

Croydon Town Centre Opportunity Area Planning Framework (OAPF)

Integrated Impact Assessment (IIA)

January 2013

Prepared by Greater London Authority and Croydon Council

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Non-technical Summary

This is a non-technical summary of the Impact Assessment (IIA) of Croydon Opportunity Area Planning Framework (OAPF) which assesses the environmental, social and economic performance of the OAPF against a set of environmental and socio-economic objectives. The following section explains the purpose of IIA, what the OAPF is and provides an outline of the IIA's content and methodology and conclusions.

The OAPF is being produced jointly by the Greater London Authority (GLA), the London Borough of Croydon and Transport for London (TfL).

Integrated Impact Assessment (IIA)

The IIA incorporates the statutory requirements for Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), and Equalities Impact Assessment (EqIA). This approach provides for a comprehensive assessment, seeks to increase consistency and expediency of assessment work and benefits from a shared understanding of policies.

The Sustainability Appraisal (SA) process incorporates the requirements of the European Directive (Directive 2001/42/EC) on the environmental assessment of plans and programmes. The SA covers wider social and economic effects of plans, as well as the more environmentally-focused considerations in the Directive.

The SEA Directive is implemented in England through the Environmental Assessment of Plans and Programmes Regulations 2004. The Directive is procedural in nature and sets out a series of steps that must be undertaken as part of an assessment. The purpose of the SEA is summarised in Article 1:

"To provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adaptation of plans and programmes with a view to promoting sustainable development".

The purpose of an Equality Impact Assessment (EqIA) is to improve strategies, policies and projects by making sure they do not discriminate and that, where possible, they promote equality. This assessment must consider the impacts of any policies upon different groups (in national EqIA practice these have included: women; Black, Asian and minority ethnic people; disabled people; children and young people; older people; faith groups; lesbians, gay men, bisexual and trans gendered people). It will also ensure that the requirements of the Race Relations Act 1976 (statutory duties) Order 2001, Disability Discrimination Act (2005) and Equality Act (2006) to promote race, disability and gender equality are met. Through the integration of an EqIA, the Mayor can ensure that equalities issues are considered in the making of OAPF document.

The preparation of this IIA is subsequent to firstly the IIA of the London Plan as adopted in 2011 (The OAPF is supplementary the London Plan) and then secondly the London Borough of Croydon, Core Strategy Proposed Submission Sustainability Appraisal (August 2011), and Equality Impact Assessment (Proposed Submission Draft Core Strategy (September 2011)). In accordance with

requirements of the SEA Directive, the 3 Statutory Consultees¹ were invited to comment on the scope of Sustainability Appraisal.

What is the OAPF?

Covering an area of 194 Ha. Croydon Opportunity Area is one of 33 opportunity areas identified in the Mayor's London Plan. This provides for a new community of 7,300 homes (17,000 people) over the next 20 years, up to 95,000 sq.m. of new commercial space along with substantial refurbishment/redevelopment of existing stock, and a focussed growth in the retail sector. The OAPF will help resolve complex planning issues relating to the provision of this significant residential and commercial growth

The proposed land use approach to the COA aims to:

1. To increase the residential population with new medium and high density residential
2. To expand the retail offer and have a managed growth of the office sector consistent with the status of the Croydon town centre as a metropolitan centre
3. Managed growth of the office sector and the release of office surplus/uncompetitive office space for alternative uses
4. Stem recent declines in job numbers and wider economic performance; and
5. Ensure the COA can grow and become a place where people want to live and recreate in addition to a place primarily used to work, shop and interchange.

The OAPF key land use proposals are:

Residential and community

- Promote mixed use development
- 7300 new homes across the COA
- Accommodate 17,000 new people
- A mix of medium to high density housing; of infill, mid-rise and towers
- Help deliver a new community with education, health and cultural facilities

Retail

- Consolidate primary comparison retailing in the Retail Core character area (North End, Centrale and Whitgift)
- Improve substantially the qualitative offer of retail space in the Retail Core to meet the current requirements of retailers and the aspirations of shoppers
- Support the development of a new quality full range department store, located to provide a joined up and comprehensive retail circuit in the Retail Core
- Enhance and enliven the COA High Streets through a mixture of physical improvements and a focussed high street retail support and physical improvement plan

Commercial

- Focus new commercial space at New Town & East Croydon

¹ English Heritage, The Environment Agency and Natural England

- 95,000 sq.m. of new office space
- Encourage refurbishment of 150,000 sq.m. of existing outdated office space.
- Promote conversion/redevelopment of surplus office buildings to other uses
- Help grow cultural and creative industries through the establishment of an Enterprise Centre in the COA

Built environment

- Transform the quality and character of Wellesley Road creating a new focal point at the heart of the COA
- Significantly improve the quality and permeability of the public realm
- New and improved streets & amenity
- Focus the most dense and tallest buildings in the centre of the COA
- Achieve well designed residential, commercial and retail buildings
- Improve transport capacity & the approach to public off-street parking

Baseline/Profile of Equality Groups

The Baseline analysis highlighted a series of issues concerning the Croydon Opportunity Area (COA). There is an existing residential population of approximately 8,000 people living with the COA. Less than 1,000 of these people live within the boundary of the CMC. As a result there is no notable evening presence, or support for COA services, facilities and social infrastructure. The urban centre is low density and insufficient mix. The OAPF foresees the development of significant residential development. It is relevant to consider the mix of housing typologies, tenure, and user groups.

There is a concentration of employment in the COA area of some 60,000 jobs. However, there has been drop in private sector employment balanced by a growth in the public sector. This is vulnerable to competition from other centres. Office vacancy is high (approx 30%) There is a lack of diversity in the local economy or diversity (i.e evening economy). The COA contains 2 large shopping malls, and two high street (London Road to South End and Church Street to George Street) which provide important service sector employment. Retail vacancy has been growing on the main street, and the main shopping Malls (Centrale and Whitgift) are dated. The Hotel sector is a growing major economic activity in Croydon, which highlights economic advantages of the COAs location and costs compared to central London.

The area around the opportunity area contains a diverse community and includes some deprived wards. The COA as a metropolitan centre, serves an important function for surrounding areas, and should be related to this population in terms of function, profile, and services. Social deprivation indicates the population suffers from poor overall health outcomes. The COA has a role in serving these needs. The quantum of development envisaged for the area has implications for schools and nurseries within and surrounding the opportunity area.

The COA is served by very good public transport infrastructure. Capacity in road network, and underused car parks presents opportunities. Strong physical segregation based on railway and road infrastructure severely affects pedestrian and cycling permeability across the COA.

With regard to environmental issues, while both Wandle Park and Park Hill have benefitted from improvements, there is a general lack of small open space, and in particular green space. Where there is open space in the COA its design and location mean that it is not easily accessible and tends to be underused as a result. There are no Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation and Sites of Importance for Nature Conservation. There is an opportunity for increased open space and intensive planting and a positive impact. The opportunity area is within an Air Quality Management Area, arising from car based pollutants, and the foreseen increase in household numbers has the potential to impact on CO₂ emissions. There are potential impacts arising from demolition and construction.

Development is proposed on brownfield sites. Intensification of development has potential to increase hard surface area, with negative effect on surface water run-off. The de-culverting of the Wandle River on the western side of the COA is positive for drainage and run-off. Intensive development in the COA will give rise to an increased demand for water, energy use, pressure on biodiversity and open space arising from population growth and increased economic activity.

Framework Development

For the purpose of assessing the potential Environmental Impact of the plan a series of SA objectives were developed which set out what is ideally to be achieved or tackled in terms of sustainable development. These objectives are wider than the plan objectives (which are typically more focused in their ambition and more oriented towards delivery). They provide a benchmark against which the content of the emerging OAPF – including options - can be assessed. The degree to which the OAPF is anticipated to contribute towards these objectives then provides a measure of its sustainability.

Alternatives

To further consider the impact of various means of achieving the OAPF goals four reasonable plan alternative(s) were developed. From this process, a preferred Alternative emerged titled the 'Consolidated Growth' approach emerges as a preferable alternative, due to its capacity to address the needs of the area; namely a declining commercial role, and under-performing residential function.

The Consolidated Growth approach is positive, as it builds upon the sustainable assets of the location (relative to public transport) and capacity of the landbank for renewal and intensification of activity through day and evening economies. Alt 2 appears to balance better the need to inspire change in the CMC, and utilising existing assets. The Medium to high economic growth, and medium to high housing growth provided under the Core Growth scenario are seen to have more beneficial effect on built heritage through and existing built fabric through the focus on growing the retail core and supporting the High Streets.

Assessment

The Assessment of the Sustainability (including SEA) and Equalities Impact of the OAPF is summarised in the following table.

SA Objective	Assessment of OAPF
<p>1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.</p>	<p>Proposals to increase and improve public realm throughout the COA will introduce new planting, & public open space/green spaces. The OAPF would have positive cumulative impact over the short to long-term</p>
<p>2. Water Quality & Water Resources. To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources</p>	<p>Replacement of dated building stock with new build (to high standard) could have positive impact on run-off from sites. Also the on-going de-culverting of the Wandle River will have a positive impact on drainage and flood-risk</p>
<p>3. Natural resources. To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products.</p>	<p>The proposals do not present any relative discernable benefit or negative impact on natural resources.</p>
<p>4. Climate Change. To address the causes of climate change through minimising the emissions of greenhouse gases</p>	<p>More people generally means more energy demand and emissions. However, new intense mixed-use development potentially mitigates impact, through good building standards and diminished travel demand Development will need to be managed to ensure effects on micro-climate are not negative</p>
<p>5. Air Quality. To improve air quality.</p>	<p>Evidence shows that Air Quality is generally dependent on vehicle emissions. The OAPF has limited impact on this, given location on strategic transport corridors, with origins and destinations outside COA. Bus services may adapt to new technologies with improvements. In line with London Plan policy new development in the COA will have to be air quality neutral.</p>
<p>6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</p>	<p>High growth scenarios have potential to have a higher energy demand. However dense populations present a greater efficiency in energy use. The development strategy would facilitate the LB Croydon CHP initiative. There is significant potential to pursue new and innovative approaches to future development including Area Rating, so that impact can be positive. This impact is medium to long-term and positive.</p>
<p>7. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed.</p>	<p>Building Height, Urban Realm and Land Use objectives have been designed to address the potential impact of development on protected and important built heritage, and architectural distinctiveness. In respect of tall buildings, 'Impacts of New Buildings on Views' seeks to mitigate the potential impact on skylines by requiring new development to demonstrate how it contributes to COA townscapes. The identification of character areas and related principles of the Urban Realm seek to identify and complement the built heritage of the COA. The approach of 'Consolidated Growth' will allow tall buildings to be located in areas which contribute to the skyline and the COA's overall built Environment and located in areas which will not unduly impact on heritage assets. The OAPF strategy is</p>

	considered neutral to positive over the medium to long-term.
8. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.	The OAPF provides clarity on the scale and location for intense redevelopment. LB Croydon and GLA standards for affordable housing, and diversity of tenure complement physical proposals. The OAPF impact is positive in the medium to long-term.
9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot.	Proposals to achieve an improved public realm and intense mixed use development in the Metropolitan Core area are important elements to necessitate less car journeys, and a more attractive pedestrian and cycling environment. OAPF measures are positive in medium to long-term.
10. Regeneration & Land Use To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.	The OAPF provides a positive framework for regeneration and new uses of brownfield lands. The OAPF is considered to have positive cumulative impact in the medium to long-term.
11. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.	The OAPF contains positive objectives to support employment in main retail streets and shopping centre redevelopment, as well as long-term office employment and construction employment over short to long term employment.
12. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.	Environmental enhancements are positive initiatives in themselves, but do not necessarily have broader benefits for community and social-cohesion, which requires social and economic sustainability for the community. The Mayor's Recovery Fund and funded Social Infrastructure measures will provide for early implementation and short to long term positive impact. Sustainable waste management practices (in accordance with the LB Croydon Waste Strategy) and good practice in noise control (construction and design) will complement sustainable character of new development.
13. Education and Skills. To improve the education and skills levels of the population.	Intensive growth and density will potentially support the establishment of new educational facilities in association with the LB Croydon Infrastructure Delivery Plan, and CIL.
14. Health and Well-being. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	Improved public space, public realm and improvements to cycle and pedestrian network may have health benefits for population. There are no direct health proposals.
15. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	For equality groups, the promotion of diverse housing tenures and typologies within a dense urban core may potentially be positive. The OAPF may enable the delivery of new facilities and services. Investment in the public realm & population intensification may have a positive impact on safety. The OAPF Land Uses strategy also includes specific proposals for the Delivery of Social Infrastructure. The Public Realm strategy highlights funded and unfunded interventions to be implemented immediately or in the longer term utilising the Mayor's Recovery Fund which provides £49.2m for 27 projects. The objectives proposed in the OAPF address a wide range of spatial issues

	which will have far reaching impact on people living and working in the borough. By providing better opportunities for jobs, homes, community facilities and transport network the OAPF would have an indirect but positive impact on community cohesion and equality issues.
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Overall, this Sustainability Appraisal considers the impact of the OAPF to positive in the short to long-term period.

The OAPF is in general found to be sound in equality issues.

1. Introduction

1(a) Background

The Croydon Opportunity Area Planning Framework (OAPF) is being produced jointly by the Greater London Authority (GLA), the London Borough of Croydon and Transport for London.

This Integrated Impact Assessment (IIA) has been prepared to accompany the OAPF, presenting an assessment of the environmental, social and economic performance of the OAPF.

The IIA incorporates the statutory requirements for Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), and Equalities Impact Assessment (EqIA). This approach provides for a comprehensive assessment, seeks to increase consistency and expediency of assessment work and benefits from a shared understanding of policies.

The preparation of this IIA is subsequent to firstly the IIA of the London Plan as adopted in 2011 (The OAPF is supplementary the London Plan) and then secondly the London Borough of Croydon, Core Strategy Proposed Submission Sustainability Appraisal (August 2011), and Equality Impact Assessment (Proposed Submission Draft Core Strategy (September 2011). In accordance with requirements of the SEA Directive, the 3 Statutory Consultees² were invited to comment of the scope of Sustainability Appraisal.

1(b) Opportunity Area Planning Frameworks

Policy 2.13 of the London Plan encourages strategic partners to work with the Mayor to prepare, and then implement, spatial planning frameworks for opportunity areas set out in the London Plan.

Paragraph 2.58 of the London Plan states that planning frameworks for opportunity areas should focus on implementation, identifying both the opportunities and challenges that need resolving such as land use, infrastructure, access, energy requirements, spatial integration, regeneration, investment, land assembly and phasing.

The objectives of Opportunity Area Planning Frameworks are:

- To establish a policy framework which brings together London Plan and Borough development plan documents (DPDs);
- To set out the policy framework in a series of maps and diagrams to define a geographically accurate spatial context to enable major developments to come forward in a co-ordinated manner;
- To bring forward partnership working in strategically significant development areas in London – maximising public and private resources in regeneration;
- To bring consultation forward in the planning process by engaging planning authorities and developers as early as possible and throughout the development process.

² English Heritage, The Environment Agency and Natural England

1(c) Introduction to the Croydon OAPF

The OAPF for Croydon has been produced in partnership by the Greater London Authority (GLA) with Transport for London (TfL), London Borough of Croydon, and partner organisations form the steering group for the project.

Covering an area of 194 Ha. Croydon Opportunity Area is one of 33 opportunity areas identified in the Mayor’s London Plan. This provides for a new community of 7,300 homes (17,000 people) over the next 20 years, up to 95,000 sq.m. of new commercial space along with substantial refurbishment/redevelopment of existing stock, and a focussed growth in the retail sector.

The OAPF will help resolve complex planning issues relating to the provision of this significant residential and commercial growth. Key issues include car parking, infrastructure and transport, connections with Purley Way and providing an attractive and consolidated commercial area. The OAPF will also deliver a series of development guides to help enable development by addressing issues around the existing poor public realm, tall buildings, provision of family housing, building typologies, conversions of vacant and underused office space, utilising leftover spaces, and principles for new retail development.

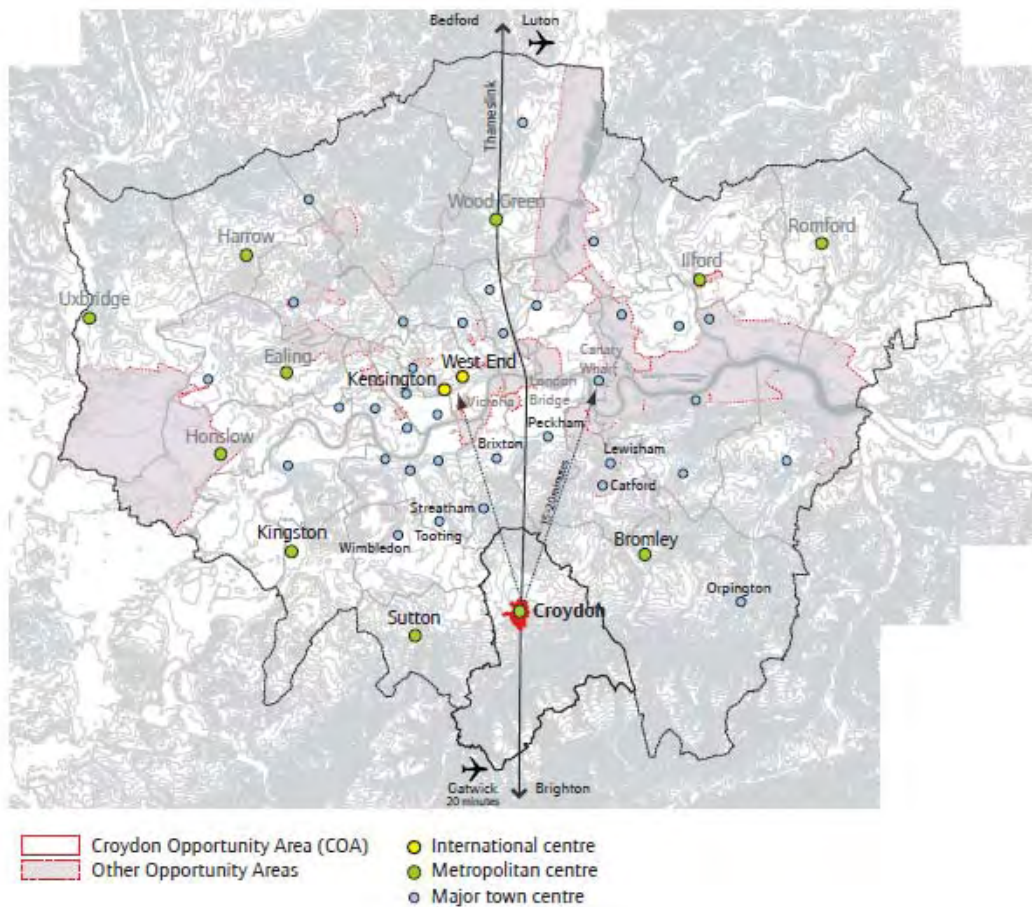


Figure 1.1. Croydon Opportunity Area in Londonwide Context

Context

The Croydon Opportunity Area (COA) includes the Croydon Metropolitan Centre (CMC) and immediate surrounding residential areas. The COA also includes Wandle Park and Park Hill.

The COA is characterised by a central and an outer area. The central area comprises; the core commercial and tall buildings areas around New Town & East Croydon, served by East Croydon Station; and the core retail area around the pedestrianised North End, and Old Town with its lower rise buildings, served by West Croydon Station. Both areas are joined by Tramlink. The outer area is a more urban and suburban residential in nature, characterised by older, heritage, lower rise residential buildings with some ground floor retail and commercial uses and some random tall buildings.

The COA has predominant land uses are: commercial, retail, car parking and residential with approximately 3,000 homes. Institutional buildings include the law courts, police station, library, museum complex and Council offices. Religious buildings include the Minster of St John the Baptist and Parish Church St. Michael and All Angels. Croydon College is centrally located, while smaller educational facilities and schools are located around the periphery of the central area.

The COA accommodates an important transport interchange function. Commuters flow to and from its rail stations, between London and the south coast. By rail, the COA is midway between Central London and Gatwick Airport.

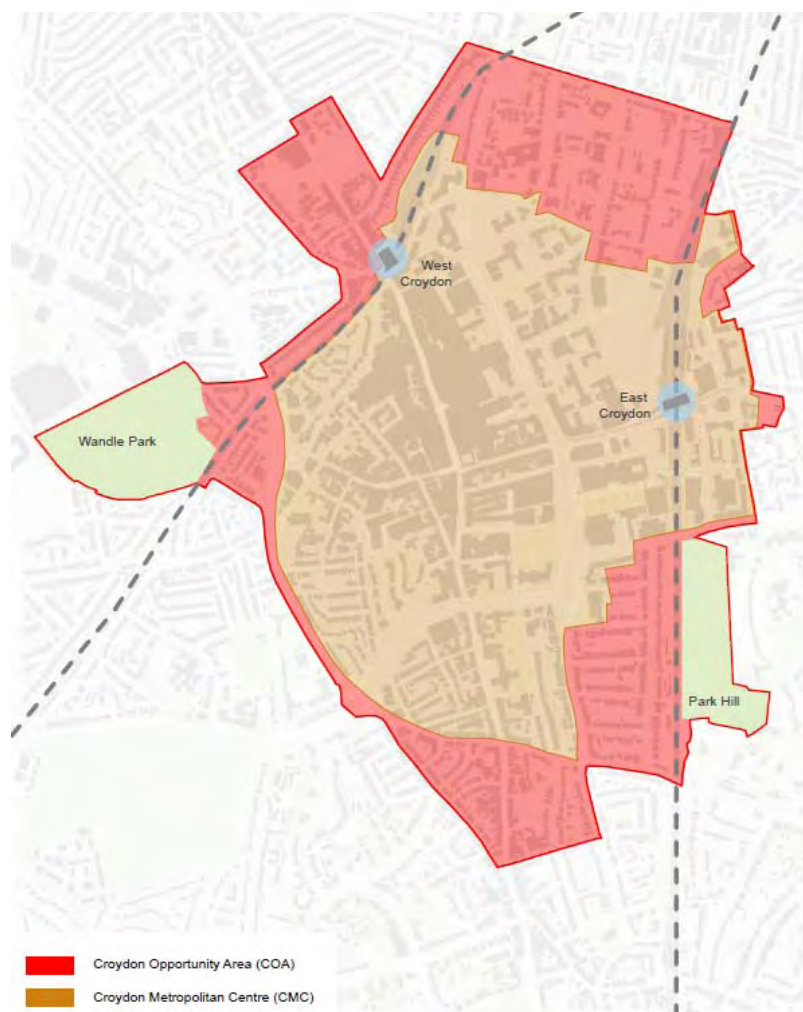


Fig 1.2 Definition of Croydon Opportunity Area and Croydon Metropolitan Centre (CMC)

OAPF Development Principles

The proposed land use approach to the COA aims to:

1. To increase the residential population with new medium and high density residential
2. To expand the quality of the retail offer and have a managed growth of the office sector consistent with the status of the Croydon town centre as a metropolitan centre
3. Managed growth of the office sector and the release of office surplus/uncompetitive office space for alternative uses
4. Stem recent declines in job numbers and wider economic performance; and
5. Ensure the COA can grow and become a place where people want to live and recreate in addition to a place primarily used to work, shop and interchange.

OAPF Objectives

The OAPF key land use proposals:

Residential and community

- Promote mixed use development
- 7300 new homes across the COA
- Accommodate 17,000 new people
- A mix of medium to high density housing; of infill, mid-rise and towers
- Help deliver a new community with education, health and cultural facilities

Retail

- Consolidate primary comparison retailing in the Retail Core character area (North End, Centrale and Whitgift)
- Improve substantially the qualitative offer of retail space in the Retail Core to meet the current requirements of retailers and the aspirations of shoppers
- Support the development of a new quality full range department store, located to provide a joined up and comprehensive retail circuit in the Retail Core

Enhance and enliven the COA High Streets through a mixture of physical improvements and a focussed high street retail support and physical improvement plan

Commercial

- Focus new commercial space at New Town & East Croydon
- 95,000 sq.m. of new office space
- Encourage refurbishment of 150,000 sq.m. of existing outdated office space.
- Promote conversion/redevelopment of surplus office buildings to other uses
- Help grow cultural and creative industries through the establishment of an Enterprise Centre in the COA

Built environment

- Transform the quality and character of Wellesley Road creating a new focal point at the heart of the COA
- Significantly improve the quality and permeability of the public realm
- New and improved streets & amenity
- Focus the most dense and tallest buildings in the centre of the COA
- Achieve well designed residential, commercial and retail buildings
- Improve transport capacity & the approach to public off-street parking

1(D) PURPOSE OF IIA

The purpose of IIA is to facilitate better strategy development by seeking to integrate key issues such as sustainability, health, equalities, climate change adaptation and mitigation and community safety within a single impact assessment process, thus maximising opportunities for synergies. IIA considers the implications of a plan or strategy, from a broad perspective, by assessing it against an appropriate level of evidence to identify potential significant effects and synergistic solutions.

1(e) Sustainability Appraisal

The Sustainability Appraisal (SA) process incorporates the requirements of the European Directive (Directive 2001/42/EC) on the environmental assessment of plans and programmes. The SA covers wider social and economic effects of plans, as well as the more environmentally-focused considerations in the Directive.

The SEA Directive is implemented in England through the Environmental Assessment of Plans and Programmes Regulations 2004. The Directive is procedural in nature and sets out a series of steps that must be undertaken as part of an assessment. The purpose of the SEA is summarised in Article 1:

"To provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adaptation of plans and programmes with a view to promoting sustainable development".

This IIA document comprises the 'Environment Report' required under SEA.

The aims of this SA are to:

- Ensure the OAPF fully integrates sustainable development into the strategy making process, influencing all stages of the plan development.
- Ensure the OAPF provides environment protection and balances environmental, economic and social considerations.
- Ensure the OAPF gains more material weight and planning consideration following the process of undertaking a SA.
- Consult on the SA process informing the public and stakeholders of the appraisal's finding.

1(f) Equality Impact Assessment (EqIA)

The purpose of an Equality Impact Assessment (EqIA) is to improve strategies, policies and projects by making sure they do not discriminate and that, where possible, they promote equality. This assessment must consider the impacts of any policies upon different groups (in national EqIA practice these have included: women; Black, Asian and minority ethnic people; disabled people; children and young people; older people; faith groups; lesbians, gay men, bisexual and trans gendered people). It will also ensure that the requirements of the Race Relations Act 1976 (statutory duties) Order 2001, Disability Discrimination Act (2005) and Equality Act (2006) to promote race, disability and gender equality are met. Through the integration of an EqIA, the Mayor can ensure that equalities issues are considered in the making of OAPF document.

1(g) Structure of this Report

The purpose of this IIA Report is to present the findings of the impact assessment of the Croydon Opportunity Area Framework Document against a range of social, economic and environmental indicators. This report is structured as follows:

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|------------------|---|
| Section 1 | Introduction and Background: Provides the planning context to the OAPF and its ambitions and development principles. |
| Section 2 | The IAA process Methodology of the SA and EqIA |
| Section 3 | Baseline and Context Information on Social, Environmental and EqIA Profile of Equality Groups |
| Section 4 | Developing the Framework |
| Section 5 | Alternatives Consideration of the plan options and their impact |
| Section 6 | Assessment: The assessment of policies and objectives in the OAPF, for SA and EqIA |
| Section 7 | Mitigation A framework for the mitigation of potential impacts |
| Section 8 | Monitoring: A framework for monitoring of important indicators |

1(h) Consultation

This IIA Report was issued for public consultation from 23 July 2012 to the 28 September 2012. An update to the IIA was undertaken following consultation on the draft OAPF and IIA Report, to take into account consultation responses received, amendments made to the draft OAPF in response to consultation responses received and following further consideration of the likely environmental effects of the adoption version of the OAPF and mitigation measures. The

changes made to the final IIA are minor in nature and therefore do not change the overall conclusion of the final IIA.

2. The IIA Process (methodology)

The IIA approach entails a parallel process, where the key requirements of the Sustainability Appraisal (including SEA) and Equality Impact Assessment are progressed in coherent manner. The approach to these assessments takes account of relevant guidance³. The Assessment should be proportionate and relevant to the scale and extent of the strategy proposed. It should build on previous assessments that have been undertaken⁴, minimise duplication, but also not delegate assessment or decisions downwards that should be addressed at the strategic level. Consultation on IIA is a basic requirement. The two parallel processes are set-out below.

2(a) Sustainability Appraisal Process

The table below outlines the key stages of the SA process (which are based on Guidance on Sustainability Appraisal (ODPM,2005 (Fig. 5, p.39). Stages A, B and C of the process are combined with the SA. This approach is in keeping with Government guidance, which notes the importance of treating the SA as a flexible process, tailored to the needs of different plans and programmes to which the directive applies whilst at the same time ensuring that the requirements of the directive are met.

2(b) The SEA directive

The issues, environmental objectives, and assessment methodology to be addressed by this IIA are also required to be informed by the SEA Directive. Annex I of the SEA Directive states that the assessment should include information on the *“likely significant effects on the environment, including on issues such as:*

- (i) biodiversity*
- (ii) population*
- (iii) human health;*
- (iv) fauna;*
- (v) flora;*
- (vi) soil;*
- (vii) water;*
- (viii) air;*
- (ix) climatic factors;*
- (x) material assets;*
- (xi) cultural heritage, including architectural and archaeological heritage;*
- (xii) landscape; and*
- (xiii) the inter-relationship between the issues referred to in heads (i) to (xii).”*

In accordance with the SEA Directive, the potential effects that may arise from the implementation of the OAPF on each of the relevant issues identified above will be considered as part of the Sustainability Appraisal as outlined in the following table.

³ See list of documents in section 3

⁴ GOL CIRCULAR 1/2008 Strategic Planning in London, Section 3.6,p.12

Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope
A1	Identifying other relevant plans, policies and programmes and sustainable development objectives
A2	Collecting baseline information
A3	Identifying Sustainability issues and problems
A4	Developing the Sustainability Appraisal framework
A5	Consulting on the scope of the Sustainability Appraisal
Stage B	Developing and refining options and assessing effects
B1	Testing the OAPF objectives against the SA framework
B2	Developing the OAPF options
B3	Predicting the effects of the OAPF
B4	Evaluating the effects of the OAPF
B5	Considering ways of mitigating adverse effects and maximising the effects of implementing the OAPF
B6	Proposing measures to monitor the significant effects of implementing the OAPF
Stage C	Preparing the Sustainability Appraisal report
C1	Prepare the SA
Stage D	Consulting on the draft OAPF and SA report
D1	Public participation on the SA report and the draft OAPF
D2	Assessing against significant changes
D2	Making decisions and providing information
Stage E	Monitoring implementation of the OAPF

Table2.1: SA Stages and Tasks incorporating SEA process.

Stage A involves establishing the framework for undertaking the SA – essentially a set of sustainable development objectives against which the OAPF can be assessed, together with the evidence base that will help to inform the appraisal. The evidence base determines the environmental, social and economic characteristics of the area in question, which can be used in evaluating the impacts of the OAPF on the sustainable development objectives. The OAPF focuses on brownfield development in an established metropolitan centre (the COA), so the evidence and objectives should be appropriate to this context.

Stage B assesses the proposed land use, economic and social infrastructure objectives in the OAPF against the sustainable development objectives with reference to changes that may be caused to the baseline evidence base. Measures for mitigating and monitoring the effects of options / preferred options can also be put forward at this stage.

Stage C involves documenting the appraisal process and findings in a Sustainability Appraisal Report (incorporated in the IIA) and Stage D involves consultation on this report and the preferred options themselves. Stage E involves monitoring the implementation of the LDD including its significant effects.

The purpose of preparing an SA to accompany and inform the Croydon OAPF is to support the creation of sustainable communities able to manage and use resources efficiently and to tap the ecological and social innovation potential of

the economy, ensuring prosperity, environmental protection and social cohesion⁵.

2(c) Limitations of the SA approach followed

In accordance with section 12(5) of the Environmental Assessment of Plans and Programmes Regulations 2004, the statutory Consultation Bodies (Environment Agency, English Heritage and Natural England) were invited to make comments on the scope of the Environment Report / Sustainability Appraisal to be prepared, referring to the main issues to be addressed in the SA report. A formal scoping report was not prepared as part of this consultation (there is no legal requirement to produce one) having regard to the substantive work recently completed (August 2011) as part of the Croydon Core Strategy Strategic Appraisal (in which the plan area is located),

Other limitations may arise from the availability and inconsistency of baseline data. Appraisal of policies is not a straightforward process and the outcomes include uncertainty due to the following factors:

- Lack of suitable and appropriate data to base indicators on;
- Natural variation. Personal perception and interpretation might interfere policies implementation;
- Limited documentations of cause and effects. It would be difficult to associate cause and effects, for instance, the impacts of climate change and waste generation.
- Late initiation of the SA;
- Data could not be compared on a like for like basis. Some categorises of census data were restricted to borough level; and
- Uncertainty in predicting policy and timeframe for implementation

⁵ The Renewed EU Strategy for Sustainable Development (10117/06)

2(d) Equalities Impact Assessment (Methodology)

The EqIA process is addressed in parallel to the SA/SEA methodology outlined above. This is in accordance with the Equalities Act 2010 which requires authorities to conduct and publish assessments to determine whether their policies, practices and procedures have an adverse impact on any section of the community.

The Equalities Act 2010 protects people from discrimination on the basis of “protected characteristics”. These are the grounds upon which discrimination is unlawful. The relevant characteristics for services and public functions are:

- age;
- disability;
- gender reassignment;
- race, including ethnic or national origins, colour and nationality;
- religion or belief;
- sex/gender, including maternity and pregnancy; and
- sexual orientation;
- Marriage and civil partnership - in relation to the need to eliminate unlawful discrimination as set out below.

The Mayor and the GLA when exercising their functions must have due regard to:

- Eliminating unlawful discrimination, harassment and victimisation and any other conduct which is unlawful under the Equality Act 2010.
- Advancing equality of opportunity between people who share a protected characteristic, and those who don't have that characteristic. This means in particular:
 - a. Removing or minimising disadvantages suffered by people who share a protected characteristic that are connected to that characteristic.
 - b. Taking steps to meet the needs of people who share a protected characteristic that are different from the needs of people who don't have that characteristic.
 - c. Encouraging people who share a protected characteristic to participate in public life or in any other activity in which their participation is disproportionately low.
- Fostering good relations between people who share a protected characteristic, and those who don't have that characteristic. This means, in particular:
 - a. Tackling prejudice;
 - b. Promoting understanding.

For the purpose of this report people with these protected characteristics are referred as *equality groups*. This EqIA seeks to identify those groups that may be disadvantaged by the proposals, and address what the equality impacts are, and what measures are to be applied to policy to minimise or eliminate the adverse equality impacts? The EqIA must also establish a framework to monitor and review the proposed changes after implementation to check they work as planned and to screen for unexpected equality impacts.

This EqIA follows upon the preparation of the EqIA for the Croydon Core Strategy. It therefore, has the benefit of the comprehensive research conducted as part of

that study (for a broader catchment area than the COA), and also the knowledge gleaned through the consultation process with Equality Groups. It is an important part of this OAPF EqIA that the contributions made by these groups be addressed during implementation. EqIA.

3. Baseline and context

3(a) Links to policies, plans programmes, and sustainability objectives (Task A1)

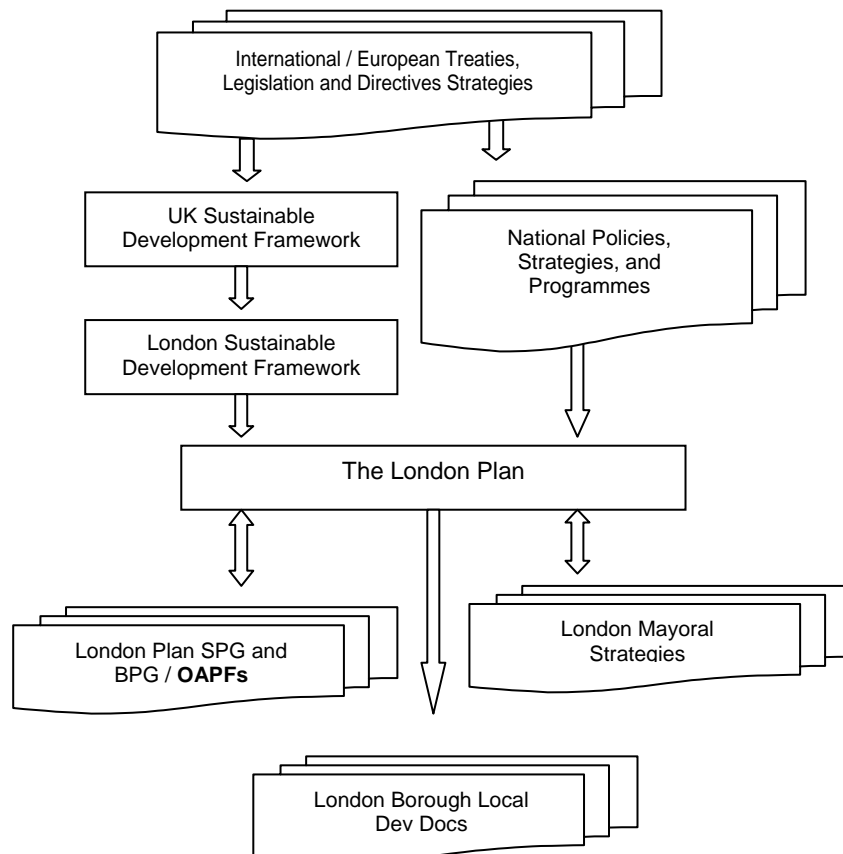
The 2004 SEA Regulations (Schedule 2) require the Environment Report *to include an outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.*

The purpose of reviewing plans and programmes as part of the IIA is to ensure that the relationship the Croydon OAPF has with other documents is recognised, and to ensure that any relevant environmental protection and sustainability objectives contained within these are taken on board as required by the SA/SEA process.

Reviewing plans and programmes can also highlight appropriate baseline information for the plan area and help inform identification of the key sustainability issues. This is particularly important in the case of this IIA, where recent SA and EqIA of the Croydon Borough Core Strategy are particularly contemporary and relevant.

The OAPF is framed in the context of international, national, regional and local objectives and policy. The SA scoping process undertaken by the London Borough of Croydon as part of the formulation of the Local Development Framework Core Strategy, is an important source document for the OAPF, as are the background studies undertaken in preparation of the OAPF itself. To summarise, the documents that influence (and are influenced by) the IIA of the OAPF are outlined below in Figure 3.1.

Fig. 3.1 Plan Hierarchy



The table below lists all relevant plans, policy documents and programmes at the regional and local level along with technical reports that have been used to establish the opportunity area baseline:

International
European Directive 2001/42/EC (SEA Directive)
European Directive 92/43/EEC and amended by 97/62/EC on the conservation of natural habitats
National
National Planning Policy Framework, Department for Communities and Local Government , March 2012
Sustainability Appraisal Advice note, Planning Advisory Service, June 2010
The UK Government Sustainable Development Strategy, 2005
Localism Bill: neighbourhood plans Equalities Impact Assessment January 2011 (Department for Communities and Local Government)
Regional / London -
The London Plan 2011
Draft affordable housing note 2011
Early minor alterations to the London Plan 2011
All London Green Grid 2011
Mayoral Community Infrastructure Levy 2011
Sustainable Development Framework for London
Sustainable Design and Construction SPG 2006
Industrial Capacity SPG 2008
Draft London View Management Framework 2011
Sustainable Communities in London ODPM 2003
GOL CIRCULAR 1/2008 Strategic Planning in London,
The Mayor's Housing Design Guide 2010
London Climate Change Adaptation Strategy
London Water Strategy 2007
Health Inequalities Strategy 2008
Draft River Basin Management Plan 2009
Health Care for London. A Framework for action. Second Edition.
Improving Londoners Access to Nature – London Plan Implementation Report 2008
London Energy Strategy 2009
London Economic Development Strategy 2010
Meeting the needs of London's diverse communities 2006
Transport 2025: transport vision for a growing world city 2006
Improving walkability. Good practice guidance on improving pedestrian conditions as part of development opportunities 2005
Sub-Regional/ South London
South London Waste Plan 2011
Borough – Croydon
Core Strategy Croydon Development Plan Document - Proposed Submission for Publication For consultation 12 September to 24 October 2011
We are Croydon, This is our vision (Strategic Partnership Croydon)
Borough Character Appraisal Version 4 Evidence Base June 2011
Faiths Together in Croydon, <i>An Interfaith Network</i> Faith Communities in Croydon - Findings from the 2006 Mapping Exercise (Penny Smith-Orr & Barry Godwin)
London Borough of Croydon Council Indoor Sports facilities needs assessment Final Report, Aug 2009

FD2619 Developing Urban Blue Corridors, Scoping Study, Final Report March 2011 (URS/Scott Wilson, Kingston University and London Borough of Croydon were commissioned by the Department for Environment, Food and Rural Affairs (Defra) under the joint Defra/Environment Agency)
Croydon Climate Change Mitigation Action Plan, <i>Croydon Environment and Climate Change Partnership (Strategic Partnership Croydon)</i>
Local Development Framework Sustainable design and construction evidence base, Croydon Decentralised Energy Study (February 2010)
Strategic Flood Risk Assessment Croydon Level 2 Final Report, April 2009 Scott Wilson for Croydon Bor.
London Borough of Croydon Open Space Needs Assessment, Final Report August 2009
Core Strategy Sustainability Appraisal (London Borough of Croydon)
Equality Impact Assessment , Full Assessment Proposed Submission Draft Core Strategy, Sept 2011
Borough of Croydon Urban Centre Baseline Report 1 June 2009 (Space Syntax Limited © 2009)
Core Strategy, Sustainability Appraisal Scoping Report
Croydon Joint Strategic Needs Assessment 2009-10 Children with special educational needs & disabilities
Improving health and well-being, Our plan for a healthy Croydon 2008-11 (Healthy Croydon Partnership)
Infrastructure Delivery Plan, Local Development Framework, August 2011
Housing Croydon <i>Our strategy to 2015</i> Evidence base to April 2011

Table 3.1: Plans, policy documents and programmes

The overall objective to prepare the OAPF's derives from section 2.13 of **The London Plan 2011** where it sets out the following under **Policy 2.13 Opportunity Areas and Intensification Areas**

Strategic

A Within the opportunity and intensification areas shown in Map 2.4, the Mayor will:

- a provide proactive encouragement, support and leadership for partnerships preparing and implementing opportunity area planning frameworks to realize these areas' growth potential in the terms of Annex 1, recognising that there are different models for carrying these forward; or
- b build on frameworks already developed; and
- c ensure that his agencies (including Transport for London) work collaboratively and with others to identify those opportunity and intensification areas that require public investment and intervention to achieve their growth potential.
- d encourage boroughs to progress and implement planning frameworks to realise the potential of intensification areas in the terms of Annex 1, and will provide strategic support where necessary.

Planning decisions

B Development proposals within opportunity areas and intensification areas should:

- a support the strategic policy directions for the opportunity areas and intensification areas set out in Annex 1, and where relevant, in adopted opportunity area planning frameworks

- b seek to optimise residential and non-residential output and densities, provide necessary social and other infrastructure to sustain growth, and, where appropriate, contain a mix of uses
- c contribute towards meeting (or where appropriate, exceeding) the minimum guidelines for housing and/or indicative estimates for employment capacity set out in Annex 1, tested as appropriate through opportunity area planning frameworks and/or local development frameworks

Annex 1 (6) of the London Plan sets out the Strategic Policy Direction for Croydon:

One of the potential Strategic Outer London Development Centres, Croydon is also recognised as London's largest 'Metropolitan' town centre and one of the capital's two strategic office centres outside central London. The council's strategy will need to be built upon to re-brand the offer of Croydon to meet modern commercial needs, realising its competitive advantages and good public transport accessibility. This will entail consolidating its strengths as a strategic office location through mixed-use re-development and enhancements to the business environment. A carefully managed balance must be struck between modernising office provision and encouraging the conversion of surplus capacity to other uses including a significant increment to housing. An integrated approach to a number of sites will be needed, including East Croydon station, Fairfield Halls, Croydon College, Park Place and the Whitgift extension. Rejuvenation of the mix and vitality of supporting uses, enhancement of the environment and improvements to traffic management will help support redevelopment.

The London Plan policy provided for an OAPF area of 173 Ha. with indicative employment capacity of 7,500 Min. and 10,000 new homes, while recognising that the detailed figures need to be reviewed and amended through the detailed preparation of an OAPF.

Croydon Core Strategy 2011

The preparation of the Croydon Core Strategy has driven several important studies for this IIA referred to in the table above. The research undertaken for the Core Strategy Sustainability Appraisal, Infrastructure Delivery Plan and Equalities Impact Assessment presented important scoping, environmental, health and social perspectives on the COA. Paragraphs 7.101 to 7.107 of the Plan reflect the London Plan's ambitions for the Metropolitan Centre as the foremost retail location outside of Central London, and to be a major office and residential location with up to 95,000m² of new and refurbished office floor space. A varied evening economy, for existing and new residents can utilise the good links and location relative to the City, West End, Docklands and Gatwick Airport. Hotels and conferencing will be a growth sector in the Opportunity Area. Fairfield Halls will continue to be a major regional arts facility. It is envisaged that masterplanning process will present opportunities to improve the public realm of the Opportunity Area. Also, the potential exists to implement flood mitigation and adaptation measures from Old Town towards the Brighton Road and for carbon reduction from a district energy network within CMC. Proposed improvements to Wellesley Road and improved east-west links are to provide more access to the three major parks on the outskirts of Croydon Opportunity Area (Wandle Park, Park Hill and Duppas Hill), other Local Historic Parks and Gardens, and the wider Green Grid.



Fig. 3.2 LB Croydon Core Strategy for Croydon Opportunity Area

3(b) Baseline considerations (Task A2)

In order to identify the issues for both the plan and the SA it is necessary to first establish an evidence base. The 2004 SEA Regulations (Schedule 2) require that the Environment Report include information on 'the relevant aspects of the current state of the environment and the likely evolution thereof'. The baseline or 'receiving environment' study helps to clarify the scope of the SA/SEA Assessment and Key Sustainability Issues for the OAPF plan.

The baseline summary below describes the underlying social, economic considerations and environmental conditions, and provides a basis for predicting and monitoring effects, and includes the topic areas referred to in the SEA Regulations. The baseline conditions are taken from a range of sources including the policy, plans and programmes referenced above. The baseline is formed of the following topic areas.

- Spatial context;
- The built environment;
- Heritage;
- Employment and income;
- Deprivation;
- Flood risk and water resources;
- Biodiversity;
- Air quality;
- Social infrastructure;
- Transport and travel.

3(c) Sustainability Appraisal Baseline context

Spatial context

The Croydon Opportunity Area (COA) is 194 Hectares in extent and is included entirely within the London Borough of Croydon. It includes the Croydon Metropolitan Centre (CMC) and immediate surrounding residential areas. The COA is generally characterised by a highly urbanised metropolitan centre, but also includes Wandle Park and Park Hill.

The COA accommodates an important transport interchange function. Commuters flow to and from its rail stations, between London and the south coast. By rail, the COA is 15 minutes from central London and 20 minutes from Gatwick Airport. However, Road connections to Central London are generally poor. In instances where they are relatively good such as the A23, heavy traffic congestion exists.

The Built Environment (Material Assets)

The COA is characterised by a central and an outer area. The central area comprises; the core commercial and tall buildings areas around New Town & East Croydon, served by East Croydon Station; and the core retail area around the pedestrianised North End, and Old Town with its lower rise buildings, served by West Croydon Station. Both areas are joined by Tramlink. The outer area is a more urban and suburban residential in nature, characterised by older, heritage, lower rise residential buildings with some ground floor retail and commercial uses and some random tall buildings.

The COA predominant land uses are commercial, retail, car parking and residential. Institutional buildings include the law courts, police station, library, museum complex and Council offices. Religious buildings include the Minster of St John the Baptist and Parish Church St. Michael and All Angels. Croydon College is centrally located, while smaller educational facilities and schools are located around the periphery of the central area.

The dominant land use in the COA is office space. Retail and car parking (underground, surface level and multi-storey) are secondary, with other important uses including residential, hotel and educational/community. The COA is London's third largest provider of office space, after the City of London and Canary Wharf. There is 550,000 sqm. of space in the COA. The most successful office space in the COA is located close to East Croydon station, with approximately 6 or 7 Grade A office buildings in this area. However, approximately 30% of the overall office stock is vacant and a large proportion of the office space achieve relatively low rental values.

The COA has a strong retail offer and this attracts shoppers from all over London and the south east region. The COA has approximately 270,000 sqm. of retail floorspace. Shopping in the COA is provided in; the core retail area located between the Whitgift Centre, North End and Centrale; and also along a series of local high streets that run north / south from South End to London Road, and east / west from Church Street to George Street. The core retail area houses the large comparison goods shopping and the higher end retailers, whilst the high streets provide more independents and convenience shopping.

There are approximately 2,500 to 3,000 homes in the COA, with an existing residential population of approximately 9,000 people, with only some 1,000 persons located in the central area and 8,000 in the outer area as identified on Fig. 1.2.

The COA contains approximately 1,000 hotel bed spaces and this market is performing strongly. This is linked to great rail connections to central London, Gatwick and the wider south east; cheaper room rates compared to central London; and its own retail and cultural offer.

Heritage

The COA's history has been one of short bursts of rapid growth, interspersed by periods of much slower change, or decline. From mediaeval market town to the Victorian centre of suburban Surrey, its location between central London and its rural hinterland has always attracted people, commerce and wealth. The first railways and car based suburbs brought significant change to Croydon and this continued post war with the creation of the Croydon Development Corporation which provided much of the impetus for the growth of offices and the building of Whitgift Shopping Centre and Fairfield Halls.

The COA contains 35 listed buildings and scheduled monuments⁶ and 6 conservation areas. These buildings and places cover and include a wide range of heritage building ages and styles, from old historic buildings to post war modernist buildings.

English Heritage have included the Wellesley Road North Conservation Area on their 'At Risk List' (2011). Surrey Street Pumping Station, Surrey Street and the Segas Offices, Park Lane are included on the Buildings at Risk list (2011)

Table 3.2 Statutory listed buildings

- | | |
|--|---|
| 1. 46 SOUTH END II | 20. UNION BANK CHAMBERS 21 KATHARINE STREET II |
| 2. BOSWELL COTTAGES 19 SOUTH END II | 21. MUNICIPAL BUILDINGS COMPRISING THE CLOCK TOWER, PUBLIC LIBRARY, AND CORN EXCHANGE, AND INCLUDING THE AREA |
| 3. BOSWELL HOUSE 17 SOUTH END II | 22. CROYDON WAR MEMORIAL KATHERINE STREET II |
| 4. 88 SOUTHBRIDGE ROAD II | 23. 11 CROWN HILL II |
| 5. CHURCH OF ST ANDREW SOUTHBRIDGE ROAD II | 24. 13 AND 13A CROWN HILL II |
| 6. SEGAS OFFICES 32 PARK LANE | 25. NUMBERS 2 TO 8 (EVEN) WITH BOUNDARY WALL AND ENTRY ARCHES AND PIERS CHURCH ROAD II |
| 7. THE SOCIETY OF FRIENDS HALL 60 PARK LANE | 26. CHURCH OF St. Andrew, South Bridge Road II |
| 8. NAT WEST BANK (39 to 45) HIGH STREET II | 27. CHURCH OF ST JAMES ST JAMES ROAD II* |
| 9. THE SHIP PUBLIC HOUSE 47 HIGH STREET II | 28. PARISH CHURCH OF ST MICHAEL AND ALL ANGELS POPLAR WALK I |
| 10. WRENCOTE HOUSE 123 HIGH STREET II* | 29. ELECTRICITY SHOWROOMS AND OFFICES WELLESLEY ROAD II |
| 11. FORMER GRANT'S DEPARTMENT STORE 14, 16 AND 18 HIGH STREET II | 30. Surrey Street Pumping Station II |
| 12. OLD PALACE SCHOOL (CROYDON PALACE) OLD PALACE ROAD I | 31. Ruskin House, 23 Coombe Road II |
| 13. 61, 63, 65 CHURCH STREET II | 32. Gatepiers to Gates to no. 23 Coombe |
| 14. 91 AND 93 CHURCH STREET II | |
| 15. PARISH CHURCH OF ST JOHN THE BAPTIST CHURCH STREET I | |
| 16. 120 CHURCH STREET II | |
| 17. ELIS DAVID ALMSHOUSE INCLUDING RAILINGS AND GATES TO STREET, 122 | |

⁶ English Heritage NMR Data Download.

- | | |
|--|---|
| CHURCH STREET II | Road II |
| 18. ROSE AND CROWN PUBLIC HOUSE 124
CHURCH STREET II | 33. Hospital of the Holy Trinity (Whitgift
Hospital), North End I |
| 19. THE DOG AND BULL PUBLIC HOUSE 24
SURREY STREET II | 34. Redcourt, 27 Stanhope Road II |
| | 35. Park Hill Water Tower (in Park Hill
Recreation Ground, Water Tower Hill II |

List of historic parks and gardens in the COA

- *Park Hill Recreation Ground*
- *Queen's Gardens*
- *Whitgift Almshouse*
- *St. John's Memorial Garden, Church Street*
- *Wandle Park*

Figure 3.3 Location of Listed Buildings and Conservation Areas in COA

CONSERVATION AREAS

- 1. Parish Church
- 2. Central Croydon
- 3. St. Marys
- 4. Chatsworth

LISTED BUILDINGS

- Statutory listed
- Locally listed
- Local landmarks



CONSERVATION AREAS

- 1 Parish Church
- 2 Central Croydon
- 3 St Marys
- 4 Chatsworth

LISTED BUILDINGS

- Statutory listed
- Locally listed
- L Local landmarks

Employment and income

Croydon is one of the biggest employment locations in South London with approximately 60,000 employees in the town centre (down from about 75,000 people in the mid 1980's). Its transport links integrate Croydon's and London's labour market. This is positive for attracting and retaining Croydon residents who can access a wide pool of job opportunities and benefit from London's growth (although this also means that Croydon's businesses are competing with a wide geographic area for the most talented staff). The attractiveness of London to Croydon residents is reflected in the fact that Croydon is a net exporter of labour. It is also illustrated by a decrease in Croydon's job density, meaning the town is becoming more residential.

Altogether almost 40 percent of Croydon's workforce commuted to other London local authorities in 2004. Most travelled north into other south or central London local authorities. Comparatively, Croydon's commuting flows into the Gatwick Diamond are of a secondary nature. Considering the variety and volume of jobs in London compared with the Gatwick Diamond this is unsurprising.⁷

The majority of those working in Croydon in 2004 also lived there. Of those commuting into Croydon, 24.2 percent lived in other London boroughs in 2004, predominantly in the south of the capital. This means that while Croydon benefits from London's growth, it also acts as a 'hub' in its own right, mainly for local residents and residents of neighbouring boroughs, such as Bromley and Sutton.

The main employment sectors in Croydon are;

- 29.9% - public sector, education, health
- 28.6% - banking, finance and insurance
- 22.3% - distribution, hotels, restaurants, retail
- 3.2% - manufacturing

The public sector is one of Croydon's main employers and has been a major source of job growth. Public sector jobs growth accounted for almost all of the total jobs growth between 1998 and 2008, stabilising employment levels within the borough during a time of private sector job losses. As the private sector lost 10,500 jobs between 1998 and 2008, the public sector created 14,000 jobs. Employment within the sector now stands at 29.9 percent, eight percentage points above the average employment in the sector within the London Primary Urban Area, making the area highly dependent on the public sector⁸.

Private sector employers include Nestle, MDA Consulting, Mondial Insurance, Direct Line Insurance, Chartis Insurance, Atkinson WS Group, MDA Consulting, TPS Consult, Alders, House of Fraser, Debenhams, NCP, Marks & Spencer and Pension Protection Fund. Public sector employers include the Local Authority, UK Border Agency, HM Revenue & Customs, HM Courts Service, Home Office (excl agencies), Land Registry Crown Prosecution Service, Insolvency Service, Tribunals Service and Ministry of Defence.

⁷ Centre for Cities, March 2011, p.20, Linked In: Realising Croydon's Growth Potential

⁸ Centre for Cities, March 2011, p.20, Linked In: Realising Croydon's Growth Potential

The COA has approximately 270,000 sq.m. of retail floorspace with a retail turnover of £770 million (2010), which is a reduction of £909 million from 2005. Coinciding with this decrease in spend there has been an increase in vacancy rates from 5% to 11% (between 2007 and 2011). Zone A rental is frequently used as a measure of town centre vitality and vibrancy and is an important indicator according to PPS 6. Croydon's Peak Zone A rental is mid-range, standing at £2500m²/annum (2004) compared to Kensington at £6,250 or Peckham at £750⁹.

Employment Rates

When examining unemployment rates, it is pertinent to consider a broader area than COA, given its small population (approx. 2,000) and its function as Metropolitan centre for surrounding areas. This information is generally sourced from the Croydon Core Strategy SA (2011).

The percentage of population in LB Croydon who are economically active (of working age) is 78.5% (2006)¹⁰ For London the average is London: 74.8% and Great Britain 78.6%. The Percentage unemployed in LB Croydon in 2006 was 6.6% compared to averages of 7.6% for London and 5.3%¹¹ for Great Britain. With population growth both employed and unemployed people have been increasing. Highest areas of unemployment were in the north of the Borough and in the wards of Fieldway and New Addington. This correlates to areas of health and other deprivation. The Percentage of working age people on out of work benefits was 12.2% in 2007. The LBC Target was 10.8% for 2010/11.

Job Density (numbers of jobs per resident of working age): Croydon has a density <1 or 0.78 (2006)¹² whereas London is 1.02 and the UK average 0.88.

There were 960 VAT registered businesses in 2005/06, a rate: 10.6. The comparable statistic for London is 11.3% UK: 9.4%. The LBC Target aims for growth of 1.4% on 2005 baseline¹³. The Number of businesses starting as a result of LEGI Programme support stood at 227 (2007/08) (LBC has a Target for 2010/11 of 302)

Croydon is about average in terms of creative businesses and employment compared to other south London Boroughs. The Percentage of creative businesses and employment stood at 13% for Businesses and 19%^{14 15} for employment. The Number of inward investment projects attracted to the Borough stood at 10 investments per year in 2006¹⁶

The Percentage of households within reach of employment serves as an indication of proximity to good transport links, reflects the good transport location of the COA and Borough generally with 97.37% of working age within access to

⁹ Valuation Office Property Report 2004

¹⁰ www.neighbourhood.statistics.gov.uk (DCLG - Floor Targets Interactive www.fti.neighbourhood.gov.uk)

¹¹ LNC LAA

¹² www.nomisweb.co.uk

¹³ www.nomisweb.co.uk LBC LAA

¹⁴ SLP – South London Creative Industries Study, DTZ (August 2005).

¹⁵ Distribution of Creative Businesses within South London(2005): Bromley 13% Kingston 10% Merton 11% Richmond 23% Sutton 7% Wandsworth 23% Creative Employment across South London (2005): Bromley 11% Kingston 12% Merton 11% Richmond 19% Sutton 9% Wandsworth 19%

¹⁶ Croydon LEGI Baseline & Performance Indicators Framework (2006)

employment opportunities within 20 minutes. The Percentage of jobless within access to employment opportunities is 97.92% within 20 minutes¹⁷.

The London Plan 2011 (Table 1.1) presents employment projections by Borough for the period 2007 to 2031. The figures for LB Croydon are shown below.

Table 3.3 London Plan (Table 1.1) Employment projections 2007-2031 by borough¹⁸ (figures per '000)

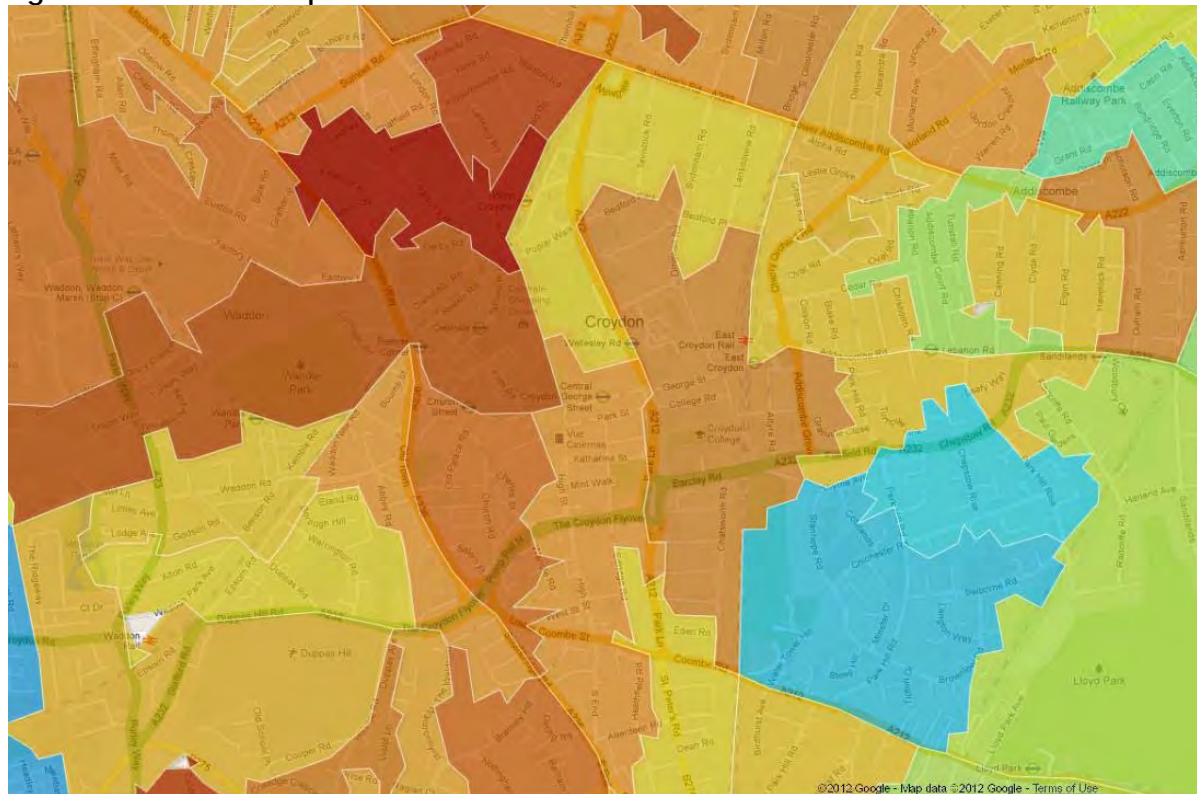
Adjusted Triangulated Forecasts	2007	2011	2016	2021	2026	2031	growth (2007- 2031)
Croydon	150	146	145	144	149	155	3.5%

The projected growth of 3.5% over this 24 year period is well below the average for London of 16.6%, reflecting that the most of the growth is expected to occur in the central area. However, this reflects a view of a Metropolitan centre performing well below its potential.

Deprivation

In Croydon Borough generally, there are 7 wards with SOAs in the bottom 30% most deprived for employment deprivation (including Broad Green, Fieldway, New Addington, South Norwood, Thornton Heath, Upper Norwood and West Thornton)¹⁹. Employment deprivation is highest in the northern and south eastern wards of the Borough.

Figure 3.4 Indices of Deprivation 2010



¹⁷ DfT Core Accessibility Indicators (2005)

¹⁸ The London Plan, 2011, p.24

¹⁹ GLA Indices of Deprivation 2007 (2008)

[Source: Communities and Local Government, 2011, Guardian.co.uk/data](http://Guardian.co.uk/data)

At the local level of the OAPF area, the above Figure illustrates the distribution of deprivation in and around the COA. Deprived areas have higher deprivation scores than less deprived areas, and are shown in dark red on the map. Blue areas on the map are the least deprived. The most deprived area in England has a rank of 1 and the least deprived has a rank of 32,482. The darkest area and highest deprivation score is Croydon 020B which is included in the Broad Green Ward (Between Mitchem Road and West Croydon Stn). It has a Deprivation Score (2010) of 54.837360 and a Deprivation Rank (2010) of 1434. To south of this is Croydon 024A (Ward: Broad Green) (includes Old Town and Wandle Park) which has a Deprivation Score (2010): of 39.521260 and a Deprivation Rank (2010) of 4702

Croydon 020C (central Yellow area which includes Whitgift Centre, and bounds Wellesley Road) is in the Fairfield Ward. It has a Deprivation Score (2010) of 19.937240 and a Deprivation Rank (2010) of 14044. Croydon 027C (to the east of Wellesley Road (incl. Lansdowne Road, East Croydon Stn & Croydon College) is located in Fairfield Ward. It has a Deprivation Score of 32.284380 and a Deprivation Rank of 7224. Croydon 027D (Centred on St. Peter's Road south to Croham Road and South Croydon Stn), also within Fairfield, has a Deprivation Score of 19.545100 and a Deprivation Rank of 14332.

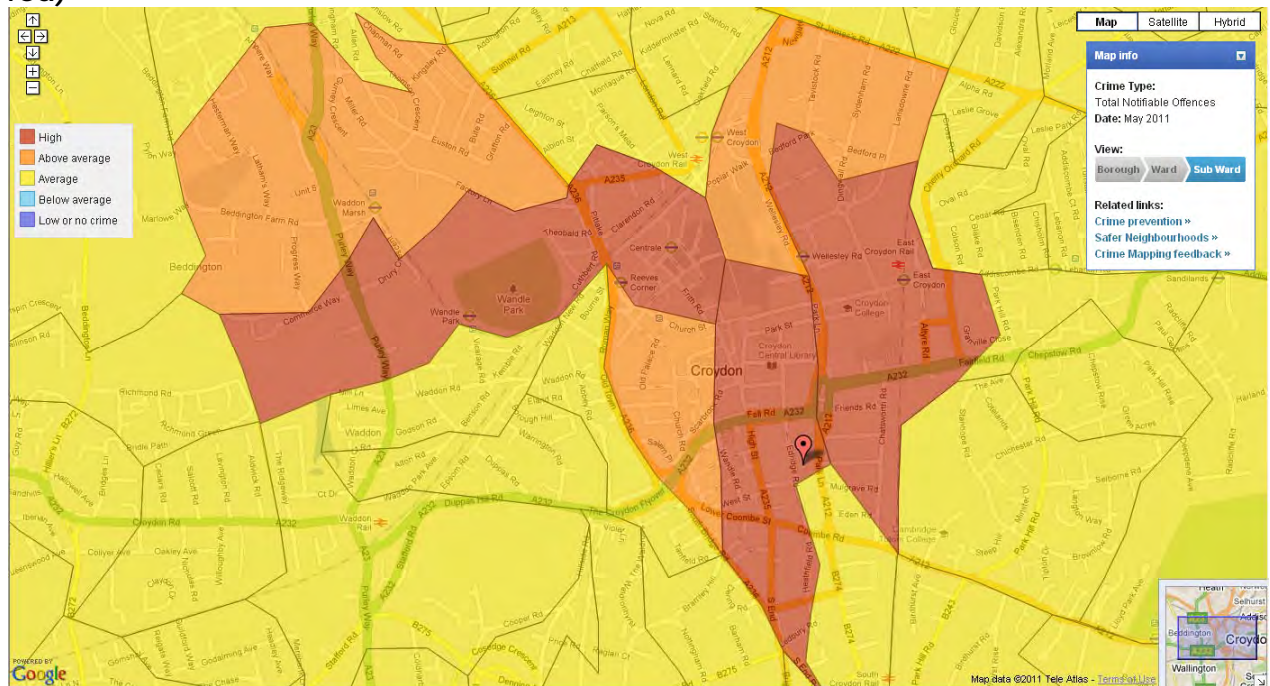
Crime and Safety

The Figure below shows Metropolitan Police Crime Mapping covering the COA. The central COA area appears to show high levels of crime. Considerable development and change in the Borough and the town centre could have an impact on safety and security problems.

The basic requirement for safe and secure living and home environments are set out in SPD 3 - Designing for Community Safety. The OAPF might consider:

- conditions that reduce safety, security and anti-social behaviour problems, including promoting safety by design;
- measures to reduce or avoid actual incidence of problems and the perception and fear of problems for residents.

Figure 3.5 Indices of Crime by location (from low (blue) to high red)



Source: Metropolitan Police Crime Mapping. Total Notable Offences, May 2011
<http://maps.met.police.uk>

Flood risk and water resources

Water is a particularly important issue for climate change, as a resource to supply populations and flora and fauna, as well as for flooding events.

The River Wandle / River Graveney / Caterham Bourne form the dominant sources of fluvial flood risk within the LB Croydon²⁰. Flood Risk vulnerability is identified on the Figure below, which highlights that the Old Town and Green Dragon sites in the COA are particularly affected.

Wandle Park in Colliers Wood was formerly the site of Wandle Park House, built about 1791. The house was demolished in 1962. Before it was straightened, the River Wandle used to flow through the park, but after that the old course was left as an arm of the river, which subsequently dried up. It has now been restored and water once more flows south to north diagonally across the park from its southern corner. A new reedbed has been developed to enhance the quality of the water.

The principal measures of the Surface Water Management Plan (SWMP) for the Borough (now being finalised) to protect against surface water flooding are:

- to maintain soakaways in the highways network
- to require Sustainable Urban Drainage Systems (SUDS) to be provided in those water catchment areas prone to runoff
- to require property flood protection measures in new build in those flood risk areas specified in the Surface Water Management Plan.

²⁰ Strategic Flood Risk Assessment Croydon Level 2 Final Report (April 2009) London Boroughs of Wandsworth, Merton, Sutton & Croydon

The majority of Croydon has benefitted from main sewer replacement programmes, some localised areas remain at risk.

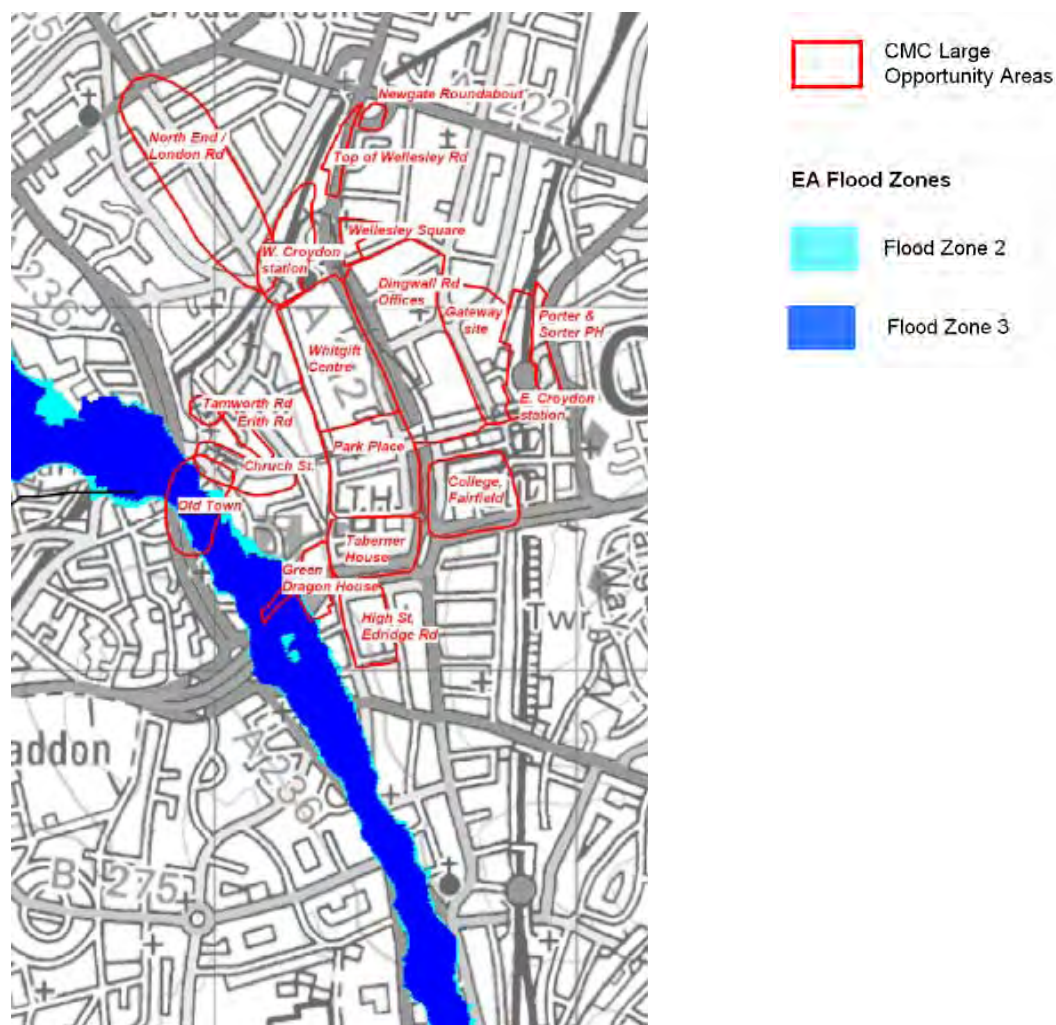


Figure 3.6 Flood Risk Zones, Central Croydon

Source: Croydon Strategic Flood Risk Assessment, Fluvial Flood Zones & Allocation Sites, Figure A2²¹

Groundwater Vulnerability

The two sources of the Wandle are springs at Carshalton (in London Borough of Sutton) and Waddon, which rise at the junction between the Chalk and the overlying Clays and Gravels outside the COA area. The Environment Agency reports that within the Borough, chemical quality of the Beddington Ditch, Beddington Arm and Carshalton Arm is “very good”. However, the biological quality is poor; this is likely to be due to the high nitrate content in the water.

These results have not shown significant changes over recent years. Protection zones to protect drinking water extraction sites are located in the south of the Borough are closely monitored by the Environment Agency²². There are no sites in the COA,

²¹ *ibid*

²² Core Strategy & Site Specific Allocations DPD Sustainability Appraisal Scoping Report, Hyder Consulting (UK) Limited, p.45

however it is clearly important that development and activities have no negative impact on water courses and groundwater.

Biodiversity

The COA is an established densely urbanised area with occasional open space. The COA area is generally classed as an 'area of deficiency' in access to nature, with the exceptions of Wandle Park and Park Hill which are classified as sites of 'Interest for Nature Conservation'. There are no areas of international importance (i.e. Ramsar sites, Special Areas of Conservation or Special Protection Areas). While there are 3 Sites of Special and Scientific Interest (SSSI) in LB Croydon, none are located in, or proximate to the COA area. There are approx. 20 non-statutory sites in the COA with 'Key Biodiversity Action Plan (BAP) species present'²³.

Soil

The character of the COA is dominated by the Previously Developed Land (PDL) that is Unused or may be Available for Development. The percentage of new homes built on previously developed land is significantly higher in Croydon than in most other London boroughs and now stands at almost 100%.

The bedrock throughout this area is London Clay, with alluvium deposits along the valley bottom and gravel formations on valley sides. The gravels were deposited as river terraces mainly in cold periods between about 350 000 and 70 000 years ago. The soil throughout the valley is seasonally wet deep clay surrounded by seasonally wet deep loam.

Waste

The South London Waste Plan aims to govern the management of waste within South London. It allocates land to waste management, to enable the future development of waste management facilities, and specify how policies will be monitored annually. As the COA is highly urbanised area there are no waste sites. However, it is pertinent to refer to usage and potential generation of waste.

Croydon produces less household waste per head than the national average, however, the recycling and composting rates are low. Kilograms of household waste collected per head stands at 407kg per-annum²⁴, whereas the national average is 495kg per annum. The percentage of household waste being recycled and composted has steadily increased over the past four years, but this must increase further to meet the 2008/09 target. Percentage of household waste recycled and composted in 2006/07 was 20.1%²⁵. The LBC Target for 2009/10 was 35% and 40% for 2010/11 (LBC Waste Strategy).

Air quality (Climate + Energy)

Climate change and Air quality and Energy demand are closely linked issues. CO2 emissions from domestic energy use and transport are key sustainability /

²³ Core Strategy & Site Specific Allocations DPD Sustainability Appraisal Scoping Report, Hyder Consulting (UK) Limited, p.42

²⁴ LBC Waste Strategy South London Waste Plan www.captialwastefacts.com

²⁵ LBC LAA Waste Statistics, defra.gov.uk

climate change issues. The demand on energy use from activities ranging from movement to use of electricity by office buildings are important considerations.

Air Quality

Poor air quality has been measured across Croydon, particularly in central areas and where there are high levels of traffic flow and congestion. Almost all of the pollutants - gases and airborne particles, are the product of vehicular transport and traffic congestion. An Air Quality Management Area (AQMA) was designated for the annual mean nitrogen dioxide (NO₂) objective across the whole of Croydon in April 2003²⁶.

LB Croydon operates long-term automatic high quality continuous monitoring analysers at George Street (Croydon 4) in the COA area: a roadside site in a commercial area, with public exposure mainly limited to people walking to and from East Croydon Station. It is also adjacent to tramlines and hence there is less road traffic in the immediate vicinity than would otherwise be the case. SO was previously monitored at George Street but this stopped in 2006.

Croydon monitors NO₂ using twelve diffusion tubes at roadside/kerbside sites, and four a background/suburban sites. The monitoring results indicate that the annual mean NO₂ objective has been exceeded in the COA area on a regular basis. The UK and EU Air Quality Framework Directive Guideline value is 40 µg/m³²⁷. The table below shows local levels. CR4 George Street is in the COA. There are no Industries with emissions to air under licence in the COA area

Table 3.4 Annual monitoring of Air Pollution (NO₂ and PM₁₀)

Predicted Annual Mean Nitrogen Dioxide Levels²⁸:

Location	Predicted Annual Ave NO ₂ Concentration (µg/m ³) for 2010
CR2 (Purley Way)	42.9
CR3 (Thornton Heath)	33.1
CR4 (George Street)	49.3
CR5 (London Road, Norbury)	43.7
CR6 (near Euston Road)	31.8

Predicted Daily Mean PM₁₀ Levels for 2010²⁹

Location	Predicted Annual Ave PM ₁₀ Concentration (µg/m ³)
CR2 (Purley Way)	27.8
CR3 (Thornton Heath)	26.4
CR4 (George Street)	27.9
CR5 (London Road, Norbury)	27.8
CR6 (near Euston Road)	26.5

²⁶ 2009 Air Quality Updating and Screening Assessment for London Borough of Croydon (May 2009)

²⁷ EU Air Quality Framework Directive Guideline value is 40 µg/m³.

²⁸ Air Quality Modelling for the London Borough of Croydon, Final Report, October 2006 London Atmospheric Emissions Inventory (2003).

²⁹ Air Quality Modelling for the London Borough of Croydon, Final Report, October

CO2 emissions slightly decreased across the Borough between 2005 and 2006, from CO2 (ktpa) 1,841 in 2005 to 1,826 in 2006. But this was not the case for London generally with total London growing from 48,061 (ktpa) in 2005 to 49,614 (2006). CO2 emissions from the domestic sector add significantly to the total CO2 emissions of the Borough. The domestic sector emissions of the Borough form a greater proportion of the total compared to those of London. CO2 emissions (ktpa) from each sector³⁰ comprise Industry and Commercial: 553 Domestic: 821 Road transport: 449 Land Use, Land-Use Change and Forestry (LULUCF): 3 TOTAL: 1,826 (2006)

Each Croydon household produces more CO2 than the average London household per year. Total CO2 emissions (t) per household per year: 5.7 tonnes based on 2006 household projections³¹ London: 5.2 tonnes per household per year based on 2006 household projections.

Energy³²

The local network of supply for electricity is owned and operated under licence by UK Power Networks. They advise that in central Croydon, an additional primary grid substation to be known as Croydon North, is required. Additionally east and west supplies to the central area need to be linked to provide greater flexibility and resilience of supply. The need is reported to be urgent and should be implemented within 3-5 years

The Croydon Central Area Heat and Power Scheme (CHP) is a primary objective of LB Croydon' climate change strategy. In order to achieve a major reduction in the Borough's carbon footprint, and meet the Mayor's decentralised energy target the Core Strategy (Policy CS6) expects that larger developments and refurbishments should be enabled to connect to district energy networks based on centralised combined heat and power plants (CHP), particularly in the metropolitan centre and other district centres.

A feasibility study by AECOM [July 2010 Final] has established the specific scope for a district energy scheme in the CMC. Exploration of private / public joint funding arrangements suggest the environmental and energy cost savings potential make the scheme highly desirable and should be incorporated into the delivery of the Infrastructure Delivery Plan programme within 5 years.

The installation of a DE scheme will happen with greatest efficiency and cost saving if it is incorporated with the installation of other services. For example, the construction of new buildings in CMC provide a vital opportunity to co-fund and to install energy centres with CHP. The installation of a heat network would best be installed at the same time as new or renewed broadband, water, waste and substation infrastructure. The refurbishment of roads and pavements such as is planned for Wellesley Road also offers an opportunity for the including the 'energy spine' that forms a key part of the piped heat network).

³⁰ Defra (Croydon Observatory, 2005)

³¹ Defra (Croydon Observatory, 2005)

³² Source: Croydon Infrastructure Delivery Plan, August 2011

Noise

The COA is increasingly becoming a place of 24 hour a day activity and use, so the scope for noise pollution is likely to increase. Road and rail noise are significant contributors to the ambient noise environment, particularly around the town centre.

Noise is defined as unwanted sound. Sensitive receptors to noise include residential areas, educational facilities, health care facilities and places of worship.

Department for Environment, Food and Rural Affairs (Defra) Online road, rail and industrial noise mapping shows the extent to which these noise sources may effect sensitive receptors. Built up areas shield unwanted sound and cause the effect to decrease over a short distance. Open areas such as parks allow the noise to travel over a longer distance and disturb users of such spaces.

The railway lines that travel north-south through the Borough are main sources of noise. The main road sources of noise are the A23 and A232. Road noise is also evident around Croydon Town Centre from A236 and A212.

Fig. 3.7 Road Noise Map



(Source: <http://services.defra.gov.uk/wps/portal/noise/>)

Fig. 3.8 Rail Noise Mapping



Population

There are approximately 2,500 to 3,000 homes in the COA, with an existing residential population of approximately 9,000 people, with only some 1,000 persons located in the central area and 8,000 in the outer area as identified on Fig. 1.2.

The London borough of Croydon had a population of 339,000 in 2001. The population for the entire borough is expected to grow to 380,000 by 2031, which is an overall increase of approximately 41,000 people. It is anticipated that a significant portion of this population in the region of 15,000 to 20,000 people would be housed in the Croydon Opportunity Area.

Of the 339,000 existing residents, almost 40% are from black and minority ethnic groups. The borough has a changing population and over the coming 20 years this population make up is expected to become more diverse and by 2031 over half of the residents of the borough will be from a Black or Minority Ethnic Group (GLA projections PLP low). Further analysis of the population, and its composition, are provided in the Equalities Impact Assessment Baseline section of this IIA.

Social infrastructure

The social and environmental infrastructure needed to support and underpin the borough's growth to 2031 are identified in Croydon's Infrastructure Delivery Plan. In addition, there are also a number of commitments for further developing local community facilities that serve the COA's current and future residents as follows;

- Stephenson House, Cherry Orchard Road, 328m², medical centre
- Gateway Site, George Street, 346m², healthcare facility

- 16 to 18 Barclay Road, 464m², GP consulting room
- 73 North End, 358m², hairdressing training centre
- 267 to 279 High Street, 662m², education
- Woolwich House, George Street, 125m², dentist
- 96 Drummond Road, 317m², place of worship
- 36 Pitlake, 1656m², place of worship
- Croydon College, College Road extension which was recently opened in September 2011

In terms of primary schools, the Council's projections indicate that demand for reception places will continue to rise to around 4500 places in 2011 and be sustained at 4500-4700 places each year for the next decade. This growth is concentrated in the north and central parts of the borough which includes the COA. In response the Council, through the Infrastructure Delivery Plan, is planning to deliver 10 Form of Entry (FE) in September 2012 at a cost of approximately £25 million. 1 FE expansion relates to the Aerodrome Primary School which is located just to the west of the COA. Up to £34 million has also been set aside in the 5-year Croydon Capital programme to fund the delivery of the additional permanent primary expansion and the temporary bulge classes.

For secondary schools a shortage of spaces is expected by 2015 and by 2016 a total of an extra 10 forms of entry (FE) is likely to be needed. The Croydon Core Strategy outlines ambitious plans for 19,000 new dwellings across the entire borough to 2031, 7300 of which are to be located in the COA. This new development is expected to demand an increase of 15-30% in secondary school places. This demand equates to an identified need of 10 FE secondary school provision in the north and central parts of the borough, which included the COA. Funding for delivering this growth has yet to be determined as proposals are currently being developed against the Government's recently announced 'priority school building programme.' More detailed proposals are to be presented to the Cabinet in early 2012.

Transport and travel

The Croydon Metropolitan Centre is one of the most accessible locations in Outer London by public transport and most of the town centre benefits from the highest possible Public Transport Accessibility Level (PTAL) of 6b, out of a range of 1 to 6. However, there are problems with capacity. East Croydon station is the busiest railway station for entries and exits in London outside central London termini, Tramlink overcrowding is an issue, and the level of traffic means slow journeys for drivers and bus passengers and that many pedestrian and cycle movements around the centre are not easy.

East Croydon railway station is currently operating at capacity and West Croydon will require enhancements in the medium term to accommodate the increased flows to and from the London Overground services. By 2031 under a 'do nothing' scenario, severe crowding will be experienced on Southern services from East Croydon to Clapham Junction and to London Bridge. Tramlink is already crowded, particularly on the Wimbledon branch and the eastern approach to the town centre.

Croydon OA is a hub for bus services with 29 daytime routes providing links across the whole of the south London and into Surrey, and five night routes. Bus usage is

high in the Metropolitan town centre and there is a large amount of interchange with rail services. Croydon is also well served by road. At the strategic level, the A232 "Red Route" runs east-west across South London and the southern part of the town centre while the A23 is a little over a kilometre to the west, linking Central London with the M25, Gatwick Airport and the south coast. The topography of the area concentrates movement south of the town into the valley, resulting in a lot of traffic on a limited number of roads.

There are five TfL designated taxi ranks within the COA at the following locations, Cherry Orchard Road, High Street, London Road (West Croydon Station), Poplar Walk and South End.

Walking & Cycling

Barriers to movement within the town centre cause severance and prevent ease of pedestrian movements and difficulties for cyclists. The main barrier for pedestrians is Wellesley Road. It is important that the OAPF looks into the development of more walking routes within the centre as part of the Connected Croydon programme but also to and from the surrounding area, to help promote more sustainable modes of transport. Safety (real or perceived), severance and air pollution detract from cycling in the CMC.

Parking

The COA is served by 20 off-street car parks totalling nearly 8,000 spaces and include open surface, above ground multi-storey and underground car parks. The public off street car parks vary considerably in terms of their condition and proximity to key activities. This is reflected in the high variance in usage across different car parks ranging from 5% to nearly 100%. Across the board between 30% to 40% of the COA's public off street spaces are not used during a normal weekday. There are also 950 public on-street spaces within the COA which like the off-street are also significantly underused by around 20% on a normal weekday. Taking off-street and on-street parking together the COA's has underutilised car parking capacity of between 2500 to 3500 spaces on any given weekday.

The COA also contains substantial private parking associated with office development in the vicinity of approximately 2,000 spaces. Given the high level of office vacancy much of these car parks are also underutilised.

3(d) Equalities Impact Assessment

Profiles of Equality groups

This section outlines the characteristics of the Equality Groups identified in section 2 (methodology) under the Equalities Act.

The EqIA for the Croydon Core Strategy 2011, identified that the planned growth in the Croydon Opportunity Area and the surrounding places would provide the majority of new homes in LB Croydon, as well as opportunities for studio/workshops, creative industries, retail and night time economy. The Core Strategy EqIA emphasised that equality groups should have equal access to these new homes, jobs and facilities in this major growth area.

This OAPF EqIA re-emphasises that the OAPF should consider how future growth will affect the equality and diversity of the existing communities in these areas, try to remove barriers for the equality groups, and promote social cohesion in the new communities created in these major growth areas. Given that the COA serves the as the Metropolitan Centre, for the Croydon catchment area, the following profile of the LB Croydon population is generally sourced from the Croydon Core Strategy EqIA, 2011 document.

Age

Croydon Opportunity Area is the metropolitan centre for surrounding wards, and LB Croydon generally. The population within this area is relatively small. There are approximately 3,000 homes in the COA, with an existing residential population of approx. 8,000 people. So it is important to take a broader view of the urban centre within its hinterland, and how it serves surrounding populations.

The COA has (with South Croydon) the highest level of working age population in LB Croydon (over 70%) and the lowest proportion of people under the age of 16 (both about 15%).

In 2010 it is estimated that there are 60,523 people aged 60 or over in Croydon, approximately 18% of all residents in Croydon. 55% of people aged 60 or over are women and the female proportion increases as the age rises.

In 2001, 16,626 households in Croydon (i.e. 12% of all households) are single pensioners and a further 9,181 households (7%) are pensioner-only households.

Single pensioner households make up a much higher proportion of social housing tenants (21% council and 16% housing association tenants) than of the borough average although the proportion of other pensioner-only households is slightly lower than average.

In 2001, 17% of 50 - 74 year olds were from a BME background, but this fell to only a little over 10% of 70-80 year olds and under 5% of people aged 80 and over. Most older BME people are from an Asian Indian or Black Caribbean ethnic background.

In 2010 there were 89,671 children and young people aged 0 to 19 years living in Croydon. This is 26% of the total population and the largest population of children and young people in London. This makes Croydon the "youngest" borough in south London.

With over 58,000 pupils Croydon has the highest school population of the London boroughs, and 22.6% of primary school pupils and 18.5% of secondary school pupils are known to be eligible for free school meals. Entitlement for free school meals is used as a proxy indicator for deprivation.

In September 2009, young people aged 16-18 not in education, employment and training accounted for 9% of the population in Croydon, an increase of 1.4% from 2007/08.

The teenage pregnancy rate in Croydon dropped in 2009. The under-18 conception rates for quarter 2 (March to June) in 2009 were 41.5 per 1,000 conceptions amongst women aged between 15 to 17 years-old representing a 33% decrease from the same period in 2008, where the figure was 62 per 1,000. These figures now put Croydon below the London average for under-18 conception rates of 42.5 per 1,000 and just above the overall average for England of 39.5 per 1,000.

Disability

The proportion of Croydon's population with a disability is at 15%, slightly below the average of London and England. In 2001 census 48,660 people described themselves as having a limiting long-term illness, health problem or disability that limits their daily activity or work. Given that the population of Croydon has increased and become older since the national census, it is likely that this figure now exceeds 50,000 and it is estimated that this will exceed 53,000 by 2018.

There are a variety of disabilities, whether it is physical or mental, which means that disabled people can have a wide range of different issues and difficulties in daily life depending on their type and level of disability.

In 2009, there were a total of 9,490 people claiming Incapacity Benefits and 1,160 for Severe Disablement Allowance. The claimants were predominantly male (56%) and have claimed for 5 years or over. The main medical reasons for claiming were mental disorders (46%), musculoskeletal diseases (14%) and other (24%).

In 2009, there were a total of 14,065 people claiming disability living allowance and 2,035 benefit claimants in Croydon who were disabled. The geographical distribution of these claimants in proportion to all working age population was fairly even (0.9%) in the borough with a slightly higher rate in the East spatial management area (1.1%).

Croydon's Joint Strategic Needs Assessments (JSNA) estimated that in 2007 there were 42,796 adults with a moderate or serious disability in Croydon, 1,695 people were registered as blind or partially sighted, 2,400 were registered as hearing impaired and 6,846 people had a learning disability.

GP recorded prevalence of learning disability (of all age) by Croydon middle super output areas as at 31 Dec 2009, showed there were a total of 1,484 persons with learning disability.

The most common reason for registering children and young people as disabled was communication disorders (including autistic spectrum disorders) (57%), followed by moderate (36%) and severe (28%) learning difficulties.

Race, including ethnic or national origins, colour and nationality; religion or belief

The overall population of Croydon is very diverse. In 2001 Census, 6% of residents classifying themselves as White Irish or White other, 3% as White mixed, 10% are Asian or Asian British, and 13% Black or Black British, and 1% Chinese. Croydon's Black and Minority Ethnic (BME) population was approximately 36.3%, compared with 40.2% in London and 13.0% in England

Croydon's Black Ethnic population is concentrated in the central part of north Croydon, around Thornton Health, whilst the Indian sub-continent ethnic population is more concentrated in the western part of North Croydon, along London Road and in Norbury and some pocket of areas in the south east and west of the borough. The people of mixed and Chinese origins are distributed more evenly in the borough. The south of the borough are predominantly white.

33% of the population of Central Croydon are from a Black or Ethnic minority origins. The comparative figure for Broad Green is 51%, Norbury is 50% and Thornton Health is 59%. So a significant proportion of population is of BME background.

Croydon's changing BME population is one of the fastest growing in London. In the 2009 population projections produced by the Greater London Authority indicated that the BME population is rising, at 40% in 2009 and projected to be more than 50% by 2023.

The Black and Minority Ethnic communities are younger overall than the white community with 29% of all BME residents being under 16 and 64% are aged 16 to 65. Only 7% of BME residents are at pensionable age or above. Services targeted at younger adults are therefore likely to be used by proportionately more BME people than services targeted at older adults.

At least 40% of all school children (5-16) and 33% of working age residents (16-pensionable age) are from a Black and Minority Ethnic communities. In 2007 a quarter of all primary school children and a fifth of secondary school children had English as a second language.

Exclusions relating to black Caribbean pupils have been of concern at national and borough level for a number of years. Black Caribbean pupils make up just over 11% of school population at secondary and primary phase. In 2008/9, 25% of permanent exclusions for maintained schools related to black Caribbean pupils.

In 2004, in Great Britain generally, people in employment from Pakistani, Chinese and White Irish groups were more likely to be self-employed than those in other ethnic groups. One in five Pakistanis in employment were self-employed (21 per cent), as were just under one in six Chinese (16 per cent) and White Irish (15 per cent) people. This compared with around one in eight (12 per cent) White British people and fewer than one in ten people from a Mixed or Black ethnic group.

In 2001 63% of BME households lived in owner-occupied housing, 10% in council housing, 9% in other social rented housing and 16% in privately rented accommodation. The remainder live rent free or in communal establishments. In 2007/8 approximately 6,000 international migrants registered with a doctor in Croydon.

In 2008 Croydon had a higher number of unaccompanied asylum seeking children and more young people than elsewhere in London. In 2009, of the 1068 children who were looked after by the local authority, 681 were unaccompanied asylum seeking children. With the UK Border Agency located in the borough, Croydon is a gateway site and the only asylum screening centre in the country.

According to latest hate crime recorded in incident data (April 2009 – January 2010), recent concentrations of racial and religious hate crime tend to arise in the west central area of the borough with slightly lower numbers of offences recorded in the wards in north west. It is not possible to compare recorded incidents of homophobic hate crime or disability hate crime on this basis, due to the small number of recorded incidents (12 and 1 respectively) during this period.

Gypsy and Travellers are people living a nomadic habit of life following a traditional or voluntarily decision, whatever their race or origin. They experience wide-ranging inequalities, including accommodation, employment, health, education, criminal justice system and are often subject to racism and discrimination. In 2008 it is estimated⁶ that there are a total of 88 Gypsy and Travellers families in Croydon.

Religion

In the 2001 Census more people in Croydon stated they had a religious belief than in any other London borough but there is a significant proportion that either had no religion or it was not stated. The most common religion is Christianity (66%), followed by those reporting no religion/not stated (23%), with Muslim (5%) and Hindu (5%) following. In 2010 The GLA Annual Population Survey (2011) estimated that this breakdown had changed to 59% Christian, 24% no religion, 8% Muslim and 5% Hindu. Analysis of secondary data shows that the key statistics relating to religion and faith in Croydon are:

Croydon is one of the most religiously diverse boroughs in the country, although this diversity tends to be in the north west of the borough. Since 2000 there have been 15 applications related to places of worship in Croydon.

The black majority churches are some of the fastest growing in the borough in terms of congregations. Fifty of the groups without premises were in north west Croydon and were mainly the Black led, Pentecostal or Evangelical groups who wanted to worship in their own way. Some groups were worshipping in their own language. A few were groups that had been 'planted' by other churches outside Croydon and had grown to sizeable communities.

Recent studies show a London-wide problem for finding space for worship, especially for Pentecostal and Evangelical churches and Muslim communities which tend to have a large and growing number of worshippers but fewer resources than the more established faith communities.

Faith Communities in Croydon (a mapping exercise in 2006) found that there are two hundred and sixty worshipping groups in the whole of Croydon, just over half of these are to be found in north west Croydon. 78 of these groups did not have a place of worship of their own and were either sharing premises with another group or meeting in school halls or community halls.

The Faith Communities in Croydon study from 2006 would seem to show a demand for more places of worship particularly within the north of the Borough. It

would appear that the groups that will see the greatest levels of growth will be Muslim and the Christian black majority churches. The nature of the black majority churches require larger facilities as the membership tends to be drawn from a wider area than a local parish.

Sex/gender, including maternity and pregnancy (Gender reassignment)

In Census 2001, 52% of Croydon residents were women and 48% men. 62% of those aged over 75 are women.

The overall gender pay gap, measuring the difference between all working men and all working women's hourly earnings, was 19 per cent. Between 1995-97 and 2004-7 the overall pay gap fell from 24% to 19% on the national level. The pay gap was insignificant at school leaving age, became positive at age 27 and then rose to a peak at age 45. There is no local gender pay gap data available in Croydon.

A study on the gender pay gap by the Government Equalities Office¹⁰ showed that 10% of the overall pay gap can be attributed to occupational sex segregation. A 10% greater share of men in an occupation is associated with 2 per cent higher average hourly wages. 12% of the gap is due to the industries in which men and women work, 21% is due to differences in years of experience of full-time work, 16% is due to the negative effect on wages of having previously worked part-time or having taken time out of the labour market to look after family and 36% of the pay gap cannot be explained by any of the characteristics that have been controlled for in the study.

9% of households in the borough are lone parent families and over 90% of these parents are women. The proportion of such households in the population has doubled since the 1991 census. Single parents make up a high proportion of households living in social housing (23% of council tenants and 32% of housing association tenants).

Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income and they are far poorer than couples with children; they are more than three times as likely to be dependent on benefits than the average household; they are twice as likely to be in unsuitable housing than others.

Households headed by women are also highly represented among housing applicants. 18% of waiting list applicants and 55% of homeless households on the housing register are headed by a woman.

Women are much more likely to suffer from gender specific violence than men, including rape and sexual violence, trafficking and prostitution and domestic violence. In the 12 months prior to July 2010, there were 17 reported incidences of rape and 24 reported incidences of other sexual crime (of both men and women) in Croydon.

1 in 3 women experience domestic violence in their lifetime. There were a total of 215 reported incidences of domestic crime in the 12 months prior to July 2010. According to latest hate crime recorded in incident data (April 2009 – January 2010) in Croydon, less affluent wards in the north and to a lesser extent New

Addington and Fieldway tended to have greater incidences of domestic violence than more affluent wards in the south. Men can also be affected by domestic violence.

There are more men than women sleeping rough and it can be harder to place men in hostel accommodation. Men are more likely to suffer from psychotic illness or have a learning disability.

Sexual orientation

Nationally there is very little data about the Lesbian, Gay, Bisexual and Transgender³³ (LGBT) community. It has been estimated between 5-10% of the population could potentially classify themselves as lesbians, gay men, bisexual or transgender people which would equate to about 15-30,000 residents in Croydon.

Analysis of the secondary data available shows that the key statistics relating to sexual orientation and transgender people in Croydon are:

In 2001 census there were 672 people living as same sex couples in Croydon. The second National Survey of Sexual Attitudes and Lifestyles in 2004 found that 3.9% of women and 5.5% of men aged 16 to 44 and living in London had had a same gender sex partner in the last five years. The figures were lower in the rest of the UK for both women (2.4%) and men (2.1%), confirming that LGBT people migrate to large cities, especially London. Within London, LGBT people are concentrated in inner rather than outer London.

LGBT Studies in neighbouring Lambeth (2006) found that the greatest social need amongst LGBT people resides with those who are members of groups which are already disadvantaged, such as women and ethnic minority groups.

The 2008 Croydon Strategic Crime Assessment indicated there had been an increase in homophobic hate crimes recorded by the police.

Recent studies in the LGBT community in Croydon conducted by Crocus indicate that there is a need for more LGBT or LGBT- friendly venues in Croydon.

Recent studies estimate prevalence of transgender people to be about 20 per 100,000 people, (about 10,000 people in the UK in total), of whom 6,000 have undergone transition in the UK. There is no figure for the number of transgender people in Croydon but the group is likely to be relatively small and the majority are likely to be in concealment for family or employment reason.

3(e) Identifying sustainability issues and problems (Task A3)

Task A3 of the SA process requires the identification of sustainability issues. This is integral to the SA process, and informs Stage B where the OAPF alternative options are tested against the SA framework. The identification of sustainability

³³ Transgender is a state of someone's 'gender identity' (self-identification as woman, man, neither or both) not matching someone's 'assigned sex' (identification by others as male, female or intersex based on physical/genetic gender). Transgender does not refer to any specific form of sexual orientation. Transgender is a separate equalities group from sexual orientation

issues meets the requirements of the SEA Directive to identify “any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to relevant areas or particular environmental performance”.

The following list of issues has been developed from the review of plans, programmes and policies and baseline data summarised above.

Table 3.5 Key sustainability issues and problems
Economic
Population: There is an existing residential population of approximately 8,000 people living with the COA. Less than 1,000 of these people live within the boundary of the CMC. As a result there is no notable evening presence, or support for COA services, facilities and social infrastructure
Employment: There is a concentration of employment in the COA area of some 60,000 jobs. However, there has been drop in private sector employment balanced by a growth in the public sector. This is vulnerable to competition from other centres. Office vacancy is high (approx 30%) There is a lack of diversity in the local economy or diversity (i.e evening economy).
Retail: The COA contains 2 large shopping malls, and two high street (London Road to South End and Church Street to George Street) which provide important service sector employment. Retail vacancy has been growing on the main street, and the main shopping Malls (Centrale and Whitgift) are dated.
The Hotel sector is a growing major economic activity in Croydon, which highlights economic advantages of the COAs location and costs compared to central London.
Social
Deprivation: The area around the opportunity area contains some deprived wards. The COA as a metropolitan centre, serves an important function for surrounding areas, and should be related to this population in terms of function, profile, and services.
Health and Wellbeing: Social deprivation indicates that the population suffers from poor overall health outcomes. The COA has a role in serving these needs.
Education: The quantum of development envisaged for the area has implications for schools and nurseries within and surrounding the opportunity area.
Transport and travel: The COA is served by very good public transport infrastructure. Capacity in road network, and underused car parks presents opportunities. Strong physical segregation based on railway and road infrastructure severely affects pedestrian and cycling permeability across the COA.
Housing: There is currently a low population in the urban centre and insufficient mix. The OAPF foresees the development of significant residential development. It is relevant to consider the mix of housing typologies, tenure, and user groups.
Environment
Open space: While both Wandle Park and Park Hill have benefitted from improvements, there is a general lack of small open space, and in particular green space. Where there is open space in the COA its design and location mean that it is not easily accessible and tends to be underused as a result.
Biodiversity: There are no Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation and Sites of Importance for Nature Conservation. There is an opportunity for increased open space and intensive planting and a positive impact.
Air quality: The opportunity area is within an Air Quality Management Area, arising from car based pollutants, and the foreseen increase in household numbers has the potential to impact on CO ₂ emissions. There are potential impacts arising from demolition and construction.
Waste: There are no existing waste processing facilities within the opportunity area. Significant reconstruction projects may cumulatively give rise to environmental impacts.
Water quality and resources: Development is on brownfield sites. Intensification of development has potential to increase hard surface area, with negative effect on surface water run-off. The de-culverting of the Wandle River on the western side of the COA is positive for drainage and run-off.
Natural resources: Intensive development in the COA will give rise to an increased demand for water, energy use, pressure on biodiversity and open space arising from population growth and increased economic activity.

4. Developing the SA framework (Task A4)

Testing the framework objectives against the SA framework

SA has generally been based on an 'objectives-led approach'. Essentially, those responsible for the SA develop – having consulted with stakeholders – a series of objectives which set out what is ideally to be achieved or tackled in terms of sustainable development. These objectives are wider than the plan objectives (which are typically more focused in their ambition and more oriented towards delivery). They provide a benchmark against which the content of the emerging OAPF – including options - can be assessed. The degree to which the OAPF is anticipated to contribute towards these objectives then provides a measure of its sustainability.

This IIA uses topics and sub-areas as the basis for the appraisal to provide a more narrative based approach centred on an assessment against the baseline situation (a key requirement under the SEA Directive). 15 Sustainability Appraisal Objectives are set-out below.

Table 4.1 Sustainability Appraisal Objectives

Sustainability Appraisal Objectives	Possible Indicators and Sources
Managing Resources	
1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.	<ul style="list-style-type: none"> • There are no areas of importance for nature conservation • Net loss or increase of open space (the London Plan Monitoring Report).
2. Water Quality & Water Resources. To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources	<ul style="list-style-type: none"> • Estimated Water consumption (source: OFWAT). This is also a UK Government Sustainable Development Indicator. • Rivers of good biological quality (source: DEFRA). This is also a UK Government Sustainable Development Indicator. <p>Existing performance target:</p> <ul style="list-style-type: none"> • No net loss of functional flood plain. • Introduction of SUDs techniques in new development/protection of groundwater from pollutants • New development and construction achieve good standards etc. • De-culverting/naturalisation of the Wandle River channel
3. Natural resources. To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products.	<ul style="list-style-type: none"> • Energy generated from renewables (source: Department of Trade and Industry). • Energy Use (Transport, Domestic and Commercial Use) • Reconstruction/decommissioning of materials (particularly construction). <p>Existing performance target:</p> <ul style="list-style-type: none"> • Ensure new development achieves the highest standards of energy efficiency and seeks to exceed Part L of the 2010 Building Regulations by energy efficiency measures

	<ul style="list-style-type: none"> • Promotion of a decentralised energy network • Ensure that new development maximise the use of on-site energy generation (CHP and renewable)
<p>4. Climate Change. To address the causes of climate change through minimising the emissions of greenhouse gases</p>	<ul style="list-style-type: none"> • Carbon dioxide emissions. Note: Already collected as part of the London Plan Annual Monitoring Report process. This is also a UK Government Sustainable Development Indicator. • Area of functional flood plain (source DCLG). Note: Already collected as part of the London Plan Annual Monitoring Report process. • Number of zero-carbon developments • Hectares of land at risk of flooding. Source: Environment Agency. • Carbon efficiency of economic activity (source: EBS, GLA Economics, GLA Environment). This is also a LSDC Quality of Life Indicator. <p>Existing performance targets</p> <ul style="list-style-type: none"> • London Plan Annual Monitoring Report • New development achieves the highest standards of energy efficiency and seeks to exceed Part L of the 2010 Building Regulations by energy efficiency measures alone • Implementation of a decentralised energy network • New development maximise the use of on-site energy generation (CHP and renewable)
<p>5. Air Quality. To improve air quality.</p>	<ul style="list-style-type: none"> • Estimated emissions of NO2, PM10 and SO2 (source: DEFRA). This is also a UK Government Sustainable Development Indicator and a LSDC Quality of Life Indicator. • Number of days of moderate or higher air pollution (source: Defra, netcen). <p>Existing performance target:</p> <ul style="list-style-type: none"> • Continued monitoring of Air Quality • Status of CMC as Air Quality Management Area (AQMA).
<p>6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.</p>	<p>Increase in energy generated from renewable sources. Note: Already collected as part of the London Plan Annual Monitoring Report process. Reduction in Energy Use (efficiency)</p>
<p>7. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed</p>	<p>At Risk list- listed buildings and Conservation Areas in Croydon (source English Heritage Register of Buildings at Risk).</p> <p>Existing performance target:</p> <p>Reduction in the number of buildings and Conservation Areas at risk</p>
<p>8. Housing. To ensure that</p>	<ul style="list-style-type: none"> • Supply of Affordable housing. • Households living in fuel poverty (source: DTI).

<p>all Londoners have access to good quality, well-located, affordable housing that promotes liveability.</p>	<p>Note: This is also a UK Government Sustainable Development Indicator.</p> <ul style="list-style-type: none"> • Percentage of homes not meeting the 'Decent Homes' standard (source: English Housing Conditions Survey, ODPM). Note: This is also a UK Government Sustainable Development Indicator. This is also a LSDC Quality of Life Indicator. • Total number of housing completions • Tenure, typology and diversity of units constructed. <p>Existing performance targets</p> <ul style="list-style-type: none"> • London Plan Annual Monitoring Report
<p>9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car).</p>	<ul style="list-style-type: none"> • Use of public transport in relation to the use of the private car (source: TfL, ONS, the London Travel Report). Note: Already collected as part of the London Plan Annual Monitoring Report process). • Bus Passengers per year (source: TfL, BVPI102). • Average number of cycling trips made (source: TfL Annual Report). • Travel to School – proportion of children walking to school (source: Department of Transport). This is also a LSDC Quality of Life Indicator. Note: Travel to school data is not monitored on an annual basis. • Traffic Volumes (Source: Department of Transport Traffic Volumes). This is also a LSDC Quality of Life Indicator. <p>Existing performance targets:</p> <ul style="list-style-type: none"> • Use of public transport per head grows faster than use of private car per head • Regular assessment of the adequacy of transport capacity to support development in opportunity and intensification areas.
<p>10. Regeneration and Land Use. To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.</p>	<ul style="list-style-type: none"> • Percentage of development on previously developed land within London (source ODPM). Note: Already collected as part of the London Plan Annual Monitoring Report process. This is also a UK Government Sustainable Development Indicator. • Protection/loss of open space designated (source: The London Development Database). Note: Already collected as part of the London Plan Annual Monitoring Report process (also mentioned under objective 1). • Average density of new housing (source: DEFRA). This is also a UK Government Sustainable Development Indicator. <p>Existing performance target: Increasing the proportion of development taking place on previously developed land by a minimum of 5% over each 5 year period.</p>

<p>11. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.</p>	<ul style="list-style-type: none"> • New jobs created in area (both construction and long-term) • Employment opportunities for those suffering from disadvantage in the employment market (source: Annual Local Area Labour Force Survey 2002/2003). Note: Already collected as part of the London Plan Annual Monitoring Report process. • Employment rates in London's most disadvantaged areas (source: Census). Note: This is an indicator Identified in London Development Agency (2005) London Economic Snapshot. • London's employment rate (by women / ethnic group etc) (source: GLA Economics, ONS). This is also a LSDC Quality of Life Indicator. • Workless households with dependant children (source: LSDC). • Unemployment (source: London Health Strategy High Level Health Indicator). • Unemployment among BME population (source: London Health Strategy High Level Health Indicator). • Registration of New Businesses in Area
<p>12. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.</p>	<ul style="list-style-type: none"> • Percentage of households satisfied with the area in which they live (source: ODPM). This is also a UK Government Sustainable Development Indicator. • Neighbourhood satisfaction (source: GLA MORI Poll). This is also a LSDC Quality of Life Indicator. • Number of visitors per year (source: GLA Economics).
<p>13. Education and Skills. To improve the education and skills levels of the population.</p>	<ul style="list-style-type: none"> • Percentage of businesses reporting a lack of appropriately skilled employees as a significant problem (source LABS). Note: This is an indicator Identified in London Development Agency (2005) London Economic Snapshot. • 19 year-olds with Level 2 qualifications and above (source: ONS Labour Force Survey). Note: This is also a UK Government Sustainable Development Indicator. • The number of nursery places per 100 children in London This is also a LSDC Quality of Life Indicator. • The Quality of Primary School Education (Source: Department for Education and Skills). This is a LSDC Quality of Life Indicator. • Third Level: Number of Students and potential future status of Croydon College As University. <p>Existing performance target:</p> <ul style="list-style-type: none"> • An improvement in the percentage of pupils obtaining five or more GCSEs at grades A* to C in Areas for regeneration relative to the LEA as a

	whole.
14. Health and Well-being. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	<ul style="list-style-type: none"> • Healthy life expectancy (males and females) (source: GLA and ONS). This is also a UK Government Sustainable Development Indicator. This is also a LSDC Quality of Life Indicator. • Prevalence of obesity in 2-10 year olds (source: Department of Health). This is also a UK Government Sustainable Development Indicator. • Prevalence of cigarette smoking (source: Department of Health). This is also a UK Government Sustainable Development Indicator. • Cardiovascular diseases (source: Health Survey for England). • Percentage reporting good health (source: Census & Health Survey for England and London Health Strategy High Level Health Indicator).
15. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	<ul style="list-style-type: none"> • Pensioners in relative low-income households before housing costs and after housing costs (source: DWP). This is also a UK Government Sustainable Development Indicator. • Children in relative low-income households before housing costs and after housing costs (source: DWP). This is also a UK Government Sustainable Development Indicator. <p>Existing performance indicators</p> <ul style="list-style-type: none"> • Deprivation and Health indices • Crime statistics and indices

Comparing Plan Objectives and SA Objectives³⁴

Identifying and evaluating the likely significant effects of the plan requires systematic consideration of the measures (or 'choices') which together make up the plan, including Strategic Objectives³⁵.

This following sub-section provides a brief commentary on the OAPF objectives and asks: Do the objectives reflect the key sustainability issues for the area identified at the scoping stage? Are the OAPF objectives internally consistent and, if not, can any tensions be resolved early on?

The OAPF is an implementation document that sits beneath the London Plan and the Croydon Core Strategy. Its role is to translate the policies of these plans into tangible objectives. In this sense, there is not a close correlation between the Strategic SA objectives and the OAPF objectives, simply because the OAPF is not a strategic document. Rather, the OAPF seeks to achieve sustainable development through the promotion and management of urban transformation. The OAPF should score positively with regard to the SA objectives, by outlining steps towards sustainable development, rather than regurgitating SA objectives as planning objectives.

³⁴ Planning Advisory Service (June 2010) Sustainability Appraisal Advice Note, section 5.3.3

³⁵ Ibid, section 5.2.1

For SA objectives concerning Biodiversity, climate change, air quality and noise, the key consideration is that the OAPF promotes the redevelopment and intensification of use of 100% brownfield sites. The OAPF's initiatives and interventions, including improved public realm and building standards are consistent with the SA framework.

Energy demand and use are key areas where tensions exist, and require mitigation. The OAPF seeks to introduce significant additional resident and working populations into the area. This is likely to be positive in terms of SA Objectives of Population, Social Infrastructure and Economy/Employment. These populations will potentially give rise to an increase in energy demand (heating, lighting, appliances and movement). Important measure will include the energy efficiency of buildings and energy supply, and improvements in movement alternatives from mixed-use development (walking and cycling).

The Building Form and Height Strategy is cognisant of heritage designations and restrictions, and responds directly to this context. A tension may lie in comprehensive development detracting investment from renewing the existing building stock.

For housing and employment SA goals, the OAPF positively responds by targeting significant growth in these areas. The OAPF should be responsive to the Equalities and Social Infrastructure needs of populations in and around the COA, in order to address these SA Objectives positively. It promotes mixed-use development of 7300 new homes across the COA, accommodating 17,000 new people in a mix of medium to high density housing; of infill, mid-rise and towers. This will help deliver a new community with education, health and cultural facilities. The Livability and Place SA objective is complemented by the OAPF's Public Realm strategy.

SA Employment objectives are complemented by the OAPF's proposed Consolidation of growth of the primary comparison retail area along North End and in Whitgift and Centrale, and the support of the two High Streets, and the OAPF's Commercial focus on new commercial space at New Town & East Croydon, and combined provision of new and refurbished office space.

The Regeneration and Land Use SA Objective is complemented by the universal goal to provide for and manage change in the established CMC on brownfield lands.

There is a close correlation between the Accessibility / Availability (Transport) SA Objective and OAPF measures for Transport and Parking. The OAPF promotes an increase in the proportion of journeys made by public transport, by bicycle and by foot (relative to those taken by car). The OAPF parking strategy complement this objective by potentially reducing the quantum of (under-used) car parks and improving the street environment, through control of surface parking.

OAPF Delivery proposals complement a range of SA Objectives, particularly Regeneration and Land Use, where social infrastructure and land use proposals are linked to delivery mechanisms and funding.

5. Alternatives

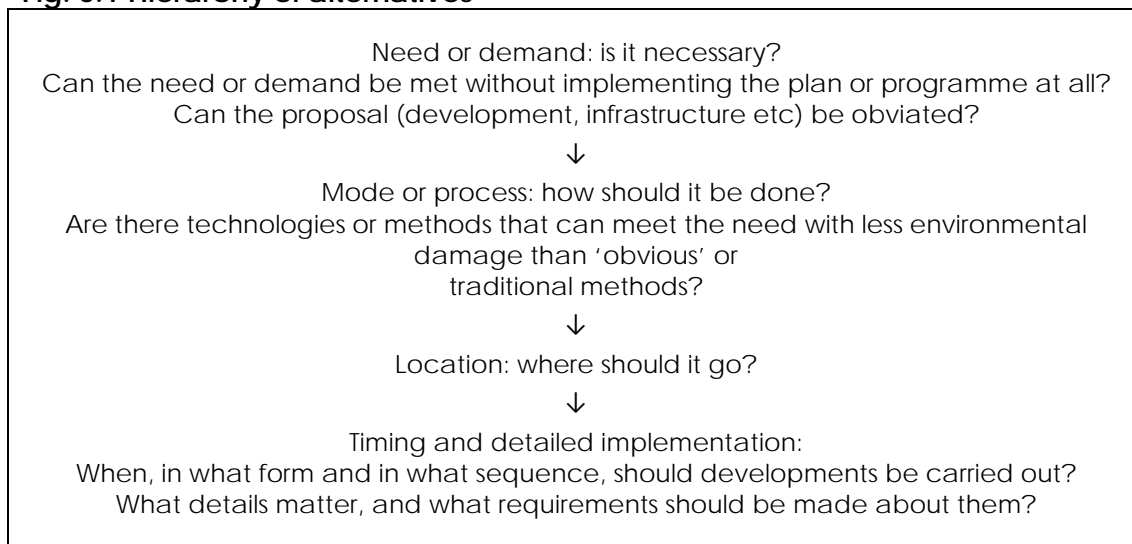
(Task B2: Development Scenarios)

The consideration of alternatives in SA is useful in thinking about the sustainability implications of different objectives, and influencing the choice of plan alternative(s). The sustainability appraisal should inform the decision making process to facilitate the evaluation of alternatives. It should also help demonstrate that the plan is the most appropriate given the reasonable alternatives³⁶. The assessment of 'reasonable alternatives' is a requirement under the 'SEA Directive'³⁷.

The consideration of reasonable alternatives also must be placed in the context of the preparation of the OAPF under a hierarchy of plans. In particular, The London Plan 2011 directed that Croydon Opportunity Area should accommodate growth of the level predicted, which also influenced the LB Croydon Core Strategy.

The OAPF is distinct from the other documents in that it considers in detail how the strategic objectives of the London Plan (as noted in section 3) can be achieved within the COA. How, where, and when the strategic objectives are delivered involve multiple-considerations, that have directed the consideration of a 'preferred alternative'. Also, given the urban nature of the receiving environment, there are no distinct scenarios i.e. there is not a choice of greenfield vs. brownfield development. The 'Hierarchy' of alternatives³⁸ Figure 5.1 below highlights that alternatives in this OAPF/SA focus on location, timing and detailed implementation (scale, density etc).

Fig. 5.1 Hierarchy of alternatives



³⁶ The Plan Making Manual

³⁷ PAS Sustainability Appraisal Advice Note s.3.4. Article 5(1) of the SEA Directive states "Where an environmental assessment is required ... an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated". Annex I(h) requires "an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information"

³⁸ A Practical Guide to Strategic Environmental Assessment, OPDM 2006, Appendix 6, Fig.14

As part of this process of assessing alternative options for the COA a detailed transport modelling exercise was carried to assess the transport impacts of varying levels of development on the COA. To inform TfL's modelling, a series of development scenarios were prepared in March 2011. The purpose of these varying development scenarios was to help inform Croydon Council and the GLA where there is capacity in the transport network, and to identify where interventions would be required. This is necessary to help realise the development potential of the Town Centre. Four development scenarios were prepared assuming different levels of growth and figures (floorspace, number of units, employees) for a range of land uses. The floor areas indicated in these scenarios are not absolute or deterministic of future allocations, but rather provide distinct development alternatives to allow environmental evaluation of the strategic impact of the plan.

- Scenario 1: high economic growth and low housing growth
- Scenario 2: medium to high economic growth and medium to high housing growth
- Scenario 3: low economic growth and high housing growth
- Scenario 4: high economic growth and high housing growth

Table 5.1 Scenario Development

Sector	Scenario			
	1	2	3	4
Residential	4,000	8,000	10,000	12,000
Office	66,000 sqm (+15% excluding vacant)	22,000sqm (+5% excluding vacant)	0%	393,050 sqm (+60% excluding vacant)
Retail	70,000 sqm (+35%)	55,000 sqm (+28%)	0	100000sqm (+50%)
Leisure	0	10,000 sqm	10,000 sqm	20,000 sqm
School	1 primary school	2 primary school	3 primary school	4 primary school
College	0	15,000 sqm (+35%)	15,000 sqm (+35%)	30,000 sqm (+70%)
Hotel	100% growth on 1,030 rooms	50% growth on 1,030 rooms	25% growth on 1,030 rooms	150% growth on 1,030 rooms
Fairfield Hall	0	5,000sqm	5,000sqm	10,000sqm

The Alternatives for this SA are developed from this scenario development, to take into account of other important indicators including social, population, energy, heritage, redevelopment, air pollution/water quality/disturbance.

Alt 1 High economic growth and low housing growth - Environmental enhancement and high office floorspace increase (c. 66,000 sq.m.) with opportunity to increase parks and public space (low housing growth).

Alt 2 Consolidated Growth: Medium to high economic growth and medium to high housing growth (8,000 units); Retail Floorspace 'medium growth (potentially c.55,000 sqm increase) – significant retail qualitative improvement with focus on growing the retail core, supporting the High Streets and supporting consolidated growth of the commercial core (c.22,000 sq.m. office).

Alt 3 Residential growth centre with c. 10,000 new units This alternative focuses on using decline of office function of metropolitan centre to increase residential density. Low economic and commercial growth.

Alt 4 High growth option for residential (12,000 units), economic (c. 393,050 sq.m.) and commercial (c. 100,000 sq.m.) floorspace. Major transformation Focus on Wellesley Road and (high economic growth and high housing growth).

The Alternatives were evaluated against the SA objectives in the table below. All alternatives follow broad objective of the OAPF strategy and therefore on many items the relative impact is neutral and does not warrant extensive comment. Rather the table focuses on tangible merits and disbenefits for the various approaches.

Table 5.2 Evaluation of Alternatives against Sustainability Appraisal Objectives

Key: + Positive relative to other alternatives
 - Negative relative to other alternatives
 / No discernable differences between alternatives

SA Objectives	Alt 1	Alt 2	Alt 3	Alt 4	Comment
1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.	/	/	/	-	Increase in parks and open space would have advantage. Less dense options likely to be neutral and dense option (4) relative disadvantage.
2. Water Quality & Water Resources. To improve the quality of groundwater and to achieve the wise management and sustainable use of water resources	/	/	/	/	Although replacement of older building stock with new build (to high standard) could have positive impact on run-off from sites on balance it is considered no alternative is positive in relation to others in respect of this Objective.
3. Natural resources. To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products.	/	/	/	/	The alternatives do not present any relative discernable benefit or negative impact on natural resources.
4. Climate Change. To address the causes of climate change through minimising the emissions of greenhouse gases	/	/	/	/	More people generally means more energy demand and emissions. However, new intense mixed-use development potentially mitigates impact, through good building standards and diminished travel demand
5. Air Quality. To improve air quality.	/	/	/	/	Evidence shows that Air Quality is generally dependent on vehicle emissions. The various alternatives have

					limited impact on this, given location on strategic transport corridors, with origins and destinations outside COA. The alternatives are not negative, as mixed-use dense development is likely to encourage shorter trips, and non-car journeys. Large scale development projects have potential to impact on air quality during the construction phase.
6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.	/	+	/	+	High growth scenarios have potential for a higher energy demand. However dense populations present a greater efficiency in energy use. There is significant potential to pursue new and innovative approaches to future development including an Area Rating Tool, so that impact can be positive. The high density options will also help the Council realise its ambitions to deliver a district wide energy system in the COA, which would significantly reduce carbon emissions from all development. A balanced mix of uses mitigates high travel demands, and commercial/ domestic energy use.
7. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed	/	+	/	-	Comprehensive redevelopment has potential to negatively impact on protected built heritage, and architectural distinctiveness. Alt 4 is likely to allow little control on distribution of tall buildings, and have a dominating presence, and may not allow the impact on identified Heritage Assets to be mitigated Consolidated Growth would potentially balance development on reuse of older built stock (Alt2) and would allow the impact of tall buildings to be managed, and new development located in areas to complement the existing townscape. However, the introduction of new populations, would increase

					demand for ancillary services in the COA and promote feasible uses for historic structures.
8. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.	-	+	+	+	Low and incremental housing growth has a potentially negative on residential objectives for COA as a growth centre. The other higher density housing options will deliver in excess of 7300 new homes in the COA thereby providing much needed housing.
9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot.	/	/	/	-	Achievement of high residential densities in COA would potentially support a greater diversity of travel options. A reduction in density, or maintenance of status quo would be negative. The transport modelling shows that the proposed level of development would not have an undue negative impact on the transport system in the COA, however, it would require some interventions to ensure on-going operation. However, high retail and commercial floorspace levels would lead to higher commuting/travel demand (Alt 4)
10. Regeneration & Land Use To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.	/+	/+	/	-+	New investment and renewal of use and building stock is an important potential impact of the OAPF. Scenarios that do not actively envision growth actually seek to manage decline, with limited benefits for the communities in COA and surrounding areas. Alt 3 is relatively negative as it does not promote reuse of vacant office space
11. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.	+	+	-	+	While all alternatives are proactive in employment growth, Alt 3 does not support office or retail employment.
12. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of	/	+	/	/	Environmental enhancements are positive initiatives in themselves. Improvements to the public realm would help create a more liveable place, People will want to spend more time in the COA, and this will be instrumental in

place.					attracting future investment (commercial, retail and residential). There is no discernible difference between the alternatives in terms of Noise or Waste Management. The mix and balance of uses promoted in Alt 2 combined with less density is relatively positive. The level of development proposed in Alt 4 would not positively achieve this, as Alt 4 would not create an equal balance of uses, and Alt 4 is probably over development of the COA.
13. Education and Skills. To improve the education and skills levels of the population.	/	/	/	/	It is considered that no scenario is outstanding in relation to the others as all scenarios would provide for investment in education,
14. Health and Well-being. To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.	/	+	/	+	High density mixed-use development will increase safety potentially reduce segregation, and increase activity, and services in the COA. All options encourage walking and cycling.
15. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.	-	+	+	+	For equality groups, the promotion of diverse housing tenures and typologies within a dense urban core may potentially be positive. Consolidated and High growth scenarios may enable the delivery of new facilities and services. Investment in the public realm may have a positive impact on safety. Alt 1 is relatively negative as it provides less opportunity for affordable housing, whereas Consolidated, High Residential and High Growth scenarios would be likely to provide a greater provision of affordable housing, positively contributing to equality objectives.

Preferred Alternative

The above table helps examine the impacts of various development scenarios for the OAPF in terms of Sustainable Development. **Alt 2, the 'Consolidated Growth' approach emerges as a preferable alternative.** The balance of density, and floorspace levels provided under this scenario allow choices be made as to the appropriate location of new development, particularly for tall buildings. The mix of

uses under this scenario is critical, as the mono-functional character of the COA, being dominated by office-use, is one of the principle issues to be addressed by the OAPF. Balanced mixed-use development is at the heart of sustainable development, and encourages development that addresses community needs.

While a high residential scenario Alt 3 performs well in SA through the intensification of population into a brownfield area of high accessibility, the neglect of economic issues diminishes the positives that arise from diversity and mix of uses, and potential employment creation.

Alt 4 risks over-development, and off-sets a potentially balanced town centre with commercial floor space that would entail significant travel demand and negatively impacts on Biodiversity. Additionally, this high level of development when assessed against the Sustainability Objectives has been determined to be relatively negative in respect of impacts on the Built and Historic Environment. Alt 1 is slightly negative as it does not sufficiently address the evident need to provide affordable and normal housing units.

The Consolidated Growth (Alt2) approach is positive, as it builds upon the sustainable assets of the location (relative to public transport) and capacity of the landbank for renewal and intensification of activity through day and evening economies. Alt 2 appears to balance better the need to inspire change in the CMC, and utilising existing assets. The medium to high economic growth, and medium to high housing growth provided under the Consolidated Growth scenario are seen to have more beneficial effect on built heritage through and existing built fabric through the focus on regenerating the Retail Core and supporting the High Streets.

6. Sustainability Assessment - Croydon OAPF

Tasks B3 and B4: Predicting and evaluating the effects of the OAPF

Approach to appraising policies

The aim of the SA is to identify and respond to significant effects of a plan. What constitutes significant will vary according to circumstance. In appraising the significance of effects, the Plan Making Manual includes a series of principles:

- significance has to be determined individually in each case – effects which are significant in one situation are not necessarily significant in another;
- analysis of significance needs to be proportionate to the expected severity of the effect; and
- mathematical models are sometimes difficult to use to determine significance - inappropriate use of numeric models could give rise to fictitious precision and attempts to quantify qualitative and semi-qualitative aspects are unlikely to lead to an increase in objectivity³⁹.

Annex II to the SEA Directive further specifies the following criteria for determining the likely significance of effects of the plan:

- the probability, duration, frequency and reversibility of the effects
- the cumulative nature of the effects
- the risks to human health or the environment (e.g. due to accidents)
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
- the value and vulnerability of the area likely to be affected due to:
- special natural characteristics or cultural heritage,
- exceeded environmental quality standards or limit values,
- intensive land-use
- the effects on areas or landscapes which have a recognised national, Community or international protection status

6(a) Sustainability Appraisal Assessment

The following table draws together the Sustainability Objectives of the SA with the principles of the OAPF. In other words, it is a means to test the sustainability credentials of the OAPF. This table should be viewed as a useful means to examine and describe multiple-issues arising from the making of the OAPF.

The SA Objectives heading set-out across the top of the table (Context, Land Uses, Urban Realm Principles, Building Form and Height, Transport and Delivery) and their sub-headings are based on the corresponding sections of the OAPF, and consolidates the principle issues/ objectives of the OAPF under those headings.

The following commentary extracts key sustainability issues to emerge from the table and overall assessment.

³⁹ PAS Sustainability Appraisal Advice Note

Table 6.1 Environmental Assessment of Croydon OAPF Objectives

Key: + Likely to contribute positively
 - Likely to detract from the achievement of the IIA objective
 / Considered to have no significant positive or negative effect

	Context	Land Uses	Urban Realm Principles and Playspaces								Building Form and Height	Transport	Delivery					
SA Objectives														Comment				
	Recognising heritage & modernist assets	6 Character Areas	Retail Core, Commercial Core, High Streets, Residential	(1) Creating a permeable core by breaking down large urban blocks	(2) Improving arrival spaces at east & west Croydon stations	(3) Improving the High Streets	(4) Creating a network of high quality routes and public	(5) Creating an East-West route from East Croydon to Old Town through the	(6) Improving Wellesley Road	Playspace Requirements	Three Building Height Areas	Building Form	Impacts of New Buildings on Views	Public Transport	Parking	Connecting Key Regeneration Areas	Town Centre Recovery Fund	
1. Biodiversity. To conserve and enhance natural habitats and wildlife and bring nature closer to people.	/	/	/	+	+	+	+	+	+	+	/	/	/	/	/	/	/	Proposals to increase and improve public realm throughout the COA will introduce new planting, & public open space/green spaces. The OAPF would have positive cumulative impact over the short to long-term
2. Water Quality & Water Resources. To improve the quality of groundwater and to	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	Replacement of dated building stock with new build (to high standard) could have positive impact on run-off from sites. Also

achieve the wise management and sustainable use of water resources

3. Natural resources.

To minimise the global, social and environmental impact of consumption of resources by using sustainably produced, harvested and manufactured products.

4. Climate Change. To address the causes of climate change through minimising the emissions of greenhouse gases

5. Air Quality. To improve air quality.

/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/
/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/
/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/

the on-going de-culverting of the Wandle River will have a positive impact on drainage and flood-risk

The proposals do not present any relative discernable benefit or negative impact on natural resources.

More people generally means more energy demand and emissions. However, new intense mixed-use development potentially mitigates impact, through good building standards and diminished travel demand
 Development will need to be managed to ensure effects on micro-climate are not significant and negative (wind and shadow) Evidence shows that Air Quality is generally dependent on vehicle emissions. The OAPF has limited impact on this, given location on strategic transport corridors, with origins and destinations outside COA. Bus services may adapt to new technologies with improvements. In line with London

6. Energy. To achieve greater energy efficiency and to reduce reliance on fossil fuels for transport, heating, energy and electricity.

/ / + / / / / / / / + + + + + + +

Plan policy new development in the COA will have to be air quality neutral.

High growth scenarios have potential to have a higher energy demand. However dense populations present a greater efficiency in energy use. The development strategy would facilitate the LB Croydon CHP initiative. There is significant potential to pursue new and innovative approaches to future development including Area Rating, so that impact can be positive. This impact is medium to long-term and positive.

7. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage), and ensure new buildings are appropriately designed and constructed

+ + + + + + + + + + + / + / / + +

Building Height, Urban Realm and Land Use objectives have been designed to address the potential impact of development on protected and important built heritage, and architectural distinctiveness. In respect of tall buildings,, 'Impacts of New Buildings on Views' seeks to mitigate the potential impact on skylines by requiring new development to demonstrate how it contributes to COA townscapes. The identification of character areas and related principles of the Urban Realm seek

to identify and complement the built heritage of the COA. The approach of 'Consolidated Growth' will allow tall buildings to be located in areas which contribute to the skyline and the COA's overall built Environment and located in areas which will not unduly impact on heritage assets. The OAPF strategy is considered neutral to positive over the medium to long-term.

The OAPF provides clarity on the scale and location for intense redevelopment. LB Croydon and GLA standards for affordable housing, and diversity of tenure complement physical proposals. The OAPF impact is positive in the medium to long-term.

Proposals to achieve an improved public realm and intense mixed use development in the Metropolitan Core area are important elements to necessitate less car journeys, and a more attractive pedestrian and cycling environment. OAPF measures are positive in medium to long-term.

The OAPF provides a positive

8. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing that promotes liveability.

/ / + / / / / / / / + + + / / + +

9. Accessibility / Availability (Transport). To ensure that all residents and visitors have access to key services and amenities and increase the proportion of journeys made by public transport, by bicycle and by foot.

/ / + + + + + + + + + / / + + + +

10. Regeneration & Land

+ + + + + + + + + + + + + + + +

Use

To stimulate regeneration that maximises benefit to the most deprived areas and communities and to improve efficiency in land use through the sustainable reuse of previously developed land and existing buildings.

11. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.

12. Liveability and Place. To create and sustain liveable, mixed use physical and social environments that promote long-term social cohesion, sustainable lifestyles and a sense of place.

| | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
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| + | + | + | + | + | + | + | + | + | + | + | + | + | + | / | / | + | + |

framework for regeneration and new uses of brownfield lands. The OAPF is considered to have positive cumulative impact in the medium to long-term.

The OAPF contains positive objectives to support employment in main retail streets and shopping centre redevelopment, as well as long-term office employment and construction employment over short to long term employment.

Environmental enhancements are positive initiatives in themselves, but do not necessarily have broader benefits for community and social-cohesion, which requires social and economic sustainability for the community. The Mayor’s Recovery Fund and funded Social Infrastructure measures will provide for early implementation and short to long term positive impact. Sustainable waste management practices (in accordance with the

| | | | | | | | | | | | | | | | | | | | | |
|--|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| <p>13. Education and Skills.
To improve the education and skills levels of the population.</p> | / | / | + | / | / | / | / | / | / | / | + | / | / | / | / | / | / | + | + | <p>LB Croydon Waste Strategy) and good practice in noise control (construction and design) will complement the sustainable character of new development. Intensive growth and density will potentially support the establishment of new educational facilities (primary, secondary and third level) in association with the LB Croydon Infrastructure Delivery Plan, and CIL.</p> |
| <p>14. Health and Well-being.
To maximise the health and well-being of the population, reduce inequalities in health and promote healthy living.</p> | + | + | + | + | + | + | + | + | + | + | + | + | + | + | / | / | / | / | / | <p>Improved public space, public realm and improvements to cycle and pedestrian network may have health benefits for population. There are no direct health proposals.</p> |
| <p>15. Equality and Diversity. To ensure equitable outcomes for all communities, particularly those most liable to experience discrimination, poverty and social exclusion.</p> | + | + | + | + | / | / | / | / | / | / | / | / | / | / | / | / | / | / | / | <p>For equality groups, the promotion of diverse housing tenures and typologies within a dense urban core may potentially be positive. The OAPF may enable the delivery of new facilities and services. Investment in the public realm & population intensification may have a positive impact on safety.</p> |

General Commentary

Baseline analysis highlighted that Croydon is a highly accessible employment and residential centre. However, it has been in functional decline with growing levels of vacancy in commercial property, and a small, low density of population in the COA area. The urban environment of the COA is an outward expression of these trends, with mono-use modernist superblocks, representing an inflexibility to change and to contemporary needs. This under-utilisation of buildings and land does not represent a positive environmental impact, as they must be considered as wasted urban assets, and under-used developed/brownfield land. It is also clear that the existing form of development and road network discourages more sustainable land use and movement choices. Croydon is experienced as a dated car-based 1960s centre, with poor environmental qualities.

The proposals presented in the OAPF are a significant opportunity to remodel the Croydon experience, to a sustainable and vibrant, mixed-use urban centre. The integration of Sustainable environmental objectives are considered to be a critical part of realising a new direction as a green metropolitan centre.

The OAPF seeks to provide a framework that improves the livability, and attractiveness of the area, through short to medium term investment in urban realm, and providing clear guidance for intensive redevelopment of part of the COA core.

The OAPF's flexible, mixed-use approach will result in the establishment of a new community of approximately 17,000 people. Connecting and integrating this population with the existing community will determine whether the COA can be considered successful. The OAPF's capacity to serve the existing diverse ethnic populations and equality groups of Croydon, as well as a commuter location for London City Centre are integral to the successful implementation of the plan.

The OAPF's objective to prescribe seven indicative building typologies and three height areas, with according density and family-unit objectives complement LB Croydon's Core Strategy and Housing Strategy for affordable housing. Residential development will be required to include a mix of private sale, rented, mixed tenure, lettings and serviced apartments along with hotels. Housing will be designed to accommodate the elderly, the young, students and visitors. Students will come to Croydon to study at an expanded Croydon College, Croydon University Centre with its links to Sussex University and the Brit School. People will visit the COA not only as a destination in its own right, but also as a location with convenient access to central London, Gatwick and the south east.

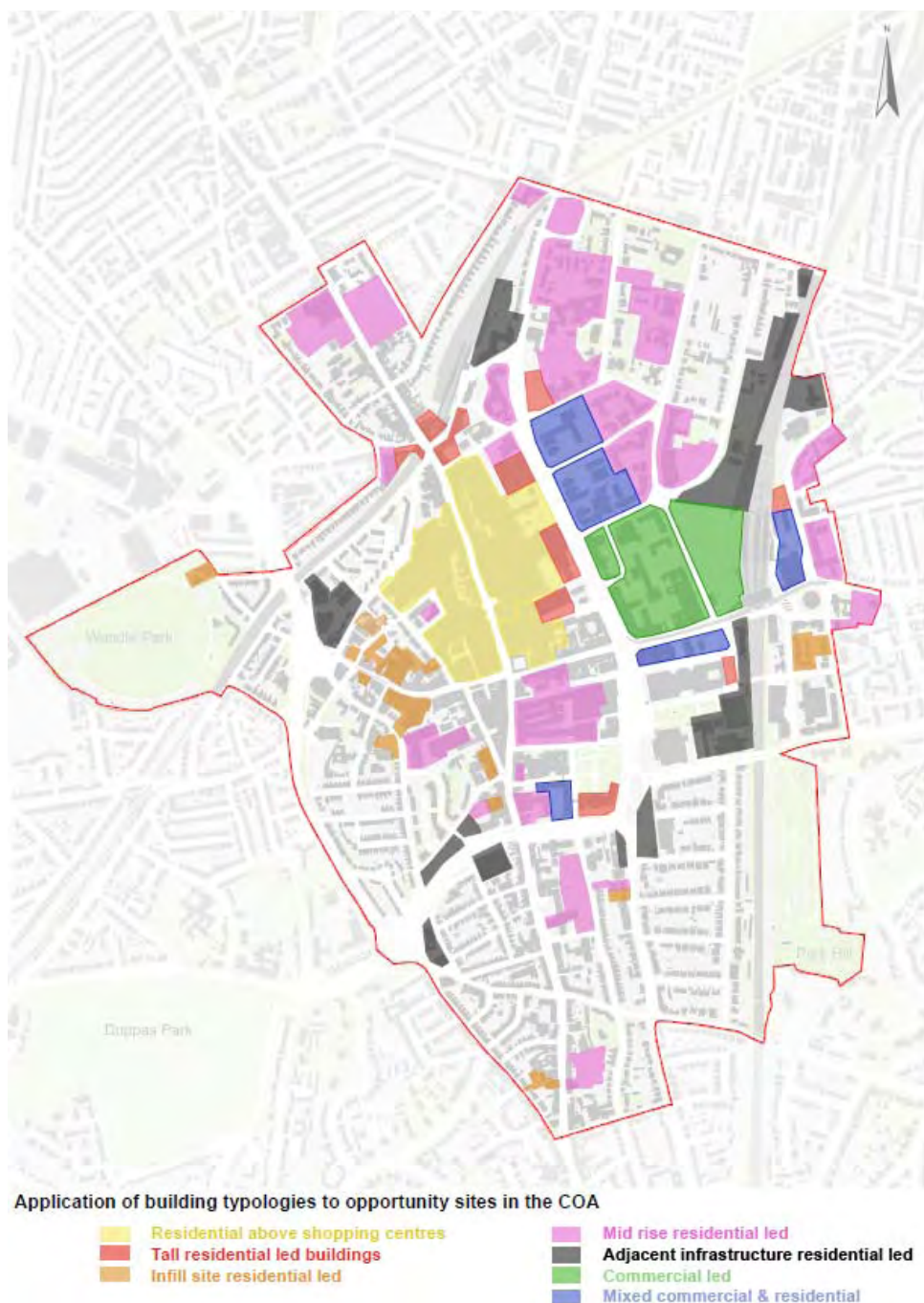
The character of the commercial sector in the COA will change considerably. Existing outdated office buildings offer the potential to accommodate new ways of working and living. These buildings can be converted and transformed to flexible, creative and productive work spaces and living places.

The increase in economic activity envisaged is likely to attract more students, entrepreneurs, businesses and customers that will help stimulate growth in the evening economy. Closely tied to this will be the overall improvements to the public realm and built environment, with streets, spaces and buildings providing a quality place for people to live, work and visit.

The main retail shopping centres will remain Centrale and the Whitgift Centre which will benefit from substantial investment planned by Hammerson and Westfield respectively. This investment will help draw in higher end retailers in order to create a stronger and more diverse retail offer. The secondary retail locations will benefit from the increased footfall attracted into the COA and the improved public realm along the existing High Streets to and from the Retail Core and West and East Croydon stations.

The OAPF seeks to plan for this growth in residents, employees and visitors, to take advantage of the significant opportunity within the COA. A key aspect of this OAPF's planned approach is a delivery plan that sets out deliverable projects and stakeholders, identifies funding sources and current funding gaps and establishes phasing plans and assets, which together will help deliver this change.

Figure 6.1 OAPF's 7 building typology areas



The OAPF Land Uses strategy sets out a detailed capacity study to accommodate the projected COA growth, in a strategic manner in 6 character areas.

In order to accommodate the needs of the population, a total of seven indicative building typologies have been proposed, which vary according to density, height and percentage of family housing (3-bed units) and include;

- Historic and infill residential led
- Mid rise residential led
- Adjacent infrastructure residential led
- Residential above shopping centres
- Tall residential towers
- Mixed-use (commercial & residential)
- Commercial-led building

The above map shows the general application of these typologies to opportunity sites across the COA. This approach informed the overall development capacity for the COA, of 7,300 new homes and 95,000 sqm. of additional commercial space.

The height strategy directs family housing to 3 areas without different requirements;

- A central area: 5% three bed+ housing
- Edge area: 20% three bed+ housing; and
- Outer area: 45% to 50% three bed+ housing (the exact quantum to be determined on the size and location of the site)

The OAPF Land Uses strategy also includes specific proposals for the Delivery of Social Infrastructure. The Public Realm strategy highlights funded and unfunded interventions to be implemented immediately or in the longer term utilising the Mayor's Recovery Fund which provides £49.2m for 27 projects. The availability of funding is critical in achieving important interventions in the short-term, which would not be possible if dependent on development contributions.

Transport and Parking Objectives of the OAPF are an important part of the overall strategy. The over-supply of car parks and surface parking within the COA represents an inefficient use of the material assets of the area. Either through what may be described as managed decline or a consolidation of parking provision, this strategy is likely to have a positive long-term cumulative effect. Parking measures proposed, complement a strong public transport context, with improvements to cycle and walking environments and facilities.

It has been identified in this IIA that the building height objectives of the OAPF have potential impacts for Micro Climate & Heritage. In this regard it is notable that Sensitive Areas were identified as part of the policy development process, which informed the objective to prescribe 3 building height areas, with tall buildings positioned furthest away from these sensitive receptors so as to mitigate impacts. The OAPF requires that the impact of tall buildings is monitored in the planning application process requiring further cumulative shadow studies are required.

Overall, the balance of land uses, built form, density of development, and housing typologies that this OAPF seeks to deliver leads this Sustainability Appraisal to consider that the impact of the OAPF to be positive in the short to long-term period.

6(b). Equalities Impact Assessment

The policies proposed in the OAPF address a wide range of spatial issues which will have far reaching impact on people living and working in the borough. By providing better opportunities for jobs, homes, community facilities and transport network the OAPF would have an indirect but positive impact on community cohesion and equality issues.

The policies in the Croydon OAPF have been assessed to ensure the equalities impacts of the objectives been considered.

In preparation of the assessment of the effects of the OAPF on Equality Groups in the COA and surrounding communities, the analysis is framed by the following questions:

- Which group(s) of people has been identified as being disadvantaged by the proposals? What are the equality impacts?
- What changes are proposed to minimise or eliminate any adverse equality impacts?

Age

Redevelopment of the OAPF area in accordance with the OAPF development principles would help deliver an integrated, inclusive urban environment designed to accommodate the needs of people of all ages.

The OAPF Building Height and Typologies sets out a detailed framework for the delivery of a broad range of building types and residential units. Read in conjunction with the LB Croydon Housing strategy, there is a strong positive response to the housing needs of the Borough, and its diverse population.

A total of seven indicative building typologies have been proposed, and include;

- Historic and infill residential led
- Mid rise residential led
- Adjacent infrastructure residential led
- Residential above shopping centres
- Tall residential towers
- Mixed-use (commercial & residential)
- Commercial-led building

The Housing Croydon *Our strategy to 2015* Evidence base to April 2011 document highlights that the 2006 the housing strategy evidence base identified household growth, declining household size and the growth in the proportion of lone

parents, older people and BME households within the boroughs population as key drivers of household growth. More recently the Mayor of London published an evidence base in support of his 2010 London Housing Strategy⁴⁰ which similarly identified population growth and the growth in the proportion of one person households as the key issues for housing in London. High house prices and rents in comparison to household income is the key issue for affordability set out in the 2006 evidence base and the Mayor's 2010 evidence base.

The emerging housing strategy⁴¹ highlights a need for 20,200 new homes in Croydon by 2031, where the main growth area - Croydon Opportunity Area (COA). Generally there is a 25% of new housing affordable rent 10% for intermediate housing.

In the COA there is a strategy to provide 7,300 new homes by 2031, 400 new homes a year, 17,000 new residents, 10% affordable housing on-site, and 1,460 new three-bed homes within the Croydon Opportunity Area together with New infrastructure and facilities

Croydon Council Core Strategy includes an aspiration that 20% of new homes in the COA should be three bed, and with 35% of 2-beds provided as 2-bed, 4-person homes. The 20% three bed housing requirement equates to 1,460 across the COA. It will not be possible for each housing scheme to in the COA to achieve this figure. The OAPF recognises this difficulty and proposes three 3-bed housing areas as follows:

- A central area: 5% three bed+ housing
- Edge area: 20% three bed+ housing
- Outer area: 45% to 50% three bed+ housing (the exact quantum to be determined on the size and location of the site)

–Also, all housing would be built to Lifetime Homes standards, 10% of all housing would be built to wheelchair homes standards and Lifetime Neighbourhood Standards adopted and applied for all new housing schemes.

The promotion and provision of higher levels of family housing would increase housing choices and provide additional housing opportunities for the area's current population which is significantly younger than that of London as a whole. This in turn would make it easier for people to stay in the area as their family circumstances change, thereby helping community cohesion and stability.

There is also likely to be substantial improvements in general accessibility throughout the OAPF area with barriers to accessibility removed and a network of new connections created to link the area's new and existing communities. This would help people at all stages of their life and particularly benefit the elderly and parents and carers with young children. New social infrastructure including health and community facilities would also directly serve the needs of the area's different age groups.

Improvement to the transport network in the centre of the borough will be beneficial to those groups who tend to have less access to cars such as students/pupils, the elderly and other equality groups living in or visiting the areas.

⁴⁰ Housing in London, GLA (2010) (published as a draft for consultation in November 2008)

⁴¹ Developing our strategy together, Croydon's housing strategy conference 2011

Improvement to the pedestrian crossings / cycle links and accessibility in the CMC would be beneficial in particular for those who are less mobile, the elderly and people with shopping trolley bags and push chairs.

The OAPF details a series of public realm interventions that are funded via the Mayor's Recovery Fund, and will be implemented in the short-term.

With regard to impact on young people, the following education initiatives referred under Social Infrastructure (Land use) are noted:

Croydon College, College Road extension was opened in September 2011

- *Primary school*; the Council's projections show demand at 4500 places in 2011 and this continues for the next 10 years. This growth is concentrated in the north and central parts of the borough which includes the COA. 10 Form of Entry (FE) are planned in September 2012 at a cost of approximately £25 million and one expansion is located at the Aerodrome Primary School located west of the COA. Up to £34 million has been set aside to fund the delivery of the additional permanent primary.

- *Secondary school*; The planned level of new housing across the borough is expected to have an increase of 15-30% for secondary school places. This demand equates to 10 FE secondary school provision in the north and central parts of the borough. Funding for delivering this growth has yet to be determined as proposals are currently being developed against the Government's recently announced 'priority school building programme.'

- *University*; A key part of the vision for the COA is to achieve a new university presence. A 'multiversity' concept is preferred whereby a range of further and higher education courses and qualifications are offered, possibly from a number of institutions across the borough and beyond. A partnership approach will be adopted to forge links with the higher education sector. The College currently has an agreement in place with Sussex University to offer degree level courses and hopes to offer masters level courses in the next 2-3 years.

Disability

New development in the OAPF area carried out in accordance with the OAPF's development principles would help deliver an integrated, inclusive urban environment that is likely to reduce barriers for people with disabilities.

For example, the application of London Plan lifetime home standards as set out in the OAPF would ensure that at least 10% of new homes across the OAPF area would be designed to accommodate the needs of disabled people and the creation of new Lifetime Neighbourhoods will help disabled people travel to and through the OAPF area and access its facilities and open spaces.

The wide range of new and improved business space and training and employment opportunities the OAPF seeks should also be fully accessible to disabled people and the health outcomes this section of the OAPF promotes will benefit all people, including those with disabilities.

The OAPF seeks to provide housing, job opportunities and community facilities in the COA (which is accessible locations by public transport). The Public Realm strategy provides for greatly enhanced public spaces, streets, and pedestrian facilities. It therefore is likely to have some positive impact on the accessibility needs for disabled people.

Tramlink enhancement and line extension would be beneficial for wheelchair users and those with mobility scooters as well as people pushing buggies and pushchairs.

The OAPF highlights (Land use section) that critical to building a new residential community of 17,000 people is the provision of supporting social and community infrastructure. Committed facilities include;

- Stephenson House, Cherry Orchard Road, 328m², medical centre
- Gateway Site, George Street ,346m² ,healthcare facility
- 16 to18 Barclay Road, 464m², GP consulting room
- Woolwich House, George Street, 125m², dentist
- Croydon College, College Road extension which was opened in September 2011

Approximately £36 million of funding has also been identified within the 5-year Croydon Capital Programme to deliver specific Special Education Needs proposals.

Pregnancy and maternity

Whilst the OAPF is not seeking to deliver a service for people who are pregnant or have just given birth there are benefits that would accrue to pregnant women and those with young children.

For example, new development in the OAPF area in accordance with the OAPF's development principles would require designing buildings and places so that they are accessible to all, and a wide range of affordable and accessible housing would be provided with a particular focus on family housing.

There would be a substantial improvement in general accessibility throughout the OAPF area with barriers to accessibility removed and all footways and crossings built to safely and conveniently accommodate prams and buggies. The creation of new connections that link homes with community facilities and transport nodes will increase the ability of all people, in particular pregnant women and those with young children to navigate and move through the OAPF area safely and directly. This would positively impact on pregnant women and women with babies and young children and new social infrastructure including health facilities, crèches and community facilities would also serve the area.

The OAPF Public Realm section includes a specific Play Space strategy, "To create a place where families are willing to live and raise children it is important that the COA is designed as a place that can accommodate children."

In line with the standards set out in the London Plan SPG on 'Providing for child and young people play and informal recreation', A overall quantum of 17,000 sq.m. Play space is to be provided in on-site and off-site locations. The OAPF

prescribes 6 locations where new and improved amenity spaces could be located by character area.

The OAPF Strategy addresses some concerns of women: the promotion of business start up and creative industries might provide more flexible time/part time working opportunities for women. The proposal to have more homes, community facilities, and studio/ workshops/ creative industries (i.e. jobs) in accessible locations by public transport would be useful for women who are more likely to depend on public transport. The improvement of access, movement, crossing and links and public space is particularly useful for those people with push chairs and those using shopping trolley bags.

Race

The OAPF is at the core of an extremely diverse area. 41.9% of Croydon's population are now estimated to be from a Black or Ethnic Minority Group. With high concentrations of Black Caribbeans, Black Africans and Indians. Croydon is projected to reach 48.3 per cent BAME in 2021, increasing to 51.6 per cent in 2031.

Table: Croydon Borough Ethnicity Projections

| | Totals | White | Black Caribbean | Black African | Black Other | Indian | Pakistani | Bangladeshi | Chinese | Other Asian | Other |
|------|---------|-------|-----------------|---------------|-------------|--------|-----------|-------------|---------|-------------|-------|
| 2011 | 347,010 | 58.1 | 10.2 | 7.2 | 4.1 | 8.7 | 3.3 | 0.7 | 0.6 | 4.1 | 2.9 |
| 2021 | 368,881 | 51.7 | 11.5 | 8.5 | 4.8 | 10.0 | 4.1 | 0.9 | 0.5 | 4.6 | 3.5 |
| 2031 | 379,825 | 48.4 | 12.4 | 8.9 | 5.2 | 10.7 | 4.5 | 1.0 | 1.0 | 4.7 | 3.8 |

GLA Ethnic Group Population Projections, London Boroughs, 2011

GLA analysis shows that Black and Ethnic Minority Households are disproportionately likely to become homeless and are also more likely to be living in overcrowded conditions. Unemployment rates are also higher than those faced by white people, particularly for younger people. The number of racist incidents increased in 2008/09 as did faith hate crime.

Also, research published by the Office of the Deputy Prime Minister in 2005⁴² cites previous research⁴³ from 2003 in concluding that *"The very way the planning system operates can unwittingly exclude some persons and groups. Examples are those who do not understand the technical language that planners use, or those whose responsibilities in caring for young children prevent them from attending public meetings held in the evening."*

Drawing largely on research from overseas, the 2003 report itself concludes that: *"Poverty and ethnicity are major barriers that need to be tackled if real inclusion is to be achieved."*

The OAPF does not directly address the needs of a particular ethnic group. However it does indirectly address equality group needs. For example, it seeks to address existing housing need (and scarcity of dwellings) within the COA as well as the needs for the Borough more generally. The OAPF complements the LB

⁴² *Diversity and Equality in Planning-A good practice guide* (ODPM, January 2005)

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/324051.pdf>

⁴³ *Participatory Planning for Sustainable Communities: International experience of mediation, negotiation and engagement in making plans* (ODPM, 2003). <http://www.communities.gov.uk/documents/planningandbuilding/pdf/participatory-planning.pdf>

Croydon Housing Strategy in providing for a diversity of tenure and typology appropriate to the relevant equality groups

The OAPF strongly stresses the need to promote and secure convergence outcomes, and by good design, help integrate new and existing development. Improved connectivity and safety will also help reduce crime and the fear of crime amongst the area's disadvantaged groups as well as the area's population as a whole.

It will be particularly important and challenging to ensure that existing communities have access to the new facilities and opportunities, and are not excluded or displaced by the changes in the OAPF area.

Sex

Women in London are less likely to be in employment than men in London and women elsewhere in the UK, and that this is almost entirely due to the lower employment rate of women with children. Furthermore, the same report notes that the overall employment rate of Black and Ethnic Minority women in London is significantly less than that of men and women in London as a whole, and that the employment rate of Bangladeshi and Pakistani women is lower than that of women from other minority ethnic groups.

Given the racial characteristics of the OAPF area highlighted above, it is reasonable to assume that many women in the OAPF area suffer from multiple disadvantage.

The social and community benefits the OAPF promotes, if achieved should therefore assist women, particularly those from ethnic minority backgrounds and those with children. Furthermore, development in the OAPF area carried out in accordance with the OAPF's development principles will help deliver an integrated, inclusive and safer urban environment that would also help improve women's safety, and whilst transport and accessibility improvements will be inclusive, as men generally have more travel choices than women, improved access to public transport could further help improve women's safety, employment choices and access to community infrastructure and facilities.

Although the objectives in the OAPF do not deal with unlawful discrimination and harassment directly, the London Plan and the Core Strategy together do promote a well-designed and safe public realm and safer neighbourhoods. These policies are likely to have positive impacts on elimination of unlawful discrimination and harassment.

Religion or belief

A GLA report in 2011 found that one of the key issues in examining faith inequality is the lack of current and accurate information, and found that there was no up to date data available on religious groups in London, with the 2001 Census providing the most accurate source of data.

The Census showed that London had a wide diversity of faiths, with Christians representing the largest group (58% of Londoners), followed by Muslims (8%), Hindus (4%), Jews (2%) and Sikhs (1%). There were also significant Baha'i, Jain and Zoroastrian communities in London and around 16% of Londoners stated that they followed no faith. Croydon's largest faith groups are Christian (59%), Hindu (6%) and Muslim (8%).

However, since the 2001 Census, London's population has changed significantly and GLA population projections for London predict significant increases in the proportions of BAME and white 'other' groups over the next twenty years. Given the concentrations of BEMG in Croydon, it is considered reasonable to assume that there will continue to be specific concentrations of faith groups within the OAPF area, in particularly Christian, Muslims, and Hindus. There will also be a significant number of people with no religious belief.

Redevelopment of the OAPF area in accordance with the OAPF's development principles would help deliver an integrated, inclusive urban environment that could accommodate faith groups. This will though require that all social and community infrastructure (such as new libraries and community spaces) be made available for use by faith and special interest groups. Public open space and green space should also be made available for formal and informal events.

The OAPF seeks to provide more opportunities for employment and new housing of different size and affordability to suit the needs of the residents. It also seeks to provide community facilities in accessible locations. It promotes the creation of a well-connected network of high quality, multi-functional public spaces. It is therefore likely to contribute positively towards good relations between people of different racial or other minority/community/social or economic groups.

The Land Use section of the OAPF; - 'Social Infrastructure' notes that committed facilities include;

- 96 Drummond Road, 317m², place of worship
- 36 Pitlake, 1656m², place of worship

In delivering the Core Strategy it will be important to ensure that equality groups will have equal access to new enterprise and employment opportunities in the borough, especially in the envisaged growth sector in creative industries.

The OAPF Landuse; - Social Infrastructure notes that the OAPF is also looking to accommodate Enterprise Centre in the COA where people can engage in cultural and creative industries. In the short term this could be provided in temporary and/or converted space. This space could be included as part of a Council owned building (i.e. Tamworth Road), or as part of an underused office building, or on a vacant brownfield site. A flagship centre at 2,000 sqm. could then be provided over the life of the plan in a more permanent location.

In view of the strategic nature of the OAPF objectives, their impacts on equality and diversity should be treated as *potential*. Whether these impacts would materialise depends on the details of the scheme during the implementation stage and the mitigation actions. The implementation of OAPF is related to other delivery mechanisms, such as the Infrastructure Development Plan, Community Infrastructure Levy and Masterplans.

The OAPF is in general found to be sound in equality issues.

7. Mitigation (Task B5)

Sustainability Assessment Mitigation

Table 3.5 of this IIA outlined a series of key sustainability issues and problems for the COA arising from the Baseline SA review of plans, programmes, policies and baseline data for the area. The development of the OAPF objectives, incorporated various mitigation measures to address the issues identified. These are summarised under the same headings used in table 3.5; Economic, Social and Environment in Table 7.1 below:

| Table 7.1 Sustainability Mitigation |
|--|
| Economic |
| Population: An existing residential population of approximately 8,000 people living with the COA was identified with less than 1,000 of these people live within the boundary of the CMC. The OAPF seeks to introduce approx. 7,300 units and a residential community of some 17,000 people into the town centre area. The OAPF's objective to provide for a dense, diverse mixed-use centre will mitigate potential negative impacts arising from mono-use development, or a potential narrow diversity of residential tenure and typology. |
| Employment: While it was identified that the COA supported some 60,000 jobs it was noted that there has been a drop in private sector employment balanced by a growth in the public sector. Also, office vacancy is high (approx 30%) There is a lack of diversity in the local economy or diversity (i.e evening economy). The OAPF supports re-use of office buildings as well as new office development, redevelopment of established retail use in the Retail Core and renewal of identified high streets, and greater diversity of building typology and enterprise. This addresses potential negative displacement effects. |
| Retail: The COA contains 2 large shopping malls, and two high streets (London Road to South End and Church Street to George Street) which provide important service sector employment. Retail vacancy has been growing on the main street, and the main shopping Malls (Centrale and Whitgift) are dated. The OAPF supports significant retail qualitative improvement to regenerate the Retail Core, and to improve on the COA's status as a major retail location consistent with its London Plan Metropolitan Centre designation. |
| The Hotel sector is a growing major economic activity in Croydon. The OAPF supports the development of more than 1,000 hotel bed spaces in the COA. |
| Social |
| Deprivation: The area around the opportunity area contains some deprived wards. The COA as a metropolitan centre, serves an important function for surrounding areas, population in terms of function, profile, and services. In terms of housing the OAPF supports the delivery of diverse housing tenures and typologies. Implementation of the OAPF will yield construction jobs, as well as long-term employment in services and commercial sectors. The OAPF supports investment in social infrastructure accommodating educational and training opportunities. |
| Health and Wellbeing: Social deprivation indicates the population suffers from poor overall health outcomes. The OAPF supports the delivery of a medical centre, healthcare facility, GP consulting room and dentist (supports Croydon Capital Programme). |
| Education: The population growth envisaged to be delivered in the COA area will be mitigated by the support of development for new primary school and secondary schools. The development of Croydon College and its new status under Sussex University provide improved educational facilities for the community. Croydon College, College Road extension was opened in 2011. |
| Transport and travel: The COA is served by very good public transport infrastructure. Capacity in road network, and underused car parks presents opportunities. OAPF Urban Realm objectives seek to improve the pedestrian and cycle environment. Urban design guidance seeks to mitigate the strong physical segregation based on railway and road infrastructure severely affects pedestrian and cycling permeability across the COA. |
| Housing: There is currently a low population in the urban centre and insufficient mix. The OAPF seeks to address this insufficient mix, by introducing approx. 7,300 units and a residential community of some |

17,000 people into the town centre area. All housing would be built to Lifetime Homes standards. The OAPF proposes three 3-bed housing+ at 5%, 20% and 45 to 50% in the respective Central, Edge and Outer areas of the COA. Generally there is a 25% of new housing affordable rent 10% for intermediate housing.

Environment

Open space: While both Wandle Park and Park Hill have benefitted from improvements, there is a general lack of small open space, and in particular green space. While the OAPF does not introduce new parks, it does provide for an improved public realm and street network.

Heritage: Building height objectives incorporate definition and mitigation of impact on sensitive receptors, and heritage assets, The OAPF, through Chapter 6 'Building Form and Heights' contains guiding principles to ensure that new tall buildings are located and designed to contribute to the skyline and the COA's overall built environment and states that tall buildings should not be allowed to have unduly negative impacts on their surroundings.

Energy: Potential increase in energy demand is to be mitigated through high building standards to be delivered as part of any proposals in COA (ie. BREEM, Carbon Neutral development) Redevelopment proposals to support delivery of Croydon CHP scheme

Biodiversity: There are no Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation and Sites of Importance for Nature Conservation. Urban Realm objectives in the OAPF will mitigate increase in development and floorspace through the improvement of public spaces and road corridors.

Air quality: The opportunity area is within an Air Quality Management Area, arising from car based pollutants, and the foreseen increase in household numbers has the potential to impact on CO² emissions. There are short-term potential impacts arising from demolition and construction. This will require implementation of good construction practices. However, the overall impact is considered to be neutral.

Waste: There are no existing waste processing facilities within the opportunity area. Significant reconstruction projects may cumulatively give rise to environmental impacts. All development projects will be required to manage waste in accordance with the waste policies of the Croydon Local Plan DPP and the LBC Waste Strategy

Water quality and resources: Development is on brownfield sites. Intensification of development has potential to increase hard surface area, with negative effect on surface water run-off. Flood Risks have been identified, and measures included to ensure that new development addresses surface water run-off and filtration.

Natural resources: Intensive development in the COA will give rise to an increased demand for water, energy use, pressure on biodiversity and open space arising from population growth and increased economic activity.

Equality Impact Assessment Mitigation

The EqIA has identified the Equality Groups in and around the COA, and raises issues facing these groups, and how the OAPF can be viewed as an opportunity to address the needs of the population.

The OAPF (land Uses) has identified Social Infrastructure facilities to be implemented (funded and unfunded) including education, social/faith group facilities and health facilities. This has mitigated the potential impacts of preparing a plan that would exclude consideration and integration of social infrastructure delivery.

In addition to the details outlined in the OAPF, The LB Croydon Infrastructure Delivery Plan (2011) provides further detail on programmes and project timescales, responsibility for implementation, and funding sources (i.e. CIL, Mayor's Recovery Fund).

OAPF Transport and Public Realm proposals have prepared to facilitate equality groups and improve access and movement experience and facilities for all groups. Play facility objectives have been developed to provide facilities for families, and to mitigate against exclusion of Equality Groups who would experience exclusion through an urban environment that is not family and child friendly.

Land use (building typologies) and Building Height objectives have been developed to facilitate diversity of residential tenure and typology so that no group is excluded.

The OAPF includes proposals to encourage redevelopment of retail in the COA (High Streets and Malls) and refurbishment of office/ new commercial space. The proposal for an Enterprise Centre will help mitigate the exclusion of equality groups from access to employment opportunities.

8. Monitoring (Task B6)

Both SA and EqIA processes have a requirement to monitor and review the proposed changes after implementation. The purpose of this is to check the proposals work as planned and to screen for unexpected impacts. The measure the OAPF's success or otherwise will be dependent on the impact it has on the COA over time.

The following list details of how GLA /TfL and LB Croydon will monitor/evaluate or review the proposals and when the review will take place. LB Croydon will prepare an Annual Monitoring Report (AMR) for the Core Strategy. This is the main reference document for SA and EqIA indicators in the Borough. TfL will monitor transport and parking implementation. The OAPF is regarded as an implementation strategy, rather than a static document, and will be regularly revisited and monitored by GLA.

Monitoring will have regard to changes in the following indicators:

- **Land use:** monitoring of dominant land uses/mix of use/typology of residential and commercial building
- **Land recycling:** monitor new development on previously developed land
- **Dwelling density:** monitor average density of new housing and population
- **Households and dwellings:** households, single person households, dwelling stock and tenure
- **Quality of Green Space** – Monitor quantum of green/public spaces, and planting incorporated as street improvements. Monitor Green Flag Status of parks.
- **Heritage** Monitor Buildings/Conservation Area at Risk

- **Inequalities** –Deprivation Indices, Equality Group consultation and feedback, access to Education/ affordability and access to services, demographic profile
- **Safety – Crime** Met Police Statistics
- **Health** – Health indices and implementation of Health Facilities in Infrastructure Delivery Plan

- **Transport Indicators** – Monitor Public Transport, cycling, pedestrian statistics. Car Parking spaces (quantum and locations (off-street and car-parks)Traffic Volumes.

- **Biodiversity conservation:** increase in habitat areas

- **Flooding:** *Monitor through planning proposals in or near Flood Risk areas*
- **Energy** – Implementation of CHP (medium to long-term)
- **Local Environmental Quality** Audit potentially with Area Rating Tools. (Breem/English Green Building Council)
- **Waste** - Waste generation and recycling indices
- **Energy Indicators** – Energy use indices
- **Emissions of air pollutants:** SO₂, NO_x, NH₃ and PM₁₀ emissions and GDP
- **River quality*:** rivers of good (a) biological (b) chemical quality
- **Water** monitor the impacts of water quality and supply