

# Habitats Regulations Assessment of the Croydon Local Plan Review

London Borough of Croydon

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## Quality information

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# 1. Introduction

## Scope of Project

- 1.1 Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment is required, where a plan or project is likely to have a significant effect upon a European Site, either individually or 'in combination' with other projects.
- 1.2 AECOM was appointed by the London Borough of Croydon to undertake a Habitats Regulations Assessment of its Croydon Local Plan<sup>1</sup> Review (CLPR). The objective of this assessment was to identify any aspects of the Plan that would cause an adverse effect on the integrity of European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs), candidate Special Areas of Conservation (cSACs), potential Special Protection Areas (pSPAs) and, as a matter of Government policy, Ramsar sites), either alone or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.

## Legislation

- 1.3 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). This established a transition period, which ended on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic law, meaning that legislation relating to nature conservation continues to apply to and in the UK post-Brexit.
- 1.4 The need for Appropriate Assessment (Figure 1) is set out by the Conservation of Habitats and Species Regulations 2017 (as amended) and is retained in the EU Exit Regulations 2019. The Regulations apply the precautionary principle<sup>2</sup> to assessments of European Sites, which form part of the newly coined National Site Network. Consent should only be granted for plans and projects once the relevant competent authority has ascertained that there will either be no likelihood of significant effects, or that a mechanism is in place to ensure that no adverse effect on the integrity of the European Site(s) in question arises. Where an Appropriate Assessment has been carried out and results in a negative assessment, or if uncertainty remains over the significant effect, consent can only be granted if there are no alternative solutions and there are Imperative Reasons of Over-Riding Public Interest (IROPI) for the development and compensatory measures have been secured.
- 1.5 To ascertain whether site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question.
- 1.6 Figure 1 provides the legislative basis for an Appropriate Assessment.

**Conservation of Habitats and Species Regulations 2017 (as amended)**

The Regulations state that:

*"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... must make an appropriate assessment of the implications for the plan or project in view of that site's conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site."*

**Figure 1. The legislative basis for the HRA process.**

- 1.7 Over the years, the term 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of "Appropriate

<sup>1</sup> Adopted 2018.

<sup>2</sup> The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as:  
*"When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".*

Assessment". Throughout this report, the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

## 2. Methodology

### Introduction

- 2.1 This section sets out the methodology for undertaking the HRA. HRA itself operates independently from the Planning Policy system, being a legal requirement of a discrete Statutory Instrument. Therefore, there is no direct relationship to the 'Test of Soundness'.
- 2.2 The HRA is being carried out in the absence of formal Government guidance. The Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities (DLUHC)) released a consultation paper on Appropriate Assessment (AA) of Plans in 2006<sup>3</sup>. As yet, no further formal guidance has emerged although Government published general guidance on appropriate assessment in 2019<sup>4</sup>. However, Court Judgements can be used to shape the approaches used.
- 2.3 The draft DLUHC guidance<sup>5</sup> makes it clear that when implementing HRA of land-use plans, the AA should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself: *"The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project."* More recently, the Court of Appeal<sup>6</sup> ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to avoid an adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy)<sup>7</sup>. In this case the High Court ruled that for *'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg. 61 of the Habitats Regulations'*.
- 2.4 In other words, there is a tacit acceptance that HRA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers.
- 2.5 Figure 2 below outlines the stages of HRA according to current draft DLUHC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the plan until no significant adverse effects remain.

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<sup>3</sup> DLUHC (was CLG) (2006) Planning for the Protection of European Sites, Consultation Paper

<sup>4</sup> <https://www.gov.uk/guidance/appropriate-assessment>

<sup>5</sup> Ibid

<sup>6</sup> No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17<sup>th</sup> February 2015

<sup>7</sup> High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015



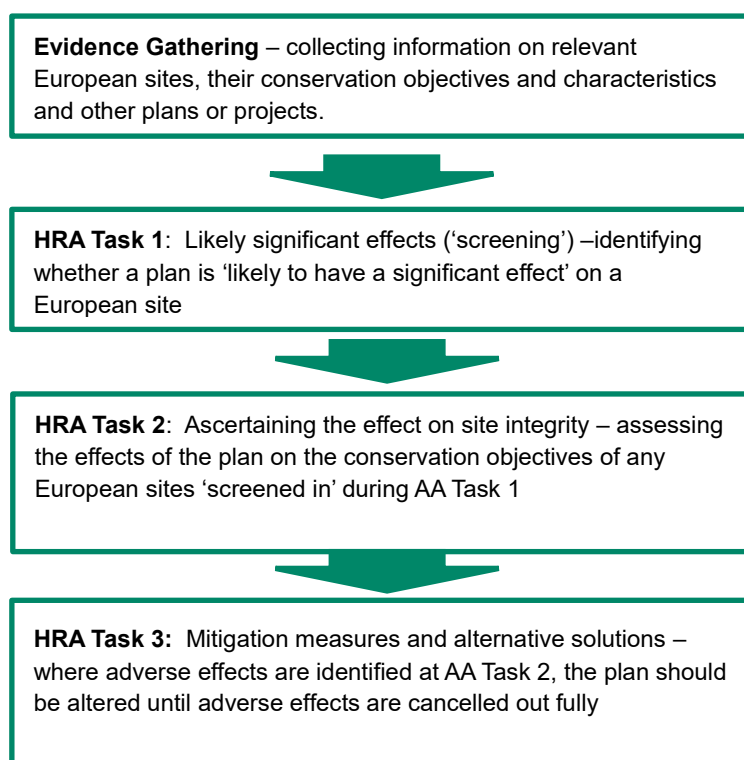
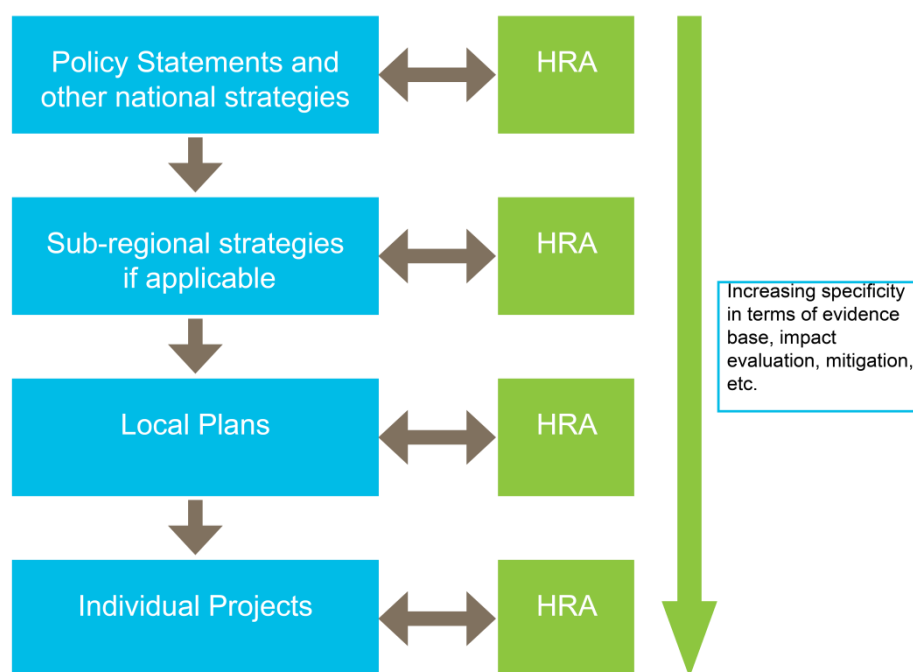


Figure 2. Four-Stage Approach to Habitats Regulations Assessment (Source: DLUHC, 2006).

## HRA Task 1 – Likely Significant Effects (LSE)

- 2.6 The first stage of any Habitats Regulations Assessment (HRA Task 1) is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- 2.7 *“Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”*
- 2.8 The objective is to ‘screen out’ those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites.
- 2.9 The level of detail in land use plans concerning developments that will be permitted under the plans is rarely sufficient to allow the fullest quantification of potential adverse effects. It is therefore necessary to be cognisant of the fact that HRAs for plans can be tiered, with assessments being undertaken with increasing specificity at lower tiers. This is in line with DLUHC guidance and court rulings that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be ‘appropriate’ to the level of plan or project that it addresses. This ‘tiering’ of assessment is summarised in Figure 3.



**Figure 3. Tiering in HRA of land use plans.**

- 2.10 On these occasions the advice of Advocate-General Kokott<sup>8</sup> to the European Court of Justice is worth considering. She commented that: *“It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure”* [emphasis added].

## HRA Task 2 – Appropriate Assessment

- 2.11 Where it is determined that a conclusion of ‘no likely significant effect’ cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that ‘appropriate assessment’ is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment.
- 2.12 By virtue of the fact that it follows Screening, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment would take any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).
- 2.13 A 2018 decision by the European Court of Justice<sup>9</sup> (ECJ), which appears to conclude that measures intended to avoid or reduce the harmful effects of a proposed project on a European site, but which are not an integral part of the project or plan, may no longer be taken into account by competent authorities at the Likely Significant Effects or ‘screening’ stage of HRA. The implications of the ECJ ruling are structural, essentially meaning that the role of avoidance and measures should be discussed in the subsequent ‘appropriate assessment’ stage instead, with a more in-depth, reasoned scientific basis.
- 2.14 A more recent 2018 case<sup>10</sup> also confirmed that an appropriate assessment must consider the interest features of European sites even where those features may be found outside the strict boundaries of those

<sup>8</sup> Opinion of Advocate-General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49.  
<http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

<sup>9</sup> People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

<sup>10</sup> Holohan et al vs. An Bord Pleanála (C-461/17)

sites and must also consider other habitat types or species, which are present on the site, but for which that site has not been listed but which are necessary to the conservation of the habitat types and species listed for the protected area.

## HRA Task 3 – Avoidance and Mitigation

- 2.15 Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.16 In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.
- 2.17 When discussing 'mitigation' for the proposed development sites, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the CLPR document is a high-level policy document.

## Confirming other Plans and Projects that may act 'in-combination'

- 2.18 The Conservation of Habitats and Species Regulations (2017 as amended) require that plans are not considered purely in isolation but 'in combination' with other projects and plans. Those in relation to the London Borough of Croydon include:
- London Borough of Bromley Local Plan (January 2019)
  - London Borough of Southwark Core strategy (2016 – 2026). New Southwark Local Plan Submission Version (2019)
  - London Borough of Lambeth Local Plan (2020 – 2031 – Adopted 2021)
  - London Borough of Merton Core Planning Strategy (2011 – 2026)
  - London Borough of Sutton Local Plan (2016 – 2031 – Adopted 2018)
  - Tandridge District Council Core Strategy (2006 – 2026 – Adopted 2008; a Local Plan is in progress but is still going through Examination and is therefore subject to change)
  - Reigate and Banstead Borough Council –Core Strategy (Adopted 2014 and reviewed 2019) and associated DPD
  - The London Plan (2021)
  - South London Waste Plan 2012
- 2.19 As shown in the Table 1 (below), residential growth in the London Borough of Croydon (highlighted) is targeted to account for 3.76% of the growth in Greater London over the next 10-year period. Nevertheless, the potential for The London Borough of Croydon's contribution – however small – to an in-combination effect arising from increased development throughout Greater London, must be considered.

**Table 1: 10 year targets for net housing completions (Taken from the London Plan 2021)**

<b>Planning Authority</b>	<b>Ten year housing target</b>
Barking & Dagenham	19,440
Barnet	23,640
Bexley	6,850
Brent	23,250
Bromley	7,740
Camden	10,380
City of London	1,460
<b>Croydon</b>	<b>20,790</b>
Ealing	21,570
Enfield	12,460
Greenwich	28,240
Hackney	13,280
Hammersmith & Fulham	16,090
Haringey	15,920
Harrow	8,020
Havering	12,850
Hillingdon	10,830
Hounslow	17,820
Islington	7,750
Kensington & Chelsea	4,480
Kingston	9,640
Lambeth	13,350
Lewisham	16,670
London Legacy Development Corporation	21,540
Merton	9,180
Newham	32,800
Old Oak Park Royal Development Corporation	13,670
Redbridge	14,090

Planning Authority	Ten year housing target
Richmond	4,110
Southwark	23,550
Sutton	4,690
Tower Hamlets	34,730
Waltham Forest	12,640
Wandsworth	19,500
Westminster	9,850
<b>Total</b>	<b>552,870</b>

2.20 It should be noted that, while the broad potential impacts of the London Plan will be considered, this document does not carry out a full HRA of the London Plan. Instead, it draws upon existing HRAs that have been carried out on that Plan.

## 3. Internationally Designated Sites within and around the London Borough of Croydon

3.1 There are three internationally designated sites within 10km of the London Borough of Croydon. These are:

- Mole Gap to Reigate Escarpment SAC;
- Wimbledon Common SAC ; and,
- Richmond Park SAC.

**Table 2. Physical Scope of the HRA.**

European Site	Location
Mole Gap to Reigate Escarpment SAC	5.9km
Wimbledon Common SAC	6.4km
Richmond Park SAC	9.1km

## Ecological Context and Interest Features of Designated Sites

### Mole Gap to Reigate Escarpment SAC

#### Introduction

3.2 The Mole Gap to Reigate Escarpment SAC is 892.3ha in size and comprises broad-leaved deciduous woodland, dry grassland and steppes (25%) and heath and scrub (15%). It lies on an extensive area of the Chalk ridge of the North Downs in Surrey. The site entails a wide range of aspect, gradient and soil types, which gives rise to diverse habitat types. A primary feature of the landscape is the steep valley cut through the Chalk by the River Mole, giving rise to chalk cliffs.

3.3 The habitat mosaic present in the SAC includes species-rich chalk grassland, different types of woodland (beech, ash and yew), mixed chalk scrub with juniper and an extensive area of chalk heath located on a plateau. The SAC is important as a tourist destination and includes Box Hill, a National Trust owned site that is popular among walkers and cyclists.

#### Qualifying Features<sup>11</sup>

3.4 Annex I habitats that are a primary reason for selection of this site:

- Stable xerothermophilous formations with *Buxus sempervirens* on rock slopes (*Berberidion* p.p.)
- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (\* important orchid sites)
- *Taxus baccata* woods of the British Isles

3.5 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- European dry heaths

<sup>11</sup> Available at: <https://sac.incc.gov.uk/site/UK0012804> [Accessed on the 04/09/2020]

- *Asperulo-Fagetum* beech forests

3.6 Annex II species present as a qualifying feature, but not a primary reason for selection of this site:

- Great-crested newt *Triturus cristatus*
- Bechstein's bat *Myotis bechsteinii*

## Conservation Objectives<sup>12</sup>

3.7 "With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

3.8 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site."

## Threats / Pressures to Site Integrity<sup>13</sup>

3.9 The following threats / pressures to the site integrity of the Mole Gap to Reigate Escarpment SAC are listed in Natural England's Site Improvement Plan:

- Disease
- Inappropriate scrub control
- Change in land management
- Public access / disturbance
- Air pollution: Risk of atmospheric nitrogen deposition

## Wimbledon Common SAC

### Introduction

3.10 The Wimbledon Common SAC is a 351.38ha site in the south-west of London, comprising dry grassland and steppes (45%), broad-leaved deciduous woodland (45%), heath and scrub (5%) and some improved grassland (3.5%). The SAC is one of the main areas of undeveloped land in the conurbation of London and consists of a diverse mosaic of habitats.

3.11 The soil underlying the site comprises predominantly sands, gravels and silty clays, and is poorly drained, acid and nutrient-poor. This are ideal conditions for the relatively small elements of dry and wet heaths present within the site. The habitats support high animal and plant diversity, including many species that are rare in the wider London area. The Wimbledon Common SAC is also a stronghold for the stag beetle, due to its extensive tracts of undisturbed woodland and large volumes of decaying wood.

<sup>12</sup> Available at: <http://publications.naturalengland.org.uk/publication/4911739200077824> [Accessed on the 04/09/2020]

<sup>13</sup> Available at: <http://publications.naturalengland.org.uk/publication/5966636066537472> [Accessed on the 04/09/2020]

## Qualifying Features<sup>14</sup>

3.12 Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

3.13 Annex II species that are a primary reason for selection of this site:

- Stag beetle *Lucanus cervus*

## Conservation Objectives<sup>15</sup>

3.14 “With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;

3.15 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.”

## Threats / Pressures to Site Integrity<sup>16</sup>

3.16 The following threats / pressures have been identified in Natural England’s Site Improvement Plan:

- Public access / disturbance
- Habitat fragmentation
- Invasive species
- Air pollution: Impact of atmospheric nitrogen deposition

## Richmond Park SAC

### Introduction

3.17 The Richmond park SAC is a 846.27ha site comprising broad-leaved deciduous woodland (25%), heath and scrub (25%), improved grassland (20%) and dry grassland / steppes (18%). It sits in south-west London, enclosed by the densely populated suburbs of Kingston, Putney, Richmond and Wimbledon, and is the largest of the Royal Parks. Richmond Park was originally enclosed by King Charles I in the 17th century as a hunting forest. He also introduced herds of red and fallow deer, which fulfil the role of the main grazers in the park.

3.18 The historic grazing processes and geology have produced a mosaic of habitats, including acid, marshy and neutral grassland, as well as open parkland and wood pasture. The area of unimproved grassland is the largest in Greater London, harbouring brown bent *Agrostis canina*, sheep’s fescue *Festuca ovina* and wavy hair-grass *Deschampsia flexuosa*.

<sup>14</sup> Available at: <https://sac.incc.gov.uk/site/UK0030301> [Accessed on the 04/09/2020]

<sup>15</sup> Available at: <http://publications.naturalengland.org.uk/publication/5706571287887872> [Accessed on the 04/09/2020]

<sup>16</sup> Available at: <http://publications.naturalengland.org.uk/publication/5638512552443904> [Accessed on the 04/09/2020]



3.19 The parkland and wood pasture support both ancient and veteran trees (especially oak species), which host diverse invertebrate assemblages that are dependent on dead and decaying wood. The SAC is one of the four primary sites in England for the stag beetle, a globally threatened species.

3.20 Together with the nearby Wimbledon Common, also a SAC, Richmond Park provides one of the most important recreational spaces for walking, cycling and horse riding.

## Qualifying Features<sup>17</sup>

3.21 Annex II species that are a primary reason for selection of this site:

- Stag beetle *Lucanus cervus*

## Conservation Objectives<sup>18</sup>

3.22 *“With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;*

3.23 *Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*

- *The extent and distribution of the habitats of qualifying species*
- *The structure and function of the habitats of qualifying species*
- *The supporting processes on which the habitats of qualifying species rely*
- *The populations of qualifying species, and,*
- *The distribution of qualifying species within the site.”*

## Threats / Pressures to Site Integrity<sup>19</sup>

3.24 Natural England’s Site Improvement Plan identifies no current threats / pressures that affect the site integrity of the Richmond Park SAC.

<sup>17</sup> Available at: <https://sac.incc.gov.uk/site/UK0030246> [Accessed on the 04/09/2020]

<sup>18</sup> Available at: <http://publications.naturalengland.org.uk/publication/5279688851193856> [Accessed on the 04/09/2020]

<sup>19</sup> Available at: <http://publications.naturalengland.org.uk/publication/6625232836100096> [Accessed on the 04/09/2020]

## 4. Likely Significant Effects

### Physical scope of the HRA

3.1 Based upon Natural England's Site Improvement Plans, there are seven impact pathways that require consideration regarding increased development within the CLP area and the three scoped in European sites.

3.2 Table 1 describes these environmental impact pathways. The consideration of CLPR policies (the Test of Likely Significant Effects) is then documented in Table 2. Note that policies that are not proposed for change are not assessed in that table because they have already been subject to HRA at the time the Local Plan was adopted.

### Impact Pathways

3.3 The following potential linking impact pathways have been identified that could link the European sites to the CLPR. These are:

- Public Access/Disturbance
- Air Pollution: impact of atmospheric nitrogen deposition
- Loss of functionally-linked habitat for great crested newt and Bechstein bat populations of Mole Gap to Reigate Escarpment SAC

### Public Access/Disturbance

There is growing concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels and impacts on European protected sites. Different European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of Local Plans tend to focus on recreational sources of disturbance as a result of new residents. Although it is to be noted that the use of recreation spaces is also increasing among existing residents, particularly in the wake of the COVID-19 pandemic, placing an additional burden on designated wildlife sites. However, HRAs focus on the impact of growth rather than changes in existing patterns of activity unrelated to growth.

Increased development near a European site area could lead to higher numbers of visitors to European Sites, particularly those within relatively easy recreational access. For example, the nature, scale, timing and duration of some human activities can result in the disturbance of bats at a level that may substantially affect their behaviour, and consequently affect the long-term viability of the population. Increased visitors can have direct and indirect impacts for a European Site that could prevent said site achieving its conservation objectives.

Adverse effects from recreation on the integrity of the European site of relevance to the CLPR area can be reasonably dismissed.

### Air Pollution: impact of atmospheric nitrogen deposition

The main pollutants of concern for European sites are oxides of nitrogen (NO<sub>x</sub>), ammonia (NH<sub>3</sub>) and sulphur dioxide (SO<sub>2</sub>). Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges. NO<sub>x</sub> can also be toxic at very high concentrations (far above the annual average critical level). However, in particular, high levels of NO<sub>x</sub> and NH<sub>3</sub> are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere is widely known to enhance soil fertility and to lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats.

Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping. Ammonia emissions originate from agricultural practices, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO<sub>2</sub> or NH<sub>3</sub> emissions will be associated with the CLPR.

NO<sub>x</sub> emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NO<sub>x</sub> footprint (92%) through the

associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison. Emissions of NO<sub>x</sub> may therefore increase because of a higher number of vehicles due to implementation of the CLPR.

## Loss of Functionally-Linked Habitat

While most European sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not always the case. A diverse array of qualifying species including birds, bats and amphibians are not confined to the boundary of designated sites.

For example, the highly mobile nature of both wildfowl and heathland birds implies that areas of habitat of crucial importance to the maintenance of their populations are outside the physical limits of European sites. Despite not being designated, this area is still integral to the maintenance of the structure and function of the interest feature on the designated site and, therefore, land use plans that may affect such areas should be subject to further assessment. Examples of other mobile qualifying species are great-crested newts and bats. The latter animal group is known to travel considerable distances from their roosts to feeding sites. For example, in a 2001 study, female adult Bechstein's bats regularly undertook commuting distances of up to 1km<sup>20</sup>. A study on another bat species, the lesser horseshoe bat, found that bats generally foraged within 600m of the nursery roost, with a single individual foraging up to 4.2km from the roost<sup>21</sup>. Both spring migrations or regular foraging trips might take these species beyond the designated site boundary.

For the purposes of this assessment a distance of 1.5km is used to define the core sustenance zone around the SAC within which all habitat suitable for use by foraging Bechstein's bats (primarily broad-leaved woodland) and associated commuting features such as river corridors and mature hedgerows should be preserved. This is based upon radio-tracking evidence for the home ranges of several Bechstein's bat populations. Bechstein bat radio-tracking projects have established that individuals generally remain within approx. 1.5km of their roosts<sup>22</sup>. For example, a 2001 radio-tracking study in the Ebernoe Common SAC, showed that the maximum distance travelled by tagged individuals was 1,407m, with an average of 735.7m<sup>23</sup>.

In addition to the Bechstein bat population of the SAC, the great crested newt population of Mole Gap to Reigate Escarpment SAC may travel outside the SAC boundary to forage or over-winter depending on the location of their ponds. Great-crested newts are known to utilise both aquatic and terrestrial habitat. During the breeding season, their breeding ponds are of primary importance, however, in winter good-quality terrestrial habitat up to 250m away from the ponds is of high value to newts and depending on the location of the ponds this could involve land beyond the SAC boundary. A wide range of semi-natural habitats might be used for shelter, dispersal and foraging, including meadows, tussocky grassland, scrub, woodland, low-intensity farmland and brownfield sites. Terrestrial newt dispersal is highly dependent on habitat connectivity, and habitat fragmentation must therefore be avoided.

Since Croydon is well outside the relevant zones for loss of functionally-linked habitat of this SAC, this impact pathway can be screened out and is not discussed further.

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<sup>20</sup> Kerth G., Wagner M. & Koenig B. 2001. Roosting together, foraging apart: Information transfer about food is unlikely to explain sociality in female Bechstein's bats (*Myotis bechsteinii*). *Behavioral Ecology and Sociobiology* **50**: 283-291.

<sup>21</sup> Bontadina F., Schofield H. & Naef-Daenzer B. 2002. Radio-tracking reveals that lesser horseshoe bats (*Rhinolophus hipposideros*) forage in woodland. *Journal of Zoology* **258**: 281-290.

<sup>22</sup> Schofield H. & Morris C. (2000). Ranging Behaviour and Habitat Preferences of Female Bechstein's Bats in Summer. Vincent Wildlife Trust.

<sup>23</sup> Fitzsimmons P., Hill D., Greenaway F. 2002. Patterns of habitat use by female Bechstein's bats (*Myotis bechsteinii*) from a maternity colony in a British woodland.

**Table 3. Screening analysis of London Borough of Croydon's CLPR Policies**

Policy Name	Brief Description	Screening Outcome
<p><b>SP1.0 – Growth in Croydon 2019 - 2039</b></p>	<p>SP1.0A Growth in homes, jobs and services that constitutes sustainable development following a brownfield land first approach, will be welcomed, provided growth is directed to places with good concentrations of existing infrastructure or areas where there is capacity to grow with further infrastructure and following the good growth principles. Across the borough growth will be accommodated as follows:</p> <p>Targets for growth up to 2039</p> <p>a. A minimum of 41,639 homes will be delivered (2019-2039) to address future demographic and economic needs. Of these, 6410 homes (641 dpa) will be delivered on small sites (below 0.25ha) and at least 20,790 homes by March 2029.</p> <p>b. The Croydon Opportunity Area will accommodate at least 9,753 new homes and 10,500 jobs up to 2039, supported by upgrades to the Brighton mainline and provision new/enhanced supporting infrastructure.</p> <p>c. Ensure 40% (or 831 dpa ) of all additional housing delivered is affordable to low income groups during the life of the Plan</p> <p>f. The local economy will be supported by retaining and intensification of employment land, primarily in the Croydon Opportunity Area and District Centres for all</p> <p>g. To support the overall growth, sufficient new and enhanced infrastructure will be provided in sustainable locations.</p> <p>Development Hierarchy</p> <p>These locations according to the hierarchy provide for a level of services and facilities to serve their appropriate catchment. Growth and facilities should be provided in line with the hierarchy.</p>	<p>Potential Likely Significant Effect</p> <p>This policy provides for a minimum of 41,580 homes (the additional 20,000 dwellings is because the London Plan target is rolled forward for the 20 year planning period of the Local Plan review). Depending on the location of the site in relation to European Sites there could potentially be likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>

**Policy Name**

**Brief Description**

**Screening Outcome**

a. The Croydon Opportunity Area- This is the main focus of significant growth of housing, employment, town centre uses and infrastructure as it provides excellent access to jobs, retail, services and visitor facilities with well-established transport links with other places within and outside the borough.

b. Main District Centres of Purley and Thornton Heath-. These locations have a sufficient provision of retail, local services, community facilities and good public transport provision including main line stations that are able to be accessed from more than one of the Places of Croydon, enabling them to be the secondary focus of development and other supporting facilities.

c. District Centres –Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, South Norwood and Selsdon. These locations provide good access to local services and facilities such as retail, community uses and public transport

d. Local and Neighbourhood Centres –These locations provide small scale facilities and community uses for day to day needs for the immediate local area, with some access to public transport.

Development Hierarchy

These locations according to the hierarchy provide for a level of services and facilities to serve their appropriate catchment. Growth and facilities should be provided in line with the hierarchy.

a. The Croydon Opportunity Area- This is the main focus of significant growth of housing, employment, town centre uses and infrastructure as it provides excellent access to jobs, retail, services and visitor facilities with well-established transport links with other places within and outside the borough.

b. Main District Centres of Purley and Thornton Heath-. These locations have a sufficient provision of retail, local services, community facilities and good public transport provision including main line stations that are able to be accessed from more than one of the Places of Croydon, enabling them to be the secondary focus of development and other supporting facilities.

c. District Centres –Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, South Norwood and Selsdon. These locations provide good access to local services and facilities such as retail, community uses and public transport



Policy Name	Brief Description	Screening Outcome
<b>SP1.0B – Transformation Areas</b>	<p>SP 1.0B Transformation areas are identified locations for large scale redevelopment, change and renewal alongside the required infrastructure.</p> <p>a. The Purley Way transformation area is an opportunity for mixed use redevelopment using large areas of brownfield land. It will include three new local centres, a neighbourhood centre, renewed and intensified light industry and warehousing providing jobs to support residential growth alongside much improved public realm that reduces the dominance of the road infrastructure and creates a safe and welcoming environment for pedestrians and cyclists;</p> <p>b. The North End Quarter transformation area will be renewed with integrated retail and leisure alongside green and blue infrastructure and public life at its core. It will have a more balanced and resilient mix of uses including new homes, public realm, education and other knowledge economies, creative and cultural uses, and supporting services.</p> <p>c. The Brighton Main Line and East Croydon Transformation Corridor will accommodate major new transport infrastructure to address the ‘Croydon Bottleneck’ and enable growth (development and inward investment) across the borough and elsewhere in the Croydon-Gatwick-Brighton corridor.</p>	<p>Potential Likely Significant Effects</p> <p>This policy identifies transformation areas which are areas for large scale redevelopment, including the Purley Way, North End Quarter and Brighton Main Line and East Croydon Transformation Corridor. This policy does not provide a quantum of development, only a broad location and type.</p> <p>Dependent on the location of the development sites in relation to the European Sites there could potentially be likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>
<b>SP1.0C – Delivering Homes</b>	<p>Delivering Homes SP1.0C There are residential areas where the characteristics and infrastructure provision have led to the identification of potential for sustainable housing growth and renewal.</p> <p>a. Areas of Focused Intensification are areas where a step change of character to higher density forms of development around transport nodes and existing services will take place; (in the Places of Broad Green &amp; Selhurst, Coulsdon, Kenley &amp; Old Coulsdon, Purley; Selsdon and South Croydon)</p> <p>b. Moderate Intensification – are areas where density will be increased, whilst respecting existing character, in locations where access to local transport and services is good. c. Evolution and gentle densification will be supported across all other residential areas.</p>	<p>Potential Likely Significant Effects</p> <p>Although this policy does not provide a quantum of housing growth, it does promote the development of higher density development in certain areas.</p> <p>Dependent on the location of these sites in relation to the European Sites there could potentially be likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>
<b>SP1.0D – Place to Belong</b>	<p>Developments will be supported that can achieve the following.</p> <p>a. Protect and enhance what is distinctive about Croydon and its Places collectively by securing a sense of belonging and high quality design that sits well with its surroundings.</p>	<p>No Likely Significant Effects</p>

Policy Name	Brief Description	Screening Outcome
	<p>b. Sustainable growth while protecting and enhancing the borough's natural environment and built heritage.</p> <p>c. An enhanced Green Grid with creating a biodiversity network contributing towards better health and well-being of the residents and help address climate change.</p> <p>d. A welcoming place that is designed inclusively to meet the needs of the residents and visitors.</p>	<p>This policy is a development management policy that provides parameters to follow for the support of the development by the Council. There are no linking impact pathways.</p>
<p><b>SP2.1 - Homes</b></p>	<p><b>SP2.1</b> In order to provide a choice of housing for people in socially-balanced and inclusive communities in Croydon, the Council will apply a presumption in favour of sustainable development of new homes provided applications for residential development to meet the future needs of the area requirements of Policy SP2, SP3.14 and other applicable policies of the development plan.</p>	<p>No Likely Significant Effects</p> <p>This policy is a development management policy which supports sustainable development. Sustainable development by definition should not adversely impact the natural environment and therefore there are no linking impact pathways.</p>
<p><b>SP2.2 – Quantities and Locations</b></p>	<p><u>Quantities and Locations</u></p> <p><b>SP2.2</b> In order to provide a choice of housing for people in Croydon the Council will seek to deliver a minimum of <del>32,890</del><sup>24</sup> <b>37,795 (or 2,100 over 18 years)</b> homes between <del>2016 and 2036</del> <b>2019-2039</b>. This will be achieved by:</p> <p>a) Concentrating development in the places with the most capacity to accommodate new homes whilst respecting the local distinctiveness of the Places and protecting the borough's physical, natural and historic environment, whilst recognising that Places change and in particular suburbs will sustainably grow; and</p> <p>b) The allocation of <del>6,970</del> <b>11,724</b> homes in the Croydon Local Plan's <del>Detailed Policies and Proposals</del> beyond the Croydon Opportunity Area;</p>	<p>Potential Likely Significant Effects</p> <p>This policy provides for a minimum of xxxxx homes during the plan period within the Borough and identifies number of dwellings within Opportunity Areas. It also identifies a windfall quantum.</p> <p>Dependent on the location of these sites in relation to the European Sites there could potentially be likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>

<sup>24</sup> Of which 4,890 ~~3,844~~ are either completed or under construction

Policy Name	Brief Description	Screening Outcome
	<p>c) Within the Croydon Opportunity Area, <del>the Croydon Local Plan's Detailed Policies and Proposals has been informed by the Croydon Opportunity Area Planning Framework and allocates</del> allocate sites for at least <del>10,760</del> 7, 9,753 net additional homes;- and</p> <p>d) <del>10,060</del> 10,897 (.i.e. 641*17, assuming adoption in 2023) homes being delivered across the borough on windfall sites; and</p> <p>e) <del>Seeking to return at least 190 vacant homes back into use by 2026;</del> and</p> <p>f) Ensuring land is used efficiently, and that development addresses the need for different types of homes in the borough and contributes to the creation or maintenance of sustainable communities; and</p> <p>g) Not permitting developments which would result in a net loss of homes or residential land; <del>and</del></p> <p>h) <del>Supporting a range of housing delivery methods, including self-build, custom-build and community-led housing.</del></p>	
<p><b>SP2.3 – Affordable Homes</b></p>	<p><u>Affordable Homes</u>  <b>SP2.3</b> <del>The Council will seek to</del> ensure that a choice of homes is available in the borough that will contribute to addressing the borough's need for affordable homes. <del>This will be achieved by a strategic policy target of</del> <b>as follows:</b></p>	<p>No Likely Significant Effects</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the percentage mix of</p>



Policy Name	Brief Description	Screening Outcome
	<p>a) 25% of all new homes developed in the borough over the plan period to be either affordable <b>low cost</b> rented homes (homes which are up to 80% market rent) <b>comprising of social and affordable rented homes</b> or homes for social rent to meet the borough's need; and</p> <p>b) 15% of all new homes in the borough developed over the plan period to be intermediate affordable housing for <b>starter</b> homes, low cost shared or <b>intermediate rent</b> home ownership managed by a Registered Social Landlord or <b>intermediate rent</b>.</p> <p><b>SP2.4</b> To deliver affordable housing in the borough, on sites of ten or more dwellings the Council will:</p> <p>a) <del>Negotiate to achieve up to 50% affordable housing, subject to viability providing that;</del></p> <p>b) <del>Seek a 60:40 ratio between affordable rented homes and intermediate (including starter) homes unless there is agreement between Croydon Council and a Registered Provider that a different tenure split is justified and subject to national regulations on provision of starter homes or, on schemes which are covenanted Private Rental Schemes where the 60:40 ratio is not viable<sup>25</sup>;</del></p> <p>c) <del>Require a minimum provision of affordable housing as set out in SP2.5.</del></p>	<p>affordable housing to be provided within a development. There are no linking impact pathways.</p>

<sup>25</sup> In such instances, the Council will expect the covenant to require the scheme to be solely for private rented accommodation owned by one institution or company for a minimum of seven years post completion of the development.

Policy Name

Brief Description

Screening Outcome

Residential development should respond positively to the need for affordable homes that are genuinely affordable for local residents by.

a) Providing at least (i) 35% of new housing as affordable on residential developments of 10 or more dwellings, exploring all possible options to achieve 50% affordable housing and (ii) 50% onsite affordable housing if publically owned land or land protected by Policy SP3.2

b) Providing affordable housing in a ratio of: (i) 70% low cost rented homes, comprising of social rented or affordable rented housing, prioritising increasing the delivery of social rented housing (ii) 30% intermediate housing to meet a range of needs. To depart from this, an agreement with a Registered Provider will be required to demonstrate that a different tenure split is justified and it will address local housing needs; and

a) Ensure that low cost rented homes are genuinely affordable to lower income households; Ensuring that the provision of intermediate homes responds to local needs by providing rented or low cost home ownership products that are in reach of local household incomes;

b) Making the most efficient use of land in order to facilitate and maximise the delivery of affordable housing and where a development site is sub-divided so as to create two or more separate development schemes one or more of which falls below the relevant threshold, the appropriate level of affordable housing to reflect the provision that would have been achieved

Policy Name

Brief Description

Screening Outcome

on the site as a whole had it come forward as a single scheme for the site, will be sought.

c) Where development seeks to add additional dwellings on a site with an existing consent or under construction the affordable housing will be calculated on the gross number of dwellings;

d) Building out the development and achieving an agreed level of progress on implementing the scheme within 2 years of grant of planning consent, otherwise an early stage review will be triggered to assess whether additional affordable housing is viable.

~~SP2.5 The Council will require a minimum provision of affordable housing to be provided either:~~

~~a) Preferably as a minimum level of 30% affordable housing on the same site as the proposed development or, if 30% on site provision is not viable;~~

~~b) If the site is in the Croydon Opportunity Area or a District Centre, as a minimum level of 15% affordable housing on the same site as the proposed development plus the simultaneous delivery of the equivalent of 15% affordable housing on a donor site with a prior planning permission in addition to that site's own requirement. If the site is in the Croydon Opportunity Area, the donor site must be located within either the Croydon Opportunity Area or one of the neighbouring Places of Addiscombe, Broad Green & Selhurst, South Croydon or~~

Policy Name

Brief Description


Screening Outcome

~~Waddon. If the site is in a District Centre, the donor site must be located within the same Place as the District Centre; or~~

~~c) As a minimum level of 15% affordable housing on the same site as the proposed development, plus a Review Mechanism entered into for the remaining affordable housing (up to the equivalent of 50% overall provision through a commuted sum based on a review of actual sales values and build costs of completed units) provided 30% on-site provision is not viable, construction costs are not in the upper quartile and, in the case of developments in the Croydon Opportunity Area or District Centres, there is no suitable donor site.~~

In the following specific instances where affordable housing is not provided in full the following may apply:

- a) In exceptional circumstances, affordable housing is not provided in accordance with policy, applications must be supported by a viability assessment which will be independently tested, demonstrably designed to maximise affordable housing delivery, be able to demonstrate a planning benefit which outweighs the provision of affordable housing and will be subject to a late stage review (i.e. at the point of 75% of sales/tenancies). Developments proposing below a minimum of 20% affordable housing will not be supported;
- b) Where development proposes a higher level of affordable housing than 35%, a different tenure mix may be supported

Policy Name	Brief Description	Screening Outcome
	<p>without the need for a viability assessment, where this is agreed with a Registered Provider;</p> <p>c) Where development is for build to rent<sup>38</sup>, co-living or community-led housing scheme, the affordable housing may be provided in a different form such as discounted market rent, providing it is genuinely affordable and meets identified housing needs in the borough.</p> <p>d) Making the most efficient use of land in order to facilitate and maximise the delivery of affordable housing,</p> <p>e) Ensuring that the provision of intermediate homes responds to local needs by providing rented or low cost home ownership products that are in reach of local household incomes; and</p> <p>f) Building out the development and achieving an agreed level of progress on implementing the scheme within 2 years of grant of planning consent, otherwise an early stage review will be triggered to assess whether additional affordable housing is viable.</p> <p>In assessing viability, the Council will compare Residual Land Value with Existing Use Value <b>Benchmark Land Value (competitive)</b> <del>(plus an incentive to provide a competitive return to a willing landowner)</del> or Alternative Use value if there is an alternative use for the site which would comply with the policies of the development plan and could be implemented<sup>26</sup>; will take</p>	

<sup>26</sup> To be implementable an alternative use will generally need to have an existing implementable planning permission unless other evidence on how it will be implemented can be provided.

Policy Name	Brief Description	Screening Outcome
	<p>account of features which appear to seek to exclude affordable housing by design or by incurring upper quartile construction costs<sup>27</sup>; and will take account of abnormal costs incurred.</p>	
<p><b>SP2.3 – Quality and Standards</b></p>	<p><u>Quality and Standards</u>  <b>SP2.8</b> The Council will seek to ensure that new homes in Croydon meet the needs of residents over a lifetime and contribute to sustainable communities with the borough. This will be achieved by:</p> <ul style="list-style-type: none"> <li>a) Requiring that all new homes achieve the minimum standards set out in the <del>London Plan</del> <del>Mayor of London’s Housing Supplementary Planning Guidance</del> and National Technical Standards (2015) or equivalent; and</li> <li>b) Ensuring that all new homes designed for families meet minimum design and amenity standards set out in the Croydon Local Plan’s Detailed Policies and Proposals and other relevant London Plan and National Technical Standards (2015) or equivalent. <b>Development will need to demonstrate the design of both private and communally shared spaces, and supporting management strategies successfully meet the needs of all residents, including families.</b></li> <li>c) <b>Provide internal and external spaces which contribute positively to resident’s health and wellbeing, whilst offering places for activity, shared experiences and retreat. And</b></li> </ul>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to building standards within the development. There are no linking pathways.</p>

<sup>27</sup> By reference to Building Cost Information Service (BCIS) or similar indices for similar development types in London.

Policy Name	Brief Description	Screening Outcome
	<p>d) <b>Ensure the design and layout will support independent living.</b></p>	
<p><b>Policy DM1 – Housing choice for sustainable communities</b></p>	<p><del>The Council will seek to enable housing choice for sustainable communities by requiring the minimum provision of homes designed with 3 or more bedrooms or larger home (in its current form) on sites of 10 or more dwellings as shown in Error! Reference source not found., except: and smaller homes below 130m2 (as originally built.</del></p> <p><del>Where there is agreement with the associated affordable housing provider that three or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal, or;</del></p> <p><del>Within three years of the adoption of this plan, where a viability assessment demonstrates that larger homes would not be viable, an element may be substituted by two bedroom, four person homes complying with the floor space specification of national Technical Standards or the London Mayor’s Housing Supplementary Planning Guidance or equivalent.</del></p> <p>The Council will permit the redevelopment of the residential units where it does not result in the net loss of 3 bedroom homes (as originally built) or the loss of homes smaller than 130m<sup>2</sup>. <b>To enable housing choice for sustainable communities, the minimum provision of homes designed with 3 or more bedrooms, must comply with Error! Reference source not found.</b> except where there is evidence from an associated affordable housing provider that 3 or more bedroom dwellings are neither viable nor needed as part of the affordable housing element of any proposal.</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating ensuring no net loss of family homes. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
<p><b>Policy DM1A – Amenity Standards for Residential Developments</b></p>	<p><b>DM1A.1 Residential development will need to provide private amenity space that:</b></p> <ul style="list-style-type: none"> <li><b>a) Is of high quality design, and enhances and respects the local character</b></li> <li><b>b) Provides a minimum amount of outdoor space of 5m<sup>2</sup> per 1-2 person unit and an extra 1m<sup>2</sup> per extra occupant thereafter; and it must achieve a minimum depth and width of 1.5m</b></li> <li><b>c) Provides functional with a minimum width and depth of balconies should be 1.5m</b></li> <li><b>d) All flatted developments and major developments need to provide a minimum of 10m<sup>2</sup> per child of new play space, calculated using GLA's the Mayor of London's population yield calculator</b></li> <li><b>e) All flatted developments of 10 units should provide a minimum of 50 square metres of communal amenity space with a further 1 square metres per additional unit thereafter</b></li> </ul> <p><b>DM1A.2 Large scale purpose built shared living schemes and non-self-contained student housing must also provide communal amenity space. When calculating the communal amenity space requirements each bedroom will be treated as a 1b1p flat and the resultant private outdoor space requirement will be combined to form the total need for communal amenity space. In Large scale purpose built shared living scheme and non-self-contained student housing communal areas (including kitchens) may be considered as communal amenity space.</b></p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the provision of the required amounts of amenity space within a development. There are no linking pathways.</p>



Policy Name	Brief Description	Screening Outcome
<b>Policy DM2A – Large scale purpose built shared living</b>	<p><b>DM2A.1</b> Development proposals for large-scale purpose-built shared living will be supported where they meet both the requirements of London Plan policy H16 and the following additional Croydon - specific requirements:</p> <ul style="list-style-type: none"> <li>a) Proposal should not compromise delivery of self-contained housing to meet housing needs of the Borough during the life of the Plan</li> <li>b) Shall be located in locations with good or excellent public transport accessibility;</li> <li>c) There should not be more than two large scale purpose built shared living schemes and purpose built student housing within a 250m distance of each other and total capacity of schemes (using a ratio of 1.8 beds/per C3 unit) should not exceed 5% of total place based housing growth. This will ensure development would not result in an over-concentration of similar uses, which may be detrimental to residential amenity or the balance and mix of uses in the area or place undue pressure on local infrastructure Including Green and social Infrastructure).</li> </ul> <p><b>DM2A.2</b> Affordable housing contributions should be made in accordance with London Plan policy H16 in the form of a single upfront payment to Croydon based on 50 per cent discount to market value of 35 per cent of the units (or 50 per cent of the units where the London Plan threshold applies).</p> <p><b>DM2A.3</b> Each private unit shall include or have exclusive access to the following;</p> <ul style="list-style-type: none"> <li>a) at least 30sqm range of functional living space separate from the communal facilities;</li> <li>b) A minimum of 5m2 of communal amenity space shall be provided per bed space/person incorporating a wide range of amenities to support a diverse and inclusive community of residents and to address their needs</li> <li>c) Include at least one set of cooking facilities for every 2-5 persons and two sets for every 6-10 persons</li> <li>d) Provided storage space in both private and communal areas.</li> </ul> <p>includes a management plan that, to the satisfaction of the Council, will appropriately mitigate potential harm to the amenities of future resident and neighbouring properties.</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council for large scale co living developments. There are no linking pathways.</p>

**Policy SP3 - Employment**

**SP3.1** The Council will encourage innovation and investment into the borough to support enterprise and increased employment for the benefit of all Croydon residents. The Council will apply a presumption in favour of employment-related development, provided it meets the standards of Policy SP3 and other applicable policies of the development plan.

Innovation, Investment & Enterprise

**SP3.2** ~~The Council will adopt a~~ Innovative approaches that reflect technology changes in delivery and servicing to future proof the borough's industrial and employment land will be supported in accordance with '4-Tier' approach provides the hierarchy for the retention and redevelopment of land and premises relating to industrial/employment activity as ~~set out in Table 5.4~~ follows.

- a) Strategic and Separated Industrial Locations (Tier 1) – significant sized self-contained industrial locations that have separation from nearby residential properties, with strong protection for existing, and support for new industrial and warehousing activity, employment generating Sui-Generis uses and ancillary uses that complement and support the area's industrial function will be permitted
- b) Integrated Industrial Locations (Tier 2) – smaller scale industrial estates, where residential development has grown up alongside the commercial buildings, with strong protection for existing, and support for new industrial and warehousing activity, employment generating Sui-Generis Uses and support for non-Town Centre community uses to support growth in the borough;
- c) Town Centre Employment Sites (Tier 3) – Industry, warehousing and employment generating Sui-Generis Uses<sup>28</sup> in Town Centre locations, with protection for existing, and support for new industrial and warehousing activity, with other uses permitted as set out in Policy DM22.2;
- d) Scattered Employment Sites (Tier 4) – Isolated industry, warehousing and employment generating Sui-Generis Uses<sup>29</sup> not in Tier 1, Tier 2 or Town Centre locations, with protection for existing industrial and warehousing activity, support for new Research and Development, Light Industrial or Warehousing uses, with other uses permitted as set out in Policy DM22.2.

Potential Likely Significant Effects

This policy provides for a up to 30,500 m<sup>2</sup> employment space to be located in Croydon Metropolitan Centre within the Plan period.

Dependent on the location of the employment space in relation to the European Site there could potentially be likely significant effects.

Potential impact pathways are present:

- Atmospheric pollution

**Policy Name**

**Brief Description**

**Screening Outcome**

**SP3.3** ~~The Council will promote. To support the Borough's function as a hub of culture and creativity, development supporting the growth and expansion of Cultural and Creative Industries to make Croydon a better place to live as a driver of growth and enterprise in the local economy will be supported.~~ The focus for accommodating Cultural and Creative Industries will be the network of Enterprise Centres set out below:

- a) Croydon Metropolitan Centre;
- b) Purley District Centre;
- c) Crystal Palace District Centre; and
- d) South Norwood District Centre/Portland Road.

The Council will ~~support~~ promote the remodelling of the Fairfield Halls as a performance facility.

**SP3.4** ~~The Council will support~~ Croydon is home to a diverse population known for its creative industries and unique culture, development for these uses that support culture and diversity will be supported as well as the temporary occupation of empty buildings and cleared sites by creative industries, ~~and~~ cultural organisations and other meanwhile uses where they contribute to regeneration and enhance the character and vitality of the area.

Town and Neighbourhood Centres

**SP3.5** The Council will apply the London Plan Town Centre hierarchy:

- a) Croydon Metropolitan Centre
- b) District Centres: Addiscombe, Coulsdon, Crystal Palace, New Addington, Norbury, Purley, Selsdon, South Norwood and Thornton Heath
- c) Local Centres: Beulah Road, Brighton Rd (Sanderstead Road), Brighton Road (Selsdon Road), Broad Green, Hamsey Green, Pollards Hill, Sanderstead, Shirley and Thornton Heath Pond.
- d) Future new Local Centres: Fiveways, Waddon Marsh, Valley Park.

Neighbourhood Centres

Policy Name	Brief Description	Screening Outcome
	<p>e) <b>In addition</b> The Council has identified a number of Neighbourhood Centres <b>have been identified</b> as follows:</p> <p>Ashburton Park, Bridgstock Rd., Brighton Rd./Downlands Rd, Coulsdon Rd./Court Road, Green Lane/Northwood Rd., Godstone Rd., Fieldway, London Rd./Kidderminster Rd, Lower Addiscombe Rd./Cherry Orchard Rd., Portland Rd./Watcombe Rd./Woodside Ave., Shirley Rd., Selsdon Park Rd./Featherbed Lane, Selhurst Rd, South End/Parker Rd./St. Peter's Church, Spring Park/Bridle Rd., South Norwood Hill, Waddon Rd./Abbey Rd., Woodside Green,</p> <p><b>SP3.7</b> A new Neighbourhood centre is proposed at Waddon Way.</p> <p><b>SP3.8</b> The Council will work with the GLA and neighbouring boroughs to ensure Croydon's network of town centres is sufficiently flexible to accommodate change up to 2031 by:</p> <p>f) Working with its partners through the process of regular town centre 'health checks' to highlight reclassifications of the borough's existing Local and District Centres; <b>and</b></p> <p>g) Designating the boundaries of the network of town centres and their Primary Shopping Areas in the Croydon Local Plan's Detailed Policies and Proposals and undertaking regular review to ensure the vitality of the centres is maintained; <b>and</b></p> <p>h) <del>Considering the designation of new Local Centres at Fiveways and Valley Park when they can be supported by population growth in these areas.</del></p> <p><b>SP3.8</b> <del>The Council will promote and support the development of all B1 uses (including office, light industry and research &amp; development) retail, leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre, District Centres and Local Centres.</del> <b>As a borough with a focus on innovation and enterprise development that encourages opportunities for local business to start, grow and remain in Croydon are supported. Local business and enterprise should be encouraged through a healthy mix of uses at a variety of scales with the provision and retention of affordable units and opportunities such as provision of studios or managed workspace.</b></p> <p><b>SP3.9</b> <del>Croydon's location lends it a number of strategic benefits, positioned centrally in the London – Gatwick diamond Croydon is well positioned to support innovation and enterprise uses. As the borough's metropolitan centre the Croydon Metropolitan Centre will remain the principal location in the borough for office, retail, cultural-business uses (including office, light industry and research &amp; development), retail, leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities and hotel activity, and also be the largest retail and commercial centre in South London.</del> <b>A flexible approach will be applied to these uses, the mix and scale of these uses must be appropriate to support the Croydon Metropolitan Centre's higher order destination function.</b></p>	

**Policy Name**

**Brief Description**

**Screening Outcome**

**SP3.10** The Council will adopt a flexible approach to B1 uses (office, light industry and research & development), retail, leisure (including evening/night-time economy uses), visitor accommodation, and housing and community facilities within Croydon Metropolitan Centre. This flexible approach will be supplemented by the Croydon Opportunity Area Planning Framework and the Council's masterplans that apply to the Croydon Metropolitan Centre. **Neighbourhood centres are key to sustainable neighbourhoods. Intended to be located within walking or cycling distance from neighbourhoods, these centres provide multimodal access to a communities day-to-day service needs. A wide variety of smaller scale development proposals which will enhance the vitality and viability of a neighbourhood centre and meet community needs will be supported.**

**SP3.11** The Council will promote and support measures to improve the quality of the borough's stock of retail<sup>30</sup> and office<sup>31</sup> premises, particularly in the Croydon Metropolitan Centre. **Much of Croydon's office stock is characterised by older B grade offices. Development that supports the creation and refurbishment of the borough's office stock, provision of affordable workspace and retail premises in the Croydon Metropolitan Centre will be encouraged.**

**SP3.12** The Council will favourably consider net increases to the stock of retail premises commensurate with Croydon's retail function as a Metropolitan Centre and ensuring the viability and vitality of Croydon Metropolitan Centre, District Centre and Local Centres. The Council will seek to maintain as a minimum, the current amount of retail floor space in Croydon, enhance the quality of retail floor space in Croydon and seek to reduce A Use Class vacancy. **Development should reflect the implications of a shifting work environment supporting flexible use of office space to reinforce the areas employment function. At the street level development should encourage walkability and the pedestrian experience creating pedestrian friendly frontages along key pedestrian routes leading to the town centres.**

**SP3.9** The Council will promote and support the development of new and refurbished office floor space in Croydon Metropolitan Centre, particularly around East Croydon Station and within New Town, and the District Centres as follows<sup>32</sup>: **East Croydon Station is the borough's key transportation hub, development and refurbishment of office floor space that encouragesustainable travel and provision of new local working and employment opportunities including affordable workspace around the station and within the Croydon Metropolitan Centre is supported as follows**

- a) Up to ~~92,000~~**30,500**m<sup>2</sup> by ~~2034~~ **2039** to be located in Croydon Metropolitan Centre; **and**
- b) Retaining, or through refurbishment providing, higher quality office floor space (Grade A), or lower quality floor space for which there remains a demand, within the Office Retention Area of the Croydon Metropolitan Centre. Mixed use developments must include a level of office floor space proportionate to Croydon's role as an **Edge of London** ~~Outer London~~ Office Centre; **and**

<sup>30</sup> Para 10.3, Croydon Metropolitan Centre Retail Strategy, Dec 2009 (Drivers Jonas)

<sup>31</sup> Para 7.7, L.B. Croydon Office, Industrial, Warehousing Land/Premises Market Assessment, August 2010 (URS & Stiles Harold Williams)

<sup>32</sup> Employment Land Review 2014

Policy Name	Brief Description	Screening Outcome
	<p>c) <del>Up to 7,000m<sup>2</sup> to be spread across the borough's District Centres.</del></p> <p><b>SP3.10</b> Opportunities for employment and skills training will be considered by means of section 106 agreements for major developments (residential developments of 10 units or more or non-residential developments exceeding 1,000m<sup>2</sup>). The Council will seek to secure a minimum of 20% of the total jobs created by the construction of new development above the set threshold to be advertised exclusively to local residents through the Council's Job Brokerage Service for a specified minimum period. It is expected that best endeavours be used and that the developer will work with the Council to ensure that the target of 20% employment of local residents is achieved in both construction and end user phase of new qualifying development.</p> <p>e) Each of Croydon's District and Local Centres collectively form the Borough's town centres as defined in Annex 2 of the NPPF. Each has a diverse community and unique culture. To encourage local opportunities to live, work and play development in these centres should support the consolidation of uses to target toward the local community. Business and Town Centre Uses coming forward should provide affordable workspace for small and medium size businesses that reflect the scale and nature of the centre</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council for development in Croydon Metropolitan Centre, District and Local Centres. There are no linking pathways.</p>
<p><b>Policy DM4: Development in Croydon Metropolitan Centre, District and Local Centres</b></p>	<p><del>DM4.1</del> The <del>Council will ensure that the</del> vitality and viability of Croydon Metropolitan Centre and the borough's <del>District and Local Centres is</del> will be maintained and increased by <del>not</del> permitting new developments or changes of use <del>at ground floor<sup>33</sup> in accordance with</del> <b>Error! Reference source not found.</b> <del>which would result in a net loss of ground floor<sup>34</sup>. Class A uses within Main Retail frontages (unless it relates to the expansion of an existing community use).</del></p> <p><del>DM4.2</del> Within Croydon Metropolitan Centre and the borough's District and Local Centres development proposals and changes of use on the ground floor must accord with <b>Error! Reference source not found.</b> <del>Policy deleted</del></p> <p><del>DM4.3</del> Outside of Main and Secondary Retail Frontages, but within centres, proposals for mixed use developments will be required to either:</p> <p>a) Demonstrate that a specific end user will be occupying the ground floor unit upon completion; or</p> <p>b) Provide a free fitting out of all ground floor units for the eventual end occupier to ensure that the unit is capable of occupation and operation by the end user and ensure that the ground</p>	

Policy Name	Brief Description	Screening Outcome
	<p>floor units are capable of conversion to the same use as the remainder of the building if after two years, subsequent to completion, no end user has been found for the ground floor unit..</p>	
<p><b>Policy DM5: Development in Neighbourhood Centres</b></p>	<p><b>DM5.1</b> The Council will ensure that the vitality and viability of Neighbourhood Centres are maintained and enhanced and that they continue to provide a level of service of neighbourhood significance.</p> <p><b>DM5.1</b> In the vicinity of Neighbourhood Centres, development proposals:</p> <p>a) For A1-A5 uses, B1 uses, <b>Town centre Class E (Commercial, business and service) uses, Pubs and drinking establishments</b> and community facilities should be of a reasonable scale, proportionate to serve a neighbourhood need and have a clear relationship to other facilities within the centre. Guidance is given in Appendix 4;</p> <p>b) Must accord with <b>Error! Reference source not found.</b>; and</p> <p>c) Demonstrably relate to the Neighbourhood Centre, be in scale and be within reasonable walking distance to other retail and community uses within the centre. The Council will ensure that the vitality and viability of Neighbourhood Centres are maintained and enhanced and that they continue to provide a level of service of neighbourhood significance.</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council for development in Neighbourhood Centres. There are no linking pathways.</p>
<p><b>Policy DM9: Expansion of industrial and warehousing premises in Strategic, Separated and Integrated Industrial Locations</b></p>	<p><b>DM9.1</b> Within the Strategic, Separated and Integrated Industrial Locations identified in <b>Error! Reference source not found.</b> of Policy SP3.2, the Council will encourage the redevelopment of low density industrial and warehousing premises with higher density industrial and warehousing premises <b>to enhance the function of the SIL.</b></p> <p><b>DM9.2</b> Schemes that work to improve the function of the overall SIL while making more efficient use of land for business, heavy industry and warehousing uses or take opportunities to support the integration of research and development of processes and products, or uses related to education or training connected to industrial processes, without loss of industrial floor space will be supported. This approach must ensure no net of floor space for industrial or warehousing uses.</p> <p><b>DM9.3</b> In Strategic, Separated and Integrated Industrial Locations, and on Town Centre and Scattered Employment Sites development proposals and changes of use must accord with <b>Error! Reference source not found.</b></p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy to encourage the redevelopment of industrial and warehousing premises.</p>

Policy Name	Brief Description	Screening Outcome
<p><b>Policy DM9A: Protection and provision of affordable workspace</b></p>	<p>DM9A.1 Proposals for the enhancement, and intensification of existing employment uses will be required to provide flexible and affordable space suitable for the creative and cultural sectors and/or small and medium enterprises, unless justified by the type and nature of the proposal and subject to viability</p> <p>DM9A.2 Proposals resulting in the loss of existing affordable workspace will be resisted unless it can be demonstrated that the quantum of affordable workspace is replaced on-site or re-provided elsewhere in suitable locations in Croydon on equivalent terms.</p> <p>DM9A.3 Provision of affordable workspace will encouraged in the following locations:</p> <ul style="list-style-type: none"> <li>a) Transformation Areas</li> <li>b) Croydon Opportunity Area</li> <li>c) All tiers of designated employment locations identified in Policy SP5</li> </ul> <p>DM9A.4 Elsewhere proposals for affordable workspace may be appropriate in district, local and neighbourhood centres provided they do not undermine the primary retail and community functions of the centres.</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council for the protection and provision of affordable workspace. There are no linking pathways.</p>
<p><b>Policy SP4: Urban Design, Heritage and Local Character</b></p>	<p><del>SP4.1 The Council will require Development</del> <b>should be inclusive and</b> of a high quality <del>which respects</del> <b>and enhances</b> Croydon's varied local character, <del>heritage assets contributing positively to public realm, landscape and townscape to create sustainable communities. The Council will apply a presumption in favour of development provided it meets the requirements of Policy SP4 and other applicable policies of the development plan.</del></p> <p><del>SP4.2 The Council will require</del> <b>Developments to will be required to:</b></p> <ul style="list-style-type: none"> <li>a) Be informed by the distinctive qualities, <b>heritage, character,</b> identity, topography, <b>diversity, local needs</b> and opportunities of the relevant Places of Croydon;</li> </ul>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to Urban design, heritage and local character. There are no linking pathways.</p>



Policy Name	Brief Description	Screening Outcome
	<p>b) <b>Preserve and enhance Heritage Assets and their settings</b>, Protect Local Designated Views, Croydon Panoramas, the setting of Landmarks, other important vistas and skylines; and</p> <p>c) Enhance social cohesion, <b>health</b> and well-being, and</p> <p>d) <b>Include well designed spaces for the proposed uses, ensuring any mixing of uses carefully integrates high quality amenity, access and servicing.</b></p> <p><b>SP4.3</b> <del>Planning applications in areas identified in SP4.5 as suitable for tall buildings must be supported by an elevation plan of the roof. Policy deleted</del></p> <p><u>Croydon Opportunity Area</u>  <b>SP4.4</b> In the Croydon Opportunity Area the Council will support high quality, high density developments that are tailored to and help to protect or establish local identity.</p> <p><u>Tall Buildings</u>  <b>SP4.5</b> Proposals for tall buildings will be encouraged only in the Croydon Opportunity Area, areas in <b>District</b> Centres and locations where it is in an area around well-connected public transport interchanges and where there are direct physical connections to the Croydon Opportunity Area, Croydon Metropolitan Centre or <b>District</b> Centres. <del>Detailed criteria for the assessment of tall buildings, consideration of the appropriateness of tall buildings on individual sites, and/or in District Centres, will be contained in the Croydon Local Plan's Detailed Policies and Proposals. Furthermore the Croydon Opportunity Area Planning Framework should be referred to when considering the location and design of tall buildings in the Croydon Opportunity Area.</del></p> <p><b>SP4.6</b> <del>Some locations within the areas listed in SP4.5 will be sensitive to, or inappropriate for tall buildings and applications for Tall, large, buildings and high density developments will be required to:</del></p> <p>a) Respect and enhance local character, and heritage assets <b>and their settings</b>;</p> <p>b) <del>Minimise the environmental impacts, in particular but not limited to wind and microclimate and</del> <b>Create no net worsening to wind conditions</b></p> <p><b>b) (1) Ensure optimum microclimate and wind conditions are created for a high quality public realm, and communal outdoor amenity spaces that are welcoming to occupy and respond sensitively to topography;</b></p> <p>c) Make a positive contribution to the skyline and image of Croydon; <b>and</b></p>	

**Policy Name**

**Brief Description**

**Screening Outcome**

- d) Include high quality public realm in their proposals to provide a setting appropriate to the scale and significance of the building and the context of the surrounding area.

Public Realm

~~SP4.7~~ The Council will work with partners (including private land owners) to improve the public realm within the borough. ~~Policy deleted~~

**SP4.8** The Council with its partners will improve Croydon's public realm to respect, enhance, create local character and distinctiveness, and integrate with the historic environment.

**SP4.9** The Council will establish a hierarchy of places and key strategic roads as part of a public realm framework which will guide the delivery of public realm improvements to assist regeneration focusing on Croydon's Metropolitan, ~~Town District, and Local~~ Centres, Conservation Areas, ~~Local Heritage Areas~~ and key strategic roads.

~~SP4.10~~ The Council will establish guidelines for materials and layout for the public realm as part of the borough's public realm framework ~~deliver a Smart City vision and programme, with associated infrastructure integrated into public realm design.~~

Character, Conservation and Heritage ~~Conservation of Heritage Assets and the Historic Environment~~

~~SP4.11~~ The Council and its partners will promote The use of heritage assets and the ~~historic environment~~ local character ~~will be promoted~~ as a catalyst for regeneration and cohesion and to strengthen the sense of place.

~~SP4.12~~ The Council and its partners will respect, and optimise ~~The Council will support~~ opportunities to enhance, Croydon's heritage assets, their setting and the historic landscape, through high quality new development and public realm that respects ~~and enhances~~ the ~~historic environment~~ local character and is well integrated.

**SP4.13** The Council and its partners will strengthen the protection of and promote improvements to the following heritage assets and their settings<sup>36</sup>:

- a) Statutory Listed Buildings;
- b) Conservation Areas;
- c) Registered Historic Parks and Gardens;

Policy Name	Brief Description	Screening Outcome
	<p>d) Scheduled Monuments;</p> <p>e) Archaeological Priority Areas;</p> <p>f) Local Heritage Areas;</p> <p>g) Local List of Buildings of Historic or Architectural Importance;</p> <p>h) Local List of Historic Parks and Gardens;</p> <p>i) Croydon Panoramas;</p> <p>j) Local Designated Landmarks; and</p> <p>k) Local Designated Views.</p> <p><b>SP4.14</b> The Council will maintain a regularly updated schedule of Croydon’s designated heritage assets and locally listed heritage assets.</p> <p><b>SP4.15</b> The Council and its partners will promote improvements to the accessibility of heritage assets to allow enjoyment of the historic environment for all.</p> <p><u>Intensification Areas</u></p> <p><b>SP4.16</b> In the locations identified as Areas of Focussed Intensification and Moderate Intensification, high quality developments that increase density and evolve character will be supported. They will be expected to enhance and sensitively respond to positive aspects of existing local character by being of high quality.</p>	
<p><b>Policy DM10: Design and character</b></p>	<p><b>DM10.1</b> The following policies 0 to DM10.10 apply in circumstances other than those where intensification policies (DM10.11) and place-specific policies (DM34 to DM49 and <b>Error! Reference source not found.</b>) specify otherwise and will be interpreted with reference to the description of each of the Places of Croydon set out in the introduction to each policy DM34 to DM49</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of</p>

Policy Name	Brief Description	Screening Outcome
	<p>and in the Council's Borough Character Appraisal and by reference to <b>Error! Reference source not found.</b></p> <p>Proposals <del>Development</del> should be of high quality and, <del>whilst seeking to achieve a minimum height of 3 storeys, should respect</del> <b>reflecting and maintaining the local character of the area including any heritage assets having regard to:</b></p> <ul style="list-style-type: none"> <li>a) The <b>area's</b> development pattern, layout and siting;</li> <li><del>b) The scale, height, massing, and density; <b>line deleted</b></del></li> <li>c) The <b>area's</b> appearance, existing materials and <b>roofscapes, scale, height, massing and density of existing built form</b> <del>built and natural features of the surrounding area; the Place of Croydon in which it is located. <b>And</b></del></li> <li>d) <b>The heritage assets and natural features of the surrounding area and the Place of Croydon in which it is located.</b></li> </ul> <p>Where an extension or alteration is proposed, adherence to Supplementary Planning Document 2 Residential Extensions and Alterations or equivalent will be encouraged to aid compliance with the policies contained in the Local Plan.</p> <p>Where a conversion or house in multiple occupation is proposed the Council will also consider the effects of noise, refuse collection and additional car parking on the character of an area. For this reason, the Council will seek proposals to incorporate parking within the rear, to the side or underneath building.</p> <p>In the case of development in the grounds of an existing building which is retained, development shall be subservient to that building.</p> <p>The council will take into account cumulative impact.</p> <p><b>DM10.2</b> <del>Proposals should create clear, well defined and designed public and private spaces. The Council will only consider parking within the forecourt of buildings in locations where the forecourt parking would not cause undue harm to the character or setting of the building and where forecourts are large enough to accommodate parking and sufficient screening without the vehicle encroaching on the public highway. The Council will support proposals that incorporate cycle parking within the building envelope, in a safe, secure, convenient and well lit location. Failing that, the</del></p>	<p>support by the Council in regard to design, growth and character. There are no linking pathways.</p>

**Policy Name**

**Brief Description**

**Screening Outcome**

~~council will require cycle parking to be located within safe, secure, well lit and conveniently located weather proof shelters unobtrusively located within the setting of the building. Policy deleted~~

~~**DM10.3** — The Council will seek to support proposals that restore and incorporate historic street furniture within the development. Policy deleted~~

~~**DM10.4** — All proposals for new residential development will need to provide private amenity space that:~~

~~a) — Is of high quality design, and enhances and respects the local character;~~

~~b) — Provides functional space (the minimum width and depth of balconies should be 1.5m);~~

~~c) — Provides a minimum amount of private amenity space of 5m<sup>2</sup> per 1-2 person unit and an extra 1m<sup>2</sup> per extra occupant thereafter;~~

~~d) — All flatted development and developments of 10 or more houses must provide a minimum of 10m<sup>2</sup> per child of new play space, calculated using the Mayor of London's population yield calculator and as a set out in **Error! Reference source not found.** below. The calculation will be based on all the equivalent of all units being for affordable or social rent unless as signed Section 106 Agreement states otherwise, or an agreement in principle has been reached by the point of determination of any planning application on the amount of affordable housing to be provided. When calculating the amount of private and communal open space to be provided, footpaths, driveways, front gardens, vehicle circulation areas, car and cycle parking areas and refuse areas should be excluded; and~~

~~e) — In the case of development in the grounds of an existing building which is retained, a minimum length of 10m and no less than half or 200m<sup>2</sup> (whichever is the smaller) of the existing garden area is retained for the host property, after the subdivision of the garden.~~

~~Adherence with Supplementary Planning document 3 Designing for Community Safety or equivalent will be encouraged to aid compliance with the policies contained with the Local Plan. Policy deleted~~

~~**DM10.5** — In addition to the provision of private amenity space, proposals for new flatted development and major housing schemes will also need to incorporate high quality communal outdoor amenity space that is designed to be flexible, multifunctional, accessible and inclusive. Policy deleted~~

Policy Name

Brief Description

Screening Outcome

**DM10.6** — The Council will support proposals for development that ensure that;

- ~~a) The amenity of the occupiers of adjoining buildings are protected; and that~~
- ~~b) They do not result in direct overlooking at close range or habitable rooms in main rear or private elevations; and that~~
- ~~c) They do not result in direct overlooking of private outdoor space (with the exception of communal open space) within 10m perpendicular to the rear elevation of a dwelling; and that~~
- ~~d) Provide adequate sunlight and daylight to potential future occupants; and that~~
- ~~e) They do not result in significant loss of existing sunlight or daylight levels of adjoining occupiers. Policy deleted~~

**DM10.7** — To create a high quality built environment, proposals should demonstrate that:

- ~~a) The architectural detailing will result in a high quality building and when working with existing buildings, original architectural features such as mouldings, architraves, chimneys or porches that contribute to the architectural character of a building should, where possible, be retained;~~
- ~~b) High quality, durable and sustainable materials that respond to the local character in terms of quality, durability, attractiveness, sustainability, texture and colour are incorporated; and~~
- ~~c) Services, utilities and rainwater goods will be discreetly incorporated within the building envelope<sup>36</sup>; and~~
- ~~d) To ensure the design of roof form positively contributes to the character of the local and wider area; proposals should ensure the design is sympathetic with its local context. Policy deleted~~

Landscape

<sup>36</sup> The building envelope (also known as the building shell) refers to the outer structure of a building.

**Policy Name**

**Brief Description**

**Screening Outcome**

**DM10.8** To ensure a cohesive approach is taken to the design and management of landscape within the borough the Council will require proposals to:

- a) Incorporate hard and soft landscaping; Provide landscaping as part of the overall design that enables the development to respect the character of the existing area and contributes to the integration of the buildings with the surrounding area;
- b) Provide spaces **wildlife-friendly landscapes** which are visually attractive, easily accessible and safe **and inclusive** for all users, and provide a stimulating environment;
- c) Seek to retain existing landscape features that contribute to the setting and local character of an area;
- d) Retain existing trees and vegetation including natural habitats<sup>37</sup>;
- e) In exceptional circumstances where the loss of mature trees is outweighed by the benefits of a development, those trees lost shall be replaced with new semi-mature trees of a commensurate species, scale and form; and
- f) Adherence with Supplementary Planning Guidance 12 Landscape and the Croydon's Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan.

**DM10.9** To ensure a creative, sensitive and sustainable approach is taken to incorporating architectural lighting on the exterior of buildings and public spaces the Council will require proposals to:

- a) Respect enhance and strengthen local character;
- b) Seek opportunities to enhance and emphasise the key features of heritage assets and local landmark buildings; or seek to encourage the use of public spaces and make them feel safer by incorporating lighting within public spaces; and
- c) Ensure lighting schemes do not cause glare and light pollution.

<sup>37</sup> Natural Habitats are defined as the natural home or environment of an animal, plant or other living organism.

Policy Name

Brief Description

Screening Outcome

d) Adherence with Croydon's Public Realm Design Guide, or equivalent, will be encouraged to aid compliance with the policies contained in the Local Plan.

~~**DM10.10** — When considering the layout of new development, the council will support proposals that minimise the amount of blank and inactive frontages, increase the amount of natural surveillance and avoid dark and secluded areas. Policy deleted~~

~~**DM10.11** — In the locations described in **Error! Reference source not found.** and shown on the Policies Map as areas of focussed intensification, new development may be significantly larger than existing and should:~~

~~a) Be up to double the predominant height of buildings in the area;~~

~~b) Take the form of character types "Medium-rise block with associated grounds", "Large buildings with spacing", or "Large buildings with Continuous frontage line";~~

~~c) Assume a suburban character with spaces between buildings.~~

~~Developments in focused intensification areas should contribute to an increase in density and a gradual change in character. They will be expected to enhance and sensitively respond to existing character by being of high quality and respectful of the existing place in which they would be placed.~~

~~Policy deleted~~

~~Character and growth – Urban Intensification~~

~~**DM10.11a** To deliver the homes that Croydon needs in suitable and sustainable locations that will accommodate higher levels of growth. In the areas of focused intensification, development should sustainably optimise site capacity. They may be significantly larger than existing and should:~~

~~a) Achieve a step change of density, scale and height within the area of focussed intensification which enhances and evolves local characters, except for locations in the Places of Purley, Broad Green and Selhurst where place specific policy takes precedence;~~

~~b) Have active well detailed frontages;~~

~~c) Address the higher density of the development by providing amenity and communal facilities for intensified use including utilities infrastructure, play space, parking, cycle storage and refuse storage within the capacity of the site;~~



Policy Name	Brief Description	Screening Outcome
	<p>d) Demonstrate innovative and sustainable design implementing mitigation measures to counter any identified flood risk; and</p> <p>e) Enhance landscape character, biodiversity and create opportunities for ecological, walking and cycling corridors.</p> <p><b>DM10.11b</b> Developments in areas of focused intensification should contribute to an increase in density and a change in character. They will be expected to enhance and sensitively respond to positive aspects of existing local character by being of high quality and respectful of the existing place in which they would be placed.</p> <p><b>DM10.11c</b> Developments within the areas of moderate intensification should be larger than the existing by delivering at least an additional storey. The increasing density should:</p> <p>a) Respect and enhance the character of the area and</p> <p>a) Provide amenity and communal facilities for intensified use including utilities infrastructure, play space, landscaping, parking, cycle storage and, refuse storage within the capacity of the site.</p> <p><b>DM10.11d</b> In other areas of the borough (excluding Conservation Areas and Local Heritage Areas) to support evolution without significant change, the developments should complement the predominant height, scale and density of buildings in the area.</p>	
<p><b>Policy DM15: Tall buildings and high density developments</b></p>	<p>To ensure tall or large buildings respect and enhance local character, and do not harm the setting of heritage assets, proposals will be permitted where they meet the following criteria:</p> <p>a) They are located in areas identified for such buildings in Policies DM34 to DM49;</p> <p>b) They are located in areas meeting a minimum Public Transport Accessibility Level (PTAL) rating of 4, with direct public transport connections to the Croydon Opportunity Area;</p> <p>c) The design should be of exceptional quality and demonstrate that a sensitive approach has been taken in the articulation and composition of the building form which is proportionate to its scale;</p> <p>d) The building height, footprint and design relates positively to any nearby heritage assets, and conserves or enhances the significance and setting of the assets of the wider historic environment;</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to tall buildings and high density developments. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
	<p>e) To improve the quality of and access to open space, developments including buildings taller than 40 storeys will need to incorporate amenity space, whether at ground level such as atria or above ground level, such as sky gardens and roof terraces, that is accessible to the public as well as residents of the development; and</p> <p>f) To ensure tall, and large <b>high density developments</b> buildings are well integrated with the local area, they should include at least an active ground floor and inclusive public realm. <b>and</b></p> <p>g) <b>Tall, large and high density developments shall positively respond to their surrounding environment, with no change to wind comfort category of all surrounding public realm and carriageways, particularly the experience of pedestrians and cyclists.</b></p>	
<p><b>Policy SP5.1 and 5.2 Community Facilities</b></p>	<p><b>SP5.1</b> The Council will have a presumption in favour of new <b>development</b> provided it is in accord with Policy SP5 and other applicable policies of the development plan and it <b>Development that provides for contributes to</b> the provision of infrastructure and community <b>facilities to meet the needs of the borough will be supported in appropriate locations.</b> through Community Infrastructure Levy and planning obligations requirements .</p> <p><u>Health and wellbeing</u></p> <p><b>SP5.2</b> <del>The Council and its partners will create and safeguard opportunities</del> <b>Opportunities</b> for healthy, fulfilling and active lifestyles <b>will be created and safeguarded</b> by:</p> <p>a) Working in partnership with the health authorities to improve health in Croydon;</p> <p>b) Ensuring new developments provide opportunity for healthy living by the encouragement of walking and cycling, good housing design, sufficient open space and opportunity for recreation and sound safety standards;</p> <p>c) Improving education <b>facilities</b> and skills training in Croydon and encouraging life-long learning; and</p> <p>d) Promoting the growth and expansion of further and higher education to improve skills and act as a driver of growth and enterprise in the local economy.</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to community facilities. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
<b>Policy DM19.2: Providing and protecting community facilities</b>	<p><b>DM19.2</b> The Council will support applications for community use where the proposals:</p> <ul style="list-style-type: none"> <li>a) Include buildings which are flexible, adaptable, capable of multi-use and, where possible, enable future expansion;</li> <li>b) Comply with the criteria for <del>D4 class</del> <b>community uses</b> in industrial locations set out in Table 8.13;</li> <li>c) Are accessible to local shopping facilities, healthcare, other community services and public transport or provides a community use in a location and of a type that is designed to meet the needs of a particular client group; and</li> <li>d) Are for a use that is a town centre use, as defined by the National Planning Policy Framework, are located within Croydon Metropolitan Centre or a Town Centre, have no more than 280m<sup>2</sup> of floor space (net) and are in the vicinity of a Neighbourhood Centre, or are a change of use of an existing unit in a Shopping Parade.</li> </ul>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to providing and protecting community facilities. There are no linking pathways.</p>
<b>Policy DM21: Protecting public houses</b>	<p>The Council will not grant planning permission for the demolition or change of use of a public house which displays the characteristics of a community pub such as:</p> <ul style="list-style-type: none"> <li>• Space for organised social events such as pub quizzes, darts competitions, pool leagues;</li> <li>• Meeting rooms, performance spaces, room for hire (appropriately sound proofed);</li> <li>• Ancillary facilities (skittles alley, children's play area); and</li> <li>• Associated clubs and teams;</li> </ul> <p>Unless:</p> <ul style="list-style-type: none"> <li>a) The loss of the public house would not result in a shortfall of local public house provision of this type;</li> <li>b) That the public house is no longer considered economically viable when considered against the CAMRA's Public House Viability Test; and that a range of measures have been undertaken to seek to improve viability including (but not restricted to): <ul style="list-style-type: none"> <li>– Hosting quiz nights, craft fairs, live music or comedy;</li> <li>– Food offer diversification;</li> <li>– Providing B&amp;B Accommodation;</li> <li>– Renting out space for meetings, classes or community events;</li> <li>– Maintenance, repair and visual improvements; and</li> <li>– Varied opening hours; and</li> </ul> </li> <li>c) The public house has been marketed as a public house, at a market rate for public houses, for a consistent period of <del>18</del> <b>24 months</b>.</li> </ul>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to protecting public houses. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
<b>Policy DM22: Providing for cemeteries and burial grounds</b>	<p>The council will support applications for new cemeteries and burial grounds where the proposals:</p> <ul style="list-style-type: none"> <li>a) Have good means of access from roads and are near bus routes or other transport nodes;</li> <li>b) Are located in areas of with no risk of flooding from all potential sources of flooding;</li> <li>c) Are not located in a Groundwater Source Protection Zone;</li> <li>d) Would not have unacceptable adverse impact on the biodiversity of the borough.</li> <li>e) <del>Are not located in Metropolitan Green Belt or on Metropolitan Open Land, unless it has been demonstrated that there are no suitable sites that are not in Metropolitan Green Belt or on Metropolitan Open Land, there is no impact on openness and existing provision of public access is maintained.</del> Paragraph deleted</li> </ul>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to providing for cemeteries and burial grounds. There are no linking pathways.</p>
<b>Policy SP6.1 Environment and Climate Change Sustainable Design and Construction</b>	<p><u>Sustainable design and construction</u> <b>SP6.1</b> The Council will seek high standards of sustainable design and construction from new development, conversion and refurbishment to assist in meeting local and national CO<sub>2</sub> reduction targets. This will be achieved by:</p> <ul style="list-style-type: none"> <li>a) Requiring new-build residential development of fewer than 10 units to achieve the national technical standard for energy efficiency in new homes (2015). This is set at a minimum of 19% CO<sub>2</sub> reduction beyond the Building Regulations Part L (2013);</li> <li>b) Requiring <del>all major development</del> new-build residential development of 10 units or more to achieve the London Plan requirements or National Technical Standards (2015) for energy performance, whichever the higher standard;</li> <li>c) Requiring all new-build residential development to meet a minimum water efficiency standard of 110 litres/person/day as set out in Building Regulations Part G;</li> <li>d) Requiring conversions and changes of use of existing buildings providing more than 10 new residential units to achieve a minimum of BREEAM Domestic Refurbishment Very Good rating or equivalent;</li> <li>e) Requiring new build non-residential development of 500m<sup>2</sup> and above to achieve a minimum of BREEAM Excellent standard or equivalent;</li> </ul>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to environment and climate change sustainable design and construction. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
	<p>f) Requiring conversions and changes of use to non-residential uses with an internal floor area of 500m<sup>2</sup> and above to achieve a minimum of BREEAM Very Good standard or equivalent;</p> <p>g) Requiring new build, non-residential development of 1000m<sup>2</sup> and above to achieve a minimum of 35% CO<sub>2</sub> reduction beyond the Building Regulations Part L (2013); and</p> <p>h) Requiring development to positively contribute to improving air, land, noise, and water quality by minimising pollution, with detailed policies to be included in the Croydon Local Plan's Detailed Policies and Proposals, and</p> <p>i) Taking a bespoke approach to the sustainability of historic buildings and heritage assets, giving consideration to their particular construction, fabric and character.</p>	
<p><b>Green Grid</b></p>	<p><b>SP7.1</b> In order to deliver new and enhanced green and blue infrastructure commensurate with growth the Council will apply a presumption in favour of development provided applications assist in the delivery of a Green Grid and meet the requirements of Policy SP7 and other applicable policies of the development plan.</p> <p><u>Green spaces</u></p> <p><b>SP7.2</b> The Council will protect and safeguard the extent of the borough's Metropolitan Green Belt, Metropolitan Open Land, and Very Special Community Green Spaces (Local Green Spaces), and other Important Green Spaces.</p> <p><b>SP7.3</b> The Council will establish a network of multi-functional open spaces, a 'Green Grid', comprising those parts of the All London Green Grid together with other green and blue spaces within the borough as shown in <b>Error! Reference source not found.</b> The Council and its partners will:</p> <p>a) Encourage the development of a Green Grid structured around a network of strategic blue and green corridors across the borough ensuring interconnectivity with adjacent boroughs green spaces using transport corridors including Seek the provision and creation of new green and blue spaces. With particular focus for areas deficient in access to nature, play areas, and publicly accessible recreational open space;</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to green grid. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
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- b) Improve access and links to and through green spaces to encourage walking, cycling and horse-riding;
- c) ~~Assist in the delivery of the Mayor's All London Green Grid through the implementation of the London Downlands and Wandie Valley Area Frameworks~~ **Identify and provide for Green Grid connections between open spaces;**
- d) Maintain and improve the quality, function and offer of open spaces across the borough for all users; and
- e) Maximise opportunities for street tree planting, green roofs, green walls and green landscaping to assist urban cooling in a changing climate.
- f) **Enable the Green Grid to be established in areas at risk from flooding;**
- g) **Enable and prioritise where the Green Grid can include Geological and Geomorphological Sites; and**
- h) Identify areas where green grid connections can be used to improve the setting of heritage assets such as creating better access and improved landscape setting for historic monuments and assets.

Biodiversity

**SP7.4** The Council and its partners will enhance biodiversity across the borough, assist ecological restoration and address spatial deficiencies in access to nature by:

- a) Protecting and enhancing sites of importance for biological and geological diversity;
- b) Improving the quality of current sites through habitat management;
- c) ~~Exploring options to increase the size of~~ **Enhancing** wildlife areas of existing sites and creating new areas for wildlife;
- d) Enhancing connections between, or joining up sites, either through direct physical corridors, or through a series of linked sites **to assist in enhancing and protecting wildlife;**



Policy Name	Brief Description	Screening Outcome
	<p>e) Reducing the pressures on wildlife and sensitive sites by improving the wider environment around wildlife sites by establishing buffer areas; and</p> <p>f) Promoting the naturalisation of <i>landscapes including deculverting the River Wandle</i> and the enhancement of Croydon's natural landscape signatures.</p> <p>g) Incorporate urban greening as a fundamental element of site and building design, through measures such as high-quality landscapes, trees, green and blue roofs, green walls and nature-based sustainable drainage, following Urban Greening Factor calculations</p> <p>h) Protect Regionally Important Geological Sites</p> <p>i) Retain and enhance existing habitats and features of biodiversity or geodiversity value, or if this is not possible, replace them within the development, as well as incorporating additional measures to enhance biodiversity, proportionate to the development proposed.</p> <p>j) Protect and establish new tree planting</p> <p>k) Through green infrastructure respond to climate change – through carbon sequestration and storage, temperature regulation, storm water regulation and air purification; and</p> <p>Improve environmental quality – by making positive contribution to biodiversity, heritage and landscape and taking pressure off environmental stresses whilst creating healthy ecosystems that support economic, social and ecological resilience with the ability to adapt to change.</p>	
<p><b>Policy DM26: Metropolitan Green Belt and Metropolitan Open Land</b></p>	<p><i>Very Special Community Green Spaces</i></p> <p><b>DM26.1</b> The Council will protect and safeguard the extent of the borough's Very Special Community Green Spaces. Development on Very Special Community Green Spaces will be inappropriate except for:</p> <p>a) The provision of facilities (in connection with the existing use of the Very Special Community Green Space or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Very Special Community Green Space and do not undermine the reasons why the green space was designated as a Very Special Community Green Space;</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to metropolitan green belt, metropolitan open land and very special community green spaces. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
	<p>b) The replacement of an existing building, provided the new building is not materially larger than the one it replaces;</p> <p>c) The re-use of buildings provided that the buildings are of permanent and substantial construction; or</p> <p>The change of use of land to space for outdoor sport and recreation or allotments..</p>	
<p><b>Policy DM26A: Other Important Green Space</b></p>	<p>DM30.1 Other important green spaces are identified in the borough that add to character and wellbeing of the residents. These spaces will be protected unless</p> <p>a) An equivalent green space is re-provided as part of any development that allows for the local community to continue all existing lawful uses of the Other Important Green Space;</p> <p>b) The existing Other Important Green Space is no longer used by the local community so is no longer an important open space; or</p> <p>Other equivalent green space is available for the local community to continue all existing lawful uses of the Other Important Green Space within the distances set out in <b>Error! Reference source not found.</b></p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to other important green space. There are no linking pathways.</p>
<p><b>Policy DM27: Protecting and enhancing our biodiversity and Urban Greening</b></p>	<p>DM27.1 To enhance biodiversity across the borough and improve access to nature, development proposals should:</p> <p>a) Incorporate biodiversity <b>net gain</b> on development sites to enhance local flora and fauna and aid pollination locally;</p> <p>b) Incorporate <b>urban greening and</b> biodiversity <b>measures around</b>, within and on buildings in the form of green roofs, green walls or equivalent measures;</p> <p>c) Incorporate productive landscapes in the design and layout of buildings and landscaping of all major developments<sup>38</sup>;</p> <p>d) Have no adverse impact on land with biodiversity or geo-diversity value as designated on the Policies Map; <del>and</del></p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to protecting and enhancing our biodiversity and urban greening. There are no linking pathways.</p>

<sup>38</sup> Developments of 10 or more residential units, 1,000m<sup>2</sup> or more of non-residential floor space or sites more than 0.5ha in extent.



Policy Name	Brief Description	Screening Outcome
	<p>e) Have no adverse impact on species of animal or plant or their habitat protected under British or European law, highlighted within a local/regional Biodiversity Action Plan, or when the Council is presented with evidence that a protected species would be affected.</p> <p>f) Incorporate nature-based, sustainable urban drainage solutions, such as rain gardens.</p> <p><b>DM27.2</b> To secure urban greening a borough specific Urban Greening Factor (UGF) set out in Table 9.6 identifies the appropriate amount of urban greening developments required for new build developments with 5 units or more as follows</p> <p>a) All residential development of more than one unit 0.40</p> <p>b) For commercial business and service uses 0.3, and</p> <p>For general industrial and storage or distribution 0.2</p>	
<p><b>Policy SP8: Transport and Communication</b></p>	<p><b>SP8.1</b> <del>In order to deliver a transport and communications network capable of supporting growth over the plan period the Council will apply a presumption in favour of development for new transport schemes which meet the requirements of Policy SP8 and other applicable policies of the development plan. The transportation and communication network should support the community, environmental, and economic health of the borough by connecting communities, promoting physical activity through transport, reducing vehicle emissions, and creating vibrancy through foot traffic in the borough's centres. A functioning and accessible network is essential to accommodating growth.</del></p> <p><u>Airport City</u></p> <p><b>SP8.2</b> <del>The Council and its partners will enhance the borough's sub-regional transport role to support its position as a major business, hotel and conferencing destination serving London's airports and the Coast to Capital economic area (see Policy SP3.8). East Croydon station and the surrounding area is the borough's main transport hub. Development should enhance the station's sub-regional transport role as a major business, hotel and conferencing destination serving London's airports and the Coast to Capital economic area. This enhancement should support the establishment of cycle hubs at East and West Croydon stations, including safeguarding land</del></p> <p><u>Pattern of development and accessibility</u></p> <ul style="list-style-type: none"> <li><del>The Council will actively manage the pattern of urban growth and the use of land to make the fullest use of public transport and co-locate facilities in order to reduce the need to travel.</del></li> </ul>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to transport and telecommunications. There are no linking pathways.</p>

Policy Name

Brief Description

Screening Outcome

Development will be supported if it improves conditions for active travel and encourage modal shift by:

- a) ~~Furthering Healthy Streets principles; and~~

~~SP8.4 Reducing the need to own a private car or reduce the number of cars owned in a household and encourage active sustainable modes of travel through design~~

~~SP8.5 Major development proposals will be required to be supported by transport assessments, travel plans, construction logistics plans and delivery/servicing plans. Improving public transport within Croydon is a key way to encourage modal shift. This will help to improve Croydon's transport network overall. Development should promote and support public transport improvements, including enhancements and extensions to the bus and tram networks and related facilities, bus rapid transit routes and metroisation of rail services~~

~~Sustainable travel choice and Telecommunication's~~

~~SP8.6 The Council will support improvement in the borough's Wi-Fi, fibre optic broadband and mobile broadband in order to reduce the need to travel, encourage higher levels of home working, assist independent living, support inward investment and improve the economic competitiveness of Croydon Opportunity Area and the borough's District Centres. The Council will support improvement in the borough's Wi-Fi, fibre optic broadband and mobile broadband in order to reduce the need to travel, encourage higher levels of home working, assist independent living, support inward investment and improve the economic competitiveness of Croydon Opportunity Area and the borough's District Centres~~

~~SP8.7 The Council and its partners will improve conditions for walking and enhance the pedestrian experience by: Croydon's topography is characterised by large hills, particularly to the south of the borough making walking and cycling more difficult and encouraging car dependence. With the creation of sustainable communities in mind development must consider to the pattern of urban growth and make the fullest use of public transport. Where supported by multi-modal accessibility and within 800m of the Croydon Opportunity Area or Town Centres development density should reflect the sites ability to reduce the need to travel and enable sustainable travel when travel is necessary.~~

- ~~a) Ensuring "access for all" principles are adhered to;~~

- ~~b) Increasing permeability, connectivity and legibility of redeveloped sites;~~

- ~~c) Improving crossings, in particular within Croydon Opportunity Area, District Centres and around schools;~~

**Policy Name**

**Brief Description**

**Screening Outcome**

~~d) Enhancing footpaths, strategic walking routes and links through green spaces to ensure a coherent pedestrian network;~~

~~e) Creating pedestrian streets from underused side streets and delivery lanes off main streets in Croydon Opportunity Area and the District Centres;~~

**SP8.8** Improving way finding in the Croydon Opportunity Area, District Centres and on cycle routes (including the implementation of the 'Legible London' scheme);

**SP8.9** The Council and its partners will seek to limit parking spaces in the borough and aim to reduce the overall amount of surplus car parking spaces in the Croydon Opportunity Area in accordance with the Croydon Opportunity Area Planning Framework parking strategy. **The character of streets is a key factor in the perception of pedestrian safety. On street parking blocking sight lines can negatively impact this character. The lack of on-street parking controls should not be a limiting factor for development, street parking availability must be taken into account when applying a flexible approach to car parking in town centres. Controlled parking zones should be introduced in areas of the borough to protect street character and enhance safe travel.**

**SP8.10** Outside high PTAL areas the Council will apply the standards as set out in the London Plan<sup>39</sup>. In District Centres where there are identified issues of vitality and viability, the need to regenerate such Centres may require a more flexible approach to the provision of public car parking. Parking standards for the boroughs District Centres will be assessed based upon the following considerations:

~~a) The need for regeneration;~~

~~b) Adverse impact on congestion or air quality;~~

~~c) A lack (now and in future), of public transport;~~

~~d) A lack of existing on or off street parking;~~

~~e) A commitment to provide space for electric and car club vehicles, and parking for disabled people above the minimum thresholds; and~~

~~f) A requirement, via Travel Plans, to reduce provision over time. **Policy deleted**~~


<sup>39</sup> London Plan Policy 6.13

Policy Name	Brief Description	Screening Outcome
	<p><u>Efficient and clean movement</u></p> <p><b>SP8.11</b> The Council and its partners will seek to improve the efficiency with which people and goods are moved and reduce the impacts associated with that movement by:</p> <ul style="list-style-type: none"> <li>a) Addressing pressure points in the street network, including strategic road junctions, by improving conditions for pedestrians, cyclists and public transport and maintaining the efficient movement of freight; and</li> <li>b) Ensuring travel plans for new and existing facilities, address issues with local congestion and promote sustainable travel choices.</li> </ul> <p><b>SP8.12</b> The Council and its partners will promote efficient and sustainable arrangements for the transportation and delivery of freight by:</p> <ul style="list-style-type: none"> <li>a) Safeguarding existing sites and identifying new sites to enable the transfer of freight to rail;</li> <li>b) Safeguarding existing and supporting the provision of new consolidation and 'break bulk' facilities through policy to be contained within the Croydon Local Plan's Detailed Policies and Proposals; and</li> <li>c) Requiring major developments to include transport emission reduction plans to encourage the use of less polluting forms of transport.</li> </ul> <p><b>SP8.13</b> Croydon is a key business centre and main transport hub in London. Ensuring business as usual despite development is important to support the continued prosperity of these functions. Developments, particularly high rise developments, must be phased to ensure the uninterrupted movement of the transportation network. Development should seek to avoid disruption to the successful function of the Metropolitan Centre and the borough's commercial centres taking into account peak business hours.</p>	
<p><b>Policy DM28A: Ensuring the safe and effective movement of the network</b></p>	<p><b>Policy DM 28 Ensuring the safe and effective movement of the network</b></p> <p><b>DM28A 1</b>To ensure the continued movement of the road network while enabling growth, major development must:</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of</p>

Policy Name	Brief Description	Screening Outcome
	<p>a) Take into account the development of the overall area;</p> <p>b) Be phased while on site; and,</p> <p>Support innovative solutions to ensure the lowest amount of disruption during development.</p> <p>DM28A 2 The amount of construction associated with growth in the Croydon Opportunity Area and the Purley Way Transformation Area needs to be delivered through careful management and a reduction in the number of deliveries and freight traffic. To support this, development should:</p> <p>a) Minimise the need for freight trips and seek to manage freight and servicing on an area-wide basis;</p> <p>b) Provide for freight consolidation</p> <p>c) Adopt new technologies to enable efficient servicing and deliveries to sites; and</p> <p>d) Provide onsite servicing areas to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded</p> <p>Provide onsite servicing areas to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded.</p>	<p>support by the Council in regard to ensuring the safe and effective movement of the network. There are no linking pathways.</p>
<p><b>Policy DM 29: Promoting sustainable travel and reducing congestion</b></p>	<p><b>DM29.1</b> To promote sustainable growth in Croydon and reduce the impact of traffic congestion development should:</p> <p>a) <del>Promote measures to increase the use of public transport, cycling and walking.</del> Create, enhance and promote measures to increase active travel and reduce the need to make private vehicle trips; Have a positive impact and must not have a detrimental impact on highway safety for pedestrians, cyclists, public transport users and private vehicles; and</p> <p>c) Not result in a severe impact on the transport networks local to the site which would detract from the economic and environmental regeneration of the borough by making Croydon a less accessible and less attractive location in which to develop.</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to promoting sustainable travel and reducing congestion. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
	<p>d) Reduce the impacts of suburban intensification development in low PTAL areas (PTAL 2 and below) by integrating and providing for enhanced active travel measures within the development;</p> <p>e) Implement measures that support the Mayor of London's Healthy Streets Approach, including the design of development.</p> <p>Ensure that the movement of pedestrians, cycles, public transport and emergency services are not impeded by deliveries and servicing requirements.</p>	
<p><b>Policy DM30: Car and cycle parking in new development</b></p>	<p><b>DM30.1</b> To manage the impact that parking provision has on traffic generation, and the impact of traffic on the climate development must ensure that car parking provision is in accordance with the standards set out in <b>Error! Reference source not found.</b> 10.1.</p> <p>To promote sustainable growth in Croydon and reduce the impact of car parking new development must:</p> <p>a) —Reduce the impact of car parking in any development located in areas of good public transport accessibility<sup>40</sup> or areas of existing on-street parking stress;</p> <p>b) —Ensure that the movement of pedestrians, cycles, public transport and emergency services is not impeded by the provision of car parking;</p> <p>c) —Ensure that highway safety is not compromised by the provision of car parking including off street parking where it requires a new dropped kerb on the strategic road network and other key roads identified on the Policies Map;</p> <p>d) —If the development would result in the loss of existing car parking spaces, demonstrate that there is no need for these car parking spaces by reference to occupancy rates at peak times;</p> <p>e) —Provide car and cycle parking spaces as set out in table 10.1</p> <p>Ensure that cycle parking is designed so that it is secure and can also be used for parking for mobility scooters and motor cycles; and</p> <p>Provide car parking for affordable homes at an average rate not less than <sup>2</sup>/<sub>3</sub> that of other tenures.</p> <p><b>DM30.1</b> Provide parking on-site to ensure that parking generated by the development does not contribute more than 5% increase in parking stress within a 200m catchment of the development; On</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum of development nor provide support for increasing development within the borough. This is a development management policy relating to the requirements of support by the Council in regard to car and cycle parking in new development. There are no linking pathways.</p>

<sup>40</sup> Public Transport Accessibility Level (PTAL) rating of 4 or more

Policy Name	Brief Description	Screening Outcome						
	<p>site parking stress in Croydon is assessed as being at capacity when 85% of parking stress is reached.</p> <p><b>DM30.2</b> Provide a dedicated area for motorcycle parking with ground anchors (in any location in the borough);</p> <p><b>DM30.3</b> Ensure that there is not a significant detrimental impact on the movement of pedestrians, cycles, public transport and emergency services due to the provision of car parking;</p> <p><b>DM30.4</b> Ensure that highway safety is not compromised by the provision of new off-street parking where it requires a new drop kerb or cross over (including on roads identified on the policies map where planning permission is required for any new drop kerb or crossover); and,</p> <p><b>DM30.5</b> Ensure that entrances or vehicle crossovers for new development do not have any detrimental impact on the functioning of bus and cycle routes to maintain the effective operation of sustainable transport routes;</p> <p><b>DM30.6</b> To support reduced on-site parking provision in areas of adequate public transportation and multimodal accessibility, major developments must provide car club or pool car spaces (which may include on street spaces subject to assessment by the council) or use existing, local car clubs where the operator confirms that there is availability for use of the existing car club by the new residents. There will be a requirement for the residents to be made members of the car club for 3 years at cost to the developer.</p> <p><b>DM30.7</b> Reduced provision of car parking, car-lite and car-free development will be supported in areas of high public transport and active travel accessibility<sup>41</sup> where on street parking can be managed through the presence of parking controls.</p> <p>Cycle parking provision will be in accordance with the London Plan standards, including secure, waterproof, enclosed with charging provision for electric bicycles and mobility scooters and space for cargo bikes and adapted bikes where necessary.</p>							
<p><b>Policy DM34: Addington</b></p>	<p><b>DM34.2</b> Within Addington allocate sites for development as set out in Table 11.2</p> <table border="1" data-bbox="434 1190 936 1318"> <thead> <tr> <th data-bbox="434 1190 517 1249">Ref no</th> <th data-bbox="517 1190 680 1249">Site name</th> <th data-bbox="680 1190 936 1249">Proposed use</th> </tr> </thead> <tbody> <tr> <td data-bbox="434 1249 517 1318">1</td> <td data-bbox="517 1249 680 1318">Land Fronting North Downs</td> <td data-bbox="680 1249 936 1318">Residential development</td> </tr> </tbody> </table>	Ref no	Site name	Proposed use	1	Land Fronting North Downs	Residential development	<p>Potential Likely Significant Effects</p> <p>This policy allocates one additional site within Addington for residential development.</p> <p>The allocated sites could potentially cause likely significant effects.</p>
Ref no	Site name	Proposed use						
1	Land Fronting North Downs	Residential development						

Policy Name	Brief Description	Screening Outcome												
	<table border="1"> <tr> <td data-bbox="430 255 515 347"></td> <td data-bbox="515 255 683 347">Road and &amp; Overbury Crescent</td> <td data-bbox="683 255 1393 347"></td> </tr> </table>		Road and & Overbury Crescent		<p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>Recreational pressure</li> <li>Atmospheric pollution</li> </ul>									
	Road and & Overbury Crescent													
<p><b>Policy DM36: Broad Green and Selhurst</b></p>	<p><b>DM36.6</b> Within Broad Green and Selhurst (outside of the Purley Way Transformation Area) allocate sites for development as set out in Table 11.4.</p> <table border="1"> <thead> <tr> <th data-bbox="430 475 515 539">Ref no</th> <th data-bbox="515 475 712 539">Site name</th> <th data-bbox="712 475 1393 539">Proposed use</th> </tr> </thead> <tbody> <tr> <td data-bbox="430 539 515 659">13</td> <td data-bbox="515 539 712 659">Boyden Tiles, Mayday Road</td> <td data-bbox="712 539 1393 659">Mixed use residential and industrial/warehousing development</td> </tr> <tr> <td data-bbox="430 659 515 783">20</td> <td data-bbox="515 659 712 783">98-100 Lodge Road and 1-3 Fedrick Gardens</td> <td data-bbox="712 659 1393 783">Residential development</td> </tr> <tr> <td data-bbox="430 783 515 973">22</td> <td data-bbox="515 783 712 973">Whitehorse Road garages and parking area, Whitehouse Road Estate (Johnson Road/Cromwell Road)</td> <td data-bbox="712 783 1393 973">Residential development</td> </tr> </tbody> </table>	Ref no	Site name	Proposed use	13	Boyden Tiles, Mayday Road	Mixed use residential and industrial/warehousing development	20	98-100 Lodge Road and 1-3 Fedrick Gardens	Residential development	22	Whitehorse Road garages and parking area, Whitehouse Road Estate (Johnson Road/Cromwell Road)	Residential development	<p>Potential Likely Significant Effects</p> <p>This policy allocates 3 new sites within Broad Green and Selhurst for the development of residential development, warehousing development, and extensions.</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>Recreational pressure</li> <li>Atmospheric pollution</li> </ul>
Ref no	Site name	Proposed use												
13	Boyden Tiles, Mayday Road	Mixed use residential and industrial/warehousing development												
20	98-100 Lodge Road and 1-3 Fedrick Gardens	Residential development												
22	Whitehorse Road garages and parking area, Whitehouse Road Estate (Johnson Road/Cromwell Road)	Residential development												
<p><b>Policy DM38: Croydon Opportunity Area</b></p>	<p><b>DM38.7</b> Within Croydon Opportunity Area allocate sites for development as set out in Table 11.6.</p> <table border="1"> <thead> <tr> <th data-bbox="430 1034 515 1098">Ref no</th> <th data-bbox="515 1034 712 1098">Site name</th> <th data-bbox="712 1034 1393 1098">Proposed use</th> </tr> </thead> <tbody> <tr> <td data-bbox="430 1098 515 1217">33</td> <td data-bbox="515 1098 712 1217">26-28 Addiscombe Road (Go Ahead House)</td> <td data-bbox="712 1098 1393 1217">Residential, office and/or hotel</td> </tr> <tr> <td data-bbox="430 1217 515 1361">34</td> <td data-bbox="515 1217 712 1361">Land Bounded BY George St, Park Lane, Barclay Road, And Main London to</td> <td data-bbox="712 1217 1393 1361">Mixed use development incorporating residential use on land behind the Fairfield Halls.</td> </tr> </tbody> </table>	Ref no	Site name	Proposed use	33	26-28 Addiscombe Road (Go Ahead House)	Residential, office and/or hotel	34	Land Bounded BY George St, Park Lane, Barclay Road, And Main London to	Mixed use development incorporating residential use on land behind the Fairfield Halls.	<p>Potential Likely Significant Effects</p> <p>This policy allocates 10 additional sites within Croydon Opportunity Area for the development of residential developments, office development, and mixed use development</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>Recreational pressure</li> <li>Atmospheric pollution</li> </ul>			
Ref no	Site name	Proposed use												
33	26-28 Addiscombe Road (Go Ahead House)	Residential, office and/or hotel												
34	Land Bounded BY George St, Park Lane, Barclay Road, And Main London to	Mixed use development incorporating residential use on land behind the Fairfield Halls.												



**Policy Name**                      **Brief Description**                      **Screening Outcome**

	Brighton Railway Line			
37	45 Lansdown Road	Residential development		
40	West Croydon Bus Station	Redevelopment over bus station to incorporate residential uses and town centre uses (office, leisure, food & drink or hotel). The bus station is to be retained as part of any redevelopment.		
41	Direct Line House, 3 Edridge Road	Residential and/or office development		
42	The Lansdowne, 2 Lansdowne Road	Mixed use development of office and residential		
45	East Croydon Station	Redevelopment of the existing railway station including a square with associated public realm		
47	3-9 Park Street	Mixed use residential and ground floor town centre use		
133	Woburn and Bedford Court	Additional residential development.		
148	Canterbury House	Mixed use development including residential (but not retail)		

**Policy DM39: Crystal Palace and Upper Norwood**

Within Crystal Palace and Upper Norwood allocate sites for development as set out in Table 11.7.

Ref no	Site name	Proposed use

Potential Likely Significant Effects

This policy allocates 3 sites within Crystal Palace and Upper Norwood for the development of residential development and higher education.

Policy Name	Brief Description			Screening Outcome
	58	140 & 140a Hermitage Road	Residential development	<p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>
	59	Garages at rear of 96 College Green and land at Westow Park, Upper Norwood	Residential development	
	126	Spurgeons College, 126 Norwood Hill	Higher education and residential development	
<p><b>Policy DM40: Kenley and Old Coulsdon</b></p>	<p><b>DM40.1</b> An area of focused Intensification (AFI4) has been designated close to Kenley Rail Station, where high density residential development and renewal will be supported. The boundaries of these are shown on the map below. Development within this should:</p> <ol style="list-style-type: none"> <li>Well designed to protect, enhance the suburban character, setting of the settlement and nearby heritage assets</li> <li>Assess and mitigate any potential noise pollution impacts, near the Station, to create a healthy environment for future residents</li> <li>Include adequate measures to demonstrate; development will minimise and mitigate any flood risk on areas to the south of Godstone Rd, it will be safe for future residents and not increase risk elsewhere.</li> <li>Include measures to protect and enhance the biodiversity of nearby ecology assets and ensure net gains in biodiversity.</li> </ol> <p><b>DM40.2</b> Area of moderate intensification have been designated to the north, the north east and south east of Kenley and Old Coulsdon. The sustainable moderate, intensification and renewal of areas within these via proposals for new residential development will be supported that result in a reasonable increase in the density. Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of this is shown on the map below</p>			<p>Potential Likely Significant Effects</p> <p>This policy provides for an area of intensification within Kenley for residential development.</p> <p>The development could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>
<p><b>Policy DM41: Norbury</b></p>	<p><b>DM49.3</b> Within Norbury allocate sites for development as set out in Table 11.9.</p>			<p>Potential Likely Significant Effects</p>

**Policy Name**

**Brief Description**

**Screening Outcome**

	Ref no	Site name	Proposed use		
	106	CACFO, 40 Northwood Road	Mixed use residential and community use (to retain equivalent floor space or functionality of the community use)		<p>This policy allocates a site within Norbury for the development of residential development, Mixed use residential and community use, and redevelopment for residential and retail.</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>
<p><b>Policy DM42: Purley</b></p>	<p><b>DM42.1</b> Within Purley District Centre and its environs, to ensure that proposals positively enhance and strengthen the character and facilitate growth, developments should:</p> <ol style="list-style-type: none"> <li>Reinforce the continuous building line which responds to the street layout and include ground floor active frontages;</li> <li>Complement the existing predominant building heights of 3 to 8 storeys, with a potential for a new landmark of up to a maximum of 16 storeys; and</li> <li>Demonstrate innovative and sustainable design, with special attention given to the detailing of frontages.</li> <li>Facilitate new pedestrian routes/laneways and manage servicing and deliveries in ways that provide attractive and active streets and spaces and celebrate the distinctive spaces at the rear of Brighton Road;</li> <li>Facilitate works that reduce the dominance of the Purley Cross gyratory and better connect different part of the Purley District Centre and its environs;</li> <li>Facilitate the delivery of a network of mobility hubs for shared transport services around the edge of the District Centre. And</li> <li>Respond to the historic context, and preserve and enhance the significance of heritage assets and their settings including the listed Purley Library, locally/nationally listed buildings ,Conservation Areas and their settings;</li> </ol>			<p>Potential Likely Significant Effects</p> <p>This policy allocates sites within Purley for the development of residential development, Mixed use redevelopment, and primary school development.</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>	

Policy Name	Brief Description	Screening Outcome
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**DM42.2** In the environs of Reedham station, to create the sense of place and facilitate growth proposals should:

- a) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys;
- b) Reinforce the predominant building lines and frontages which positively respond to the form of the Brighton Road/Old Lodge Lane junction;
- c) Improve pedestrian and cycle permeability, accessibility and connectivity across the railway between Brighton Road, Watney Close, Aveling Close and Fairbairn Close;
- d) Enhance the suburban shopping area character of this section of Brighton Road; and
- e) **Preserve and enhance the listed Purley Town Hall and its setting.**

**DM42.3** In the area of the junction of Brighton Road and Purley Downs Road, to reduce the impact of Brighton Road as a linear route, clearly differentiate the area from Purley Town Centre and Brighton Road (Sanderstead Road) Local Town Centre and strengthen the sense of place, proposals should:

- a) Retain and create open glimpses and vistas between buildings;
- b) Introduce building with landscapes that respond and reflect the layout of the 1930s blocks of Lansdowne Court and Purley Court; and
- c) Complement the existing predominant building heights of 2 storeys up to a maximum of 5 storeys.

**DM42.4** An Area of focused Intensification has been designated near/within Purley District Centre (AF15). High density residential development and renewal will be supported within this location and the boundaries of these are shown on the map below. Development should:

- a) Be well designed to protect, enhance the suburban character, setting of this transport corridor into/out of the settlement
- b) Include adequate measures to demonstrate development; will minimise and mitigate any flood risk (where necessary), it will be safe for future residents and not increase risk elsewhere.
- c) Assess and mitigate any potential noise pollution impacts, near Purley and Reedham Railway Stations, to create a health environment for future residents

**DM42.5** Areas of moderate intensification have been designated to the north, east of Purley, as well as south west of this crossing into Coulsdon and south (crossing into Kenley and Old Coulsdon). The sustainable moderate, intensification and renewal of areas within these via proposals for new residential development will be supported that result in a reasonable increase in the density.

**Policy Name**

**Brief Description**

**Screening Outcome**

Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of these are shown on the map below

**DM42.6** Within Purley allocate sites for development as set out in Table 11.10.

Ref no	Site name	Proposed use
64	112a and 112b Brighton Road	Residential, with leisure uses (up to existing floor space)
490	95-111 Brighton Road and 1-5, 9-15 and 19 Old Lodge Lane	Primary school (on up to 0.4ha of the site) and residential development, to be brought forward in one phase, and limited retail/food and drink (up to existing floor space)

**Policy DM43: Sanderstead**

**DM43.1** Within Sanderstead Town Centre, to respect and enhance the distinctive qualities proposals should:

- a) Reinforce the suburban shopping area character;
- b) Reference, respect and enhance architectural features such as the consistent rhythm of pairs of buildings with identical frontages and the articulation of openings;
- c) Retain features such as the projecting bay windows;
- d) Retain wide vistas and strengthen visual connections to green open spaces including the village character of open spaces to the north;
- e) Improve walking and cycling connectivity and access to open space; and
- f) Respect the setting of listed and locally listed buildings.

Potential Likely Significant Effects

This policy provides for an area of intensification within this place for residential development.

This policy allocates sites within Sanderstead for the development of residential development, and mixed use residential and retail development.

The allocated sites could potentially cause likely significant effects.

Potential impact pathways are present:

- Recreational pressure
- Atmospheric pollution

**Policy Name**

**Brief Description**

**Screening Outcome**

**DM43.2** Within Hamsey Green Town Centre, to respect and enhance the distinctive 'Suburban Shopping Area' character of Hamsey Green, proposals should:

- a) Reinforce the suburban shopping area character;
- b) Positively reference, respect and enhance architectural features such as the consistent rhythm and articulation of window and doors;
- c) Ensure the extent of the public realm within the vicinity of the development is retained and improved; and
- d) Incorporate multi-stock brick or white render as the predominant facing material, or a material which is complementary to multi-stock brick or white render.

**DM44.2A** An Area of moderate intensification has been designated to the north east of Sanderstead. The sustainable moderate, intensification and renewal of areas within this via proposals for new residential development will be supported that result in a reasonable increase in the density. Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of these are shown on the map below.

**DM43.3** Within Sanderstead allocate sites for development as set out in Table 11.11.

Ref no	Site name	Proposed use
71	2 Red Gables, Beech Avenue	Residential development
79	Waitrose, Sanderstead	Mixed use residential and retail development

**Policy DM44: Selsdon**

**DM44.1** Within Selsdon Town Centre, to enhance the character of District Town Centre proposals should:

- a) Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys;

Potential Likely Significant Effects

This policy allocates sites within Selsdon for the development of residential development with retail.

The allocated sites could potentially cause likely significant effects.

Policy Name	Brief Description	Screening Outcome						
	<p>b) Ensure large buildings are sensitively located and of a massing no larger than buildings within this area;</p> <p>c) Ensure that the front elevation are designed to respect the architectural rhythm and proportion of the existing street frontages; and</p> <p>d) Should be incorporate red multi-stock brick as the predominant facing material.</p> <p><b>DM45.1A</b> To address the future housing needs of Selsdon and support sustainable growth of this, the following broad locations have been designated;</p> <p>a) An Area of focused Intensification is identified to the east of this (AFI6), within close proximity to Gravel Hill Tram Stop and the District Centre. High density residential and renewal will be supported within this.</p> <p>b) An Area of moderate intensification identified to north of this (close to Coombes Lane Tram Stop). The sustainable moderate, intensification and renewal of areas within this via proposals for new residential development will be supported that result in an reasonable increase in the density</p> <p>c) Development within these should: be well designed to protect, enhance the suburban character, setting of this settlement. The boundaries of these is shown on the map below.</p> <p><b>DM52.2</b> Within Selsdon allocate sites for development as set out in Table 11.12.</p> <table border="1" data-bbox="432 999 936 1214"> <thead> <tr> <th>Ref no</th> <th>Site name</th> <th>Proposed use</th> </tr> </thead> <tbody> <tr> <td>85</td> <td>The Forestdale Centre</td> <td>Residential development incorporating a new shopping parade with retail, finance, and food &amp; drink</td> </tr> </tbody> </table>	Ref no	Site name	Proposed use	85	The Forestdale Centre	Residential development incorporating a new shopping parade with retail, finance, and food & drink	<p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>Recreational pressure</li> <li>Atmospheric pollution</li> </ul>
Ref no	Site name	Proposed use						
85	The Forestdale Centre	Residential development incorporating a new shopping parade with retail, finance, and food & drink						
<p><b>Policy DM45: Shirley</b></p>	<p><b>DM45.1</b> Within Shirley Local Centre, to retain the unique qualities development should:</p> <p>a) Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;</p>	<p>Potential Likely Significant Effects</p> <p>This policy allocates sites within Shirley for the development of residential development, and mixed use development.</p>						

**Policy Name**

**Brief Description**

**Screening Outcome**

- b) Reference, respect and enhance architectural features such as the consistent rhythm and articulation of fenestration and retain features such as the triangular bay windows;
- c) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys;
- d) Incorporate or retain traditional shop front elements such as fascias, pilasters and stall risers; and
- e) **Respect the setting of locally listed buildings within the area.**

**DM45.2** In the area between 518 and 568 Wickham Road, to improve the character proposals should reference the ‘Suburban Shopping Area’ character type.

**DM45.3** In the area of the Wickham Road Shopping Parade, to retain the distinctive character of the 794-850 Wickham Road proposals should:

- a) Complement the existing predominant building heights up to a maximum of 2 storeys; and
- b) Retain the ‘Suburban Shopping Area’ character.

**DM46.3A** to retain the distinctive character of this part of Shirley Road, proposals should:

- a) **Complement the existing predominant building heights of 2 storeys up to a maximum of 3 storeys along Shirley Road and 2 storeys up to a maximum of 4 storeys directly behind the parade; and**
- b) **Reference, respect and enhance architectural features such as the consistent rhythm and articulation of windows and doors.**

**DM45.4** Within Shirley allocate sites for development as set out in Table 11.13.

Ref no	Site name	Proposed use
87	Shirley Community Centre	Mixed use development with residential and replacement community facility that provides at

The allocated sites could potentially cause likely significant effects.

Potential impact pathways are present:

- Recreational pressure
- Atmospheric pollution



Policy Name	Brief Description	Screening Outcome
	<p>least equivalent functionality to the existing centre</p>	
<p><b>Policy DM46: South Croydon</b></p>	<p><b>DM46.1</b> Within the Brighton Road (Selsdon Road) Local Centre, to encourage a balance to be struck between strengthening and enhancing the character and facilitating growth, proposals should:</p> <ul style="list-style-type: none"> <li>a) Complement the existing predominant building heights up to a maximum of 3 storeys;</li> <li>b) Positively reinforce, strengthen and enhance characteristic features such as the articulation and primacy of corner buildings such as the public houses, and continuous building line;</li> <li>c) Incorporate main entrances onto Brighton Road; and</li> <li>d) Positively reference, respect and enhance the articulation of shop fronts, including consistent rhythm and size of windows and doors.</li> </ul> <p><b>DM47.1A</b> To ensure a balance is struck between strengthening and enhancing the character and facilitating growth within the Brighton Road (Sanderstead Road) Local Centre, proposals should:</p> <ul style="list-style-type: none"> <li>a) Complement the existing predominant building heights of 2 storeys up to a maximum of 4 storeys; and</li> <li>b) Incorporate multi-stock brick as the predominant facing material, or a material which is complementary to multi-stock brick.</li> </ul> <p><b>DM47.1B</b> Areas of focused Intensification have been designated on Brighton Road (AFI7a) close to Purley Oaks Railway Station and Sanderstead Road (AFI7b), which are located within proximity to the above Local Centres. High density residential and renewal will be supported within these. The boundaries of these are shown on the map below. Development should:</p> <ul style="list-style-type: none"> <li>a) Be well designed to protect, enhance the suburban character, setting of this transport corridor into/out of the settlement</li> <li>b) Include adequate measures to demonstrate development; will minimise and mitigate any flood risk on Brighton Road (.i.e. within AFI7a), it will be safe for future residents and not increase risk elsewhere.</li> </ul>	<p>Potential Likely Significant Effects</p> <p>This policy provides for an area of intensification within this place for residential development.</p> <p>This policy allocates sites within South Croydon for the development of residential development, and mixed use residential and supermarket development.</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>

Policy Name	Brief Description	Screening Outcome									
	<p>c) Assess and mitigate any potential noise pollution impacts, near Sanderstead Station (AFI7b), to create a health environment for future residents.</p> <p><b>DM54.3</b> Within South Croydon allocate sites for development as set out in Table 11.14.</p> <table border="1" data-bbox="434 405 972 651"> <thead> <tr> <th>Ref no</th> <th>Site name</th> <th>Proposed use</th> </tr> </thead> <tbody> <tr> <td>101</td> <td>Toby Carvery, Brentwood Road</td> <td>Residential development</td> </tr> <tr> <td>114</td> <td>Garage courts at 18 Bramley Hill</td> <td>Residential development</td> </tr> </tbody> </table>	Ref no	Site name	Proposed use	101	Toby Carvery, Brentwood Road	Residential development	114	Garage courts at 18 Bramley Hill	Residential development	
Ref no	Site name	Proposed use									
101	Toby Carvery, Brentwood Road	Residential development									
114	Garage courts at 18 Bramley Hill	Residential development									
<p><b>Policy DM47: South Norwood and Woodside</b></p>	<p><b>DM55.3</b> Within South Norwood and Woodside allocate sites for development as set out in Table 11.15.</p> <table border="1" data-bbox="434 746 972 963"> <thead> <tr> <th>Ref no</th> <th>Site name</th> <th>Proposed use</th> </tr> </thead> <tbody> <tr> <td>51</td> <td>Land and car park between Belgrave Road and Grosvenor Road</td> <td>Residential and community use</td> </tr> </tbody> </table>	Ref no	Site name	Proposed use	51	Land and car park between Belgrave Road and Grosvenor Road	Residential and community use	<p>Potential Likely Significant Effects</p> <p>This policy allocates sites within South Norwood and Woodside for the development of residential development, and community.</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>			
Ref no	Site name	Proposed use									
51	Land and car park between Belgrave Road and Grosvenor Road	Residential and community use									
<p><b>Policy DM48: Thornton Heath</b></p>	<p><b>DM48.1</b> Within the Thornton Heath District Centre and its environs, to ensure a balance is struck between strengthening and enhancing the character and enabling growth, proposals should:</p> <p>a) Complement the existing predominant building heights of 3 storeys up to a maximum of 4 storeys except in the vicinity of Thornton Heath railway station where any tall or large buildings proposed should not exceed 9 storeys;</p> <p>b) Retain the continuity of ground floor active frontages and allow flexibility at first floor and above for mixed use;</p>	<p>Potential Likely Significant Effects</p> <p>This policy provides for an area of intensification within this place for residential development.</p> <p>This policy allocates sites within Thornton Heath for the development of residential development, and mixed use development.</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> </ul>									

**Policy Name**

**Brief Description**

**Screening Outcome**

- c) Promote the expansion and enhancement of the shared public realm within the curtilage of the development;
- d) Ensure that the setting of Thornton Heath's local landmark, the Clock Tower, is respected; and
- e) Ensure development to the east of the Town Centre responds to the character of the Thornton Heath High Street Local Heritage Area.

**DM48.2** Within the Thornton Heath Pond Town Centre and its environs, to ensure a balance is struck between strengthening and enhancing the character and facilitating growth, proposals should:

- a) Ensure building lines and frontages positively reference and respond to the form of the Thornton Heath Pond junction;
- b) Incorporate red multi-stock brick as the predominant facing material;
- c) Retain the extent and enhance the quality of the existing public realm; and
- d) Complement the existing predominant building heights of 3 storeys up to maximum of 6 storeys; and
- e) Ensure transitions between buildings of different sizes create sense of continuity at the street level.

**DM48.3** An area of focused Intensification (AFIX) has been designated on London Road transport corridor, large comprising the same boundary of Thornton Heath Pond Local Centre. Proposals for high density schemes will be supported within this, comprising of mixed use residential and retail/other town centre uses (on ground floor) development, renewal will be supported within the town centre boundary. High density residential development will be supported in areas outside of the Town Centre. The boundaries of these are shown on the map below.

**DM48.4** Within Thornton Heath allocate sites for development as set out in Table 11.16.

Ref no	Site name	Proposed use

- Atmospheric pollution

Policy Name	Brief Description	Screening Outcome						
	<table border="1"> <tr> <td data-bbox="430 252 517 379">103</td> <td data-bbox="517 252 725 379">585-603 London Road</td> <td data-bbox="725 252 1397 379">Mixed use development for residential and hotel (up to existing floor space).</td> </tr> <tr> <td data-bbox="430 379 517 443">105</td> <td data-bbox="517 379 725 443">Strand House, Zion Road</td> <td data-bbox="725 379 1397 443">Residential development</td> </tr> </table>	103	585-603 London Road	Mixed use development for residential and hotel (up to existing floor space).	105	Strand House, Zion Road	Residential development	
103	585-603 London Road	Mixed use development for residential and hotel (up to existing floor space).						
105	Strand House, Zion Road	Residential development						
<p><b>Policy DM49: Waddon</b></p>	<p><b>DM49.1</b> An Area of moderate intensification has been designated to the south of Waddon. The sustainable moderate, intensification and renewal of areas within this via proposals for new residential development will be supported that results in a reasonable increase in the density. Development will need to be well designed, respect, reflect and help evolve the existing suburban character and local distinctiveness of the area. The boundaries of these are shown on the map below.</p> <p><b>DM49.2</b> Within Waddon allocate sites for development as set out in Table 11.17.</p>	<p>No Likely Significant Effects.</p> <p>This policy proposes the renewal of Waddon, but does not allocate any sites for growth. There are no linking pathways.</p>						
<p><b>Policy BMLSP: Transforming the Brighton Main Line and Selhurst Triangle</b></p>	<p><b>BML SP1</b> The Brighton Main Line and East Croydon Transformation Corridor will provide a high quality station and transport interchange enabling the increased use of public transport to, from and through East Croydon station, and via Windmill Junction and the Selhurst Triangle. To ensure this development proposals in the Brighton Main Line and East Croydon Transformation Corridor area will be expected to:</p> <ul style="list-style-type: none"> <li>a) Enable the delivery of the Brighton Main Line Upgrade Project;</li> <li>b) Provide for efficient and effective transport interchange which facilitates transfers between different modes of transport;</li> <li>c) Include innovative measures to improve passenger transfer and integrate digital and smart city infrastructure;</li> <li>d) Enable the ongoing effectiveness of the existing transport network during the Brighton Main Line Upgrade delivery;</li> <li>e) Outside of the remit of the TWAO, but within the Brighton Main Line and East Croydon Transformation Corridor area, deliver a mix of uses, which contribute to the development of the borough as a significant commercial centre alongside associated services and facilities and residential development.</li> </ul>	<p>Potential Likely Significant Effects</p> <p>This policy details the transformation of the Brighton Main Line and Selhurst Triangle, which encompasses the redevelopment of the transport hub, creation of new homes, and improvements to the public realm.</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>						

Policy Name	Brief Description	Screening Outcome
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**BML SP2** to deliver an effective transport hub integrating all modes of transport the redevelopment must:

- a) Provide for an effective accessible, inclusive and legible network integrating all modes of transport focussed on East Croydon Station;
- b) Establish new or integrated connections to the wider transport network through the borough and to the south east; and
- c) Connect and enhance the accessibility of to the Croydon Metropolitan centre including the retail core.

**BML SP3** Enhancements to public transport facilities should incorporate:

- a) Significant improvements to East Croydon Station for rail and tram passengers;
- b) Improvements to the bus infrastructure and network to enable full integration with the new station location;
- c) Taxi and private hire provision that meets the needs of station users.

**BML SP4** To deliver a high quality transport interchange in the new location, development will be required to manage the impacts of increased passenger numbers, the change in geographical location of the station and support growth and development in the Brighton Main Line and East Croydon Transformation Corridor area by:

- a) Providing for the effective onward distribution of passengers in an integrated format to all modes of transport;
- b) Providing new east-west connections across the station;
- c) Providing new, direct connections to the station from the east and west, together with direct, legible connections via George Street to the south.
- d) Providing a new public station square adjacent to George Street and the relocated station entrances.

**BML SP5** Key measures to manage the impact of the new station and support growth and development in the area will include measures to promote walking and cycling, including new routes

Policy Name	Brief Description	Screening Outcome
	<p>and facilities, enhanced signage and significant public realm improvements, in order to reduce pressure on the public transport network.</p> <p><b>BML SP6</b>To reduce the impact of construction works associated with CARS and make provision for sustainable freight routes, phasing and modes, which minimise the impact of freight and construction traffic.</p> <p><b>BML SP7</b> Redevelopment in the Brighton Main Line and East Croydon Transformation Corridor Area will be phased to support its transformation to ensure that:</p> <p>a) The effective and efficient health and viability of local businesses is protected so that the local economy of Croydon continues alongside the transformation; and</p> <p>b) The phasing of development ensures that the strategic transport network is effective and operates in support of local business, Croydon's function as a strategic outer London centre</p>	
<p><b>Policy NEQSP: Transforming the North End Quarter</b></p>	<p><b>NEQ SP1</b> The North End Quarter forming part of the Croydon Metropolitan Centre and Croydon Opportunity Area, will be an important public destination in the borough, with a productive and diverse range of uses within a green and sustainable framework, where revitalisation and development will include a resilient and diverse mix of uses, including a renewed retail offer alongside a new residential community and supported by a programme of infrastructure investment maintaining its status as the commercial heart of the borough. Development proposals will be expected to reflect and be delivered through a collection of strategic principles for change :</p> <p>a) the North End street frontage between George Street and Poplar Walk will serve as the main retail and commercial frontage for the town centre;</p> <p>b) Sustainable development which is adaptable and future-proofed including provision of retail spaces according to identified and evidenced need, where evidence responds to emerging consumer behaviour trends, environmental benefits, hyper-local and circular economy principles;</p> <p>c) Provide a diverse and balanced mix of uses alongside renewed retail, new homes, local services and social infrastructure. This can include offices and workspaces, arts and creative industries, a diverse evening/night-time economy, leisure, sports and play, entertainment, learning and innovation activity, and promote new forms of innovative ventures that provide public benefit and support local organisations. Retail is to be focused along North End with the wider Quarter including a balanced and complementary mix of uses;</p>	<p>Potential Likely Significant Effects</p> <p>This policy details the transformation of the North End Quarter, which encompasses the creation of new homes, destination uses, support for a university proposal and improvements to the public realm and public transport.</p> <p>The allocated sites could potentially cause likely significant effects.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure             <ul style="list-style-type: none"> <li>• Atmospheric pollution</li> </ul> </li> </ul>

Policy Name	Brief Description	Screening Outcome
	<p>d) An integrated Northern area that supports and complements West Croydon becoming a civilised transport interchange and celebrating diverse local businesses and convenience shops of London Road;</p> <p>e) Wellesley Road will become more welcoming approach to the North End Quarter with enhanced public realm, green infrastructure and become a healthy street;</p> <p>f) A green network - an inclusive quarter for public life stitched together through a generous high quality accessible public realm, a strong green grid and new network of streets and public spaces; it will improve permeability, connectivity and include a central anchor space and a series of pocket parks throughout<sup>42</sup>;</p> <p>g) Our heritage will be revealed, conserved and enhanced alongside complementary and respectful new development. Development proposals should seek to celebrate and enhance the area's distinct existing local character and heritage. They will be expected to have regard to historical assets alongside surrounding public realm improvements to elevate their setting and provide complementary new adjacent developments;</p> <p><b>NEQ SP2</b> The Council will work with landowners and stakeholders to bring forward and facilitate a spatial framework and guidance that further enables the execution of core principles and objectives set out in this chapter. To ensure redevelopment within the North End Quarter is coordinated, sustainable and resilient to changing trends, redevelopment proposals will be expected to:</p> <p>a) Demonstrate how they contribute towards achieving a joined up spatial vision that builds on the overarching principles of this chapter;</p> <p>b) Where possible, bring forward public realm improvements, to improve activity, perception, footfall and begin reviving the Quarter;</p> <p>c) Demonstrate that they contribute toward the creation of an accessible, inclusive and legible network of high quality streets and public spaces (including a new anchor public space, pocket parks, squares and roof gardens) across the Quarter, which shall include safe 24 hour public spaces, new 24 hour east-west and north-south routes to improve permeability and connectivity including a key east – west route connecting Wellesley Road to North End and beyond;</p> <p>d) Contribute to a balanced mix of town centre uses including residential, commercial, and community uses including affordable commercial and community spaces alongside wider social infrastructure.</p>	

Policy Name	Brief Description	Screening Outcome
	<p>e) Proposals for higher education uses (along with identified necessary supporting facilities) within the North End Quarter will be supported where they are of high quality sustainable design and complement surrounding uses and institutions;</p> <p>f) Support the creation of a residential community with a minimum of 600 new homes, including a mix of tenures and types of housing. There is an expectation that where robustly justified, a greater number of homes will be accommodated across the Quarter;</p> <p>g) Make the best use of land through a sustainable design led approach that optimises site capacity and promotes appropriate density, sustainable development that benefits from proximity to jobs, services and public transport facilities while contributing to the vitality and resilience of the town centre.</p> <p><b>NEQ SP3</b> Development shall improve the public realm within Croydon Metropolitan Centre and to reduce barriers to pedestrian movement across the town centre by:</p> <p>a) Contributing to the delivery of an accessible, inclusive and legible network of high quality streets and public spaces incorporating a new safe linked network of 24 hour east-west routes</p> <p>i. from Wellesley Road through North End,</p> <p>ii. North End to Tamworth Road/Frith Road</p> <p>iii. a new north-south route between Poplar Walk and George Street, and</p> <p>iv. Other secondary streets to improve permeability and connectivity through the Quarter;</p> <p>b) Contribute toward the establishment of a new anchor public space and a network of pocket parks, squares and roof gardens, and part of the wider green grid;</p> <p>c) Embed public art within the public realm including interventions that showcase and celebrate the heritage and diversity of the area;</p> <p>d) Create a high quality, safe, accessible and inclusive environment for all including step free access across the Quarter which resolves any issues caused by land level changes, servicing and car parking;</p> <p>e) Following a hierarchy of street networks<sup>43</sup>, where North End is the main town centre retail frontage, with other active frontages on Wellesley Road, George Street and Poplar Walk.</p>	

<sup>43</sup> See figure 5.2; 'Spatial Vision Diagrams'



Policy Name	Brief Description	Screening Outcome
	<p>These will include a mix of sustainable town centre uses that complement a renewed retail offer that is focused along North End. Other streets will include a combination of active and positive frontages to ensure vitality and safety;</p> <p>f) All frontages are to be developed as a holistic part of the public realm that promote permeability and vibrancy, passive surveillance, safety and sustainable service arrangements.</p> <p><b>NEQ SP4</b> To ensure the North End Quarter positively contributes to Croydon's environmental improvements and a more sustainable centre, development should integrate urban greening, sustainable transport and public realm improvements through the following:</p> <ul style="list-style-type: none"> <li>a) An inclusive, high quality public realm that enhances the area's civic function and attractiveness, and improves connectivity for pedestrians and cyclists to locations beyond the North End Quarter including West Croydon and East Croydon stations, Fairfield Cultural Quarter, Mid Croydon, Old Town, Park Hill recreation park and Wandle Park, and the Purley Way area;</li> <li>b) Encouraging sustainable transport routes and landscaping through the integration of green and blue infrastructure within streets and open spaces;</li> <li>c) Improved biodiversity such as ecological corridors;</li> <li>d) Social spaces and play spaces that welcome and support the borough's diverse communities;</li> <li>e) Improved walking and cycling connections towards existing green and blue spaces;</li> <li>f) Joined up servicing and delivery access; and</li> <li>g) Significantly reduced provision of car parking within the North End Quarter;</li> <li>h) Contributing towards making land uses in the quarter car-free.</li> </ul> <p><b>NEQ SP5</b> Restoration, and re-use of existing buildings will be supported where:</p> <ul style="list-style-type: none"> <li>a) An existing building, its retention, restoration and re-use makes a positive contribution to the Central Croydon Conservation Area as set out in the Appraisal and Management Plan;</li> </ul>	

Policy Name	Brief Description	Screening Outcome
	<p>b) the existing building is a statutorily Listed Building or a Locally Listed Building; and</p> <p>c) It is supporting interim uses of buildings and land to avoid long periods of inactivity in the town centre, and seeks to address the vision and objectives for the North End Quarter.</p>	
<p><b>Policy PW1: Purley Way Transformation Area</b></p>	<p>To enable development opportunities, including public realm improvements, to be undertaken in a cohesive and coordinated manner (including design) a Purley Way Masterplan will be prepared.</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum or location of residential and employment development within the borough. It seeks to facilitate development opportunities through the provision of a Masterplan for Purley Way. There are no linking pathways.</p>
<p><b>Policy PW2: Homes</b></p>	<p>The council will seek to deliver between 6,360 and 9,210 homes over the plan period consistent with the overall vision and other policy objectives. This will be achieved by:</p> <p>a. Co-locating housing with other uses to make the best use of land, create vibrant mixed-use developments, improve personal safety, reduce the need to travel and help financial viability and delivery;</p> <p>b. Applying Borough-wide policies on dwelling mix, tenure and standards in order to ensure a mixed and balanced community and high-quality homes;</p> <p>c. Ensuring that new housing is located, designed and managed in ways which responds positively to existing and expected future environmental qualities of the area; and</p> <p>d. Ensuring that new housing does not compromise the integrity and effectiveness of industrial and waste uses by requiring developers of new housing to adopt the Agent of Change principles when designing new developments.</p>	<p>Potential Likely Significant Effects</p> <p>This policy provides for between 6,360 and 9,210 homes in Purley Way over the plan period and specifies certain criteria that these developments will need.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Recreational pressure</li> <li>• Atmospheric pollution</li> </ul>
<p><b>Policy PW3: Employment</b></p>	<p>The Council will strengthen the important role that the area plays in terms of business and enterprise, support Croydon Metropolitan Town Centre (CMTC) and other town centres in Croydon and Sutton and ensure no net loss of industrial and warehousing/distribution floorspace (B2/B8/E/sui generis) over the plan period. This will be achieved by:</p>	<p>No Likely Significant Effects.</p> <p>This policy does not provide for a quantum or location of residential and employment development within the borough. However, it does seek to</p>

Policy Name	Brief Description	Screening Outcome
	<p>a. Consolidating and safeguarding Strategic Industrial Land (SIL)</p> <p>b. Protecting existing high-quality industrial and warehousing/distribution floorspace and facilities, ensuring that businesses can operate on a 24-hour basis and ensuring that any permitted non industrial and warehousing/distribution uses/buildings in or adjacent to SIL are located and designed accordingly;</p> <p>c. Encouraging the redevelopment and intensification of poor-quality industrial and warehousing/distribution floorspace and facilities;</p> <p>d. Encouraging businesses that relate to waste sites in area and help develop a circular economy;</p> <p>e. Applying planning conditions to control the subdivision of units, and the range of functions that can be carried out in new buildings within Class E of the Use Classes Order;</p> <p>f. Improving the environmental quality and safety of streets and public spaces within SIL;</p> <p>g. Ensuring that there is a better range of small-scale 'walk to' services for industrial occupiers that support enterprise, such as workplace crèches and cafés;</p> <p>h. Adopting a 'town centre first' approach by encouraging comparison shopping floorspace to re-locate to CMTC and permitting additional comparison shopping and leisure floorspace only if it accords with Policy DM8 of this Plan;</p> <p>i. Consolidating retail and leisure uses in the to be defined Valley Park, Waddon Marsh and Five Ways Local Centres and allowing new small-scale convenience shopping, leisure and hotel provisions which focus on supporting businesses, workers, and residents in the area; and</p> <p>j. Creating a Waddon Way Neighbourhood Centre and allowing new small-scale convenience shopping and community uses to support nearby business and residential communities.</p>	<p>intensify poor-quality industrial floorspace, likely resulting in a net increase in employment opportunities and associated commuter traffic.</p> <p>Potential impact pathways are present:</p> <ul style="list-style-type: none"> <li>• Atmospheric pollution</li> </ul>
<p><b>Policy PW4: Urban Design and Local Character</b></p>	<p>The council will use the creation of distinctive Local and Neighbourhood Centres to help provide a stronger structure and sense of place for the area. This will be achieved by:</p> <p>a. Focusing development and taller buildings in Local and Neighbourhood Centres;</p>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that aims to create distinctive Local and Neighbourhood Centres. It does not propose any location or quantum of residential and employment development. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
	<p>b. Integrating these Centres with their environs, including existing industrial/warehousing, open spaces and residential areas, by new attractive green streets and routes;</p> <p>c. Transforming Purley Way into a pleasant, new city street which balances its important movement function with a sense of place in the Local and Neighbourhood Centres it passes through and is fronted by high-quality buildings, spaces and trees which create attractive places and help improve air quality; and</p> <p>d. Safeguarding existing landmarks, views and heritage assets and developing characterful and attractive new development that knits in and is fully integrated with the character of Broad Green &amp; Selhurst and Waddon Places.</p> <p>e. Adopting the following five design principles for the Purley Way Corridor</p> <ul style="list-style-type: none"> <li>• Provide a street-based address for new buildings;</li> <li>• Frame the street with buildings that establish a rhythm of rising and falling height along its length and avoid creating canyons where poor air quality could get trapped;</li> <li>• Create separate perpendicular streets for residential access and service for employment areas either side</li> <li>• Establish parallel 'quietways' that provide priority for pedestrians and cyclists, stitch together new development with existing neighbourhoods and provide high-quality amenity space; and</li> <li>• Respond positively to adjacent development by ensuring appropriate back-to back, scale-to-scale and use-to-use relationships.</li> </ul>	
<p><b>Policy PW5: Community Facilities</b></p>	<p>The Council will ensure that additional homes and new businesses and the good growth of the area incorporates sufficient additional social infrastructure to meet additional demands and integrate existing and new communities. This will be achieved by:</p> <p>a. Identifying the likely need for additional childcare, school places, health and sports facilities and allocating land accordingly and establishing appropriate monitoring and delivery mechanisms to ensure that provision keeps pace with population growth;</p>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that ensures that new development will be supported by adequate additional social infrastructure. It does not propose any location or quantum of residential and employment development. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
	<p>b. Locating additional facilities in Local and Neighbourhood Centres and improving connections so that they can be used by existing as well as future residents, businesses and visitors; and</p> <p>c. Applying planning conditions to safeguard against the change of uses of new community buildings to other uses within Class E of the Use Classes Order.</p>	
<p><b>Policy PW6: Environment and Climate Change</b></p>	<p>The Council wants to take advantage of the area's proximity to the Beddington Energy Recovery Facility and maximise opportunities to make a positive contribution to tackling climate change and to improve air quality by:</p> <p>a. Ensuring that all new 'major' development is designed to connect to the proposed Beddington-Central Croydon District Energy Network;</p> <p>b. Applying Borough-wide policies on sustainable design and construction;</p> <p>c. Managing through traffic, encouraging active travel, providing electric vehicle charging points; and</p> <p>d. Ensuring that development along the Purley Way Corridor includes significantly more trees and urban greening and does not trap and worsen pollution levels.</p>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that seeks to tackle climate change and improve air quality in Croydon. It does not propose any location or quantum of residential and employment development. There are no linking pathways.</p>
<p><b>Policy PW7: Green and Blue Grid &amp; Open Space</b></p>	<p>The Council will transform the area into a much greener, more attractive and better-connected place to support the expected levels of growth by requiring new development to provide or otherwise contribute towards:</p> <p>a. The development of the Wandle Valley Regional Park;</p> <p>b. De-culverting the River Wandle and integrating the open river with new development, routes and spaces;</p> <p>c. Improving the attractiveness of green spaces and their ability to accommodate increased levels of activity;</p> <p>d. The provision of additional green space and public realm, particularly in that part of the area to the north of Mill Lane/Waddon Road, including pocket parks and squares;</p>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that aims to transform Croydon into a greener, better connected and more attractive place, such as by providing additional greenspace and walking / cycling routes. It does not propose any location or quantum of residential and employment development. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
	<p>e. Tree planting along Purley Way and other public highways, generous landscaping and other green and blue features including rain gardens, living roofs, green walls and productive landscapes that results in a net gain in biodiversity; and</p> <p>f. Providing safe, attractive green and blue walking and cycling routes that connect places, encourage children to walk to school, significantly increase tree cover and help wildlife movement.</p>	
<p><b>Policy PW8: Transport &amp; Communication</b></p>	<p>Working with landowners, developers, TfL, Network Rail and other stakeholders and securing in-kind provision and/or financial contributions towards improving the area's walking and cycling, public transport, highway and parking infrastructure to ensure that it has sufficient capacity to support the level of proposed growth and that it maximises the use of sustainable modes of transport. This will be achieved by:</p> <p>a. Creating a network of attractive and safe walking and cycling routes that safely and conveniently connect new development with shops, services and open spaces and reduce the severance effect of Purley Way and other roads;</p> <p>b. Enhancing public transport nodes (bus stops, tram stops and Waddon Station);</p> <p>c. Facilitating enhanced rail services at an improved/new Waddon Station;</p> <p>d. Facilitating additional tram capacity on the Wimbledon branch;</p> <p>e. Establishing Purley Way as a sustainable transport corridor by;</p> <p>I. Reducing 'pinch points' to secure wider footways, better cycle lanes and better bus priority measures and enabling a potential extension of the tram network.</p> <p>II. Facilitating enhanced and/or new bus services</p> <p>III. Investigating the feasibility and viability of a southerly extension of Croydon Tram to Purley and Coulsdon.</p> <p>f. Working with TfL and other partners to implement improvements to the Five Ways junction and other improvements to other priority road junctions;</p>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that aims to improve transport and communication in Croydon, such as by enhancing the area's walking, cycling and public transport. It does not propose any location or quantum of residential and employment development. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
	<p>g. Working with TfL, LB Sutton and other partners to implement traffic management and calming measures which discourage additional traffic from using roads in the surrounding area (particularly residential streets);</p> <p>h. Improving and reducing the impact of deliveries and servicing by the provision of micro-consolidation/last mile logistics hubs and using Delivery and Service Plans to designate traffic routes for new industrial, warehousing/distribution and retail developments;</p> <p>i. Implementing increasingly restrictive car parking policies to discourage non-essential car use and encourage cycling (see Policy PW10 below);</p> <p>j. Incorporating Smart City and digital infrastructure to make networks and services as efficient as possible; and</p> <p>k. Manage construction activities to minimise adverse impacts on traffic, business operations and residential amenity.</p>	
<p><b>Policy PW9: Croydon tram capacity</b></p>	<p>To ensure that public transport capacity in the area is sufficient to accommodate growth, no more than 2,000 additional homes shall be built and occupied in the area in advance of the implementation of works to increase capacity of the existing Wimbledon Branch tram network from 12 trains per hour to 18 trains per hour.</p>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that seeks to improve Croydon's tram capacity. It does not propose any location or quantum of residential and employment development. There are no linking pathways.</p>
<p><b>Policy PW10: Car parking standards</b></p>	<p>In order to ensure that vehicular trips are restricted to essential only and that there is sufficient highway capacity, the following car parking standards shall be implemented:</p> <p>a. In the short term (2021-2026), all new development will be required to comply with the borough-wide car parking standards set out in Policy DM30</p> <p>b. From 2026 to 2031, all new development will be required to comply with Purley Way Car Parking Standards 1, as set out in Appendix X.</p> <p>c. From 2031 onwards, all new development will be required to comply with Purley Way Car Parking Standards 2, as set out in Appendix X.</p>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that regulates car parking standards across the Borough to minimise vehicle trips to essential only. It does not propose any location or quantum of residential and employment development. There are no linking pathways.</p>

Policy Name	Brief Description	Screening Outcome
<b>Policy PW11: Areas for managed change</b>	<p>The Council will make sure that growth in the areas for ‘transformational change’ is well integrated (physically, socially and economically) with existing residential and business communities in ‘areas for managed change’ by ensuring that:</p> <ul style="list-style-type: none"> <li>a. New housing helps meet local needs;</li> <li>b. New employment space provides additional high-quality job and training opportunities for local people;</li> <li>c. New buildings and spaces draw on positive aspects of local character;</li> <li>d. New community facilities are in locations that are convenient for existing communities;</li> <li>e. Improved and new walking and cycling routes connect neighbourhoods with improved public transport nodes and Local and Neighbourhood Centres; and</li> <li>f. Proactive measures are taken to prevent additional traffic and overspill car parking.</li> </ul>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that seeks to integrate growth with existing businesses and communities. It does not propose any location or quantum of residential and employment development. There are no linking pathways.</p>
<b>Policy PW12: Areas for managed change</b>	<p>New development within ‘areas for managed change’ will include:</p> <ul style="list-style-type: none"> <li>a. New housing and employment space in line with relevant Local Plan borough-wide policies;</li> <li>b. A new primary school at Canterbury Road;</li> <li>c. Improvements to Canterbury Road Recreation Ground, Wandle Park, Duppas Hill Park, Waddon Ponds, Purley Playing Fields and Purley Way West.</li> </ul>	<p>No Likely Significant Effects.</p> <p>This is a development management policy that identifies new development in areas of managed change. However, the quanta and delivery mechanisms for this growth are set by other policies in the plan. There are no linking pathways.</p>



## 5. Appropriate Assessment

The law does not prescribe how an appropriate assessment should be undertaken or presented but the appropriate assessment must consider all impact pathways that have been screened in, whether they are due to policies alone or to impact pathways that arise in combination with other projects and plans. That analysis is the purpose of this section. The law does not require the 'alone' and 'in combination' effects to be examined separately provided all effects are discussed.

The main impact pathways of concern to this HRA (recreational pressure/disturbance and air pollution) is inherently 'in combination' with neighbouring plans and projects. However, for completeness, potential impacts of the residential dwellings allocated within the CLPR area in isolation are also assessed.

The HRA screening exercise undertaken in Table 2 indicates 21 potential LP policy that may have likely significant effects on the European Sites due to recreational pressure and air pollution. At the screening stage, the following potential housing allocations were screened in and require further assessment:

- SP1.0A: Growth
- SP1.0B: Transformation areas
- SP2.4: Gypsies and travellers
- SP4: Employment
- DM34: Addington
- DM35: Addiscombe
- DM36: Broad Green and Selhurst
- DM38: Croydon Opportunity Area
- DM39: Crystal Palace and Upper Norwood
- DM40: Kenley and Old Coulsdon
- DM41: Norbury
- DM42: Purley
- DM43: Sanderstead
- DM44: Selsdon
- DM45: Shirley
- DM46: South Croydon
- DM47: South Norwood and Woodside
- DM48: Thornton Heath
- SP1: Transforming the North End Quarter
- PW2: Homes
- PW3: Employment

Three European Sites within 10km of the London Borough of Croydon are deemed to be potentially linked to the CLPR: the Wimbledon Common SAC, the Mole Gap to Reigate Escarpment SAC and the Richmond Park SAC. This chapter will assess the potential for plan policies to result in adverse effects on the integrity of these sites in relation to the impact pathways discussed in the previous chapters.

# Wimbledon Common SAC

## Recreational Pressure

The SAC is designated for relatively small parcels of Northern Atlantic wet heaths and European dry heaths, both of which are sensitive to trampling damage and nutrient enrichment arising from recreational activities. Wimbledon Common lies approx. 6.4km from the London Borough of Hounslow. While there is no visitor data available for the SAC and therefore no catchment zone, the site is comparable to other European Sites that feature similar habitats and for which such data exists.

Wimbledon Common SAC is designated mainly for its population of stag beetle *Lucanus cervus* but is also designated for its wet and dry heathland. The stag beetles are dependent on mature trees and deadwood. These supporting features are not susceptible to any adverse effects of the London Plan. The Site Improvement Plan for Wimbledon Common SAC identifies that removal of dead wood from the site by visitors could adversely affect the ability of the SAC to support stag beetle. However, this is a very specific action as a result of the personal decision of some visitors and cannot be attributed to growth generally.

The heathlands of the SAC are theoretically vulnerable to recreational pressure and Wimbledon Common generally (not just the SAC component) is a popular site for visitors. According to the most recent conservation report on the Wimbledon and Putney Commons website '*Being an unfenced Common the whole area is open to the public 24 hours a day throughout the year*'<sup>44</sup>. However, according to habitat mapping on MAGIC ([www.magic.gov.uk](http://www.magic.gov.uk)) the heathland is only found in the northern portion of the SAC. The Natural England condition assessment for the SAC states that most of the heath fails to meet key targets for quality (although the actual extent of the heathland is increasing due to a programme of tree and scrub removal). However, the condition assessment also concludes that there are no indications of significant damaging impacts to the heathland arising from non-native species, drainage, trampling, burning or disturbance. Therefore, although the heathland does not yet meet its key targets this does not appear to be attributable to recreational trampling and is more to do with a historic lack of traditional management. That has been extensively addressed in recent years with the result that '*there has certainly been no loss of heathland, removal of invasive trees and scrub has been carried out, a mosaic of age and structure for heather and gorse has been achieved, pernicious weeds have been kept under control and many areas of the Commons' heathland and acid grassland are now much improved from the condition they were in 10 years ago*'<sup>45</sup>. From reviewing that report it appears that the main hotspots of recreational usage at Wimbledon Common SAC are not the heathland areas but the grassland areas, which do not represent any SAC features.

According to Natural England's Countryside Stewardship Negotiation Schedule, the aim of the management of Lowland Heath is '*to provide a mosaic of vegetation which allows all heathland features to flourish, including pioneer heath and bare ground which benefits rarer invertebrates, birds, reptiles and plants*'. In response to this, some of the management prescriptions included in the Wimbledon and Putney Commons conservation report for 2016/17 include:

- The creation of bare ground sites through the scraping back of turves.
- The maintenance of a full range of age classes of gorse by cutting and removing arisings.
- The management of dense bracken stands and deep bracken litter layers by rotational cutting, bruising or spraying.

While clearly such measures to open up the sward can be taken to excess, the extent of historic scrub encroachment on the heathland, and these management prescriptions, suggests that in general a lack of physical disturbance and trampling (which would help to retard such encroachment), from both people and grazing animals, is more of a concern for the heathland areas than excessive footfall.

Moreover, visitor surveys have been undertaken in the Thames Basin Heaths SPA and the Wealden Heaths Phase II SPA, which both comprise tracts of lowland heathland with similar sensitivities to the Wimbledon Common SAC. For both European Sites the core catchment (i.e. the geographic area from which 75% of visitors derive) is 5km, meaning that new residential housing beyond 5km is not deemed to result in LSEs on their qualifying features. This catchment zone has been approved by Natural England and has formed the evidence for several Supplementary Planning Documents (SPDs). It is considered that a similar core recreational catchment would apply to the Wimbledon Common SAC, and this would place the housing to be delivered in the CLP beyond the Zone of Influence of the SAC. The urban setting and limited parking access locations of the SAC are likely to reduce its Zol

<sup>44</sup> <https://www.wpcc.org.uk/downloads/nature/annual-conservation-report-pdf>

<sup>45</sup> Ibid

further. Furthermore, it is noted that travel time to the Wimbledon Common SAC from Croydon is also substantially, approx. 1hr 15mins by public transport and 40-50 minutes by car, making it even less likely that a significant number of Croydon residents will visit the SAC.

Given the available evidence, it is concluded that the Croydon CLPR will not result in adverse effects on the integrity of Wimbledon Common SAC regarding recreational pressure, either alone or in combination. Similarly, the HRA of the London Plan also concluded no adverse effect would result on the SAC via recreational pressure due to housing growth across London even when considered 'in combination'.

## Atmospheric Pollution

The Air Pollution Information System<sup>46</sup> concludes that whilst the woodland habitats which stag beetle inhabit are vulnerable to nitrogen deposition, the stag beetles themselves are not.

Approx. 5% of the Wimbledon Common SAC are heath and scrub, most importantly wet heaths and European dry heaths. Heathland habitats generally comprise acid, nutrient-poor soils and are colonised by plants that are adapted to preferentially grow under these conditions. Both wet and dry heaths are thus sensitive to atmospheric nitrogen deposition. APIS identifies a critical nitrogen load of 10-20 kg N/ha/yr for both habitat types. An exceedance of this load would lead to a transition from heather to grass dominance, decrease the susceptibility of *Erica* species to abiotic factors (e.g. frost or drought) and reduce lichen abundance. However, a review of data on APIS highlights that the maximum critical load currently deposited in the SAC is 16.9 kg N/ha/yr. This is well within the critical load range and should also be considered in the context of improving nitrogen deposition rates due to new vehicle emission factors.

The SAC lies approx. 6.4km from the London Borough of Croydon which is within reasonable commuting distance. A review of detailed habitat mapping on MAGIC indicates that the heathland lies mainly in the north of the SAC in Wandsworth, directly adjacent to the A3. According to Census 2011 data, Wandsworth is the only authority among the top 10 destinations and origins for commuters from Croydon that could involve regular journeys on the A3. However, according to navigation software, Wandsworth Borough is more easily reached via the A212 and the A214 road links from Croydon. Furthermore, none of the alternative routes to the Borough involve the A3.

Moreover, the HRA of the London Plan concluded that the interventions outlined in the adopted London Environment Strategy and Mayor's Transport Strategy<sup>47</sup> will result in a 55 per cent reduction in NOx by 2025 and a 65 per cent reduction by 2030. A decline in NOx emissions will correlate with a net reduction in oxidised nitrogen deposition to European sites, particularly within 200m of roads, which are the main areas of relevance to this report. Among the London actions in the Mayor's Transport Strategy over the duration of this London Plan period are Zero emission capable taxis, Town centre Zero Emission Zones, Electric single-deck buses and bus charging infrastructure, supporting low emission freight, delivery of 2000 electric vehicle charging points, further investment in charging and refueling infrastructure, 15 hydrogen fuelling stations installed in and around London, all new taxis zero emission capable, all new private hire vehicles zero emission capable, a pan-London approach to parking charges for zero emission vehicles, keep Congestion Charge under review and support borough measures, and an Extended Ultra Low Emissions Zone<sup>48</sup>.

These data make it very unlikely that the Wimbledon Common SAC is affected by current or future residents of Croydon, both alone and in combination. Therefore, there will be no LSEs on the SAC regarding the impact pathway atmospheric pollution. This site is screened out from Appropriate Assessment in relation to this impact pathway.

## Mole Gap to Reigate Escarpment SAC

### Recreational Pressure

The Mole Gap to Reigate Escarpment SAC is designated for several habitats (semi-natural dry grasslands, European dry heaths) and species (great-crested newt, Bechstein's bat) that have different degrees of sensitivity to recreational pressure. Trampling damage of visitors venturing off marked paths represents a realistic threat to many plants and their root systems. In contrast, recreational disturbance to the SAC's animal species is not easily linked to urban growth. For example, Bechstein's bats are likely to be primarily disturbed by people accessing

<sup>46</sup> <http://www.apis.ac.uk/> [accessed 26/10/2017]

<sup>47</sup> Mayor's Transport Strategy Supporting Evidence Outcomes Summary Report <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports?intcmp=3120> [accessed 26/10/2017]

<sup>48</sup> Source: TfL (2017), Draft Mayor's Transport Strategy. Available at: [www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017](http://www.london.gov.uk/what-we-do/transport/our-vision-transport/draft-mayors-transport-strategy-2017)

maternity or hibernation sites. In most cases, this would occur through relatively uncommon activities, such as caving, which cannot be easily linked to population growth – mostly because very few residents engage in these.

Mole Valley District is the authority in which the Mole Gap to Reigate Escarpment SAC lies and is the geographic zone most likely to contribute to the recreational footprint in the site. Policy CS15 of the Mole Valley Core Strategy established an 800m buffer zone surrounding the SAC in which there is a presumption against further residential and employment development. This was to ensure that there would be no increase in recreational pressure arising from local residents.

Data on recreational use in the SAC is scarce and centres mainly on research undertaken by Bournemouth University in 2005 and 2006. Three main access points to the SAC were surveyed: Headley Heath, Box Hill and Reigate Hill / Gatton Park (Wray Lane). Annual visitor counts were highest at Box Hill (828,000) and lowest at Headley Heath (209,000). The majority of visitors travel to the site from beyond 15km, including 54% at Headley Heath and 81% at Reigate Hill. These data illustrate that specific honeypot sites in the SAC have a strong recreational draw on visitors.

Bournemouth University also surveyed the immediate area surrounding car parks. It was concluded that the actual area of the SAC visited was small, with the majority of visitors spending their time near the parking area. The largest visitor impact occurred within 100m of the car parks and very few visitors travelled beyond 1km distance in the SAC. Similar recreation patterns have been observed at other National Trust properties, where visitors typically spend only 1 hour and travel approx. 1km on site. Overall, the available data indicate that visitor pressure in the Mole Gap to Reigate Escarpment SAC will focus mainly on specific hotspots and that any recreational impacts will occur within a small radius around these car parks. The recent HRA for the Mole Valley Local Plan also concluded that development in that district would not lead to adverse effects on the integrity of the SAC and Natural England did not disagree with that conclusion in correspondence over that HRA.

Overall, in line with Habitats Regulations Assessments for adjoining planning authorities, it is therefore concluded that there will be no adverse effects on the integrity of the Mole Gap to Reigate Escarpment SAC regarding recreational pressure, from growth in the CLPR, either alone or in combination with other plans and projects.

## Atmospheric Pollution

The Mole Gap to Reigate Escarpment SAC comprises a wide range of soil types which give rise to its habitat complexity. According to APIS all four qualifying habitats are sensitive to atmospheric nitrogen deposition. The yew woodland has the lowest critical nitrogen load of 5-15 kg N/ha/yr and critical load exceedance could lead to changes in soil processes, nutrient imbalances and an altered assemblage of mycorrhiza. The SAC's dry grassland with orchids is another habitat that is sensitive to nitrogen deposition (critical load of 15-25 kg N/ha/yr). For the grassland an exceedance of the load would lead to an increase in tall grasses, declining biodiversity, mineralization and surface acidification. The presence of nitrogen-sensitive habitats requires a more detailed appraisal of Croydon's geographic location in relation to the SAC and the road infrastructure adjacent to the European Site.

The SAC lies primarily in the Mole Valley District with a small portion of the site projecting eastward into the authority of Reigate & Bansted. In relation to the London Borough of Croydon, it is the section of the SAC in Reigate & Bansted that is at the greatest risk of atmospheric nitrogen deposition because it lies directly adjacent to the M25. Detailed habitat mapping on MAGIC shows that lowland calcareous grassland in the SAC lies within 200m of junction 8 of the M25 at the top of Reigate Hill. Croydon is potentially connected to this part of the SAC via the A23-M25 road link, a potentially used commuter route.

However, Census 2011 data highlight that Mole Valley District (the authority which would most likely involve commuter journeys past this SAC component) is not among the top ten most frequent commuter origins or destinations related to Croydon. Therefore, it would be reasonable to conclude that this would also be an infrequently travelled commuter route in the CLP period.

Further features of the SAC within 70m from the M25 make it unlikely that a commuter traffic increase associated with the CLP would significantly impact any of its qualifying features. The principal habitat in SSSI Management Unit 23 is lowland calcareous grassland, located on the opposite side of the escarpment from the motorway. Based on an ecological survey undertaken by RPS for the Gatwick Runway 2 project<sup>49</sup> (consulted and commented on by

<sup>49</sup> RPS. (December 2017). Appendix 5: Gatwick Runway 2 – Mole Gap to Reigate Escarpment SAC & Ashdown Forest SPA / SAC Revised Habitats Regulations Assessment Report Stage 1 (Screening). Available at: [https://www.gatwickairport.com/globalassets/publicationfiles/business\\_and\\_community/all\\_public\\_publications/second\\_runway/revise-draft-nps/appendix-5-report1-mole-gap-reigate-escarpment-sac-ashdown-forest-spasac-habitat-regs-stage-1-screen.pdf](https://www.gatwickairport.com/globalassets/publicationfiles/business_and_community/all_public_publications/second_runway/revise-draft-nps/appendix-5-report1-mole-gap-reigate-escarpment-sac-ashdown-forest-spasac-habitat-regs-stage-1-screen.pdf) [Accessed on the 07/09/2020]

Natural England), the SSSI unit is of a condition that makes it unlikely to support orchid-rich grassland. It was concluded that there would be no potential for traffic increase on the M25 to have LSEs on the qualifying feature. Furthermore, in the same report, Natural England was cited confirming that the management unit does not harbour natural box scrub, yew woodland or heathland. The report by RPS made a further point on the grassland within the M25 being kept extremely short through grazing by rabbits. It is considered that the prevailing grazing pressure would more than offset any growth effects of future atmospheric nitrogen deposition. For these same reasons the M25 was also not considered further in the Air Quality Impact Assessment (AQIA) undertaken jointly for the authorities of Tandridge, Reigate & Bansted, and Mole Valley.

Overall, given the low likelihood of constituting a significant journey-to-work route for future Croydon residents and previous condition assessments of the SAC adjacent to the M25, it is concluded that the CLP will not result in LSEs on the Mole Gap to Reigate Escarpment SAC regarding atmospheric pollution. The site is screened out from Appropriate Assessment in relation to this impact pathway.

## Richmond Park SAC

### Recreational Pressure

The Richmond Park SAC is designated for its stag beetle population, which depends on the park's large number of ancient trees with associated decaying timber. The larvae develop in decaying tree stumps and fallen timber of broad-leaved trees, such as apple, elm, lime, beech and oak. Therefore, the presence of a sufficient amount of decaying wood is essential to maintain the structure and function of the species' habitat. While development plans are likely to lead to an increase in recreational pressure in the Richmond Park SAC, human presence is unlikely to materially reduce the volume of deadwood in the park. While visitors may, on occasion, remove fallen timber this is unlikely to systematically alter the overall extent of habitat available to stag beetles. It can therefore be concluded that the CLPR will not result in adverse effects on the integrity of the Richmond Park SAC regarding the impact pathway recreational pressure, either alone or in combination with other projects and plans. Similarly, the HRA of the London Plan also concluded no adverse effect would result on the SAC via recreational pressure due to housing growth across London even when considered 'in combination'.

### Air quality

The Habitats Regulations Assessments for the London Borough of Richmond upon Thames Core Strategy<sup>50</sup> and Local Plan<sup>51</sup> identified that Richmond Park SAC is located in an urban setting and as such is potentially vulnerable to recreational pressure and urbanisation. However, the site is designated as an SAC only for its stag beetle population, which is dependent upon mature trees and deadwood during its life stages. The presence of mature trees and deadwood would be affected by habitat management but not by development identified within the London Plan. The Air Pollution Information System<sup>52</sup> concludes that whilst the woodland habitats which stag beetle inhabit are vulnerable to nitrogen deposition, stag beetles themselves are not vulnerable to nitrogen deposition. The main reason cited is that '*nitrogen deposition is not believed to have a direct, major effect on tree growth in the UK*'<sup>53</sup> and thus the cycle of tree growth and death should continue, as should a continued supply of dead wood. Most of the effects of nitrogen deposition on woodlands are on features other than tree growth, such as ground flora diversity/structure, fungi and lichen populations.

Moreover, the HRA for the London Plan concluded that the interventions outlined in the London Environment Strategy and Mayor's Transport Strategy<sup>54</sup> will result in a 55 per cent reduction in NOx by 2025 and a 65 per cent reduction by 2030. A decline in NOx emissions will correlate with a net reduction in oxidised nitrogen deposition to European sites, particularly within 200m of roads, which are the main areas of relevance to this report. As such it can be concluded that the CLPR would not have an adverse effect on the integrity of the SAC through the impact pathway of air quality, either alone or in combination with other plans and projects. This matches the conclusion of the London Plan HRA which considered all growth in London in combination.

<sup>50</sup> Baker Shepherd Gillespie (August 2007) Assessment of likely significant effect

<sup>51</sup> LUC (2016) London Borough of Richmond upon Thames. Publication Local Plan. Habitats Regulations Assessment Report. <http://www.apis.ac.uk/> [accessed 26/10/2017]

<sup>52</sup> <http://www.apis.ac.uk/node/965> [accessed 31/10/17]

<sup>54</sup> Mayor's Transport Strategy Supporting Evidence Outcomes Summary Report <https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports?intcmp=3120> [accessed 26/10/2017]

## 6. Conclusions

- 6.1 This assessment undertook both a Test of Likely Significant Effects and Appropriate Assessment of the policies and any allocations within the CLPR.
- 6.2 The international designated sites, considered within the Appropriate Assessment were:
- Wimbledon Common SAC
  - Mole Gap to Reigate Escarpment SAC
  - Richmond Park SAC
- 6.3 However, it can be concluded that due to a general absence of either impact pathways or, in the case of the stag beetle interest features of Wimbledon Common SAC and Richmond Park SAC, a general resilience to housing and employment growth, no adverse effect on any SAC will result from the CLPR. This matches the conclusion drawn in the HRA for the London Plan.
- 6.4 It can be concluded that the Plan document will not result in an adverse effect on the integrity of any international sites either alone or in combination.

# Appendix A Map of European sites

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[aecom.com](http://aecom.com)