

# **Sustainability Appraisal (SA) of the Croydon Local Plan: Strategic Policies Partial Review & Detailed Policies and Proposals**

**Non-technical Summary  
of two SA Reports**

September 2016

## REVISION SCHEDULE

1	Sept 2016	Non-technical summary of two reports: 1) The Croydon Local Plan: Strategic Policies Partial Review (CLP1.1) SA Report 2) The Croydon Local Plan: Detailed Policies and Proposals (CLP2) SA Report	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director
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## INTRODUCTION

AECOM (formally URS) is commissioned by London Borough of Croydon ('the Council') to undertake Sustainability Appraisal (SA) in support of two emerging plans:

- 1) The Croydon Local Plan: Strategic Policies Partial Review (CLP1.1)
- 2) The Croydon Local Plan: Detailed Policies and Proposals (CLP2)

SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives with a view to avoiding and mitigating adverse effects and maximising the positives. SA for each plan is a legal requirement, stemming from the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, 'Proposed Submission' versions of the two plans are out for consultation; and each has an 'SA Report' published alongside, with a view to ensuring an informed consultation (and informed plan-making subsequent to the consultation).

This is a Non-technical Summary (NTS) of *both* SA Reports.

### Structure of the Interim SA Reports / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
  - i.e. in the run-up to preparing the current consultation documents.
2. What are the appraisal findings and recommendations at this current stage?
  - i.e. in relation to the preferred options presented within the consultation documents.
3. What are the next steps?

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

### What's the scope of the SA?

The scope of the SA is essentially reflected in a list of 47 sustainability objectives, grouped under 18 'topic' headings (and also be grouped under six Community Strategy themes). Taken together, these sustainability topics and objectives indicate the parameters of SA, and provide a methodological 'framework' for appraisal.

#### *Sustainability topics and objectives (i.e. the SA framework)*

Community Strategy theme	Sustainability topic	Sustainability Objectives
<b>An enterprising city</b>	Economic development and employment	Regenerate Croydon as a vital and diverse economic centre
		Encourage business opportunities in high areas of unemployment, such as the northern and south eastern wards of the Borough
<b>A connected city</b>	Transport	Promote public transport and improve conditions for all transportation users
		Reduce greenhouse gas emissions
		Promote the use of renewable energy
<b>A sustainable city</b>	Energy consumption	Facilitate modal shift away from the private car
		Reduce greenhouse gas emissions
		Increase the uptake of energy efficiency measures
		Promote the use of renewable energy

Community Strategy theme	Sustainability topic	Sustainability Objectives	
		Adaptation and resilience to climate change by minimising risk of overheating through design	
	Biodiversity, flora and fauna		
			Increase quality and range of wildlife habitats in the borough
			Increase tree cover
	Water Use		Encourage more efficient use of water
			Adaptation and resilience to climate change and higher population
	Drainage, flooding and water quality		Reduce pollution to water
			Reduce flood risk in vulnerable communities
			Steer vulnerable development away from areas affected by flooding
			Adaptation and resilience to climate change
	Air quality		Reduce emissions of pollutants to air
			Reduce greenhouse gas emissions
	Waste		Promote waste minimisation, recycling and composting
			Reduce greenhouse gas emissions from waste
			Increase amount of energy generated from waste
	Noise		Reduce noise pollution, including reducing the adverse impacts of noise from traffic, freight, servicing, construction and demolition
	Conservation of the built environment		Maintain and enhance the historic environment
		Bring forward investment in the historic environment for regeneration, reuse and adaptation	
		Use heritage assets to provide educational opportunities and combat social exclusion	
Materials		Promote and increase use of building materials that have a low environmental impact	
A caring city	Human health and wellbeing	Improve mental and physical wellbeing	
		Support for carers and those with long term conditions	
	Crime and Safety	Reduce anti-social activity, opportunities for crime and fear of crime	
	Social inclusion and equality	Create community identity and sense of place	
Promote adaptable, durable and inclusive developments			

Community Strategy theme	Sustainability topic	Sustainability Objectives
	Housing	Everyone should have the opportunity to live in a decent home
		Improve housing conditions and reduce homelessness
		Promote adaptable, durable and inclusive developments
<b>A learning city</b>	Archaeological heritage	Maintain and enhance the historic environment
	Education, skills and training	Facilitate fair and equal access for all members of the community to education and training
		Improve educational and training facilities within the Borough
<b>A creative city</b>	Culture, Sport & Recreation	Promote growth of creative industries and development of centralised hub to support creative businesses
		Support temporary use of vacant buildings and sites for creative/cultural activity
		Ensure that all communities have access to leisure and recreation facilities

### WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

#### The Strategic Policies Partial Review (CLP1.1)

Part 1 of the Interim SA Report explains how work was undertaken to develop and appraise ‘reasonable’ alternative approaches to housing growth policy. Specifically, this part of the report -

- 1) Explains the process of establishing reasonable alternatives;
- 2) Presents the appraisal of the reasonable alternatives; and
- 3) Gives the Council’s response to the alternatives appraisal findings.

There is no need to dwell on (1) within this NTS, but it is helpful to present summary appraisal findings (2) and the Council’s response (3). This information is presented below.

*Summary alternatives appraisal findings*

Summary appraisal findings are presented within the table below. Within each row of the table - i.e. for each sustainable topic - the alternatives are ranked in order of preference (1 being best) and efforts are also made to categorise performance in terms of 'significant effects' (using red and green shading). Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them); and '-' is used to denote instances where the objective in question is not applicable.

*Summary appraisal findings - Alternative approaches to housing growth policy*

Topic	London Plan target (1,435 dpa) delivered at preferred urban sites	Higher growth (2,162 dpa), with approximately 1,435 dpa delivered at preferred urban sites and the residual need at preferred greenfield sites
Economic development & employment	2	1
Transport	1	2
Energy consumption	2	1
Biodiversity, flora and fauna	1	2
Water use	-	-
Drainage, flooding and water quality	=	=
Air quality	1	2
Waste	-	-
Noise	=	=
Materials	-	-
Human health and wellbeing	=	=
Crime and Safety	=	=
Social inclusion and equality	2	1
Housing	2	1
Archaeological heritage	-	-
Education, skills and training	=	=
Culture, Sport & Recreation	=	=

The alternatives appraisal highlights that whilst Option 2 (higher growth with Green Belt release) has merit in terms of socio-economic objectives, more notable are the relative disbenefits of this option in terms of transport/traffic and natural environment objectives. This conclusion is reached taking some account of Green Belt sites that would likely be released, hence the Council might wish to investigate other higher growth options, e.g. options that would concentrate growth to a greater extent and/or ensure a clear focus on the least sensitive areas. However, at the current time it is fair to conclude that Option 1 is favourable.

*The Council's response / justification for the preferred approach*

The key catalyst for the partial review is the adoption of the Further Alterations to the London Plan (FALP), which increased the borough's housing target from 1,330 per annum to 1,435 per annum. Adoption of this target by the Mayor has rendered the existing housing requirements in the Croydon Local Plan: Strategic Policies obsolete.

The FALP sets a 20 year housing target of 42,000 dwellings per annum (dpa) and Croydon a figure of 1,435 dpa. However, these figures are driven by the Mayor's Strategic Housing Land Availability Assessment (SHLAA), i.e. reflect capacity considerations. The Mayor's objectively assessed housing need for London is 49,000 dpa. As such, the Mayor is clear that planning for the FALP target alone will not be sufficient to achieve the statutory requirement of general conformity with the London Plan; rather, Councils have to demonstrate how they are seeking to exceed their FALP target and thus contribute to the 49,000 dpa target.

In addition to the FALP housing target the Council has undertaken a Strategic Housing Market Assessment (SHMA). A SHMA is an objective assessment of housing need produced in accordance with the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance. Paragraph 159 of the NPPF requires local authorities to have a clear understanding of housing needs in their area by preparing a SHMA. The SHMA assesses the quantity of housing needed in Croydon up to 2036.

Ultimately, the SHMA established an overall housing need (based on the 2012 - based subnational population projections and the 2011 household projections produced by DCLG) of 2,437 dpa. The SHMA has also produced a figure based on the methodology used in the GLA's SHMA (i.e. that which informed the FALP), but based on the GLA's updated 2014 population projections and household projections. Using this methodology and these projections, Croydon's overall housing need is 2,162 dpa.

*Summary of Croydon's housing figures*

Source	Dwellings per annum
Further Alterations to the London Plan 2015	1,435
Further Alterations to the London Plan 2015 – Central variant (based on the GLA's updated 2014 population projections and household projections)	2,162
Strategic Housing Market Assessment	2,437

The preferred approach for the Croydon Local Plan: Strategic Policies Partial Review is to accommodate the FALP housing target (1,435 dpa), and seek to exceed it in a sustainable manner in the context of the FALP – 'central variant' figure of 2,162 dpa. This will be achieved by accommodating growth within the existing urban area. More specifically, this will be achieved through the Croydon Opportunity Area accommodating at least 9,500 dwellings, sites beyond the Opportunity Area being allocated at least 9,000 dwellings, sustainable growth of the suburbs, growth within district and local centres and windfall sites achieving in the region of 10,500 dwellings. Alongside, previous completions and bringing vacant buildings back into use it is anticipated just over 31,500 dwellings will be delivered over the plan period 2016 – 2036.

This preferred approach is considered to be in conformity with the National Planning Policy Framework, National Planning Practice Guidance and London Plan policy in terms of delivering sustainable growth within the urban area, without the release of Green Belt and Metropolitan Open Land (MOL). The national and London Plan policy context is very clear that residential development in the Green Belt and / or MOL is inappropriate development and such development is only justifiable in very special circumstances. Housing need is not considered to represent very special circumstances by this policy context. With general conformity with higher level policy a requirement of Local Plan soundness, it is clear a departure from this policy context cannot be justified, nor is it necessary as the FALP target (1,435 dpa) can be achieved.

Furthermore, through the SA process, evidence has been generated that indicates to the Council that accommodating development within the existing urban area is the most sustainable option, notwithstanding the economic development and employment benefits of the managed release of Green Belt and Metropolitan Open Land.

What the preferred option demonstrates is that in the face of the considerable population growth London faces - and as a consequence, the challenges Croydon faces in looking to meet housing need (and address the unarguable need for affordable housing) - Croydon is willing to plan for sustainable growth.

## Detailed policies and proposals (CLP2)

Part 1 of the Interim SA Report explains how work was undertaken to develop and appraise ‘reasonable’ alternative approaches to development management policy, and also to identify and appraise ‘site options’.

Specifically, with regards to **development management policy**, the following policy issues were the focus of alternatives appraisal: Residential annexes; Advertisement hoardings; Car and cycle parking; Public houses. No other issues / sets of alternatives were identified as necessitating appraisal; however, this position will be reviewed subsequent to the current consultation. For the sake of brevity (and also recognising that no significant effects were predicted) appraisal findings are not repeated here within this NTS.

With regards to **site options**, an initial screening process led to the identification of a large number of reasonable options across the borough (see map overleaf), and subsequently (in spring/summer 2015) these were subjected to appraisal. Appraisal of site options involved applying a strict ‘criteria-based’ methodology, which, in summary, involved querying location of site options in relation to -<sup>1</sup>

- Employment areas
- Area of high/low accessibility (‘PTAL’)
- Sites of Scientific Interest (SSSIs)
- Locally designated wildlife sites
- Ancient Semi Natural Woodland
- Other woodland
- Local Nature Reserves
- Designated common land
- Flood risk zones
- Conservation areas
- Historic parks / gardens
- Scheduled monuments
- Listed buildings
- Locally listed buildings
- Areas designated of heritage/townscape importance
- Agricultural land
- Agricultural land under ‘Stewardship’
- Green Belt
- Areas of deprivation
- Croydon, and district / local centres
- Educational Open Space
- Archaeological priority zones
- Country parks
- Metropolitan Open Land
- Locally designated open land

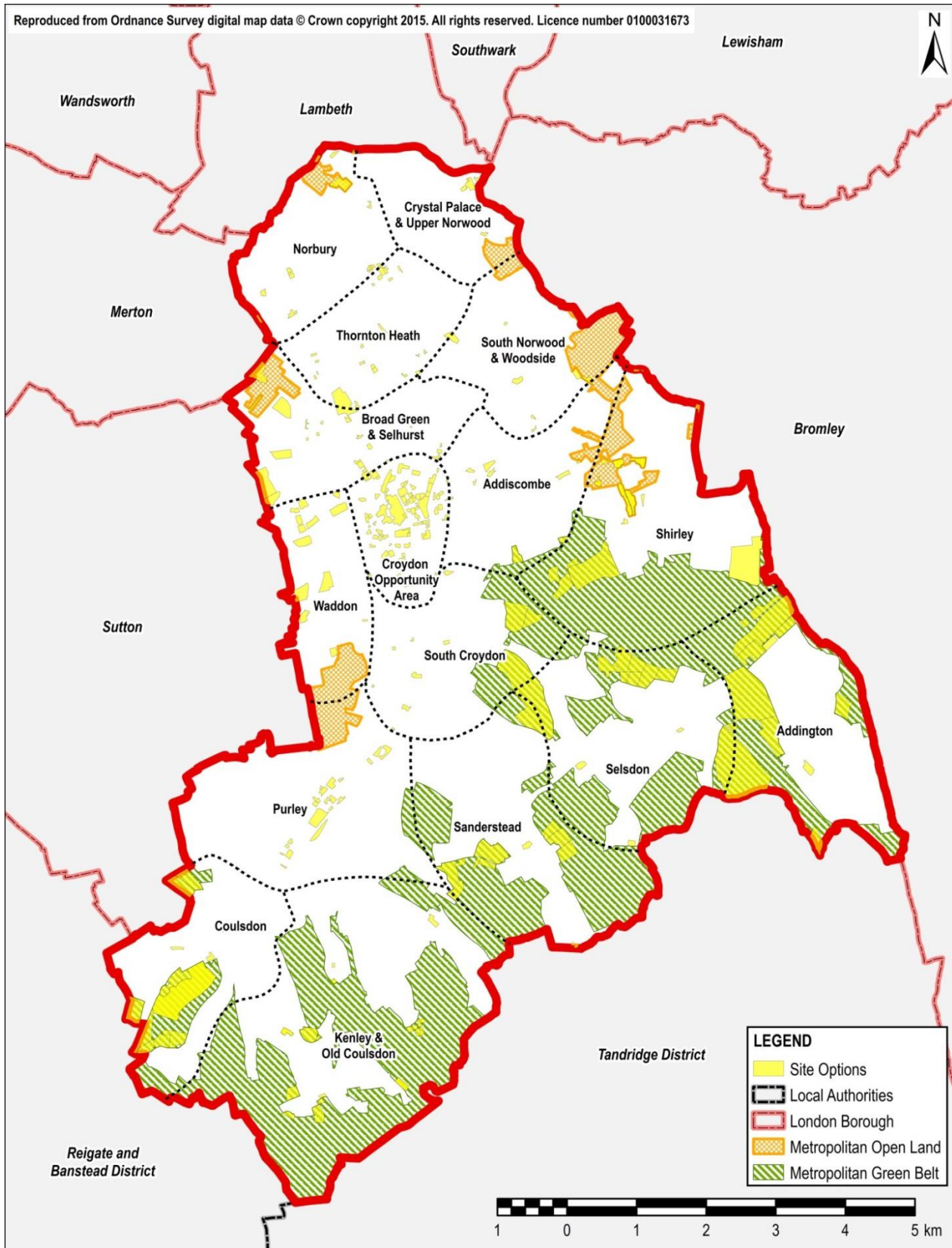
Essentially, the output of the site options appraisal was a large spreadsheet with a row for each of the reasonable site options and a column for each of the appraisal criteria). Furthermore, a series of narratives were prepared under each of the 25 criteria headings, with each narrative discussing instances of site options performing particularly well/poorly, and also discussing the performance of subsets of site options (e.g. discussing how the preferred sites perform on average, and contrasting this to the performance of the non-preferred sites). The aim was to inform the Council’s thinking on the preferred approach to site allocation and development of DM policy, and a number of specific recommendations were made. For example, statements include:

- Five site options entirely intersect with an existing employment area, whilst another two partially intersect. These sites are all located in Waddon or Broad Green & Selhurst. Of the five sites that entirely intersect, three (60%) are preferred sites, whilst both of the sites that partially intersect are preferred sites. Of the five preferred sites that intersect, four are proposed for residential or mixed use redevelopment, and one is proposed for use as a Creative and Cultural Industries Enterprise Centre (plus residential development).
- 133 site options intersect with an area with poor (level 1) or relatively poor (level 2) PTAL. Of these, 40 (30%) are preferred sites, with nine located in Shirley, seven in Broad Green & Selhurst and four in each of Addington, Thornton Heath and Waddon.
- 47 site options are adjacent to a site of importance for nature conservation (SINC), and another 18 are within close proximity (50m). Of the 47 adjacent sites 11 (23%) are preferred sites, and another five preferred sites are in close proximity. Three adjacent preferred sites are proposed for Gypsy and traveller use (sites 502, 661 and 755), and two are proposed for secondary school use (sites 16 and 662).

<sup>1</sup> N.B. This criteria-based methodology was developed to reflect (‘hang-off’) the SA framework (i.e. the list of topics and objectives established through ‘scoping’ work) as best as possible (recognising data limitations).



Reasonable site options, i.e. site options that have been a focus of appraisal (N.B. This map is not up to date and hence should be treated as **indicative**)



## WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

'Part 2' within each of the Interim SA Reports answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the preferred approach as understood from the *both* consultation documents currently out for consultation.

To reiterate, the information presented within 'Part 2' of the two reports is **identical**. This is an appropriate approach to take, given that the two plans will eventually be implemented in combination.

Summary appraisal statements - under each of the SA framework topic headings - are presented below.

### Economic development and employment

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

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

### Transport

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

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

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

### Energy consumption

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

### Biodiversity, flora and fauna

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

### Water Use

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

### Drainage, flooding and water quality

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

### Air quality

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

### Waste

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

### Noise

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

### Conservation of the built environment

The proposed increase in the rate of growth in the urban area, and also the proposed increased emphasis on sustainable growth of the suburbs, potentially leads to some tensions with built environment and heritage objectives; however, the proposed allocations tend to be in locations where there appears little potential to impact on designated assets (at least nationally designated assets; it is noted that 26 preferred sites

intersect with a locally listed building). With the development management policy in place there will be good potential to work with Historic England to ensure that design measures avoid/mitigate negative effects and result in new development that reinforces existing historic built character where possible.

### Materials

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

### Human health and wellbeing

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

### Crime and Safety

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

### Social inclusion and equality

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

### Housing

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

### Archaeological heritage

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

### Education, skills and training

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

## Culture, Sport & Recreation

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

## WHAT ARE THE NEXT STEPS?

### Plan finalisation

Subsequent to publication stage, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other submitted evidence) before determining whether the plan is sound (or requires further modifications).

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

### Monitoring

The SA Report must present 'measures envisaged concerning monitoring'. In-light of the appraisal of the draft plan presented above, it is suggested that there might be a focus of monitoring effort on -

- Unemployment resulting from loss of jobs in the light industrial sector
- Measures to improve public transport accessibility in growth locations with currently poor PTAL
- Opportunities taken to exceed London Plan low carbon, decentralised energy targets and sustainable design and construction standards
- Impacts to specific sites of biodiversity importance that could potentially come under pressure as a result of site allocations
- Development of the Green Grid
- Development within the floodplain, recognising the potential for cumulative impacts
- Traffic congestion in air quality hotspots
- Heritage indicators developed in conjunction with Historic England
- Loss of open space, recognising the potential for cumulative effects
- Achievement of regeneration objectives (including in locations outside the Croydon Opportunity Area)
- Delivery of sites that meet the needs of the Gypsy and Traveller population.