

Sustainability Appraisal (SA) of the Croydon Local Plan Partial Review

SA Report
Non-technical Summary

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Quality information

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Introduction

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

Once in place, the Partial Review will serve to adjust the spatial strategy for growth and change set out within the adopted Croydon Local Plan (CLP, 2018), including by adjusting the package of sites allocated to deliver the strategy, and will also serve to adjust the suite of strategic and development management policies (i.e. policies against which planning applications are judged). The Partial Review will also extend the plan period to 2039 (from 2036 in the adopted Local Plan), such that the plan period is 2019 to 2039.

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.

Central to the SA process is publication of an SA Report for consultation alongside the draft plan, with a view to informing the consultation and subsequent plan finalisation.

At the current time the SA Report is published for consultation alongside the ‘pre-submission’ version of the Partial Review. This is the non-technical summary (NTS) of the SA Report.

The SA Report / this NTS

The SA Report is structured so as to answer three questions in turn:

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

- Establishing and appraising reasonable alternatives

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

- Appraising the draft plan

3) What happens **next**?

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

What’s the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives, as well as an underpinning understanding of key issues, as established through evidence-gathering including consultation on a Scoping Report in 2019.¹

Taken together, this understanding of key topics, objectives and issues provides a methodological ‘framework’ for appraisal. A list of the topics and underpinning objectives is presented in Table 3.1 of the main report. In summary, the following topics form the back-bone to the framework:

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

¹ The Scoping Report is available at: www.croydon.gov.uk/planning-and-regeneration/planning/planning-evidence-and-information/sustainability-appraisal-and-health-impact-assessment

Plan-making / SA up to this point

Introduction

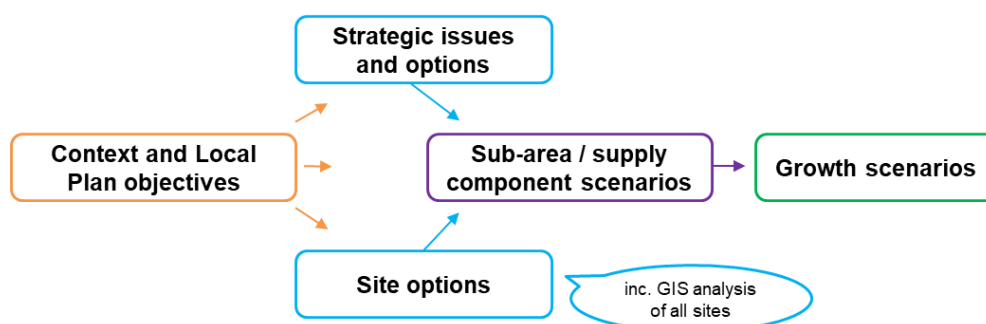
Central to the required SA process is exploring 'reasonable alternatives' with a view to informing plan-preparation. As such, Part 1 of the SA Report explains a process of establishing and appraising reasonable 'growth scenarios', i.e. scenarios for accommodating development in the Borough. In short, the process involved:

- Establishing growth scenarios;
- Appraising growth scenarios; and then
- Feeding-back to inform the Partial Review

Establishing growth scenarios

The aim here is to explain the process of establishing reasonable growth scenarios for appraisal.

Establishing growth scenarios – process overview



Context and Local Plan objectives

Importantly, because the current plan is a 'partial review', the plan objectives remain those set out in CLP 2018. Also, more broadly, policies within CLP 2018 provide the starting point for the Partial Review, with the Council's aim being to amend policies, and the package of site allocations, only where necessary, including in light of monitoring and understanding of the latest national, regional and local context, including the London Plan 2021.

A large amount of work has been completed by the Council since commencing the Partial Review process in 2018. Most notably, an Issues and Options consultation was held in 2019, with an Interim SA (ISA) Report published alongside. Central to the consultation, and the appraisal in the ISA Report, was a series of four 'Strategic Options'.

Strategic issues and options

There is a need to consider:

- **Quanta** (*how much?*) – there is a strong strategic (or 'top down') argument for setting the housing requirement (i.e. the number of homes that the Local Plan is committed to provide for, and the figure against which the Local Plan's performance will be monitored) at 41,580 homes/dwellings for the 20 year plan period (2019 – 2039), or 2,079 dwellings per annum (dpa). This is because the London Plan sets a requirement (or 'target') of 2,079 dpa for the period 2019 – 2029, and it is logical to simply roll this figure forwards for the latter ten years of the plan period. However, there is a need to test the merits of this strategy in light of 'bottom-up' consideration of capacity / supply options.

Also, there are strategic arguments for considering the possibility of providing for higher growth (i.e. setting the housing requirement at a figure above 41,580), including around providing for affordable housing needs (albeit there are also strategic arguments against this approach, including around the need to plan for housing growth at a London-wide scale including to ensure a strategic approach to infrastructure planning).

- Broad distribution (where?)** – the first step is to define sub-areas / supply components in the LB Croydon context, with the main reporting defining seven: Brighton Main Line and East Croydon Transformation Corridor; North End Quarter Transformation Area; Elsewhere within the Croydon Opportunity Area; Purley Way Transformation Area; Allocations elsewhere within the urban area; Green Belt allocations; and Windfall sites. The three Transformation Corridors/Areas (henceforth 'Areas', or TAs) are new, i.e. do not feature in CLP 2018, and the two within the Croydon Opportunity Area (Brighton Mainline and North End Quarter) are new since the Issues and Options Stage. These TAs in the Croydon OA are associated with limited strategic choice, i.e. capacity is driven by 'bottom up' consideration of the site options (North End Quarter primarily involves one site, namely the Whitgift Centre); however, there has been discussion of wide ranging capacity options for the Purley Way, ranging between 2,900 and 12,000 homes (specifically, these were the figures reflected across the Strategic Options at the Issues and Options stage). There is also clearly a strategic choice in respect of exploring Green Belt release, mindful of such factors as national and London Plan policy and a recognition that Green Belt release can support new family housing and possibly levels of infrastructure investment over-and-above redevelopment of previously developed land within the urban area. Finally, it is well-established in the Croydon context that there is a strategic choice in respect of the approach to windfall, which primarily equates to suburban intensification, with the Strategic Options at the Issues and Options stage exploring windfall supply of between 9,660 and 18,950 homes over the 20 year plan period, equating to up to 20 – 40% of supply.

Site options

The process of selecting sites for allocation and determining an appropriate housing capacity figure for each site – mindful of use mix, character/design and other factors – has been led by the Council, through a Strategic Housing Land Availability Assessment (SHLAA), building upon the London SHLAA 2017.

Nonetheless, in order to feed-into and inform the process of arriving at reasonable growth scenarios, the decision was taken to run a quantitative GIS-based exercise to examine the spatial relationship (proximity and intersect) between all site options and a range of constraint/push (e.g. flood zones, heritage assets) and opportunity/pull (e.g. district centres) features for which data is available in digitally mapped form for the Borough as a whole.

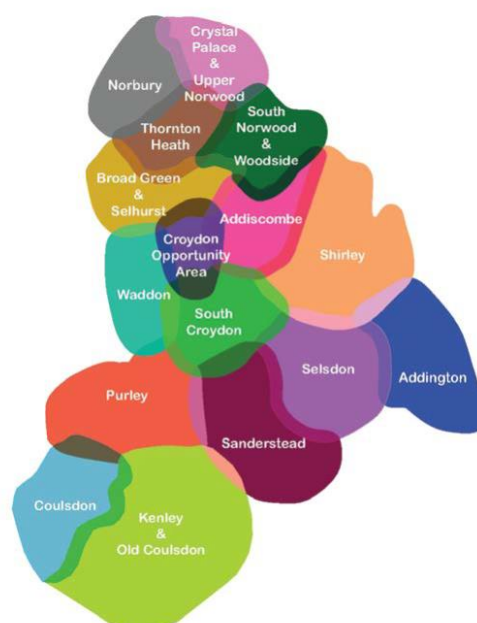
The outcome of the analysis is presented in Table 5.1 of the main report. The figure overleaf shows the distribution of site options, differentiating between those that are ultimately supported by the Council for allocation (with new proposed allocations differentiated from existing CLP 2018 allocations proposed to be 'rolled-forward') and 'omission sites', i.e. sites not supported for allocation (including all sites in the Green Belt). It is important to note that there are only a small number of omission sites in the urban area, with all ruled-out for relatively clear-cut planning reasons, i.e. there is limited choice in respect of 'site selection' in the urban area, with key choices more in terms of capacity and use mix at the level of individual sites and groups of sites.

Sub-area scenarios

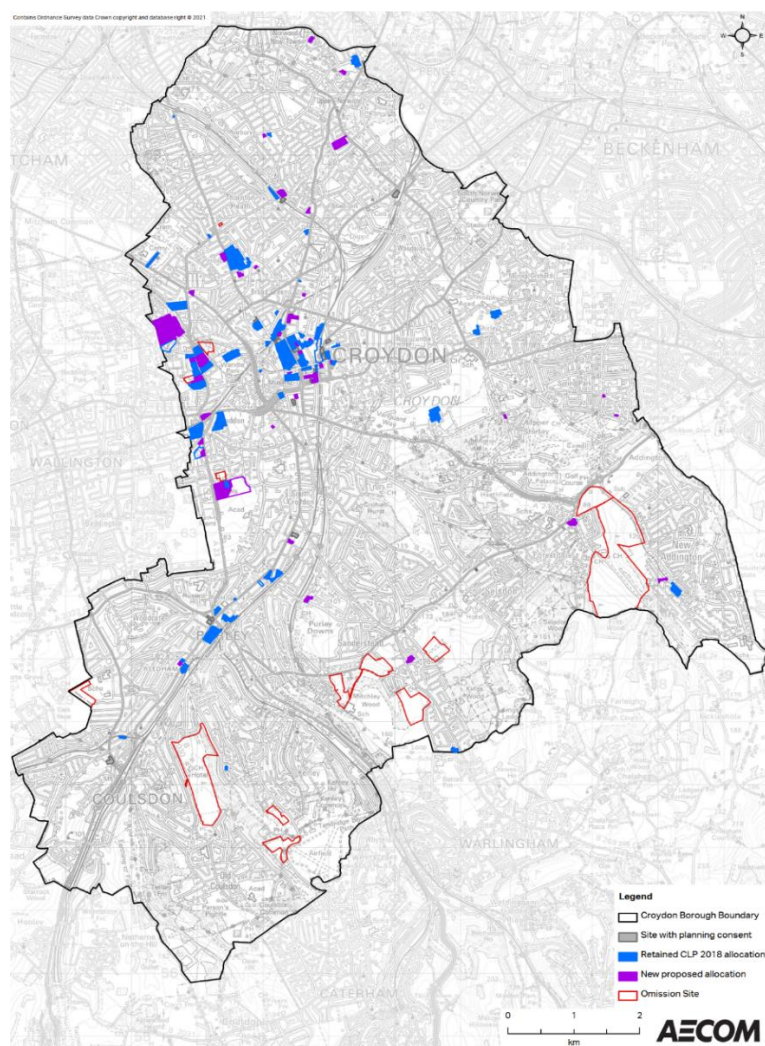
Having gone through a process of building 'top down' (quanta and broad distribution) and 'bottom-up' (strategic and non-strategic site options) understanding, the next step was to draw understanding together to establish growth scenarios for each of the Borough's sub-areas / supply components in turn.

Section 5.4 of the main report explores each of the seven sub-areas / supply components introduced above in turn. Additionally, 'Elsewhere within the Croydon Opportunity Area' is itself broken down into six sub-areas, the Purley Way Transformation Area is broken down into four sub-areas and 'Elsewhere in the urban area' is broken down into 14 sub-areas, namely the established 'Croydon Places' (see right).

The conclusion of the analysis presented in Section 5.4 is that the borough-wide growth scenarios should reasonably reflect two scenarios for four separate sub-areas / supply components, namely Brighton Mainline, North End Quarter, Green Belt and windfall / suburban intensification.



Site options



The reasonable growth scenarios

Section 5.5 of the main report then reaches a conclusion on reasonable growth scenarios for appraisal:

	Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
Completions since 2019	3,844	3,844	3,844	3,844
Sites under construction	2,685	2,685	2,685	2,685
Planning permissions	3,080	3,080	3,080	3,080
Allocations	Brighton Mainline	1,340	1,490	1,340
	North End Quarter	680	1,080	680
	Elsewhere in the COA	7,740	7,740	7,740
	Purley Way	7,430	7,430	7,430
	Allocations elsewhere	3,870	3,870	3,870
	Green Belt sites (x2)	0	0	2,500
Windfall	10,900	10,900	10,900	13,000
Total supply 2019-2039	41,580	42,130	44,080	43,680

Growth scenarios appraisal

Section 6 of the SA Report presents an appraisal of the four reasonable growth scenarios. Summary appraisal findings are presented in Table B. Within each row of the table, the performance of each of the growth scenarios is categorised in terms of significant effects (using red / amber / light green / green)² and the scenarios are also ranked in order of preference (where 1 is judged best).

Summary appraisal of the reasonable growth scenarios

Objective	Rank of preference and significant effects			
	Scenario 1 The preferred scenario	Scenario 2 Additional growth at BML and NEQ	Scenario 3 GB release	Scenario 4 Additional windfall
Air quality	★1	2	3	4
Biodiversity	★1	2	3	3
Climate change adaptation	=	=	=	=
Climate change mitigation	2	★1	2	2
Economy and employment	=	=	=	=
Health	=	=	=	=
Heritage	★1	3	★1	2
Housing	4	3	★1	2
Land and soils	2	★1	3	2
Landscape	★1	2	4	3
Population and communities	★1	★1	★1	2
Transport	2	★1	3	4
Water	=	=	=	=

Concluding discussion

The appraisal shows Scenario 1 (the preferred scenario) to perform best in terms of the greatest number of objectives, and Scenario 1 is also predicted fewest negative effects. However, it does not necessarily follow that Scenario 1 is best performing or 'most sustainable' overall, recognising that the sustainability objectives are not assigned any particular degree of importance or weight in the appraisal process. For example, if particular weight were to be attributed to housing objectives, including in respect of meeting needs for affordable and family housing, then there could potentially be overall support for Scenario 3. It is for the plan-maker (LB Croydon) to assign weight and trade-off between the competing objectives to reach an overall conclusion on which of these scenarios best reflects the plan objectives and represents sustainable development.

² Red indicates a significant negative effect; amber a negative effect that is of note but of limited or uncertain significance; light green a positive that is of note but of limited or uncertain significance; and green a significant positive effect.

The preferred growth scenario

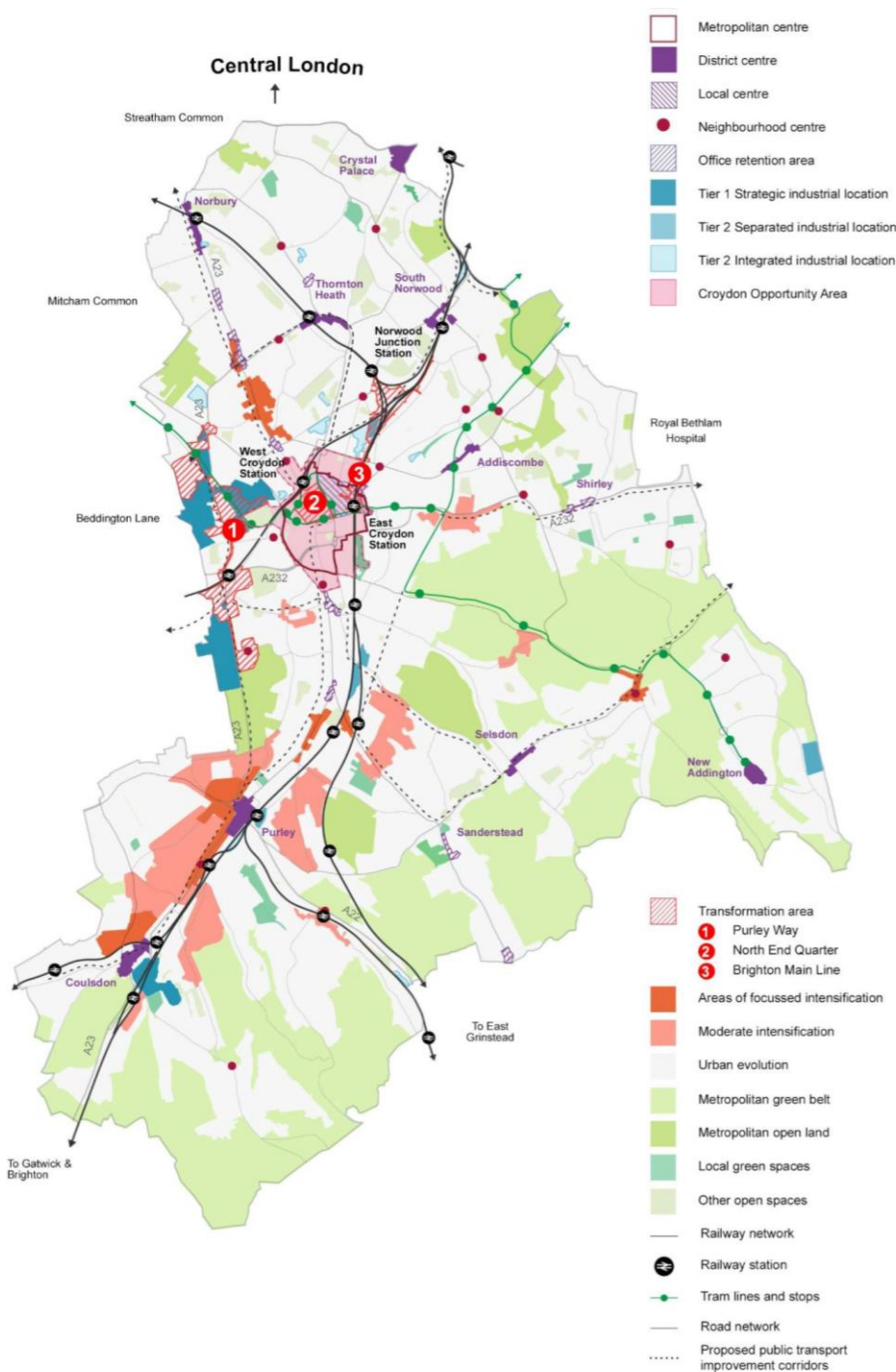
Section 7 of the SA Report explains officers' reasons for supporting **Growth Scenario 1**, in-light of the appraisal:

The appraisal shows Scenario 1 to perform well in a number of respects. Indeed, it performs best in terms of more sustainability objectives than any of the other scenarios, and is predicted fewest negative effects.

It is recognised that higher growth scenarios would help to meet housing needs more fully, including need for affordable and family housing. This is an important consideration; however, a higher growth strategy would risk departing from the London Plan, which balances housing needs and capacity across London.

With regards to Scenario 2, it is recognised that there could be certain benefits to higher density development, likely in the form of taller buildings, at the North End Quarter and/or in the vicinity of East Croydon Station (although the station redevelopment itself is not anticipated to involve a residential element). However, there is a need to balance competing objectives, for example heritage objectives in the case of North End Quarter.

The Partial Review Key Diagram



SA findings at this stage

Part 2 of the SA Report presents an appraisal of the Partial Review as a whole. The following is a summary.

Air quality

There are a range of tensions, including due to a considerable focus on housing growth alongside railway lines and main roads, including support for housing and mixed use schemes at sites previously used for employment; however, this is not unusual in the London context. On the plus side, the proposed spatial strategy might reasonably be described as 'sustainable transport-led', noting the focus on: Brighton Mainline; the wider Croydon OA with the NEQ at its heart; the Purley Way (where there is potentially an opportunity for housing growth to unlock a tram extension, albeit there are also transport and air quality sensitivities); Purley (which is set to benefit from 'metroisation' of the rail service, following BML upgrades); and other district and local centres (with identified opportunities to support walking/cycling and public transport). On balance, **neutral effects** are predicted, but it is recommended that sensitive allocations are subject to scrutiny, and that steps are taken to confirm the potential to transform transport connectivity along the Purley Way alongside or ahead of housing growth.

Biodiversity

There is a considerable new focus on matters relating to biodiversity, green infrastructure and urban greening through revised borough-wide thematic and site specific development management policies. However, there is a need to carefully consider the potential for a high growth strategy for the Purley Way to achieve a biodiversity net gain, given the river valley sensitivities, and the proposed area of moderate intensification at the northern edge of Selsdon also potentially gives rise to a degree of concern. On balance, **neutral effects** are predicted, and it will be important to carefully consider consultation responses received from biodiversity-focused stakeholder organisations such as London Wildlife Trust.

Climate change adaptation

A number of the proposed new allocations, as well as existing allocations where the proposal is now to support higher density development (relative to CLP 2018), intersect the flood risk zone (see Table 5.1 of the main report). Furthermore, two of the proposed Focused Intensification Areas (Purley and Purley Oaks) significantly intersect the area of flood zone 3 associated with the River Wandle. In each case development will deliver benefits, which could serve to justify development in a flood risk zone, whether that be: A) the potential to realise a particular site-specific opportunity; B) the potential to contribute to achievement of strategic objectives for a centre, neighbourhood or sub-area (e.g. Purley Way and Purley); and/or C) the potential to contribute to strategic objectives for the Borough, including in respect of meeting the established housing requirement, in the context of constrained options for growth outside of flood risk zones. Furthermore, there are a range of site specific and scheme masterplanning and design factors affecting flood risk, as explored through the Level 2 SFRA (2021) and which can be further explored through a Flood Risk Assessment (FRA) at the planning application stage. It will be for the Environment Agency to comment in detail through the current consultation, but at this stage it is appropriate to flag a **negative effect** of limited or uncertain significance.

Climate change mitigation

As has been discussed, the Local Plan might reasonably be described as 'sustainable transport-led', which translates into positive effects in terms of the achievement of decarbonisation objectives. However, the potential to take a more ambitious approach to built environment decarbonisation can be envisaged, mindful of the stretching nature of target decarbonisation trajectories at the national, regional and local scales. For example in respect of supporting moves to the electrification of heating, including via heat networks. On balance, **neutral effects** are predicted, but it is recommended that consideration be given to undertaking further work ahead of plan finalisation to ensure that built environment decarbonisation opportunities will be fully realised, as opposed to leaving key decisions to later stages of the planning process, when options can be constrained or foreclosed.

Communities

Having taken careful account of both the proposed spatial strategy and thematic policy (borough-wide, area-specific and site specific, also mindful of existing CLP 2018 policies that are not proposed for change) it is fair to predict **positive effects**, albeit with a degree of uncertainty given a number of proposed allocations associated with existing community uses that will need careful consideration through the development management process.

Perhaps the key point to note is that the three new Transformation Areas are all strongly supported from a community perspective (which is not to say that the policy approach at each should not be the subject of further scrutiny with a view to making adjustments, to maximise community benefits, ahead of plan finalisation; most notably with respect to the Purley Way).

Economy and employment

The broad aim of 'retaining and intensifying employment land' is supported, and all three of the Transformation Areas reflect a strong degree of ambition, from an 'economy and employment' perspective. However, there would be merit to further exploring precise implications of the Partial Review for the nature of office space available in the Borough (in terms of total quantum, distribution and type/grade) and the nature of the Borough's industrial land resource. For example, and in particular, along the Purley Way there is a need to carefully consider the implications of intensifying SIL alongside major housing growth, with a view to ensuring that existing types of industrial/employment uses are not unduly 'pushed out' of the area, and in turn potentially out of London. Overall **positive effects** are predicted, but with a degree of uncertainty, not least due to the changing national and regional context around the need for office-type workspaces and nature of demand for industrial-type land uses. It will be important to maintain a watching brief ahead of plan finalisation.

Health

One important consideration is ensuring access to health facilities, with site specific policy set to include a considerable focus on identifying sites with the potential to deliver new facilities (subject to further discussions with providers), although there are also certain issues and potential tensions, e.g. proposed redevelopment at Croydon University Hospital. Aside from access to health facilities, another important consideration is design quality and space standards, with the proposal being to supplement Policy S2 (Housing) to include new policy criteria on: shared spaced; internal and external spaces; design and layout that supports independent living; wider design considerations; and accessible/adaptable housing. Overall **positive effects** are predicted, but with a degree of uncertainty, ahead of receiving consultation responses from partner organisations including those that together form the [One Croydon Alliance](#).

Heritage

Heritage and the wider historic environment is a key consideration for one of the proposed Transformation Areas, namely the North End Quarter, and also the series of proposed intensification areas in the vicinity of rail stations in the south west of the Borough, given topography and the historic pattern of settlement and wider land use. There are also key matters for consideration at two other locations proposed for significant growth in the Croydon Opportunity Area, namely Mid Town and the part of the OA to the south of the A232. Also, outside of these areas, a number of proposed allocations intersect or are adjacent to a designated asset/area; however, it is difficult to conclude that this necessarily indicates a constraint, given the potential for redevelopment of sites that currently do not contribute positively to setting to achieve a positive effect. Many site allocations reference the need to account for heritage constraints, including with a good degree of specificity that leads to confidence. Overall, having taken account of both the proposed spatial strategy and thematic policy, it is fair to predict **positive effects**, albeit with a degree of uncertainty ahead of receiving the views of Historic England through the current consultation.

Housing

Regardless of the housing requirement that is set, the proposal is to take a proactive approach to housing growth, in the sense that the London Plan target/requirement figure for the first ten years of the plan period (2019 to 2029) is met, and then there would be additional planned supply for the latter ten years of the plan period (2029 to 2039). It is naturally the case that many of the proposed allocations are associated with delivery challenges, given that all are located within the urban area, but precautionary approach is reflected in the calculated delivery trajectory, namely an approach whereby there are not over-optimistic assumptions made regarding when a site will be able to begin and complete construction. Depending on the housing requirement that is ultimately, set there may be little or no 'supply buffer' over-and-above the housing requirement, when the 20 year plan period is viewed as a whole, but this is not unusual in the London context (given that that the London Plan focuses primarily on a 10 year time horizon). Aside from the matter of total housing quantum and deliver trajectory over the plan period, other aspects of the Partial Review are broadly supported, including the proposed approach to affordable and family housing. Overall it is appropriate to predict **significant positive effects**, albeit with a degree of uncertainty as certain figures in the supply trajectory are subject to final checks (see footnotes to Table 5.2 in the main report).

Land and soils

This is a relatively minor issue for the Croydon Local Plan Partial Review, with **neutral effects** predicted.

Landscape

A key consideration is the implications of the proposed intensification areas for suburban character, and there is a need to consider the close links between suburban areas in the south of the Borough and surrounding wooded hillsides. There are also wide-ranging townscape sensitivities in the urban areas, which leads to a need to scrutinise the higher density schemes (which will tend to involve taller buildings) and other proposed allocations in sensitive locations, such as those intersecting designated view cones and those on the edge of district centres. **Neutral effects** are predicted overall, but there are certain tensions, linked to matters discussed under Heritage.

Transport

The proposed spatial strategy is many ways considered 'sustainable transport-led', and certain of the interventions supported by the Local plan are of larger-than-local significance, most notably East Croydon Station / Brighton Mainline. However, there remain a wide range of challenges and uncertainties, most notably in respect of the Purley Way Transformation Area and at Purley. Overall the conclusion is an uncertain **positive effect**.

Water

This is a relatively minor issue for the Croydon Local Plan Partial Review, with **neutral effects** predicted.

Overall conclusions

In conclusion, the appraisal predicts: **significant positive effects** - in respect of housing objectives (because the proposal is to provide for the London Plan target in full and additional supply for the subsequent ten year period); **more moderate or uncertain positive effects** are predicted in respect of communities, 'economy and employment', health, heritage and transport objectives; **neutral effects** are predicted in respect of air quality, biodiversity, climate change mitigation, 'land and soils', landscape and water objectives; and **notable tensions / risk of negative effects** are predicted in terms of climate change adaptation.

There will be the potential to make improvements to the plan through the forthcoming examination in public, if / where they relate to matters of soundness. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to explore the negative effects / tensions and uncertainties highlighted through the appraisal. As part of the examination in public there will also be the potential to explore some of the recommendations made in respect of policy requirements (both borough-wide and site-specific) within the appraisal presented in Section 9 of the main report.

Cumulative effects

The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential 'larger than local' effects. The following bullet points cover some key considerations:

- **Adopted CLP 2018** – an immediate consideration is the effect of the Partial Review in combination with those aspects of CLP 2018 that are not a focus of the Partial Review. However, such considerations are limited, because the spatial strategy is entirely revisited, albeit there are certain aspects of the spatial strategy proposals through the Partial Review that are only a modest adjustment on the strategy set out in CLP 2018 (e.g. the strategy for the Croydon Opportunity Area outside of the two new proposed Transformation Areas).
- **Housing** – as well as contributing to London's housing needs, there is a need to recognise that the Croydon housing market area has historically been seen as closely linked to that of Tandridge District, hence there will be a need to keep track of progress with the Tandridge Local Plan examination.
- **Transport infrastructure** – aside from the headline matter of the Brighton Mainline, the Borough also shares other strategic transport corridors with neighbouring areas. In respect of the tram network, the focus on the Croydon OA, the Purley Way and district/local centres on the network amounts to a proactive approach to supporting patronage and, in turn, investment in network improvements.

- **Employment** – Croydon is a regionally important centre of employment, hence the carefully considered proposals for the Croydon OA are broadly supported. With regards to SIL, which is by definition of regional importance, the appraisal above has emphasised the importance of closely scrutinising and monitoring the practical implications of the proposed policy approach of retention and intensification. There is also a need to consider key employment areas close to the Borough boundary, notably Beddington to the west and Biggin Hill to the south east.
- **Landscape scale net gain** – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider ecosystem services, at functional landscape scales, perhaps most notably along the River Wandle corridor, which extends northwest from Croydon into LB Sutton.

Next Steps

Plan finalisation

Once the period for representations on the Partial Review / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the Partial Review is ‘sound’ and ready for submission. If this is the case, it will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.

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

Once found to be ‘sound’ the Partial Review will be adopted. 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 needs – certainly warrant being a focus of ongoing close monitoring.
- Flood risk – it would be useful to monitor not only the number of homes that come forward in a flood risk zone, but also the nature of the schemes / flood risk avoidance and mitigation measures implemented.
- Built environment decarbonisation – is a rapidly evolving policy area, and so it will be important to monitor the sufficiency of Local Plan policy closely, potentially with a view to preparing supplementary planning guidance, in order to ensure that opportunities are fully realised, including in respect of heat networks.
- Community uses – it would be useful to monitor how existing community uses on sites proposed for allocation are re-provided, for example onsite versus in the local area versus further afield. It will also be important to monitor the process of identifying sites suited to delivering new health infrastructure.
- Purley Way – there will be a need for very close monitoring of infrastructure upgrades, the needs of businesses within the SILs and traffic / air quality (also possibly wider environmental) quality along the busy road. Also project-specific green and blue infrastructure measures could be monitored to ensure that the ‘sum of parts’ aligns with the vision for a River Wandle Regional Park.
- North End Quarter – there will be a need to be mindful of ongoing changes to retail trends and understanding of best practice in respect of reimagining town centres and high streets.
- Suburban intensification – there could be merit to monitoring shifting character over time, with a view to avoiding cumulative impacts to townscape, landscape and the setting of heritage assets.