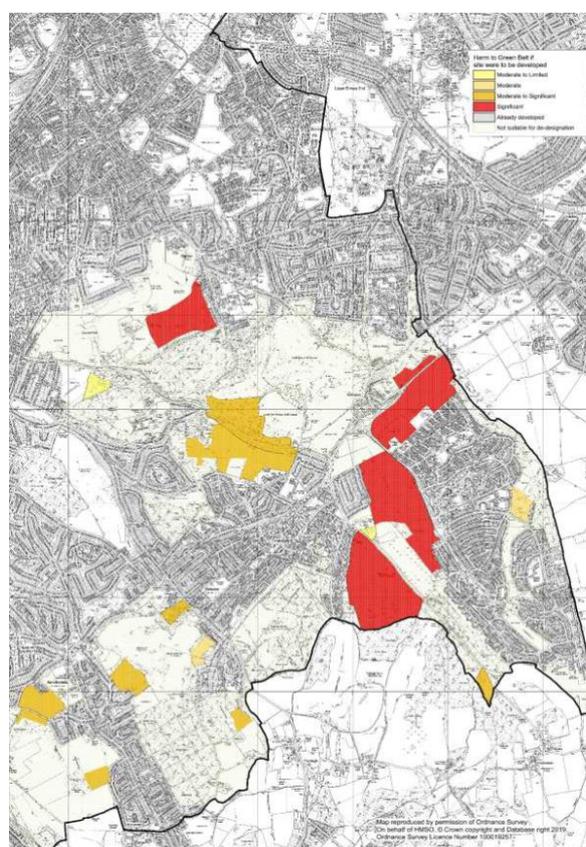


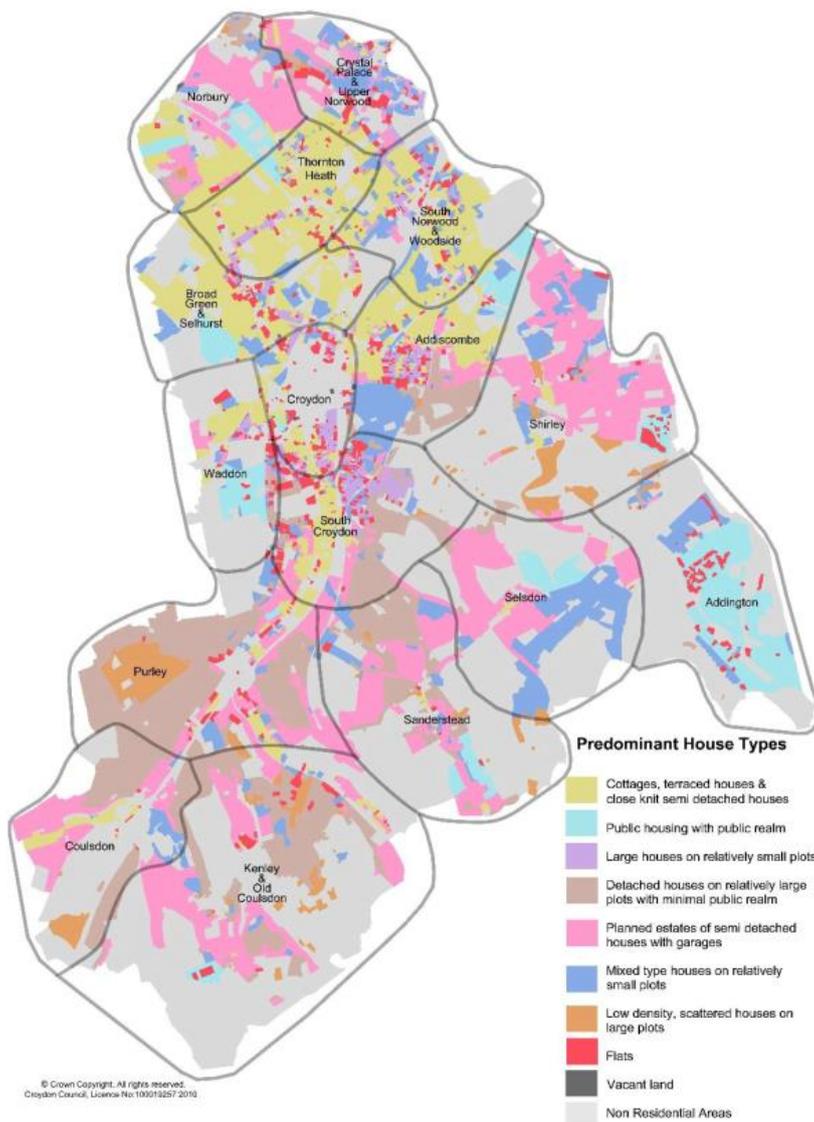
Figure 5.10: Green Belt site options (east)



Locations suitable for higher/lower growth in the suburbs

- 5.23 A “Windfall or Small Sites Evidence Base” study (2019)¹² has been prepared in order to understand the number of homes that can reasonably be expected to come forward through windfall development within each of the Borough’s 16 ‘Places’, taking account of: A) variation in urban character, which is understood on the basis of the Borough Character Appraisal (2015);¹³ and B) accessibility to a town/district centre, train and/or tram stop.
- 5.24 Figure 5.111 shows the distribution of the eight character types across the Borough, whilst Figure 5.12 shows those parts of the Borough judged to be ‘accessible’.

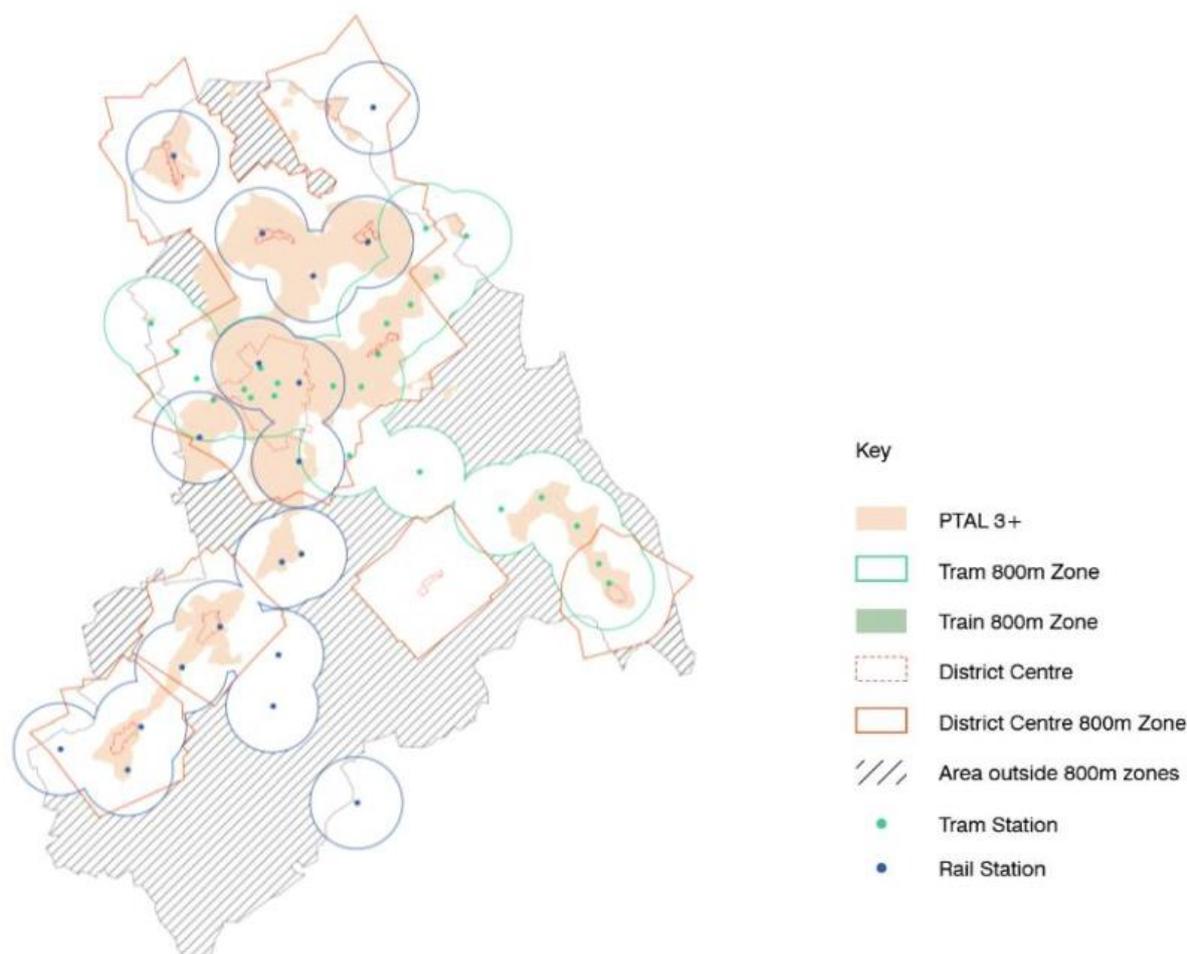
Figure 5.11: Distribution of urban (residential) character types



¹² See www.croydon.gov.uk/planningandregeneration/framework/localplan/croydon-local-plan-review

¹³ See www.croydon.gov.uk/planningandregeneration/framework/lpevidence/urban-design-local-character-and-heritage

Figure 5.12: Areas judged to be more/less accessibly by the Windfall and Small Sites study (2019)



Establishing the Strategic Options

5.25 Drawing upon the structured discussion of 'top-down' / strategic considerations and 'bottom-up' (i.e. site / area specific) considerations presented above, the aim of this section is to draw matters together and arrive at a single set of Strategic Options for appraisal.

5.26 Specifically, there is a need to:

- Consider each broad element of housing supply in turn, considering which can reasonably be held '**constant**' across the Strategic Options versus those which must reasonably be a '**variable**'.
- Establish the '**options**' for each variable that must reasonably be reflected across the Strategic Options; and then
- Draw together the constants and variables/options into a single set of **Strategic Options**.

Sites under construction

5.27 There are 5,370 homes under construction, which contribute to the target figure of 46,040 homes over the plan period (2019-2039). As such, this element of supply can reasonably be held **constant** across the Strategic Options, indeed this figure is a 'given'. Table 5.1 shows the breakdown of the 5,370 figure according to each of the 16 defined 'Places'.

Sites with planning permission

5.28 There are 5,480 homes set to come forward at sites with planning permission. As such, this element of supply can reasonably be held **constant** across the Strategic Options, indeed this figure is a 'given'. Table 5.1 shows the breakdown of the 5,480 figure according to each of the 16 defined 'Places'.

Central Croydon allocations

- 5.29 In addition to sites under construction (2,440 homes) and sites with planning permission (2,630) there is confidence in the ability to deliver 8,988-10,441 homes through allocations in the plan period. Whilst it is recognised that there will be a need for further work in order to refine the preferred approach, there is not considered to be a strategic choice at the current time, and hence this figure can reasonably be held **constant** across the Strategic Options.

Allocations elsewhere in the urban area

- 5.30 In addition to sites under construction (2,930 homes) and sites with planning permission (2,850 homes) there is confidence in the ability to deliver 3,260-4,960 homes through allocations in the plan period. Table 5.1 shows the breakdown of these figures according to each of the 16 defined 'Places'.
- 5.31 Whilst it is recognised that there will be a need for further work in order to refine the preferred approach, there is not considered to be a strategic choice at the current time, and hence this figure can reasonably be held **constant** across the Strategic Options.

Purley Way transformation area

- 5.32 There is a need to explore different degrees of transformation within the defined masterplan area, and hence this element of supply reasonably needs to be a **variable** across the Strategic Options. Whilst there will be a need for further detailed work to explore various approaches, at the current time it is considered reasonable to explore the following two 'bookend' **options** only:

- A) low growth involving 2,900-4,470
- B) high growth involving 9,430-12,000 homes

Allocations in the Green Belt

- 5.33 The increased housing target gives rise to a need to explore the option of one or more allocations within the Green Belt, and hence this element of supply reasonably needs to be a **variable** across the Strategic Options. Whilst there are seven potential combinations of the three shortlisted Green Belt site options, at the current stage it was considered appropriate to explore just two 'bookend' **options**:

- A) nil allocation
- B) allocation of all three sites for 4,540-5,350 homes

Windfall in the suburbs

- 5.34 Windfall sites in the suburbs will need to meet the shortfall in housing supply that exists having taken into account the number of homes delivered through the other elements of supply listed above, hence the approach to growth here will inherently be a **variable** across the Strategic Options.
- 5.35 There is a spectrum of policy approaches that might be taken through the Local Plan Review; however, at the current stage it is considered reasonable to explore the following two 'bookend' **options** only:
- A) low growth involving continuation of the CLP 2018 approach (25% of total housing supply)
 - B) a high growth option (40% of total housing supply)
- 5.36 It is important to note that the increase in windfall under the higher growth option is not spread evenly across all Places – see Table 5.1. This reflects assumptions regarding some locations being more suited to delivering high growth than others, reflective of urban character and transport accessibility.

Table 5.1: Supply options by Place

Place	Sites under construction	Sites with planning permission	Central Croydon allocations		Urban area allocations		Purley Way transformation area				Green Belt allocations				Windfall				% increase
			Min	Max	Min	Max	Low growth		High growth		Low growth		High growth		Low growth		High growth		
							Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	Min	Max	
Addington	26	66			41	64									87	108	173	216	100
<i>Addinton GB extension</i>											0	0	2560	3030					
Addiscombe	149	109			146	238									774	967	1229	1537	59
Broad Green & Selhurst	712	396			213	335									134	168	268	335	100
Coulsdon	263	136			230	247									1098	1372	1689	2111	54
Croydon Opportunity Area	2443	2630	8988	10441															
Crystal Palace & U. Norwood	162	67			208	346									112	140	205	257	84
Kenley and Old Coulsdon	100	89			12	12									1262	1577	1901	2377	51
Norbury	38	55			46	65									251	314	439	548	75
Purley	210	538			1213	1960									3647	4559	5511	6889	51
<i>Purley way MP area</i>							2899	4470	9430	12000									
Sanderstead	30	104			91	125									968	1210	1472	1840	52
<i>Sanderstead GB extension</i>											0	0	680	780					
Selsdon	40	86			29	41									439	549	752	940	71
<i>Selsdon GB extension</i>											0	0	1300	1540					
Shirley	18	49			179	245									73	91	132	165	81
South Croydon	819	205			59	85									403	504	626	782	55
South Norwood & Woodside	95	225			102	102									117	147	235	293	100
Thornton Heath	172	614			600	971									117	146	233	291	100
Waddon	95	113			95	128									175	218	297	371	70
Totals (rounded)	5370	5480	8990	10440	3260	4960	2900	4470	9430	12000	0	0	4540	5350	9660	12070	15160	18950	

The strategic options

5.37 Given the tentatively established housing target of 46,040 homes it was determined appropriate and reasonable to define three Strategic Options, where each would involve explore the higher growth option in respect of one of the three variables listed above. This led to three Strategic Options - see Table 5.2.

Table 5.2: The Strategic Options

Element of supply	Number of homes under each Strategic Option		
	Option 1: Suburbs	Option 2: Purley Way	Option 3: Green Belt
Sites under construction	5,370		
Sites with planning permission	5,480		
Allocations in Central Croydon	8,990-10,440		
Allocations elsewhere in the urban area	3,260-4,960		
Purley Way transformation area	2,900-4,470	9,430-12,000	2,900-4,470
Allocations in the Green Belt	0	0	4,540-5,350
Windfall in the suburbs	15,160-18,950	9,660-12,070	9,660-12,070
Total homes	46,040	46,040	46,040

Part 2: What are SA findings at this current stage?

6. Introduction to Part 2

6.1 The aim of this part of the report is to present an appraisal of the Strategic Options.

Appraisal methodology

- 6.2 For each of the Strategic Options, the assessment identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 3.1) as a methodological framework.
- 6.3 **Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how Strategic Options will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.
- 6.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the plan in combination with other planned or on-going activity).

7. Appraisal of the Strategic Options

7.1 Appraisal findings are presented across 13 sections below, with section dealing with a specific sustainability topic. Each section begins with a summary table, which both A) categorises the performance of each of the alternatives in terms of 'significant effects using red (significant negative effects) and green (significant positive effects) and also ranked in order of preference.

Air quality

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
3	2	1 

7.2 Air quality is a key consideration in Croydon and the entire borough has been declared an Air Quality Management Area since 2003. It will be important to look for opportunities across Croydon to minimise exposure to receptors by poor air quality through the design and location of new development. Particular locations where there are sensitive receptors include hospitals, schools, daycare facilities, elderly housing and convalescent facilities there are five areas in particular where air quality issues are particularly pronounced. These are the five air quality 'focus areas' identified through the 2018 Air Quality Action Plan which are located at:

- London Rd, Norbury (north)
- Purley Cross and Russell Hill (central Purley)
- Thornton Heath / Brigstock Rd / High Street / Whitehorse Lane
- London Rd between Thornton Heath Pond and St James Road
- Wellesley Rd

7.3 Four of these focus areas are in central or north Croydon where the residual air quality is generally of poorer quality than the south of the borough, consistent with the broad trend evident across much of Greater London for improved air quality as distance from the centre increases. In this context, Option 1 has a mixed performance in relation to directing growth away from many of the existing areas of poor air quality. Among the areas which will see the largest net increases in housing are Coulsdon, Kenley and Old Coulsdon and Sanderstead, all of which are in the south.

7.4 However, **Option 1** also directs very significant growth to Purley which is the only air quality focus area in Croydon located away from the north of the borough. The Purley focus area is located at the Purley Cross, where Russell Hill Road and Purley Way intersect with Foxley Land and Pampisford Road, leading to associated stationary or queuing traffic. Significant new combined development in the urban area around and the Purley focus area, delivered through Option 1, would likely lead to new road users at this area of particular air quality sensitivity, though it is recognised that intensified development at Purley would likely benefit from access to Purley, Purley Oaks and Reedham train stations which would limit the number of new road users to an extent.

7.5 Additionally, it is considered that aside from growth at Purley Way the relatively broad distribution of growth throughout the borough under Option 1 could help disperse new road users more widely than if growth were focussed at a small number of locations and there may be less control over avoiding areas such as hospitals, schools, daycare facilities, elderly housing and convalescent facilities.

7.6 **Option 2** could have potential for negative effects in relation to air quality as it would focus growth at the Purley Way masterplan area which is located a short distance to the north of the Purley Cross and Russell Hill air quality focus area along Purley Way. Significant growth in this location would have notable potential to increase traffic flows through the air quality focus areas as Purley Way is the primary north-south arterial route serving the site. Additionally, the location of the site means it would also likely generate traffic which then flows north through towards the borough's other air quality focus areas, though these are further away

from where growth would be focussed under Option 2. However, on balance Option 2 is considered to perform poorly in relation to air quality.

- 7.7 **Option 3** proposes directing growth to three Green Belt sites with good residual air quality. The sites could have potential to add additional road users to roads which flow through the borough's air quality focus areas but by virtue of distance from areas of high risk and dispersal between three sites it is considered that growth under Option 3 would perform most strongly in relation to the air quality SA theme.
- 7.8 In **conclusion**, Option 3 is judged to perform best, albeit it is recognised that growth at the edge of the urban area may lead to a degree of car dependency, relative to growth within the urban area, e.g. at the proposed Purley Way masterplan area. With regards to effect significance, it is considered appropriate to flag the risk of significant negative effects under all options, pending further work, given the borough-wide AQMA.

Biodiversity

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
	2	3

- 7.9 Whilst a network of SINC's is evident in the north of the borough, designated and priority habitats - including ancient woodland - are greater in their extent and more widely dispersed in the southern half of the Borough. This is particularly apparent in the greenfield areas of the Borough and often habitats correlate with other policy designations such as Green Belt land and MOL.
- 7.10 On this basis, **Option 3** is notable for its inclusion of Green Belt land and the proposed parcels of land for release are subject to biodiversity constraints. The Sanderstead parcel partially contains and lies adjacent to Ancient Woodland and land designated as part of the SINC network. The Addington parcel lies adjacent to a SINC, and the Selsdon parcel similarly lies adjacent to a SINC and falls within the Impact Risk Zone of the Riddlesdown SSSI (which given the potential size of the allocation is likely to require further consultation with Natural England). The effects of development at the Green Belt release sites could be both positive and negative. Any habitat loss will lead to minor negative effects for biodiversity, and even in retention of habitats there is the potential for long-term minor negative effects as a result of disturbance, noise, light and air pollution. Mitigation in design, layout and massing, as well the provision of buffers and habitat enhancement can combat these effects and even deliver long-term positive effects for biodiversity. In this respect, master-planning of the sites could be recommended as a means of minimising impacts and securing benefits for biodiversity in the long-term.
- 7.11 Alternatively, **Option 1** focuses on high levels of intensification in the urban areas of Croydon, as well as development at the Croydon Opportunity Area. This effectively minimises loss of designated and priority habitats, but the potential for negative effects are still recognised as a result of increased densities reducing both the available space in development for the provision of new green infrastructure, and potentially existing spaces that contribute to biodiversity, for example as a result of 'garden-grabbing'. As urban areas become more densely packed with built development both on and off-site provisions such as new green infrastructure become inherently more difficult to achieve.
- 7.12 Development at the Croydon Opportunity Area, whilst adjacent to land designated as a SINC, is recognised for its potential to build in habitat connectivity by contributing to wider connectivity between key locations at Farthing Downs, Wandle Park and the cemetery and deliver long-term positive effects with regards to biodiversity. The strategic sites by nature of their size are considered to have greater potential to absorb increased densities whilst still providing biodiversity benefits. Again, a master-planning approach could be considered in this respect, as a means of integrating biodiversity in design considerations at early stages of development, thus minimising impacts and securing long-term benefits for biodiversity. Considering this, **Option 2** is likely to perform better overall in comparison to Options 1 and 3. There may also be particular green infrastructure opportunities associated with masterplanned redevelopment at Purley Way, recognising nearby assets, notably Croydon cemetery to the north, the River Wandle Valley to the west and Farthing Down.

- 7.13 In **conclusion**, Option 2 should lead to positive effects; however, it is not possible to conclude 'significant' positive effects at this stage, ahead of detailed masterplanning and design work. Options 2 and 3 could lead to negative effects, in respect of biodiversity, but again it is not possible to predict 'significant' effects.

Climate change adaptation

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
2	2	1

- 7.14 Reducing flood risk to people and properties is identified as a key focus for climate change adaptation. Fluvial flood risk in Croydon is predominantly limited to land adjacent to the watercourses that flow through the borough, however surface water flood risk is far more widely dispersed and presents a more widespread constraint. Whilst surface water flood risk is not considered an 'absolute' constraint to development, the effective application of SUDs is likely to be a crucial consideration for any development, particularly in light of climate change and associated worsening of storm events.
- 7.15 On this basis, any intensification in the urban areas of the Borough (as delivered under all options) is considered to have the potential for negative effects by means of reducing the developable area and potential for effective application of SUDs on site. Negative effects may be exacerbated by intensification that reduces the extent of existing green spaces and natural drainage features, including as a result of 'garden grabbing'. As a result of the higher densities proposed through **Option 1** these threats are considered most prominent under this option.
- 7.16 Under **Option 2** further intensification at Purley Way is located in the vicinity of the floodplain of the River Wandle, and in light of climate change predictions the housing sites may come under increased flood risk pressure in the future. Very high densities are anticipated at Purley Way under this option which again may restrict the potential for effective application of SUDs to combat surface water flood risk.
- 7.17 Finally, under **Option 3**, the proposed Green Belt release sites are not located within a high fluvial flood risk area, and the site at Sanderstead is the only site subject to surface water flood risk.
- 7.18 In **conclusion**, as a result of lower densities across existing urban areas, and lower surface water flood risk associated with the Green Belt release sites, Option 3 is considered likely to perform best in relation to climate change adaptation. With regards to effect significance, it is considered appropriate to flag the risk of significant negative effects under Options 1 and 2.

Climate change mitigation

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
3	1	2

- 7.19 The key focus of the climate change mitigation SA theme is on continuing to drive down CO₂ emissions by achieving high standards of energy efficiency in new development and seeking opportunities for renewable and low carbon heat/power generation. Principal sources of emissions are transport and the built environment, though emissions from transport sources are considered in the discussion under the Transport SA theme below.
- 7.20 In this context there is essentially a need to support large scale schemes where ambitious low carbon measures can be implemented, including decentralised low/renewable heat and/or power generation schemes (e.g. a Combined Heat and Power system). Large schemes can also offer greater potential to implement sustainable design and construction practices, particularly where development will be guided by a strategic masterplan. Correspondingly, concentration growth can lead to opportunities over-and-above dispersal of growth.

- 7.21 **Option 1** is therefore considered to perform least strongly in relation to climate change mitigation as it would deliver significant growth at small sites in the suburbs which by their nature are broadly dispersed within the Borough. There is not likely to be scope for development at scale at any specific individual location.
- 7.22 By contrast, **Option 2** would focus growth at a large coherent site at which high density development could be delivered at scale in accordance with a masterplan. Such a development offers significant potential to support delivery of decentralised heat and power generation along with a district heating network or similar. Similar schemes have been successfully implemented in other London authorities. For example, the London Borough of Islington already has several operational decentralised energy networks, including the Citigen Heating and Cooling Network which serves high density development in the City of London including the Barbican Arts Centre and Guildhall and a number of commercial users.
- 7.23 Although **Option 3** proposes dispersing growth across three sites, rather than consolidating at a single strategic site, there could still be opportunities to seek to low carbon energy generation, particularly at the New Addington given the scale of the site, and the proximity of the New Addington and Selsdon sites could potentially lead to an opportunity. Additionally, greenfield development typically incurs lower costs and could in principle attract additional funding in relation to the delivery of infrastructure.
- 7.24 In **conclusion**, Option 2 performs notably strongly in relation to reducing per capita CO2 emissions from the built environment. Option 3 could also potentially lead to significant positive effects, but this is highly uncertain at this stage. Option 1 performs notably poorly in relation to climate change mitigation as it would not give rise to any meaningful opportunities to deliver low carbon infrastructure, and there could also be negative implications for low carbon design/construction. ‘Minor’ significant effects are predicted for Option 1 (negative) and Option 2 (positive) recognising that climate change mitigation is a global issue, such that local actions can only have a limited effect.

Economy and employment

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
2	 1	2

- 7.25 There is an aspiration that Croydon should be the premier business and office location in South London, and there is also a clear objective set out in the Draft London Plan that Croydon should retain the extent of its industrial floorspace; however, there are considerable pressures on industrial and office premises for them to be used for residential development. In light of the new housing target, this will only continue.
- 7.26 A focus on suburban intensification under **Option 1** would be unlikely to result in significant pressure on existing employment floorspace, over and above Options 2 and 3; however, nor would this approach give rise to an opportunity to deliver significant new employment floorspace. Having said this, there will be the potential to deliver new innovative smaller scale employment spaces as part of suburban intensification schemes. Also, it is important to note that small scale suburban intensification schemes will often be suited to construction by smaller firms, which is a notable benefit relative to Options 2 and 3, which would be suited to national housebuilders.
- 7.27 With regards to **Option 2**, there would be a clear opportunity to deliver targeted new employment floorspace through a masterplanned approach to redevelopment of the Purley Way area, and to support the intensification of existing employment land (e.g. through increasing building footprints within sites and plots; use of vacant land, and; changing the form or typology of buildings to provide more workspace). However, redevelopment does lead to certain tensions, given that the area is home to two of the Borough’s three Strategic Industrial Locations (SILs) and extensive out of town shopping areas (following support for such schemes in the 1980s and 1990s). With regards to the SILs, whilst the intention is not to support co-location of housing and industry, high density residential nearby could still lead to operational challenges, e.g. in respect of movement of heavy goods, and 24 hour working.

- 7.28 Finally, the three Green Belt urban extensions under **Option 3** may support delivery of some new employment floorspace; however, this is uncertain at this stage, and any new provision would likely be small-scale. It is also noted that these three sites have been selected on the basis of good accessibility by train and/or tram, such that there should be good potential for new residents to commute to Central Croydon and other London employment locations.
- 7.29 In **conclusion**, Option 2 is judged to perform best, although this is relatively marginal recognising the 'tensions' associated with transformational growth within Purley Way masterplan area. Significant effects are not predicted in respect of any of the alternatives.

Health

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
2		

- 7.30 The SA health objective is principally concerned with the extent to which new development can facilitate improvements to the physical and mental health of residents, including reducing health inequalities within the borough. This includes measures such as enabling access to open spaces and encouraging travel by walking and cycling, as well as exploring access to healthcare facilities. As such, health is a cross-cutting theme and there are natural overlaps with elements of the transport and population and communities themes.
- 7.31 The Council's consultation document recognises that "green spaces improve health and wellbeing, and access to nature can be peaceful and restorative". Much of Croydon benefits from reasonably local access to open spaces, woodland and parkland, including spaces such as Farthing Downs, Kenley Common, Riddlesdown, Selsdon Wood and South Norwood Country Park among many others. These spaces are well distributed across the borough and spaces in neighbouring boroughs, such as Mitcham Common are also easily accessible from within Croydon. In this sense there could be potential for positive effects under **Option 1** as a broad distribution of growth could take advantage of the wide range of open and recreational spaces across the borough. The absence of a site-specific understanding of growth under Option 1 means that that it is difficult to conclude effects in relation to encouraging walking and cycling, though it is reasonable to assume that delivery via a large number of small windfall sites would be unlikely to unlock strategic enhancement of walking and cycling infrastructure, including green infrastructure. Option 1 has a mixed performance in this context.
- 7.32 The Purley Way Masterplan Area is immediately adjacent to significant areas of open space of strategic importance to southern Croydon. Roundshaw playing field is west of the site and the extensive Purley Way playing fields lie east and south east of the site. Immediately south of the site is further expansive open space associated with the locally listed Historic Park and Garden at Purley Way West. There is notable potential for new development under **Option 2** to benefit from easy access to these high quality open spaces, with associated benefits for both physical activity and mental wellbeing. There could be potential to seek enhancements to these facilities through mechanisms such as CIL and S106 contributions to mitigate the potential impact from a potentially large number of additional users. The existing poor quality public realm along the pedestrian and cycle access between the Masterplan Area and Whaddon station and local services and facilities could potentially be enhanced through developer contributions to incentivise healthy travel choices further. Similarly, Option 2's concentration of growth at a single location could facilitate delivery of a strategic new healthcare facility to serve both new and existing residents as necessary.

- 7.33 **Option 3** directs growth to sites nearer the southern boundary of the borough from which there could be potential to enhance access to the public rights of way network (PRoW) at the London fringe with associated benefits to health and wellbeing. The proposed masterplan-led delivery at the three Green Belt sites will likely give rise to opportunities to embed high quality multifunctional open space and green infrastructure within development at each of the sites, with theoretical potential to explore opportunities to link this with the wider PRoW network where possible. Additionally, there could be potential to seek delivery of a local healthcare facility on site, particularly at Addington which is proposed to achieve the highest growth of the three options. This could augment the existing Fieldway Medical Centre, though there may also be potential to alternatively seek enhancement of this facility through developer contributions if this was of greater strategic benefit.
- 7.34 In **conclusion**, all three options could have potential for positive effects in relation to health, particularly in terms of directing growth to areas from which the borough's open spaces and recreation facilities could be accessed. However, Option 1 is considered to perform least strongly overall as the piecemeal nature of windfall development is unlikely to give rise to strategic opportunities to enhance provision of healthcare or recreation facilities. Options 2 and 3 could both deliver growth in close proximity to recreation options, either by virtue of proximity to existing features or because of their potential to deliver new facilities through the development process. Similarly, both Options 2 and 3 could potentially provide new or enhanced healthcare facilities to meet existing and future needs. On this basis Options 2 and 3 are found to perform broadly on a par with each other and could both result in positive effects in relation to health. Significant effects are not predicted in respect of any of the alternatives.

Heritage

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
3	★ 1	2

- 7.35 Croydon has a rich and diverse array of historic assets, both designated and undesignated. In addition to assets with statutory protection, such as listed buildings and registered parks and gardens, there are a range of assets which receive protection through local designations and it will be important to enhance the protection and appreciation of such assets where possible.
- 7.36 It is noted that all options appear to intersect fully or partly with Archaeological Priority Areas (APAs). APAs are often broad areas denoting potential sensitivity within the designation, rather indicating inherent sensitivity across the entire area. In this sense it is considered that it is not possible to meaningfully differentiate between the options in relation to APAs and that any specific archaeological sensitivities will be addressed through the development management process.
- 7.37 The distribution of growth through **Option 1** will see an array of smaller developments come forward throughout the plan area, with a particularly high net increase in dwellings anticipated in the south western areas of Purley, Coulsdon, Kenley and Old Coulsdon and Sanderstead. Given that windfall growth is expected to be particularly significant in these areas it is appropriate to focus attention here and although the nature of windfall development means that it is not possible at this stage to gain a site specific understanding of where this growth will be delivered, there is a need to identify the potential for effects in relation to the heritage assets in these areas in particular.
- In Purley, the Webb Estate & Upper Woodcote Village Conservation Area covers a large area of sizable dwellings on large plots, focussed on an Edwardian model village arranged around Woodcote village green. The area appears fairly self-contained in terms of historic character and is extensively screened by mature perimeter planting. This could help minimise any effects from nearby intensification.
 - The Bradmore Green Conservation Area at Old Coulsdon is much smaller in scale and mostly comprises open recreation space, which is has additional protection through the relevant open space designations, plus neighbouring dwellings. There could be harm to the character of the area through inappropriate development nearby.

- The third, and largest, of the Conservation Areas in south western Croydon is at Kenley Aerodrome. The site is within an area of Green Belt and is considered unlikely to be significantly affected by development as a result.
- 7.38 It is also noted that the Council's consultation document says that new development will "respect and protect" the borough's Conservation Areas, though there could still be potential for adverse effects from intensification to the wider setting and character of Conservation Areas and in the absence of a site specific understanding of the distribution of growth it is appropriate to flag the potential for harm from growth through Option 1 in this regard.
- 7.39 Similarly, it is appropriate to flag the potential for adverse effects from Option 1's notable intensification of development in south west Croydon in relation to scheduled monuments at Farthing Down and Coulsdon, though again this will be determined by the final design and location of windfall development. There are a number of Grade II-listed buildings throughout southwest Croydon though no notable clusters of particular sensitivity. It will be particularly important that intensification through Options 1 avoids adverse effects in relation to the Grade I-listed Church of St John the Evangelist in Old Coulsdon, as well as other Grade I buildings across the borough more broadly.
- 7.40 **Option 2** does not give rise to notable concerns in relation to heritage. The Purley Way masterplan area does not contain and is not adjacent to any of Croydon's 23 conservation areas, suggesting limited historic character. The site itself does contain two individual historic assets, both related to the former Croydon Airport which occupied the site before its redevelopment. The first is the Grade II-listed Lodge to Croydon Airport Terminal, which is now dominated by the contemporary street scene and surrounding modern development. The second is the Grade II*-listed Airport House which due to its size remains a prominent and characterful feature in the street scene. Existing built form surrounding each of the structures is largely of poor quality and there could be opportunities to significantly enhance the setting and context of both through the development process. The Croydon Airport, Purley Way West Locally Listed Historic Park and Garden (HPG) is immediately south of the existing built area of the Purley Way Industrial Area and includes the remains of a taxi area for aeroplanes, including some areas of the original tarmac which have been retained. The existing industrial and big box retail land uses create a hard and abrupt edge between the built area and the HPG and there could be potential to enhance the setting and character of the HPG through the development process.
- 7.41 Broadly, **Option 3** also does not appear to give rise to notable heritage concerns, though potential effects are slightly different at each of the three Green Belt parcels, reflecting local features at each location. First, the proposed parcel at Sanderstead appears to have very little potential for negative effects as there is low underlying sensitivity. The site is not close to any of the borough's conservation areas, does not contain and is not adjacent to any listed buildings and is not proximate to any locally designated heritage assets.
- 7.42 There is greater potential for effects from development at the Green Belt sites at Addington and Selsdon, though by virtue of their undeveloped nature this potential relates to effects on nearby features rather than on any features within the sites themselves. At Addington, the site itself has no notable heritage sensitivity as it is not directly affected by any national or local designated features and does not derive any notable historic character from undesignated features. The immediate character of the area is most strongly influenced by the mid-20th century housing development opposite the site which attracts no protective designation. However, to the north west of the site lie the Addington Village conservation area, the Grade II-listed Addington Palace Registered Park and Garden (RPG) and a number of listed buildings. The existing openness of the site is could make a contribution to the wider setting and character of these features which could potentially be adversely affected by development.
- 7.43 At the Selsdon Green Belt parcel there could be potential for negative effects in relation to the setting and character of the Grade II-listed Heathfield House. Currently the site falls within a locally designated view from Heathfield House eastwards which contributes to the historic character of the House and its grounds which could be adversely affected through development. The grounds of Heathfield House are additionally designated as a Locally Listed HPG. The Addington Palace RPG lies north and east of the site, though in practice its setting is not considered to include the site itself due to the severing effect of existing development along Gravel Hill, including the presence of the A212.

7.44 In **conclusion**, it is considered that on balance Option 2 performs most strongly in relation to the Heritage SA theme on the basis that there appears to be little potential for harm to the historic environment and significant potential to enhance the setting and enjoyment of the important heritage assets associated with the site’s former use as Croydon Airport/Aerodrome. Option 3 has greater potential for adverse effects, though these are likely to be secondary effects associated with the wider setting of historic assets and there appears to be little potential for direct harm to specific heritage assets, though the precise nature of effects will in part be determined by the final layout of a future scheme. Option 1 performs relatively poorly, and could lead to significant negative effects.

Housing

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
3	2	1 

7.45 All three options proposed delivery of the same quantum of additional homes overall, i.e. 46,040 over the plan period. In this sense it is not possible to differentiate between the options. However, quantum alone is only one consideration, albeit a significant one. It will also be essential that within this overall deliver the plan achieves a mixture of types and tenures of housing to meet a range of needs within the community, whilst ensuring that homes are delivered in the most suitable locations. In this sense there is scope to meaningfully compare and contrast the three options.

7.46 First, it is significant that **Option 1** proposes a relatively heavy reliance on windfall to meet housing need. Whilst this will likely help ensure a wide dispersal of new housing growth across the breadth of the borough, it also means that there is likely to be significant reliance on small sites. It is noted that there are positives to this approach. For example, allowing the market to bring forward small developments across the borough could help ensure that localised needs are met where they arise rather than being heavily focused towards a small number of high intensity developments. Also, a pipeline of small sites is much more likely to achieve rapid housing delivery when compared to the significant lead times associated with transformational development at masterplan-led strategic sites. This can help ensure that housing delivery is not heavily weighted towards the back end of the plan period and is instead drip-fed throughout. However, it is reasonable to assume that a substantial proportion of windfall development will take place on small sites, i.e. below ten dwellings or 0.5ha. As such, there is a significant risk that a large proportion of development under Option 1 would come forward on sites which do not deliver affordable housing. This could mean that affordable housing is under delivered across the borough. Similarly, by dispersing growth between a large number of small sites there could be limited opportunities to seek delivery of a range of housing types. Much of the borough’s southern suburbs are low density and have an established typology of family housing on medium plots sizes. If left to the market to deliver via windfall, there could be a risk that significant intensification in such areas is not achieved as there the absence of a strategic approach may simply deliver similar types of homes (where the land is available to do so). Opportunities to seek significant densification at locations which could support such an approach could potentially be missed under Option 1.

- 7.47 **Option 2** would offer the potential for masterplan-led delivery at a significant scale and there are associated benefits in terms of enabling a strategic approach to delivery of a housing mix, including a variety of affordable housing tenures and specialist elderly accommodation. There could be significant positives from such an approach in terms of delivering a particular kind of housing mix. However, significant densification in the context of the Purley Opportunity Area is likely to mean increasing building heights, i.e. flatted development. Whilst there is good potential to achieve a range of sizes, tenures and price points from flatted development, it may not be possible to deliver a full range of housing types, notably 'traditional' types of family homes or ground-level elderly accommodation. Whilst this is not necessarily a negative in itself it is potentially significant in the context of the Croydon Opportunity Area. Significant intensification of development is underway in the Croydon Opportunity Area and further transformational development will be delivered through the Local Plan review. This will be heavily reliant on the delivery of very high density, high rise dwellings. Therefore, under Option 2 there is a risk that development of similar housing types to central Croydon will be brought forward at the Purley Opportunity Area over the same timeframe, focussing attention on whether there is sufficient market capacity in Croydon to actually deliver such a high quantum of high density development in close proximity. It is recognised that establishing market capacity is a specialist technical exercise and is informed by a complex range of influences, though it is appropriate to identify at a high level the potential for uncertainty around delivery of such a high volume of similar style development, particularly as this is identified through the Council's consultation document.
- 7.48 **Option 3** performs notably strongly in relation to housing and is considered to have potential to result in significant positive effects. By their nature, the three Green Belt sites offer the opportunity to deliver a broad mixture of housing which both responds to its immediate context and expands the housing offer of Sanderstead, Addington and Selsdon. As the sites are greenfield there is good potential through the masterplan to create bespoke and high quality housing schemes which are well calibrated to meet a range of specific housing needs whilst also remaining attractive to the market. The sites also offer potential for delivery to be well phased over the plan period which will help ensure a consistent supply over time. As the sites are greenfield it is likely that development could commence rapidly and this will help ensure delivery begins early in the plan period.
- 7.49 In **conclusion**, it is considered that despite the potential for rapid delivery, Option 1 performs least strongly in relation to housing. This is because the proposed dispersal of growth between non-strategic sites, many of which are likely to be below ten dwellings in yield or below 0.5ha in size, gives rise to a significant risk of under delivery of affordable housing. Additionally, there could be a risk that each windfall site effectively comes forward in isolation and does not have regard for the wider need to deliver a range of types and tenures of homes. Option 2 is considered to perform well in terms of its capacity to deliver affordable housing at scale, though there are potential uncertainties around the capacity of the market to ensure timely delivery of such a high volume of high density development so close to similar development at the Croydon Opportunity Area. Option 3 is considered to perform very well, as the proposed masterplan-led approach at the three greenfield Green Belt sites would likely enable a broad range of housing type and tenues, including detached, terraced and flatted homes as well as specialist accommodation to meet specific needs within the community. With regards to effect significance, Options 2 and 3 are predicted to result in significant positive effects. With regards to Option 1, whilst this approach performs relatively poorly, it is not clear that there is the potential to conclude significant negative effects.

Land and soils

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
	2	3

- 7.50 In land use terms, Croydon is predominantly urban, with a greater presence of greenfield land in the east and south of the Borough. Much of the borough’s undeveloped land is designated Green Belt and MOL. **Option 1** disperses growth across the borough, though focuses urban intensification towards the south west. Windfall development will offer opportunities to make best use of available brownfield and regeneration opportunities across the borough with the potential for long-term positive effects. However, whilst urban intensification is likely to support brownfield development opportunities where possible and deliver positive effects, it may also result in the loss of existing greenspaces in urban areas, including gardens, and lead to long-term negative effects in this respect.
- 7.51 The Draft New London Plan places a strong emphasis on achieving more efficient use of land at Strategic Industrial Locations (SIL), including through consideration of “consolidation of identified SIL to support the delivery of residential and other uses, such as social infrastructure”, and **Option 2** seeks to capitalise on these opportunities by supporting significant intensification at the Purley Way Masterplan Area, including the SIL. In the context of the scale of growth proposed under Option 2 and the very limited land take that would be necessary to facilitate growth it is considered that Option 2 performs notably strongly in relation to the efficient use of land.
- 7.52 The presence of high-grade agricultural land is limited in the Borough, with only small pockets identified at this stage near Addington in the south east and Sanderstead in the south west. Of all the proposed options, **Option 3** is the only one which will result in the loss of productive agricultural land as a result of the Green Belt release sites, though it is recognised that the specific classification of agricultural land at these sites is unknown at this stage. The inevitable loss of agricultural land under Option 3 will however lead to long-term negative effects with regards to the efficient use of land and soil resources.
- 7.53 In **conclusion**, due to this loss, Option 3 is considered to have potential for negative effects, whilst Options 1 and 2 could both result in positive effects through their focus on previously developed sites. Option 2 could have potential for significant long term positive effects as a result of its notably efficient use of available land. Significant effects are not predicted.

Landscape

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
2		3

- 7.54 The key messages from the SA landscape objective include a need to seek protection and enhancement of landscape character and quality, as well as protecting open gaps and key views. In practice this means that there will be a significant focus on making the most efficient use of available land in the borough, and in this context it is appropriate to include consideration of the effects from proposed Green Belt release under Option 3 within the broader landscape discussion. There is a need to not only focus on avoiding harm to landscape, but also on seeking opportunities to deliver expansion or enhancement of the borough’s landscape offer and the associated benefits in relation to other themes, such as biodiversity and health and wellbeing. To this end the Council’s consultation document recognises the potential of development to deliver landscape enhancements, saying that “high quality design and landscape-led developments” can contribute to “maximising the use and value” of important spaces.

Paragraph 136 of the NPPF states that once established, Green Belt boundaries “should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans”. Paragraph 138 of the NPPF states that “where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well served by public transport”. However, Policy G2 of the Draft New London Plan is clear that “de-designation will not be supported” as a strategic option for meeting development needs in the boroughs. In this context, the 2019 Croydon Green Belt and Metropolitan Open Land (GBMOL) study found that nine areas of MOL or Green Belt make only a limited contribution to Green Belt purposes. None of the three alternative options propose releasing MOL, though **Option 3** proposes release of three areas of Green Belt on the basis that each one either makes a limited contribution to Green Belt purposes or is well served by public transport. As the only option to propose substantial growth at sites within the Green Belt, Option 3 gives rise to potential effects which are unique in the context of the three alternatives.

- 7.55 On the basis that the two other alternative options propose delivering the same quantity of growth on land outside the Green Belt, the principle of Green Belt release must be viewed as an inefficient use of the available land. In this sense all three Green Belt sites are considered equal. However, there are particular qualities at each Green Belt site which give rise to specific individual effects in relation to their landscape context. The 2019 GBMOL Study concluded that the Sanderstead Green Belt parcel’s “scale and orientation/exposure mean that a connection with the wider countryside and contribution to openness is maintained”. The site is open and on a south-facing slope, giving it notable exposure within the landscape and projecting openness and the perception of rural fringe character into the otherwise suburban streetscape. The character of the immediate area would likely be altered through development, potentially with adverse effects. The Addington Green Belt site is identified in the GBMOL Study as contributing to preventing “the further sprawl of development along the A212 and helps to maintain a degree of openness and countryside character”, suggesting that development at the site could have potential for adverse effects both in relation to the loss of its Green Belt function of preventing sprawl and in relation to effects on landscape character. The final Green Belt site at Selsdon is found to fall within a parcel which makes “a significant contribution to Green Belt purposes through its role in preventing encroachment as well as acting as the context for Addington Village”. Again, the GBMOL Study highlights the potential for significant negative effects in relation to the site’s Green Belt function of managing land use and its role in supporting the landscape setting and character of the historic village of Addington. Additionally, the designated Croydon Panorama from North Downs Crescent over the recreation grounds and golf course at the Addington Green Belt site would likely be altered and potentially harmed through development. Significant negative effects are anticipated from Option 3 in relation to landscape.
- 7.56 By dispersing growth within the existing built area, **Option 1** has potential to avoid significant effects on specific landscape receptors. This is because smaller developments on smaller sites are generally more likely to integrate into the existing pattern and form of development and be accommodated by the existing urban context. In many instances there could be potential for small dispersed development to enhance its townscape setting through high quality design, particularly if its local context is currently of poor quality. For these reasons, windfall development in general is unlikely to have implications in relation to characterful open spaces, landscapes or views. However, there are a number of protected views within the borough, including several in the south west of the borough where significant intensification is proposed. Intensification at scale could require increasing building heights and in this context there could be particular potential for adverse effects on the designated Croydon Panoramas at Farthing Down over Coulsdon, at Riddlesdown over Kenley and at Kenley Common towards Riddlesdown. However, all Croydon Panoramas have potential to be affected by increased height and massing at locations where development will be intensified and there are many other protected views across the borough at areas identified for more modest net intensification which could be affected through inappropriate design, layout and massing of future development.

- 7.57 By concentrating growth at a single location within the existing urban area, **Option 2** has potential to avoid direct effects on the landscape setting and character of the rural fringe of the borough, whilst also presenting opportunities to enhance the townscape and streetscape of its immediate setting. Focussing growth at the Purley Way site will therefore minimise effects at the wide range of protected views, open spaces and key landscape features elsewhere in the borough which is considered positive. However, significant intensification concentrated at a single site is likely to mean very high densification, which could mean building heights will necessarily increase on site. Tall buildings can dramatically change the street scene and townscape character of their surroundings and although the existing urban realm at Purley Way is largely of an industrial character which could have scope for enhancement, there is a broadly consistent height and massing of the existing uses on site. Whilst much of this has no notable aesthetic quality and could be significantly enhanced through a masterplan-led redevelopment, it is important to recognise the potential effects on surrounding townscape character if significantly taller buildings were delivered on site. Specifically, the protected Croydon Panorama from the Purley Way playing fields pavilion could have a substantially altered backdrop if the existing low-rise development on site were replaced or augmented with tall buildings. More broadly, the character and setting of Waddon to the north, South Beddington to the west and South Croydon to the east could potentially be impacted by a significant cluster of tall buildings under Option 2 as the openness of the Purley Way playing fields and the Roundshaw playing fields gives unbroken sightlines from these suburbs towards the Purley Way Industrial Area.
- 7.58 In **conclusion**, Option 2 performs most strongly in relation to the landscape SA theme on the basis that direct effects are largely concentrated in one location and that there could be substantial opportunities to enhance the street scene and townscape of Purley Way. Option 1 performs reasonably strongly by virtue of distributing growth to mostly small sites within the existing urban area, whilst Option 3 performs notably weakly by virtue of releasing strongly performing Green Belt land within potential to result in the perception of urban sprawl, whilst also potentially adversely affecting the landscape setting and character of three areas of the borough. With regards to effect significance, whilst Option 3 performs clearly it is not clear that the effect of Option 3 would be 'significant' in respect of landscape objectives, noting that Green Belt is not strictly a landscape designation.

Population and communities

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
3	2	★ 1

- 7.59 The consultation document sets out the aspiration that: *“The borough’s health and education facilities will reflect the diverse population, address their needs, facilitate improved education achievement, promote healthy lifestyles, as well as be of high-quality, adaptable for future generations’ needs and be located and delivered in locations commensurate to where the borough’s housing is to be accommodated.”*
- 7.60 With regards to education infrastructure, the consultation document explains that: *“Despite the considerable number of new schools delivered recently, to accommodate the increased housing need it is estimated that six new primary schools will be needed, in phases, by 2039. Specific sites will need to be allocated in the Local Plan review.”*
- 7.61 With regards to health infrastructure, the consultation document explains that: *“Delivery of NHS healthcare services have recently undergone a mode change whereby services are now being delivered through community hubs and in home care, rather than through multiple smaller GP surgeries. This means that more floor space is needed and facilities must be fit for purpose as well as flexible for future need or changes... In light of the new housing target, and considering planned healthcare expansion in New Addington, Coulsdon and Central Croydon, it is estimated at this stage that a net figure of between 12,000 and 13,000 square metres of floor space for health care provision will need to be provided.”*
- 7.62 In light of these points, **Option 1** leads to a degree of concern. Whilst new schemes will be required to pay the Community Infrastructure Levy (CIL), and CIL funds will, in turn, be used to deliver new and upgraded community infrastructure, there will be a lack of strategic coordination, which could result in a disconnect between locations where new housing is concentrated and locations where there is community infrastructure capacity.

- 7.63 In contrast, under **Options 2 and 3** there should be good potential to deliver new community infrastructure alongside housing, including new primary schools and one or more new medical/community hubs. Under Option 3 there may also be the potential to address existing issues in respect of access to community infrastructure and associated relative deprivation. New Addington – which would see a large scale urban extension under Option 3 – is associated with a notable concentration of relative deprivation – see figure below.
- 7.64 In **conclusion**, Option 1 stands out as performing relatively poorly, and it is appropriate to flag a risk of significant negative effects. Options 2 and 3 perform well, although significant positive effects are not predicted at this stage, ahead of masterplanning, design and viability work.

Transport

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
1	2	 1

- 7.65 The transport context of new development in Croydon will be strongly informed by the Draft New London Plan and the Mayor’s Transport Strategy (MTS) (2018). Policy T1 of the Draft New London Plan establishes an ambitious target for 80% of journeys in London to be made by foot, bicycle or public transport by 2041. In this context it is clear that transport will already play a significant role in unlocking the full potential of the Croydon Opportunity Area and there will be associated opportunities at each of the three alternatives options to capitalise on planned enhancements to the public transport network. Among the key enhancements will be substantially increasing capacity of the Tramlink network through the addition of longer trams and a significant increase in the frequency of services, particularly at peak times. By 2030 it is anticipated that these improvements will have increased capacity by 85% from current levels. Even before enhancement Tramlink is a considerable asset and provides key orbital connectivity across South London. There will likely be opportunities to focus growth at locations served by Tramlink to make the most efficient use of available transport connections.
- 7.66 Furthermore, the MTS recognises that “more diffuse growth can be smaller improvements to the existing network” and raises the possibility that that there could be scope to explore delivery of bus rapid transit at the Opportunity Areas. This could be a lower cost alternative to extending the tram network as it would not necessarily require significant new physical infrastructure in order to implement. In light of this, the Council’s consultation document recognises the potential for future expansions of either Tramlink or a future bus rapid transit scheme, though there are inevitable uncertainties as to which, if any, of the potential routes might come to fruition over the plan period.
- 7.67 The absence of specific sites underpinning the broad distribution of growth under **Option 1** means that it is not necessarily possible to draw specific conclusions in relation to transport, as effects will be dependent to an extent on the specific location of development. However, it is reasonable to focus on potential transport effects in south west Croydon in particular as the most significant net intensification of growth under Option 1 would be delivered here. In this context, it is notable that the Council’s consultation document anticipates the most intense net growth under Option 1 will largely be focussed along the broad corridor in south west Croydon formed by stations at Purley Oaks, Purley, Reedham, Coulsdon Town and Coulsdon South on the Brighton Main Line, plus stations at Sandserstead and Riddlesdown on the Oxted Line and Kenley station on the Caterham line. Collectively these stations offer a significant opportunity to deliver intensified development within 800m of a train station, including some areas with a PTAL score of 3+. Growth delivered at these locations would have potential to harness the potential of high frequency public transport. However, relying on windfall to deliver growth means there is little strategic coordination as to where development is directed and it cannot be assumed that suitable sites will come forward in close proximity to stations. It is equally likely that a large number of windfall development will take place in more poorly connected areas of the borough which do no benefit from nearby access to high capacity train or tram services.

- 7.68 As **Option 2** directs growth to the Purley Way Masterplan Area which benefits from good existing access to the Strategic Road Network (SRN) via the A23, with onward connectivity to the M23 and M25 available around 7 miles to the south. Orbital road connectivity is most directly available via the A232 just to the north of the site. By virtue of its current commercial and light industrial uses the site is private vehicle-centric, and its big box style retail developments, such as Costco, include substantial areas of surface parking, underscoring the existing importance of private vehicle access to allow users to fully engage with services on site. Despite this, there is good potential for public transport accessibility at Purley Way, with multiple bus stops along the northern and eastern perimeters, all served by high frequency services, though there does not appear to be any service penetration into the site itself. Additionally, Whaddon station, served by Southern Rail, is less than half a mile to the north of the area, though Existing public realm along the pedestrian route between the station and entrances to the Masterplan Area is of poor quality and dominated by vehicles. Policy E7 of the Draft New London Plan (Industrial intensification, co-location and substitution) identifies the potential for “impacts on the transport network” from co-location and it will be important that development under Option 2 capitalises on the potential of public transport to minimise additional vehicle movements generated from the site. It is noted that the Council’s consultation document references “potential tram extensions or rapid transit routes” including one such potential route along the A23 past the Purley Way Masterplan Area. However, existing planned extensions to the tram network are focussed at Sutton and there is no concrete commitment in the MTS to deliver future extension within Croydon, though the potential to explore doing so is acknowledged. In light of this it is considered that the long lead time necessary to delivery major infrastructure enhancements means it is very unlikely that Purley Way will benefit from transformational public transport enhancement over the plan period.
- 7.69 **Option 3** offers some notable benefits in relation to transport, the most significant of which would be the delivery of a substantial number of homes and employment land in close proximity to Tramlink stops at Fieldway and Addington Village (via the proposed Green Belt site at Addington) and the Tramlink stop at Gravel Hill (via the proposed Green Belt site at Selsdon). The Green Belt site at Sanderstead is the only one of the three sites not directly linked to the Tramlink network though it is only around half a mile from Riddlesdown train station from which regular services to East Croydon and London Victoria are available. All three sites are serviced by the high frequency TfL bus network.
- 7.70 In **conclusion**, it is considered that there are opportunities and challenges associated with each of the three options. On balance it is considered that Option 1 performs least strongly, as although there is potential for development to come forward near to public transport hubs, the reliance on windfall means that there can be no meaningful strategic coordination of delivery to ensure the potential of such hubs is maximised. Options 2 and 3 both offer opportunities to link new development with existing public transport nodes. However, the Purley Way Masterplan Area would be disproportionately reliant on Whaddon station, to which a significant volume of new users would likely be introduced through Option 2. Option 3 is therefore considered to perform marginally more strongly In relation to transport by virtue of capitalising on planned capacity enhancements to the Tramlink network and also distributing growth to more than one public transport node. Significant effects are not predicted in respect of any of the alternatives.

Water

Option 1 Suburbs	Option 2 Purley Way	Option 3 Green Belt
★ 1	★ 1	2

- 7.71 A key consideration in relation to the water SA objective is the extent to which new development will minimise pressure on water resources and minimise water consumption and wastewater flows. First, in terms of water resources, none of the major watercourses of the plan area are located in close proximity to the three options and there are very few minor surface water features such as ponds. In this sense there does not appear to be notable sensitivity from any of the options in relation to water resources, though it is recognised that the much of Croydon's waterways are culverted and could be affected by surface water runoff via storm drains and the sewer network. However, it is considered that none of the three options give rise to notable concern in this regard.
- 7.72 Croydon is affected by a number of Source Protection Zones which indicate where there could be potential for pollution from surface activity to reach groundwater sources. A large swathe of the south of the borough falls within areas of SPZ1 (groundwater areas most sensitive to potential pollution), SPZ2 and SPZ3. It is difficult to precisely determine potential effects under **Option 1** though it is reasonable to flag the potential for effects of some magnitude. In practice, Option 1 would mostly deliver intensification of existing urban areas and would not necessarily result in the urbanisation of existing open land. Given that much of the developed area of south Croydon is already developed, albeit often at low density, it is considered that the risk of harm in relation to SPZs may be limited. Similarly, although the Purley Way area is within an SPZ1 it is already developed in its entirety and the additional effects from intensification on site through **Option 2** are considered unlikely to be significant in this context. However, the proposed Green Belt site at New Addington is within SPZ1 and SPZ2 and residual effects from development are considered to have potential to be more significant given that the site is currently undeveloped, and **Option 3** performs more weakly in this regard.
- 7.73 In terms of wastewater resources there is a need to consider effects from development on flows to wastewater treatment works (WwTW). Around 70% of total flows from Croydon are received by either Beddington WwTW just over the boundary in Sutton or at Crossness WwTW in Bexley, with the remaining 30% being treated further afield at Dartford in Kent. Thames Water has identified that as at 2017 Beddington was at 102% capacity in terms of the population served vs population designed for. At Crossness this figure was 112%. However, this does not necessarily indicate overloading, rather that the headroom at each facility is starting to be eroded, potentially triggering consideration of an upgrade. In this context it is considered that none of the three options have notable potential to lead to significant effects in relation to wastewater as all will likely follow existing flow patterns. It is noted that **Option 2** would concentrate significant growth at a location very close to Beddington WwTW whereas **Options 1 and 3** would distribute growth between sites and potentially between WwTW catchments. However, it is considered that as Beddington WwTW is a significant asset serving a broad area of South London there is likely to be little appreciable difference to the overall volume of flows treated there under any of the options.
- 7.74 In **conclusion**, Options 1 and 2 are considered to perform broadly on a par with each other, whilst Option 3 performs less strongly by virtue of the directing a higher proportion of development to greenfield sites from which there is greater potential for effects; however, significant effects are not predicted.

Summary and conclusions

The table below presents an overview of the appraisal findings presented across the 13 sections above, and also presents overall conclusions.

Table 7.1: Summary appraisal conclusions

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

Summary discussion:

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

Part 3: What are the next steps?

8. Plan finalisation

Preparation of the Proposed Submission Plan

- 8.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and further appraisal work.
- 8.2 The SA Report will be published alongside the Proposed Submission Plan, providing the information required by the SEA Regulations 2004.

Submission and examination

- 8.3 Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report.
- 8.4 At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared (alongside SA) and then subjected to consultation (with an SA Report Addendum published alongside).
- 8.5 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

9. Monitoring

- 9.1 The SA Report must present 'measures envisaged concerning monitoring'.
- 9.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on -
 - Affordable housing delivery, particularly under an 'Option 1' scenario
 - Community infrastructure delivery / capacity, particularly under an 'Option 1' scenario
 - Effective functioning of industrial land, particularly under an 'Option 2' scenario