

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

SA Report

May 2024



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## Table of Contents

1	Introduction.....	1
2	The plan scope .....	2
3	What is the scope of the SA? .....	6
Part 1: What has plan-making / SA involved up to this stage? .....		8
4	Introduction to Part 1 .....	9
5	Defining growth scenarios .....	10
6	Growth scenarios appraisal .....	50
7	The preferred growth scenario.....	61
Part 2: What are the appraisal findings at this stage? .....		62
8	Introduction to Part 2 .....	63
9	Appraisal of the Partial Review .....	64
Part 3: What are the next steps? .....		79
10	Plan finalisation .....	80
11	Monitoring.....	80
Appendix I: Regulatory requirements .....		81
Appendix II: The SA Scope .....		84

# 1 Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Croydon Local Plan Partial Review (“the Partial Review”) that is being prepared by the London Borough of Croydon.
- 1.1.2 Once in place, the Partial Review will serve to adjust the spatial strategy for growth and change set out within the adopted Croydon Local Plan (CLP; 2018), including by adjusting the package of sites allocated to deliver the strategy, and will also serve to adjust the suite of strategic and development management policies, i.e. policies against which planning applications are judged. The Partial Review will also extend the plan period to 2040 (from 2036 in the adopted Local Plan), such that the plan period is 2019 to 2040.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.<sup>1</sup>

## 1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially appraises ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions** -
- What has Plan-making / SA involved **up to this point?**
    - including consideration of ‘reasonable alternatives’
  - What are the SA findings **at this stage?**
    - i.e. in relation to the draft plan
  - What are the **next steps?**

## 1.3 This SA Report

- 1.3.1 This is the formally required SA Report for the Partial Review, published under Regulation 19 of the Local Planning Regulations. This report is produced with the intention of informing representations on the Partial Review, which will then be submitted for consideration by an appointed Planning Inspector as part of a process of Examination in Public (see discussion of ‘next steps’ in Section Part 3 of this report).
- 1.3.2 This report supersedes the equivalent SA Report published in early 2022. The Council is re-running the Regulation 19 stage at the current time, and so a new SA Report is required.

### Structure of this report

- 1.3.3 This report is structured in **three parts** according to the three questions set out above.<sup>2</sup>
- 1.3.4 Before answering the first question, there is a need to further set the scene by setting out: the plan scope; and the scope of the SA.

<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

<sup>2</sup> See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

## 2 The plan scope

### 2.1 Introduction

- 2.1.1 The aim here is to introduce the plan area, explain the context to plan preparation (including CLP 2018) and discuss the plan objectives.

### 2.2 Legislative and policy context

- 2.2.1 The purpose of the Partial Review is to support the achievement of local objectives, but there is also a need to account for paragraph 33 of the NPPF, which states that local plans should be reviewed “*no later than five years from the adoption date of a plan, and should take into account changing circumstances...*”
- 2.2.2 The Partial Review must reflect current Government policy as set out in the National Planning Policy Framework (**NPPF**, 2023) and Planning Policy for Traveller Sites (2015) and must also account for the Government’s online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that provides for development needs as far as is consistent with sustainable development.
- 2.2.3 The Partial Review is also being prepared in the context of the adopted **London Plan** (2021), which notably assigns LB Croydon a ten year (2019 to 2029) **housing target** of 20,790 homes (2,079 dwellings per annum, dpa). The London Plan also notably identifies much of the Borough as falling within the “Trams Triangle / London-Gatwick-Brighton mainline” strategic **growth corridor** and identifies Croydon itself as an **Opportunity Area** to deliver 14,500 new homes (2019 to 2041) and 10,500 new jobs (2016 to 2041).
- 2.2.4 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the **Duty to Cooperate** established by the Localism Act 2011. For example, context is provided by the strategic policies of the Greater London Authority (GLA), Transport for London, the Croydon Clinical Commissioning Group and Government’s environmental agencies, namely the Environment Agency, Historic England and Natural England. LB Croydon must also cooperate with neighbouring areas, particularly the immediately adjacent authorities, namely Sutton, Merton, Lewisham, Bromley, Tandridge and Reigate and Banstead. LB Croydon also cooperates closely with other authorities within the Wandle Valley regional co-ordination corridor.

### 2.3 The plan area

- 2.3.1 Croydon is London’s biggest borough and has the largest youth population in London. It is one of the top retail and commercial centres in London and enjoys some of the best transport connections in the UK, with London’s only tram system, 15 minute rail connections from East Croydon station to central London and a 20 minute connection to Gatwick. Characteristics include (quotes taken from the plan document):
- Historic context – “from historic market town... to dynamic Victorian County Borough and booming 1960s commercial centre, a strong sense of civic identity and ambition runs through Croydon’s history”;
  - Modern history – “From the 1970s...Croydon Town Centre suffered a period of gradual decline as the Modernist vision fell out of favour and with the launch of a new office district at Canary Wharf. Central government’s increased emphasis on out of town shopping areas through the 1980’s and 90’s resulted in a new retail area growing along the A23 (Purley Way). Croydon is changing the reputation it received as a result of its post-war development endeavours. As it became clear that the vehicular transport system previously central to the Modernist vision was unsustainable, new public transport infrastructure was developed as part of a new vision. The new East Croydon railway station was opened in 1992 and the Croydon Tramlink (introduced 2000) provided improved east-west links. A series of detailed masterplans have already been drawn up for Croydon Town Centre and support the current Croydon Local Plan 2018. These lie at the heart of a new wave of transformation across the Town Centre.”
  - Cultural offer – including fostering the birth of Punk, Dubstep and Grime, with institutions such as The Fairfield Halls, Croydon Art College, and the Brits School;
  - Croydon Town Centre – which has more shops in one location than anywhere else in London bar the West End, but which faces major challenges, including retail decline and dated 1960s office spaces;
  - Transport connectivity – Croydon enjoys some of the best transport connections in the UK, as discussed;

- Purley Way – home to two of the Borough’s three Strategic Industrial Locations (SILs) and extensive out of town shopping areas (following support for such schemes in the 1980s and 1990s);
- Variations in deprivation – with concentrations in the north of the Borough and in Addington and Shirley, as well as some of the least deprived areas of London in the south and east;
- Demographic trends – Croydon is a young borough, however, by 2031 the number of people in Croydon over the age of 65 will have increased by 41%; and
- Green Belt and open spaces – cover over a third of the Borough, most extensively in the south.

## 2.4 The context provided by the CLP 2018

- 2.4.1 CLP 2018 Policy SP2 (Housing) provides key context for the Partial Review. It provides for 32,890 homes over the plan period (2016 to 2036; 1,645 pa) through: 10,760 homes within the Croydon Opportunity Area (OA); 6,970 homes through allocations elsewhere in the Borough; and 10,060 homes via windfall sites.
- 2.4.2 The CLP 2018 housing requirement of 32,890 homes exceeded the London Plan target, as it stood at that time, but fell short of the number of homes needed in order to meet objectively assessed housing needs.
- 2.4.3 As explained by the supporting text to SP2:
- “There is a need for over 41,580 new homes in Croydon by 2036 and evidence indicates that approximately 40% these need to be larger homes. The target of [32,890] homes reflects the availability of land for development in Croydon, facilitating the sustainable growth of the suburbs, the need to provide a mix of homes to support sustainable communities and the objective to provide a choice of homes for people at all stages of life. It also reflects the need to provide land for other uses such as employment...”*
- 2.4.4 Further key context is provided Policy DM10 (Design and character) of CLP 2018. The supporting text to the policy explains that: *“The challenge for the... Local Plan is to respect local character and distinctiveness whilst accommodating growth. Croydon’s aspiration is for this to be done in a way that contributes to the improvement of each of Croydon’s 16 places... as set out in Table 6.4...”*
- 2.4.5 From Table 6.4 of CLP 2018 it can be seen that the aim is a targeted approach to development outside of formal allocations, including within areas of ‘focused intensification’. The approach of supporting areas of focused intensification was then taken forward through the version of the Local Plan Partial Review published in early 2022. However, this approach is now proposed to be removed, as discussed below.

**Table 2.1: Table 6.4 from the CLP 2018**

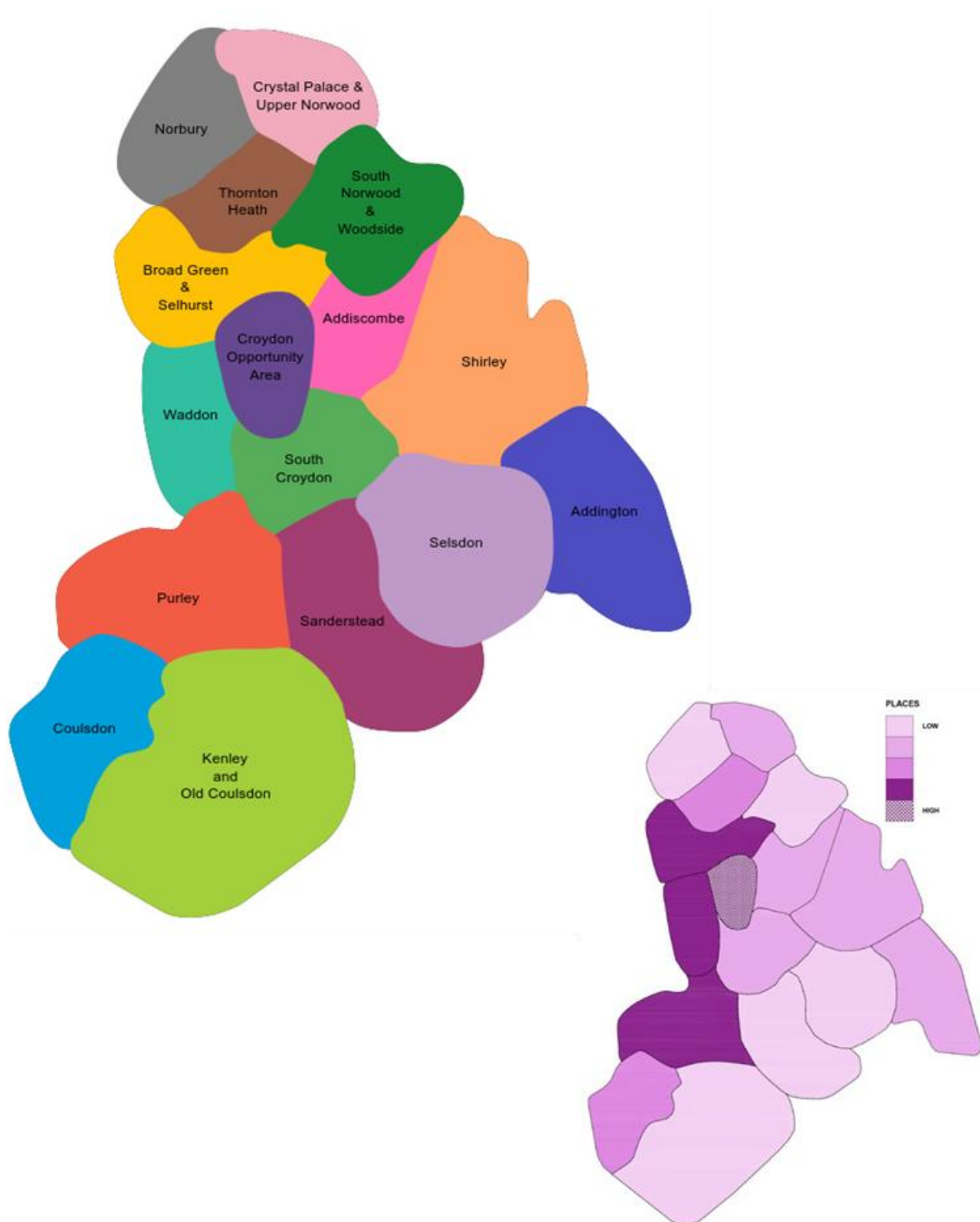
Method of accommodating growth and improving Croydon	How it works	Applicable policies
<b>Evolution without significant change of area’s character</b>	Each character type has a capacity for growth. Natural evolution is an ongoing process where development occurs in a way that positively responds to the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

- 2.4.6 The net effect of the various elements of the spatial strategy introduced above is summarised in Figure 4.1 of CLP 2018, which is reproduced below as Figure 2.1. In summary, the strategy involves:
- Highest growth in the Croydon Opportunity (within which is Croydon Metropolitan Centre, CMC);
  - Higher growth in the west the Borough within Broad Green and Selhurst, Waddon and Purley;
  - Moderate growth at either end of the western spine within Thornton Heath and Coulsdon;
  - Lower growth in those places to the east of the Croydon OA, namely Addiscombe, South Croydon and Shirley, as well as at Crystal Palace and Upper Norward to the north and Addington to the east; and
  - Lowest growth at Norbury at the northern edge of the Borough and also at the cluster of three ‘Places’ at the southeast extent of the Borough, namely Kenley and Old Coulsdon, Sanderstead and Selsdon.

2.4.7 The adopted spatial strategy can also be summarised further, in the following terms:<sup>3</sup>

*“The strategy to deliver the housing target of the circa 33,000 homes is based on three sources. A third in Croydon Opportunity Area, a third on other allocated sites and the final third in the suburbs through suburban intensification / evolution (windfalls).”*

**Figure 2.1:** The 16 defined Croydon Places and the CLP 2018 distribution of housing growth



<sup>3</sup> LB Croydon Matter Statement submitted in respect of Matter 12 of the London Plan Examination: See [https://www.london.gov.uk/sites/default/files/m12\\_lb\\_croydon\\_5662.pdf](https://www.london.gov.uk/sites/default/files/m12_lb_croydon_5662.pdf)

## 2.5 Objectives of the Partial Review

### Objectives

2.5.1 The objectives of the Partial Review are as per the objectives of the adopted Local Plan. The established objectives are as follows:

- A place of opportunity
  - Strategic Objective 1: Establish Croydon as the premier business location in South London and the Gatwick Diamond.
  - Strategic Objective 2: Foster an environment where both existing, and new, innovative, cultural and creative enterprises can prosper.
  - Strategic Objective 3: Provide a choice of housing for people at all stages of life.
  - Strategic Objective 4: Reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions.
- A place to belong
  - Strategic Objective 5: Ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.
  - Strategic Objective 6: Provide and promote well designed emergency services, community, education, health and leisure facilities to meet the aspirations and needs of a diverse community.
  - Strategic Objective 7: Conserve and create spaces and buildings that foster safe, healthy and cohesive communities.
- A Place with a Sustainable Future
  - Strategic Objective 8: Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.
  - Strategic Objective 9: Ensure the responsible use of land and natural resources and management of waste to mitigate and adapt to climate change.
  - Strategic Objective 10: Improve the quality and accessibility of green space and nature, whilst protecting and enhancing biodiversity.
  - Strategic Objective 11: Tackle flood risk by making space for water and utilising sustainable urban drainage systems.

2.5.2 However, understanding of planning policy priorities does naturally evolve over time, with the Partial Review needing to respond to the London Plan and changes to the wider planning and policy context. The Issues and Options consultation (2019) explained that key priorities relate to:

- Climate change – this is now a priority following declaration of a climate emergency by the Council.
- Housing crisis – understanding of housing needs has moved-on since adoption of the CLP 2018, including in light of the Strategic Housing Market Assessments (SHMAs) published in 2019 and 2023.

2.5.3 These remain two arguably overwhelming priority issues at the current time.

#### What is the plan not seeking to achieve?

2.5.4 Firstly, there is a need to reiterate that the Partial Review aims to build on the CLP 2018, and that the objectives of CLP 2018 are being rolled-forward for the purposes of preparing the Partial Review. The Partial Review only seeks to update certain aspects of CLP 2018, and other aspects of CLP 2018 are not a focus of the Partial Review. More generally, there is a need to be clear that the Partial Review is strategic in nature, and hence naturally omits consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, for example at the planning application stage.

2.5.5 The scope of the Partial Review is reflected in the scope of the SA (see below) and the scope of reasonable alternatives (see Part 1).



## 3 What is the scope of the SA?

### 3.1 Introduction

- 3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the appraisal of reasonable alternatives and the emerging plan.
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the SA. **Appendix II** presents further information, and the SA scope is also discussed as part of appraisal work (Sections 6 and 9) as necessary.

### 3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were consulted on the SA scope in 2019.<sup>4</sup> The scope remains broadly unchanged at the current time, but some modest adjustments have been made over time.

### 3.3 Key issues and objectives

- 3.3.1 Table 3.1 presents the sustainability topics and objectives that form the core of the SA scope. Together they provide a ‘framework’ under which to undertake appraisal (Sections 6 and 9).

**Table 3.1: The SA framework**

Topic	SA objectives
Air quality	<ul style="list-style-type: none"> <li>Take action to reverse the trend for increasing emissions by supporting and enabling the use of low emission technologies and actively encouraging sustainable modes of transport such as walking and cycling, particularly where it is possible to leverage the opportunities presented by new development.</li> <li>Locate and design development so that current and future residents will not regularly be exposed to poor air quality.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>Minimise, and avoid where possible, impacts to biodiversity, both within and beyond designated and non-designated sites of national and local significance.</li> <li>Achieve biodiversity net gain including through the long term enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.</li> </ul>
Climate change adaptation	<ul style="list-style-type: none"> <li>Adapt to current and future flood risk by directing development away from the areas of the Borough at the highest risk of flooding from all sources and provide sustainable management of current and future flood risk through sensitive and innovative planning, development layout and construction.</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>Continue to drive down CO<sub>2</sub> emissions from all sources by achieving high standards of energy efficiency in new development, by providing attractive opportunities to travel by sustainable means and by protecting land suitable for renewable and low carbon energy generation, including community schemes.</li> </ul>
Communities	<ul style="list-style-type: none"> <li>Support good access to existing and planned community and green infrastructure for new and existing residents, including as delivered through the Healthy Streets Approach. Address issues of relative deprivation and account for key equality issues relevant to the local plan.</li> </ul>
Economy and employment	<ul style="list-style-type: none"> <li>Support a strong, diverse and resilient economy that provides opportunities for all, supporting and enhancing the vitality of the Borough’s town and local centres (including regeneration opportunities) and strategic employment areas/clusters; also support social enterprise and the voluntary / community sector. Ensure that education and skills provision meets the needs of Croydon’s existing and future labour market and improves life chances for all.</li> </ul>

<sup>4</sup> The Scoping Report is available at: [croydon.gov.uk/planning-and-regeneration/planning/get-involved-croydons-planning/croydon-local-plan-review](https://croydon.gov.uk/planning-and-regeneration/planning/get-involved-croydons-planning/croydon-local-plan-review)

Topic	SA objectives
Health	<ul style="list-style-type: none"> <li>• Improve the physical and mental health and wellbeing of Croydon residents, including through enhancing access to outdoor recreational spaces, and reduce health inequalities between local communities within the Borough.</li> </ul>
Historic environment	<ul style="list-style-type: none"> <li>• Protect, conserve and enhance historic environment and heritage assets, including their setting and significance, and contribute to the maintenance and enhancement of historic character through design, layout and setting of new development.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential from strategic brownfield opportunities, to ensure delivery of good quality, affordable and specialist housing that meets the needs of residents, including older people, people with disabilities and families with children.</li> </ul>
Land and soils	<ul style="list-style-type: none"> <li>• Promote the efficient and sustainable use of land and natural resources, including supporting development which makes effective use of previously developed land and avoids the best and most versatile agricultural land where applicable.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• Protect and enhance the character, quality and diversity of the Borough's landscapes and townscapes through appropriate design and layout of new development, including the preservation of important open gaps and key views.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Ensure that the provision of infrastructure is managed and delivered to meet local population and demographic change whilst helping to reduce congestion, environmental impacts and travel times. This includes providing infrastructure that maximises accessibility for all.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Promote sustainable forms of development which minimises pressure on water resources, water consumption and wastewater flows, including the use of innovative features and techniques where possible, to maintain and enhance water quality consistent with the aims of the Water Framework Directive.</li> </ul>



*Croydon Central Library*

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

## 4 Introduction to Part 1

- 4.1.1 The aim here is to introduce the information set out in this part of the report, i.e. provided in order to answer the question: *What has plan-making / SA involved up to this stage?*

### 4.2 Overview

- 4.2.1 Plan-making has been underway since 2019; however, the aim here is not to relay the entire backstory of plan-making to date, but rather the work undertaken to examine reasonable alternatives in 2023.

**Table 4.1:** Overview of the plan-making / SA process

	Plan-making	SA
2019	Issues and options consultation	Interim SA Report
2022	Publication	SA Report
2023	Further consider issues and options / reasonable alternatives	
2024	Publication	SA Report
	Submission to Secretary of State	

- 4.2.2 Specifically, the aim is to: explain the reasons for selecting the alternatives dealt with (**Section 5**); present an appraisal of the reasonable alternatives (**Section 6**); and present justification for the preferred option in light of the appraisal (**Section 7**). This reflects the regulatory requirement to present an appraisal of “reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with”.

#### Reasonable alternatives in relation to what?

- 4.2.3 The legal requirement is to examine reasonable alternative taking into account the objectives and geographical scope of the plan (see Section 2). As such, it was determined appropriate to focus attention on reasonable alternatives in the form of ‘**growth scenarios**’, defined as alternative approaches to the supply of land, including by allocating sites (NPPF paragraph 69), in order to provide for development needs and the support the achievement of wider plan objectives. This focus serves to ensure:

- Alternatives that go to the very heart of the plan, ensuring a clear mutually exclusive choice.<sup>5</sup>
- Alternatives that are meaningfully different, in that they will vary in respect of ‘significant effects’.<sup>6</sup>

- 4.2.4 This was the approach followed in 2021, and no concerns were raised. Formally exploring development management policy alternatives was considered as a possibility, but no ‘reasonable’ alternatives emerged.

#### The inherent challenge

- 4.2.5 In practice, the task is to examine the emerging proposed approach to ‘supply’, which essentially amounts to the emerging proposed key diagram and the proposed housing supply trajectory (i.e. a chart showing the proposed supply of homes over time relative to the defined housing requirement) and then define one or more alternatives for appraisal (as a check-and-challenge prior to consultation) and then consultation.

- 4.2.6 The challenge is that there are many variables, i.e. factors that can be adjusted with a bearing on supply. Unlike with local plans outside of London, where the overriding question is around *which* sites to allocate, for Croydon and other urban local plans a key factor is around *how* to develop allocated sites, in terms of density (inc. building heights) and use mix. Choices around density and use mix are complex, as opposed to a discrete choice regarding whether or not to allocate a site, which creates an inherent challenge.

<sup>5</sup> The requirement (Regulation 12(2) of the SEA Regulations) is simply to focus SA on “*the plan and reasonable alternatives*”.

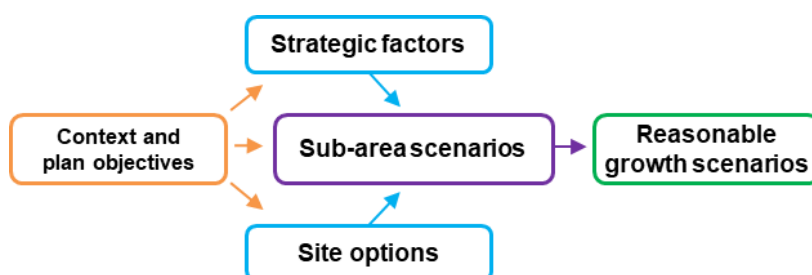
<sup>6</sup> Government’s PPG explains that SA “*should only focus on what is needed to assess the likely significant effects of the plan*”. In turn, to be ‘reasonable’, alternatives must be meaningfully different to the extent that the appraisal predicts differential significant effects, where significance is defined in the context of the plan as a whole. A focus on growth scenarios guarantees that this will be the case, and so avoids the need for a ‘screening’ process. Also, it is important to bear in mind that ‘no policy’ is not a reasonable alternative to ‘a policy’. This is because ‘no policy’ is the baseline (and so cannot lead to significant effects on *the baseline*, which is the definition of an effect). Also, ‘no policy’ is not a reasonable option for appraisal where there is a need for the policy given the plan objectives (as the plan objectives are the starting point for defining reasonable alternatives).

## 5 Defining growth scenarios

### 5.1 Overview

- 5.1.1 The legal requirement is to explore reasonable alternatives “*taking account of the objectives... of the plan*”,<sup>7</sup> hence there is a need to define growth scenarios that align with the Local Plan objectives.
- 5.1.2 From this starting point, and also from the starting point of lessons learned through the Issues and Options consultation in 2019 and Publication in 2022, the Council and AECOM went through a process involving: **1)** exploring strategic factors and site options; **2)** pulling together these top-down / bottom-up inputs to define sub-area scenarios; and then **3)** combining sub-area scenarios to form borough-wide scenarios.

**Figure 5.1:** Defining reasonable alternative growth scenarios



#### Structure of this section

- 5.1.3 This section is broken down into four sub-sections:
- Section 5.2 – discusses strategic factors;
  - Section 5.3 – discusses site options;
  - Section 5.4 – draws upon the preceding analysis to define sub-area scenarios; and
  - Section 5.5 – combines sub-area scenarios to form reasonable alternative growth scenarios.

### 5.2 Strategic factors

- 5.2.1 The aim of this section of the report is to explore strategic factors (‘issues and options’) with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:
- Quantum – how many new homes are needed (regardless of capacity to provide them)? Similarly, what is the need locally for employment floorspace, and of what types?
  - Distribution – where within the Borough is more / less suited to growth, broadly speaking, and what types of schemes are supported (e.g. in terms of density and use mix)?

#### Quantum

- 5.2.2 Central to local plan-making is **A)** establishing development needs; and then **B)** developing a policy response to those needs. Focusing on housing, the Planning Practice Guidance (PPG) explains: “*Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure...*”
- 5.2.3 With regards to **(A)**, the NPPF (paragraph 61) explains that the starting point for local plan-making should be an assessment of housing need. However, the situation is different for London Boroughs, where the key starting point is the ‘housing target’ established by the London Plan (2021).
- 5.2.4 With regards to **(B)**, many local authorities will establish a housing requirement in line with the established housing need figure or, in the London context, a housing requirement in line with the London Plan target. However, under certain circumstances it can be appropriate to set *higher* or *lower* housing requirement.

<sup>7</sup> Regulation 12(2)(b) of the SEA Regulations

- 5.2.5 The London Plan ([Policy H1](#)) sets a target for Croydon of 20,790 additional homes over a ten year period from **2019 to 2029**, which equates to a need to deliver 2,079 dwellings per annum (dpa). Within the overall target there is also a target to deliver 3,410 homes from small sites (341 dpa).
- 5.2.6 Crucially, there is also a need to consider the final 11 years of the plan period (**2029 to 2040**). In this respect, paragraph 4.1.11 of the London Plan explains: *“If a target is needed beyond the 10 year period... boroughs should draw on the 2017 SHLAA... and any local evidence of identified capacity...”*<sup>8</sup>
- 5.2.7 In other words, paragraph 4.1.11 suggests that when planning for the period from 2029 it is appropriate to simply take a ‘bottom up’ approach driven by available capacity, as opposed to seeking to provide for any particular ‘top down’ target. In particular, there is no suggestion that housing need should be a factor.
- 5.2.8 Regardless, there is a clear need to ensure that capacity options are considered in the context of a ‘top down’ understanding of development needs and wider strategic arguments for growth. In this respect, it is important to note that it is fairly common for local plans to simply apply the London Plan ten-year target for the entire plan period, or otherwise look to support a level of growth for the post-2029 period beyond that indicated by identified capacity in the London SHLAA. For example, this approach has been taken recently by Bexley,<sup>9</sup> Ealing,<sup>10</sup> Enfield,<sup>11</sup> Harrow (recent Regulation 18) Southwark<sup>9</sup> and Wandsworth.<sup>12</sup>
- 5.2.9 The question of precisely what housing requirement / supply figures to reflect across the reasonable growth scenarios is returned to in Section 5.5, subsequent to consideration of capacity / supply issues and options (strategic, site-specific and sub-area specific). Box 5.1 considers employment land needs.

#### Box 5.1: Employment land needs

Beginning with **office floorspace**, the Employment Land Review (ELR, 2020) forecasts a need for an additional 30,500m<sup>2</sup> floorspace in the plan period, or 33,000m<sup>2</sup> if account is also taken of need for R&D space. The ELR explains that this “represents a potentially significant requirement for office space” but is a major departure from the 97,000m<sup>2</sup> figure within CLP 2018, which was “stretching” and assumed “very high growth”. The CLP 2018 figure was arrived at on the basis of assumptions regarding the distribution of demand for office space across South London that are no longer supported, including on the basis of evidence relating to planning consents for major office schemes not being implemented. The general trend over recent years (para 7.5 of the ELR) has been one of limited new office development (*“three significant deliveries of high-quality stock over the last decade which includes the Council headquarters”*). However, the ELR (2020) also suggests a more recent trend of lack of supply leading to decreasing rates of vacancy, plus there is increasing demand for grade B / affordable office space; however, on the other hand, there is also a need to consider trends since 2020 (discussed below).

The ELR also discusses the spatial distribution of demand for office floorspace, ultimately concluding that the 33,000m<sup>2</sup> could be delivered entirely within Croydon Metropolitan Centre, which is a departure from CLP 2018, which supports 7,000m<sup>2</sup> at district centres. The ELR goes on to discuss the importance of retaining the existing Office Retention Area surrounding East Croydon Station, and also taking steps to stimulate office development.

With regards to **industrial land**, the first point to note is that the Borough has existing strengths and a strategic role to play in respect of B8 warehousing, with meeting warehousing need as *“the most challenging issue for Croydon Council.”* The need figure of 78,000m<sup>2</sup> is a minimum, and translates as need for 12-21 ha of land. Meeting this need – through new sites and/or intensification of existing sites – is clearly highly challenging.

With regards to light industrial land, the situation is “complex”. Whilst Croydon not a major location for manufacturing, light industrial units (particularly smaller) are seeing high demand across a wide range of sectors associated with *“higher value, good quality jobs, and which are essential to London’s economy.”* On balance, the ELR recommends continuation of the existing ‘no net loss’ approach, as part of which redevelopment (potentially mixed use) to secure an intensification of employment space will be important.

With regards to retaining and intensifying industrial land, a challenge relates to the dispersal of sites across the Borough (in contrast to office space). The ELR supports the current four tiers of designation and explains the importance of the Council intervening in support of successful intensification (e.g. “case study locations”).

<sup>8</sup> Specifically, SHLAA capacity for the 12 year period from 2029 to 2041 is set out on [page 193](#) (see phases 4 and 5).

<sup>9</sup> Discussed recently in the Lewisham Housing Targets [Topic Paper](#).

<sup>10</sup> Policy SP4.3 of the Draft Local Plan (2024) explains that the annualised London Plan target to 2029 “also forms an annual target of 2157 units for the rest of the Local Plan period.” The alternative SHLAA based figure is thought to be ~724 dpa.

<sup>11</sup> An officers report to Full Council (6<sup>th</sup> March 2024) explains: *“As the London Plan evidence would see a significant drop off in urban capacity beyond this, the ELP... proposes to exceed the urban capacity derived housing figures for the period post 2029, to better meet local needs for more family housing and more affordable homes.”*

<sup>12</sup> The Inspector’s Report explains: *“The plan period extends beyond the 10-year housing requirement set out by the London Plan and the [plan] carries forwards the housing requirement... to establish a housing requirement for the 15-year Plan period of 20,313 new homes. Notwithstanding this... completions... [will likely be]... 26,315 new homes.”*

## Broad distribution

5.2.10 This is the second of two sections exploring 'strategic factors' with a bearing on the definition of reasonable alternative growth scenarios. This section gives high level consideration to the following questions:

- Broadly **where** in the Borough might there be opportunities to boost housing supply?
- What changes might be made to policy on **how** sites are developed in order to boost housing supply?

### Why focus on options for 'boosting housing supply'?

5.2.11 As discussed, whilst the London Plan supports a capacity-led approach to setting the housing requirement for the period post 2029, it clearly remains the case that understanding of housing needs cannot be discounted entirely, i.e. must factor-in when defining reasonable growth scenarios. This was the case at the time of preparing CLP 2018, and it remains the case now.

5.2.12 With regards to CLP 2018, the plan document explains that housing need for the plan period is ~44,000 homes, but the housing requirement is set at ~33,000 homes due to limited capacity, and this decision was made in light of work to explore higher growth scenarios through the SA process.

5.2.13 With regards to the situation now, the simple fact is that housing need over the plan period is potentially in excess of 2,079 dpa figure that is the target set by the London period to 2029. For example, the Government's standard method for calculating housing need suggests a need for 3,929 dpa and, whilst the Croydon Strategic Housing Market Assessment (SHMA, 2023) does not support this figure, other boroughs do give weight to the standard method, e.g. the current draft Enfield Local Plan explains: "... by the end of the plan period, there will... be an estimated shortfall of approximately 38,000 homes in the Borough when compared against the locally assessed [standard method] housing need."

5.2.14 Affordable housing need is a further consideration, with the SHMA (2023) finding: "*There is a need for 1,817 low-cost rental homes per annum, falling to 1,243... when households already in low-cost accommodation are excluded. In terms of intermediate housing... up to 1,028 [per annum].*"

5.2.15 A final consideration is the Government's current (March 2023) consultation on "Strengthening planning policy for brownfield development", which proposes "*a change to national planning policy that would expect local planning authorities to give significant weight to the benefits of delivering as many homes as possible, and to be flexible in applying policies or guidance on the internal layout of developments especially for proposals on brownfield land.*" However, it is difficult to see that this has significant implications for Croydon, which has been delivering housing at a good rate relative to other London Boroughs (see 2022 [HDT](#)) and is one of the most affordable boroughs (see 2022 [affordability ratio](#)).

5.2.16 In this light, there is a need to explore growth scenarios that '**maximise housing supply**' within reason.

5.2.17 Also, there is a need to recognise that there is an emerging preferred approach to supply (i.e. a preferred strategy, preferred allocations etc) following publication of a version of the plan in 2022 and subsequent decision-making (including removing intensification areas) and evidence-gathering etc.

5.2.18 As such, the focus of the discussion below is on exploring options that would '**boost housing supply**' relative to the emerging preferred (or 'proposed') approach. Such options will have drawbacks, but they warrant due consideration. It is the aim of this current sub-section (Section 5.2) to start the discussion.

5.2.19 Finally, it should be noted that discussion below (within the remainder of Section 5) is not blind to the possibility of targeted lower growth, i.e. reduced supply from certain of the proposed supply components. However, it is reasonable for the focus to be particularly on options for boosting supply.

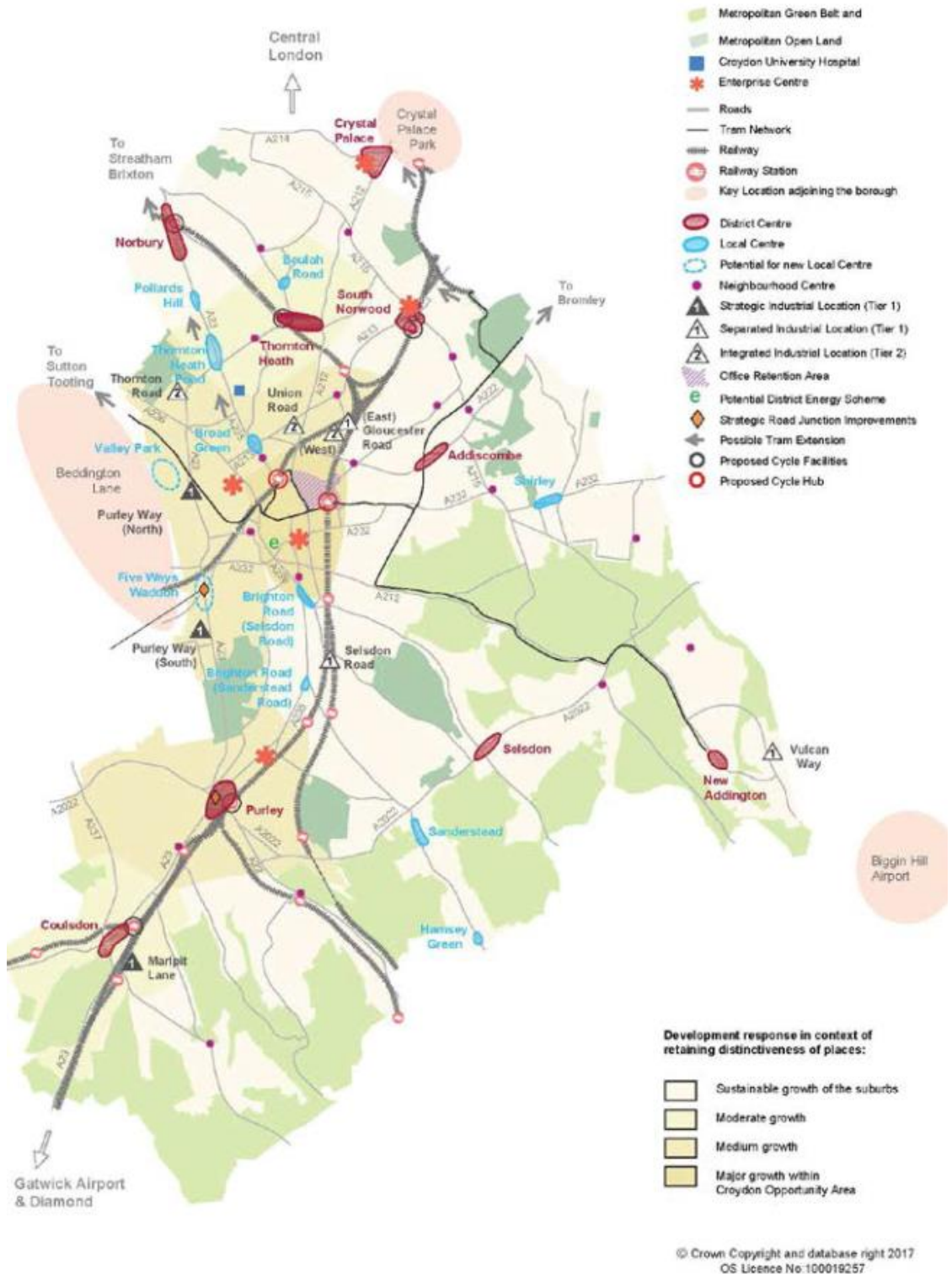
### Broadly where in the Borough might there be opportunities to boost housing supply?

- 5.2.20 A clear starting point is the approach taken by the **CLP 2018**. The broad spatial approach to growth supported through CLP 2018 is summarised in Figure 2.1 (above) and Figure 5.2 (below).
- 5.2.21 The first point to note is a clear focus on the **Croydon Opportunity Area** (including Croydon Metropolitan Centre, CMC). An Opportunity Area Planning Framework (OAPF) was adopted in 2013, and work has been ongoing since that time to deliver on its aims and objectives. The CLP 2018 then allocated sites for at least 10,760 homes over the period 2016 to 2036, and this was then followed by the Partial Review Issues and Options consultation document, which assumed supply of 8,990 -10,440 homes over the period 2019 to 2039. The 2022 Publication version of the Partial Review then provided for 14,500 homes over the same period, and the latest proposal is to provide for this same figure to 2040.
- 5.2.22 Attention focuses on two transformation areas:
- **Brighton Main Line and East Croydon** – East Croydon station area has been a focus for development since the Masterplan of 2011. The Issues and Options consultation document (2019) then identified a major opportunity associated with upgrade works along the Brighton Mainline, and Network Rail subsequently [consulted](#) on a proposal to “*unblock the Croydon bottleneck to provide Brighton Main Line passengers with [better] services, and to provide [capacity] for future growth*”. As part of this, East Croydon station could be moved to a new location, along with significant new enabling housing.
- The 2022 version of the Partial Review then designated a Transformation Corridor, to include 1,340 homes, but the SA Report (2022) also considered a scenario involving 1,490 homes. The situation has since evolved, with scheme funding and, in turn, deliverability much less certain.
- **North End Quarter** – this second proposed transformation area was presented for the first time at the 2022 publication stage. The area comprises Croydon’s retail core, including the main pedestrianised shopping street (North End) and two shopping centres. The goal is for the Quarter to 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.
- The proposal in 2022 was to deliver 680 homes, but the SA Report (2022) also considered a scenario involving 1,080 homes. The situation has since evolved, with new masterplanning work underway, to include an added emphasis on homes. Matters are considered further in Section 5.4.
- 5.2.23 Also, within the Croydon OA there is a need to note recent work on **building heights**, through the Tall Buildings Study (2024). This is discussed further below and is a key update to the evidence since 2022.
- 5.2.24 The second point to note from Figure 5.2 is **Purley Way Transformation Area**. Building on CLP 2018, the Issues and Options consultation document (2019) identified the Purley Way corridor as a potential location for transformational change, with major residential and mixed use development alongside intensification of existing uses within strategic industrial areas, transport infrastructure upgrades and improvements to the public realm and green infrastructure. Purley Way was one of the variables across the ‘Strategic Options’ that were a focus of the consultation document and its accompanying Interim SA Report (2019), with the approach to growth ranging between 2,900 homes and 12,000 homes over the plan period. Detailed work was subsequently undertaken to explore how to bring the area forward, including preparation of a draft [masterplan](#) that was then published in early 2021. Subsequently, at the time of the 2022 publication stage, the view was that the transformation area could deliver ~7,500 homes, and there was not considered to be any reasonable higher growth scenario, largely due to public transport accessibility. Most recently, understanding is that a major site (IKEA) is now unavailable, such that the emerging proposed approach involves notably fewer homes. See further discussion in Section 5.4.
- 5.2.25 Thirdly, from Figure 5.2, there is a need to consider the **Green Belt**. Release of Green Belt for new homes, including family homes, was considered to be a reasonable option to explore at the Issues and Options stage (Strategic Option 3), and the appraisal presented within the Interim SA Report did highlight this option as having merit in several respects. However, the option of Green Belt release was then found to have low levels of support through the consultation. Subsequently, the London Plan was adopted in 2021 with a housing target for the Borough significantly below that which informed preparation of the Issues and Options consultation document. In turn, the 2022 publication version of the Partial Review proposed nil homes via Green Belt release. However, a scenario involving 2,500 homes from Green Belt release was appraised within the SA Report (2022).



5.2.26 At the current time, it does remain 'reasonable' to explore the possibility of Green Belt release, including given non-Green Belt supply issues that have arisen since 2022, including Purley Way. There is a high bar set nationally in order to justify Green Belt release ('exceptional circumstances'), and the GLA tends to strongly oppose Green Belt release; however, the representation received from the GLA in 2022 did not comment on the reasonableness or otherwise of Green Belt release. Box 5.2 presents further discussion.

Figure 5.2: CLP 2018 housing distribution summary and key diagram



**Box 5.2: Green Belt release through a Local Plan – recent precedents from other London Boroughs**

Enfield is perhaps the primary example of a Borough for which the emerging Local Plan is giving close consideration to significant Green Belt release for housing. The Draft Local Plan published under Regulation 18 in 2021 proposed significant release, and the GLA [responded](#) as follows:

*“[Green Belt release] risks undermining brownfield delivery and viability... It is important to note that the London Plan is clear... that it does not meet all of London’s identified development needs and that further work will be required to explore the potential options for meeting this need sustainably in London and beyond. However, this is a matter for a future London Plan... In light of this... the intention to release Green Belt land is premature.”*

The most recent situation is that work is yet to begin on a review of the London Plan, and Enfield is now consulting on a plan that includes significant Green Belt release. Specifically, as discussed [here](#), the proposal is to deliver ~13% of the housing requirement via a strategic Green Belt urban extension and a new settlement. However, this is in the context of a proposed high ambition approach to housing growth locally, with the new version of the plan proposing 35,000 homes in contrast the previous version which proposed 25,000.

Havering is also of note, as the most recent adopted Local Plan within London to include Green Belt release. However, the Green Belt release is specifically to provide for the accommodation needs of Gypsies and Travellers. With regards to Green Belt release for housing, the paragraph 49 of the Inspector’s Report explains:

*“Having regard to... policy for the protection of the Green Belt and the fact that the Plan can demonstrate a 10-year housing supply [N.B. the plan period is 15 years], I am not satisfied that the current lack of a 5 year housing land supply provides the exceptional circumstances necessary to alter the boundaries of the Green Belt...”*

The Barking and Dagenham Inspector also recently (January 2024) reached a similar conclusion, requesting that two small Green Belt housing sites be deleted because exceptional circumstances cannot be demonstrated, including given that the established housing requirement can be provided for without Green Belt release.

- 5.2.27 Finally, from Figure 5.2, there is a need to introduce the scope of supply options from the remaining part of the Borough, i.e. the urban area outside of the Croydon OA. The approach to growth in CLP 2018 is a reflection of both site allocations and support for windfall. Specifically, CLP 2018 allocated sites to deliver 6,970 homes and identified the potential for / an expectation of 10,060 homes at windfall sites.
- 5.2.28 With regards to **site allocations**, all options are discussed below, particularly with a view to identifying those where there could be the potential to boost supply, e.g. via a higher density.
- 5.2.29 Focusing on **windfall** – i.e. supply from sites other than allocations and broad areas specifically identified in the plan (in line with NPPF paragraph 69) – it is important to explain that there are broadly two approaches that can be taken. First is the approach of simply projecting forward past trends, potentially with adjustments made on the basis of safe assumptions (e.g. reducing rates of office to residential conversion). Second, there is the potential to ‘intervene’ through policy with a view to boosting windfall supply (and, in turn, reducing the pressure on supply from allocations). The latter approach is taken through CLP 2018 (see Table 2.1, above) and further policy aimed at boosting windfall was presented in the version of the Partial Review published in early 2022. However, there is now an established need to review the approach to supporting / boosting windfall through policy. Further background is as follows:
- CLP 2018 – provides for around 30% of supply from windfall, specifically **10,060 homes** over 20 years. In support of this ambitious approach, the plan includes a degree of spatial targeting at the Croydon Opportunity Area (Policy DM36.2), four focussed areas of intensification (DM10.11) and two new Local Centres and their environs (DM36.2 and 49.1). Elsewhere there is a blanket expectation of “sustainable growth of the suburbs” which, in practice, might involve either ‘evolution without significant change’ or ‘guided intensification’, according to work through planning applications.
  - Issues and Options (2019) – the consultation document proposed a significant change of tack, in response to: A) the major focus on small sites windfall / suburban intensification set out within the Draft London Plan (2017);<sup>13</sup> and B) new evidence available through the Suburban Design Guide SPD (2019) which presented evidence in support of an ambitious approach to suburban intensification; and C) further new evidence presented within a “Windfall or Small Sites Evidence Base” study (2019).

<sup>13</sup> Whilst the final version of the London Plan (2021) sets a small sites (i.e. windfall) target for the Borough of 641 dpa, the Draft London Plan, which informed work at the Issues and Options stage, required 1,511 dpa from small sites. LB Croydon notably submitted the following statement to the Draft London Plan examination in 2019: “Applying the circa 15,000 homes from windfall sites equally across the... Places of Croydon... and... assuming that this will need to be met from semi-detached and detached units... this analysis suggests that nearly 27% of the boroughs existing semi-detached and detached stock would need to be demolished and redeveloped. This is far from suburban evolution and at the heart of the Council’s concerns.”

The proposed approach was to set each of Croydon’s 16 Places a housing target taking into account how suitable it is for small sites windfall, which in turn was determined according to: A) urban character, which is understood on the basis of the Borough Character Appraisal (2015); and B) accessibility to a town/district centre, train and/or tram stop. Further context was London Plan Policy H1 (Increasing housing supply), which supports directing growth to “sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre”.

Two scenarios were then identified for each place, involving lower/higher growth through windfall, with the net effect that the total supply from windfall varied from **9,660 - 18,950 homes** over 20 years.

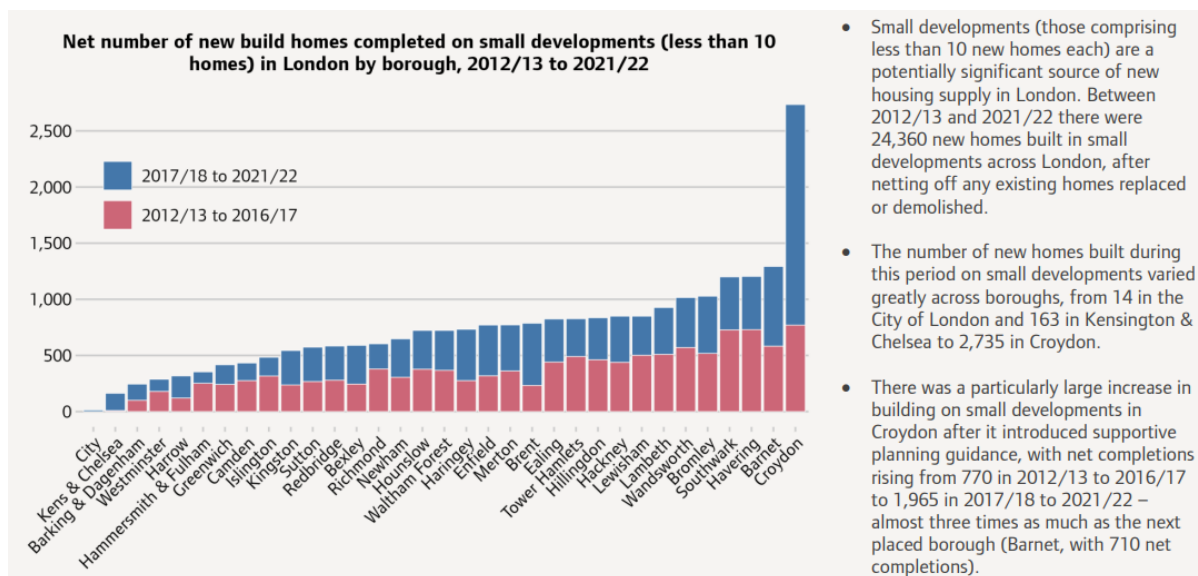
- 2022 publication stage – the version of the Partial Review published in 2022 proposed **10,900 homes** from windfall over 20 years, calculated simply as the London Plan small sites target (641 homes per annum) over the final 17 years of the plan period (to avoid double counting with planning permissions). In support of this approach, the key diagram presented a number of areas of ‘focused intensification’ and ‘moderate intensification’. Also, the SA Report presented an appraisal of a growth scenario involving boosting housing supply from small sites windfall / suburban intensification (relative to the preferred option), in order to reduce the gap to housing needs. Specifically, the assumption was **13,000 homes**.
- At the current time – the Suburban Design Guide SPD has been revoked and there is a political commitment to removing the previously identified areas of intensification. This reflects a view that the rates of small sites development / suburban intensification have been too high in some areas.

The emerging preferred approach is as follows:

- Year 3 and 4 – project forward average rate since 2016 = 1,051 dpa.
- Remaining years – reflect the London Plan’s small sites target for the Borough = 641 dpa
- Total = **9,794 homes** windfall assumption.

5.2.30 The figure below shows the significance of small sites development in Croydon. However, note that it deals only with sites of less than 10 homes (net) whilst the definition of small sites underpinning the numbers set out above (in line with London Plan Policy H4) is below 0.25 ha in size. It is also important to make the point here that small sites development is very important for supporting SME builders.

**Figure 5.3: Recent supply of homes from small sites (Source: Housing in London, GLA October 2023)**



**What ‘policy’ options might be considered with a view to boosting housing supply?**

5.2.31 As discussed, in addition to considering *where* in the Borough there could be the potential to boost housing supply (Croydon OA, Purley Way, the wider urban area, the Green Belt) there is also a need to consider adjustments that might be made to policy on *how* development comes forward in order to boost supply. There are clear cross-overs between questions of ‘where’ and ‘how’, but ‘how’ considerations include:

- **Tall buildings** – the emerging proposed approach has evolved considerably since 2023, informed by a Tall Buildings Study (2024) in line with London Plan Policy D9. The study sets out its aims as follows: “*The report puts forward evidence-based conclusions relating to the definition of tall buildings in Croydon, locations where tall buildings might be appropriate and suitable height ranges within these locations.*” The study considers the context, including existing policy on Tall Buildings in CLP 2018 (Figure 5.4), before running GIS analysis and then presenting analysis for 15 broad areas, concluding that nine are potentially suitable for tall buildings (Figure 5.5). Comparing Figures 5.4 and 5.5, it can be seen that there is strong alignment (Coulsdon and Norbury are flagged only by the new analysis).

Another factor is the new NPPF published in December 2023, which does include new wording on tall buildings at para 130: “... significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code...”

Building heights are clearly a key consideration when exploring options for boosting housing in the Croydon and wider London context. However, it is inherently difficult to define realistic policy options for boosting housing supply. This is because tall building proposals must be determined through the planning application process, i.e. when detailed consideration can be given to scheme proposals.

- **Offices** – since the time of the ELR (2020) there are early indicators that demand for office space in Croydon Metropolitan Centre (CMC) has reduced, noting: low and declining rents; falling occupied office floorspace; weak leasing activity; and continued subdued demand across London and nationally. There is also a strong supply of existing available and consented office space. In particular, there is potentially an ongoing shift away from demand for large office stock towards smaller scale and potentially higher quality office space, including flexible workspaces. Another issue is the challenge associated with retrofitting B grade office space to meet increasingly stringent Energy Performance Certification (EPC) requirements. Matters are discussed further below, in Section 5.4, with a particular focus on East Croydon Station and New Town, which is overwhelmingly the focus of office space in the Borough.

In this light, the possibility of a policy shift to support residential or mixed use redevelopment leading to a loss of office space might be considered (also noting that redevelopment of large office buildings can help to deliver smaller, affordable, flexible space for start-ups and SMEs). Amongst other things, revisiting the Office Retention Area (ORA) designation surrounding East Croydon Station could potentially be an option. However, the ELR (2020) strongly supports the current distribution of offices:

“The contribution that substantial numbers of office-based workers make to the strength of town centre retail, leisure and service provision is widely recognised. Trends in large scale office development and take-up over the last decade have seen preferences for rail linked locations in urban areas with good access to such facilities (as opposed to emphasis on out-of-town business park or campus models during the previous decade). In essence, accommodating new office employment in the CMC continues to have a rationale rooted in regeneration and sustainability.”

On balance, it is difficult to envisage a reasonable *broad* policy option for boosting housing supply via targeted reduced support for offices, but area and site-specific options are discussed in Section 5.4.

- **Industrial land** – CLP 2018 applies a four tier approach to the designation of industrial locations, and there is limited or no strategic case to be made for amending this approach, as discussed above. The Employment Land Review (ELR, 2020) supports the current approach to designation because there is:
  - A good mix, from very small scale and affordable light industrial and storage space to a small number of businesses operating out of large scale, modern and higher value industrial premises.
  - A healthy distribution across the Borough, e.g. with 46% of B1c/B2 employment in Croydon, 24% in district centres (10% in Purley) and 30% elsewhere in the Borough.
  - Forecast growth in sectors likely to generate continued demand for a wide range of property types and locations, particularly larger scale logistics and distribution facilities, but also premises for SMEs.
  - Evidence from preparing the Purley Way Masterplan that points to the vital role the area plays in accommodating micro and small businesses within a range industrial premises.

These considerations point to limited strategic choice, in respect of potentially compromising on industrial land objectives in order to boost housing supply. There is a need to explore opportunities for mixed use redevelopment of industrial sites, but this must typically be with a view to providing and intensifying the existing industrial uses, such that there is an overall no-net loss borough-wide. Mixed use intensification of industrial sites is clearly challenging, and a precautionary approach is required.

A further consideration is the letter sent from the Secretary of State for Levelling-up, housing and communities to the Mayor London on 18<sup>th</sup> March 2024. The letter explains:

“Keeping our capital running of course requires the right industrial land in the right places... and some of these activities need to take place within London. Stakeholders have, however, told us that your policies on designation are too inflexible, which in effect is discouraging developers from bringing forward other measures such as industrial intensification, co-location and substitution – all of which could enable additional residential development without compromising the capital’s industrial needs. To illustrate, every 1% of SIL/LSIS land released for housing could have a capacity for 5,000 new homes...”

Ultimately, strategic planning for industrial land is a consideration for the Purley Way area (discussed in Section 5.4) and also a site-specific consideration elsewhere, but it is not clear that there is any broad strategic policy option that might be considered, with a view to potentially boosting housing supply.

- **Other land uses** – firstly, it is important to note that there is extensive out-of-town retail space within Purley Way, which is a matter for further consideration below (Section 5.4). Another point to note is the public sector land estate, including school sites and the NHS estate, with sites under ongoing scrutiny to ensure optimal use. However, there are no clear policy options to explore through the Partial Review.

More generally, there is a clear need to balance a mix of uses within areas, sites and individual buildings, and this is a consideration that extends beyond balancing homes and employment land. Other key land uses include retail, community infrastructure and open space / public realm. However, there is no clear strategic choice for the Partial Review, with a view to potentially boosting housing supply.

- **District Centres** – there are nine district centres, namely: Addiscombe; Coulsdon; Crystal Palace; New Addington; Norbury; Purley; Selsdon; South Norwood; Thornton Heath. Any district centre must come into contention as a possible location for boosting housing supply given strong accessibility and transport credentials, and there can also be the potential for growth to support regeneration objectives. There is considerable variability across the Borough’s district centres in both respects, but none stand-out as being associated with a clear opportunity for boosting housing supply (over and above the emerging preferred approach, including as set out in the plan published in 2022). There is also the question of local and neighbourhood centres (N.B. all three designations are shown on the Local Plan Policy Map), recognising issues with reducing footfall. This is a matter that warrants ongoing scrutiny, but it is difficult to envisage a strategic option with significant implications for boosting housing supply.
- **Housing mix** – there is a clear need for a mix of housing types with a view to supporting mixed, inclusive and multi-generational communities. Whilst increased support for smaller homes is theoretically a way of boosting the number of homes delivered, in practice a good mix of homes, to include family homes, is essential. Focusing on market homes only, the latest evidence from the Strategic Housing Market Assessment (SHMA, 2023) shows a need for 62% of new homes to be 3 or 4 bedroom homes, and for only 9% to be one bedroom homes. Equally, whilst relaxing requirements around affordable housing delivery could theoretically serve to boost overall housing delivery, in practice the delivery of affordable homes is a clear local priority. Affordable housing is discussed further below.

Another consideration, and potentially a policy choice with a bearing on total housing supply, is around support for build-to-rent residential schemes, recognising that these are an increasingly popular housing product for developers. Such schemes can be an effective means of improving the quality of the overall rented stock; however, there is a need to avoid an over-proliferation. The turnover of occupiers of private rented housing tends to be rapid, so localised concentrations can impact community cohesion. Also, there are implications for securing affordable housing / affordable housing contributions.

- **Estate renewal** – the Borough contains a number of publicly owned housing estates which make an important contribution to meeting local housing need. A number of these housing estates were developed in the early to mid-20th Century and have been constructed using design and construction principals of different eras. While some assets perform their function well, and will continue to do so, some are starting to come to the end of their lifespan and have a range of issues that need addressing.

There is a particular issue with 1960s Large Panel System (LPS) tower blocks. In late 2022 the Council considered a desktop assessment of the costs of refurbishing or redeveloping the LPS tower blocks on the Regina Road Estate. It was recommended that the site was not economical to refurbish, and as such redevelopment would be more appropriate. A ballot of residents on the site subsequently confirmed local support for the redevelopment of the estate, and the redevelopment is expected to come forward in the plan period. There are other LPS estates in the Borough, and it is likely that further estates will face similar decisions over their future over the plan period. However, this is not a choice to be made at the current time, as part preparing the Partial Review. Estate Renewal must be sensitivity managed.

Figure 5.4: Summary of CLP 2018 approach to targeting tall buildings (from the TBS, 2024)

Place-specific development management policy	Policy ref	Appropriate for tall building?
1. New Addington District Centre	DM34.1	YES up to 12 storeys
2. Addiscombe District Centre	DM35.1	NO
3. Area between Addiscombe Railway Park & Lower Addiscombe Road (section between Leslie Park Road & Grant Road)	DM35.2	NO
4. Broad Green Local Centre	DM36.1	NO
5. Potential new Local Centre at Valley Park	DM36.2	YES subject to masterplans
6. Area of the Lombard Roundabout	DM36.3	NO
7. Area north of Broad Green Local Centre	DM36.4	YES up to 8 storeys
8. Area of the junction of Windmill Road and Whitehorse Road	DM36.5	NO
9. Croydon Opportunity Area (all)	DM38.1	YES subject to masterplans
10. Croydon Opportunity Area (New Town and the Retail Core)	DM38.2	YES
11. Croydon Opportunity Area (Central area)	DM38.3	YES
12. Croydon Opportunity Area (Edge area)	DM38.4	YES on its merits
13. Croydon Opportunity Area (London Road area)	DM38.5	NO
14. Croydon Opportunity Area (area along Sydenham and Lansdowne Road)	DM38.6	NO
15. Norbury District Centre	DM41.1	NO
16. Pollards Hill Local Centre	DM41.2	NO
17. Purley District Centre and its environs	DM42.1	YES up to 16 storeys
18. Environs of Reedham station	DM42.2	NO
19. Area of the junction of Brighton Road and Purley Downs Road	DM42.3	NO
20. Sanderstead Local Centre	DM43.1	NO
21. Hamsey Green Local Centre	DM43.2	NO
22. Selsdon District Centre	DM44.1	NO
23. Shirley Local Centre	DM45.1	NO
24. Area between 518 and 568 Wickham Road	DM45.2	NO
25. Area of the Wickham Road Shopping Parade	DM45.3	NO
26. Brighton Road (Selsdon Road) Local Centre	DM46.1	NO
27. Section of Portland Road between the South Norwood Conservation Area and Watcombe Road	DM47.1	NO
28. Section of Portland Road between Watcombe Road and Woodside Avenue	DM47.2	NO
29. Thornton Heath District Centre and environs	DM48.1	YES up to 9 storeys
30. Thornton Heath Pond Local Centre and environs	DM48.2	NO
31. Waddon's potential new Local Centre	DM49.1	NO

Figure 5.5: Summary findings of the Tall Buildings Study (Allies and Morrison, 2024)

	Potentially appropriate location	Threshold above which buildings will be considered tall			Appropriate height range for taller buildings		
		Outer	Inner	Core	Outer	Inner	Core
Croydon Town Centre	Y	21 m*	33 m	33 m	21 m - 48 m	33 m - 93 m	33 m - 138 m
Addiscombe	N						
Brighton Main Line Transformation Area	N						
Broad Green / London Road	Y		21 m*			21 m - 33 m	
Coulsdon	Y		21 m*			21 m - 33 m	
New Addington	Y		21 m*			21 m - 33 m	
Norbury	Y		21 m*			21 m - 33 m	
Crystal Palace	N						
Purley Way Transformation Area	Y * 3		21 m*			21 m - 33 m	
Purley	Y		21 m*			21 m - 39 m	
Selsdon	N						
South Norwood	N						
Thornton Heath	Y		21 m*			21 m - 39 m	
Regina Road	Y		21 m*			21 m - 39 m	
Thornton Heath Pond	N						
All non-appropriate locations	N		21 m*			N/A	

\* London Plan default definition of tall which is 6 storeys or 21 metres measured from the ground to the top of the building (Growth and Characterization LPG)

## Conclusion on strategic factors

- 5.2.32 This section has considered strategic ('top down') factors with a bearing on the definition of reasonable alternative growth scenarios.
- 5.2.33 The first sub-section considers the question of broadly how many homes the Local Plan Review should be aiming to provide for, via the housing requirement, subject to detailed consideration of supply / capacity options. This essentially amounts to a question of '**housing targets**'.
- 5.2.34 Whilst there is a clear top down target for the early years of the plan period (to 2029), namely the target of 2,079 homes per annum provided by the London Plan, there is no equivalent top down target for the latter years of the plan period (to 2040). This is a key issue, given that the plan period runs to 2040 (also given that work is yet to begin on a review of the London Plan, which will provide the Borough with a new target for the years post 2029). One option is to use the London Plan target of 2,079 homes per annum for the entire plan period, but there is also a need to be mindful of housing need, which may be higher (also recalling that the London Plan does not provide for needs in full to 2029). However, it is undoubtedly the case that providing for the London Plan target figure of 2,079 homes per annum across the entire plan period is highly challenging, let alone a higher figure. This serves to highlight a need for close scrutiny of capacity and supply options, including strategic, area-specific and site-specific options. The question of housing requirement / supply figures to reflect across the reasonable alternative growth scenarios is returned to in Section 5.5, subsequent to further work to consider capacity / supply options.
- 5.2.35 The second sub-section then asks the question: **Broadly what options exist to boost supply?** There is an emerging proposed approach to supply that broadly aligns with that published in early 2022, adjusted to account for certain key changes to the plan-making context, latest evidence and understanding in respect of specific sites. However, there is also a need to consider ways of *boosting supply*, over-and-above the emerging proposed approach, in order to close the gap to stretching housing target figures.
- 5.2.36 Attention focuses on at least one of the identified **Transformation Areas**, plus there is a clear need to give proportionate consideration to **Green Belt** release options. On balance, there is also an ongoing need to give proportionate scrutiny to the option of support for **windfall / suburban intensification** where local character and constraints allow, and particularly areas with strong accessibility / transport credentials. However, it is recognised that this is debateable, as the Suburban Design Guide SPD has been revoked (such that there is a reduced potential for supply from suburban intensification to be achieved in a way that aligns with design objectives) and the new plan cannot go as far as identifying intensification areas.
- 5.2.37 These are the three broad choices / variables that emerge from the discussion above as warranting further consideration below. The next port of call is the matter of **tall buildings**, but this is a very spatially-specific (and even site-specific) consideration, such that it is not possible to envisage any broad policy option involving boosting housing supply via increased support for tall buildings. It is also important to be clear that the Tall Building Zones identified by the Tall Building Study (2023) only impact on identified supply in so far as they have an influence on identified/assumed capacity at proposed allocations, all of which are considered in turn below, in Sections 5.3 and 5.4. No supply is assumed from other land that falls within the Tall Building Zones, because the component sites are not currently available.
- 5.2.38 After tall buildings, the next port of call is the possibility of boosting housing supply by adjusting the policy position in respect of **offices**, but again no clear policy option can be envisaged. Attention focuses on the Office Retention Area in particular, which is also a key location for consideration of tall buildings.
- 5.2.39 There are also numerous **other 'policy levers'** that could potentially be pulled in order to boost housing supply, but each would likely have a fairly modest impact in isolation, and there is a need to ensure that this current process of defining growth scenarios remains focused and manageable. All policy areas can be considered further in Part 2 of this report.
- 5.2.40 Strategic factors are considered further in Section 5.4 of this report, in context of specific sub-areas and broad supply components. The discussion in Section 5.4 must also be informed by bottom up understanding of the sites that area available and in contention for allocation – see Section 5.3.

## 5.3 Site options

5.3.1 The aim of this section is to introduce the emerging proposed allocations – and the emerging proposed housing capacity figure for each – with a view to **flagging options for boosting housing supply**. This is a ‘bottom up’ input to the overall process of defining reasonable growth scenarios (see Figure 5.1).

5.3.2 The emerging proposed approach has been developed over the course of several years, including in light of the consultation held in early 2022 and the SA Report published at that time. Key points to note are:

- **Omission sites** – within the urban area there is limited need to focus attention on site options that have been identified and considered by the Council but are ultimately not proposed for allocation, i.e. ‘omission sites’. This is because such sites are typically ‘omitted’ for clear cut reasons, as opposed to on the basis of a decision reached on balance, which might helpfully be scrutinised through appraisal and consultation (quite different to the typical situation when dealing with non-urban allocation options).

Specifically, the reasons for omitting sites typically relate to availability, or perhaps technical achievability, in contrast to factors relating to suitability for development. Some sites are omitted accounting for factors relating to suitability, and a key aim of this section is to flag these sites; however, again it is the case that suitability factors leading to the omission of sites tend to be quite clear cut, such that there is relatively limited value to be gained by exploring in detail the option of allocating the site in question.

The discussion above relates to omission sites within the urban area; however, there are also a number of omission sites within the **Green Belt**. These are sites that are available and achievable, but not supported by the Council in light of suitability factors that can be questioned (in light of the discussion presented in Section 5.2). As such, omission sites within the Green Belt must be considered in detail.

- **Site capacity** (focusing on homes, but also recalling the need to provide for other uses / floorspace) – the figures arrived at by the Council are the outcome of detailed work over a considerable period of time, including: work by design specialists; formal consultation; and engagement with site promoters and other interested parties. Many proposed allocations feature within CLP 2018 and have a planning history that stretches back even further, such that they have been the subject of repeated and ongoing scrutiny over many years, including through the Issues and Options consultation (2019) and at the 2022 publication stage. Since 2022 a range of adjustments have been made to site capacities and for a range of reasons, including as a result of detailed design work involving application of a new ‘cookie-cutter’ methodology, whereby exemplar delivered schemes are overlaid on site allocations. The net effect was a loss of over 1,500 homes supply over around 20 sites.

In this light, there is overall limited potential to question the Council’s emerging capacity figures for proposed allocations. However, it is nonetheless helpful to examine each site in turn, including with the aim of flagging types / categories / clusters of sites that are potentially associated with a strategic choice.

- **Deliverability** – a third key factor is the assumed timescale for delivery, recalling the importance of a smooth housing trajectory, i.e. avoiding dips in housing supply at any point in the plan period. Delivery timescales are typically inherently uncertain, particularly for urban sites, and so there is a need to apply broad rules of thumb. In this light, the aim here is to flag potentially anomalous delivery assumptions.
- **Marginal sites** – for some site options the proposed approach has been more-or-less consistent over time, which is an indication that there is relatively little to be gained from exploring options that would see a boost to housing supply. However, for other sites, the emerging proposed approach has changed significantly over the years, which is an indication that the proposed approach may be marginal and, in turn, might warrant scrutiny through appraisal and consultation.
- **Keeping up-to-date** – an inherent challenge is that, despite best endeavours to engage closely and on an ongoing basis, landowners can submit proposals planning applications for sites previously thought to be unavailable, or applications can be submitted for schemes on allocated / emerging allocation sites that differ significantly to that assumed within the allocation / emerging allocation.

By way of an example, a key site at New Addington has long been expected to deliver significant new homes, but in February 2024 the NHS, as landowner, submitted a planning application for a new community facility (a diagnostics centre) without any associated new homes. This is an example of what makes work to define reasonable alternative growth scenarios (and local plan-making in general) inherently challenging in the urban context.



**Figure 5.6:** The aforementioned site at New Addington (ref. [24/00591/FUL](#))



5.3.3 In light of these introductory points, **Table 5.1** considers all emerging proposed allocations in turn as well as a number of omission sites. Points to note on the table are as follows:

- **Sub-areas** – sites are grouped by sub-area, and then each of the sub-areas is explored in greater detail in Section 5.4. As well as considering each of the defined Croydon Places in turn, efforts are made to group site options within the Croydon Opportunity Area. The aim is to identify sub-areas / site clusters where there could be a strategic case to be made for boosting housing supply.
- **Status** – all sites are placed into an initial status category, to guide the further consideration of options.
- **Proposed capacity and site area** – sites are also placed in order according to capacity, with it clearly being reasonable to focus attention on larger sites to some extent.
- **Omission sites** – the table highlights a total of 31 omission sites. Numerous other sites have been considered at some point across the plan-making process, but the aim is to show a tailored selection.

By way of context, a total of 55 sites that appeared in CLP 2018 are now shown as deleted within the current Partial Review, but few of these are 'omission sites'. Specifically, this is the case because many have now been completed, or it is the case that they are now known to be unavailable or unachievable.

- **Comments** – a primary aim is to flag evidence that potentially points to the possibility of boosting supply. This primarily comes in the form of evidence that a site has been considered for a higher capacity in the past (which primarily means within CLP 2018 and/or at the 2022 publication stage, although another consideration is the 2019 Issues and Options stage). However, many recent decisions to reduce capacity reflect the outcome of design work completed in 2023, which is difficult to question.

Also, a secondary aim is to highlight sites where there could be a particular element of delivery risk, i.e. a risk of the site not delivering according to the anticipated timetable and/or not delivering the number of homes anticipated. Overall, there is clear evidence of uncertainty regarding site deliverability, e.g.

- Site capacities and delivery timescales changing considerably over the years.
- Numerous sites being subject to no known developer interest.
- Several sites having been deleted in 2022 and now being re-proposed for allocation.

However, this is unsurprising and unavoidable in the context of urban local plans. The key point is that delivery uncertainty / risk must be managed by ensuring that there is an appropriate supply buffer, i.e. an identified supply that comfortably exceeds the housing requirement (over the plan period).

**Table 5.1: Site options place / sub-place**

Ref	Status	Homes	Area (ha)	Comments
<b>COA 1: Brighton Mainline and East Croydon Transformation Area</b>				
21	CLP allocation	209	0.4	Site cleared but delivery post 2034 (CLP 2018 says 2021). Adjacent to the station.
199	CLP allocation	107	1.8	Comprises a builders yard. Delivery post 2034. <b>CLP 2018 says 109-313 homes.</b> Less well-connected.
45	<b>Omission site</b>	0	2.8	The station itself. Previously proposed for nil homes but with the option of including homes discussed through SA.
<b>COA 2: North End Quarter</b>				
393	CLP allocation	1080	7.8	Proposed for 650 homes in 2022. This is a centrally important site, discussed in detail in Section 5.4.
New 4	New site (2023)	438	5.3	Adjacent to Site 393. Design work 2023 suggested 846.
220	CLP allocation	76	0.2	Latest policy proposal is: "... main town centre use ground floor use, with employment or educational use above."
<b>COA 3: Office Retention Area (east)</b>				
138	Permitted	445	0.8	Now complete or near complete.
50	Permitted	120	0.3	Under construction.
33	New site (2022)	76	0.1	Currently offices.
175	<b>Omission site</b>	-	0.7	CLP 2018 says 97-279 homes ("residential and/or offices"). Proposed for 195 homes in 2022. Currently offices.
<b>COA 4: Office Retention Area (west)</b>				
142	Permitted	794	0.5	Originally proposed for 419-441 homes.
218	CLP allocation	358	1.3	<b>Proposed for 418 homes in 2022.</b> 20 storey office building for conversion (architectural merit). Links to site 236.
234	CLP allocation	199	0.9	<b>Proposed for 342 homes in 2022.</b> CLP 2018 says 82-234. Currently includes 24 story offices.
186	Permitted	199	0.4	CLP 2018 says 41-141 homes (plus offices), then deleted in 2022. Recently <a href="#">permitted</a> for 199 homes with no offices.
172	Permitted	158	0.4	Delivery by 2029.
42	New site 2022	158	0.3	Currently comprises relatively modern offices.
493	CLP allocation	158	0.3	CLP 2018 says 44-125 homes. Currently offices.
236	CLP allocation	160	0.6	<b>CLP 2018 says 82-234 homes.</b> Offices. New emphasis on town centre uses and also conversion (architectural merit).
950	CLP allocation	135	0.7	<b>CLP 2018 says 125-255 homes.</b> Now proposed for retention/conversion (locally listed).
148	New site 2022	84	0.4	<b>Proposed for 266 homes in 2022.</b> Proposal was mixed use, but now resi only (to rear of Canterbury House only).
311	CLP allocation	76	0.2	New policy emphasis on town centre uses.
489	CLP allocation	49	0.2	2022 proposal for retention/conversion (locally listed) remains. New policy emphasis on town centre uses.
200	<b>Omission site</b>	-	0.4	CLP 2018 says 133-384 homes, and then the proposal in 2022 was for 66 homes. Car park has now been refurbished.
37	<b>Omission site</b>	-	0.2	New site in 2022 for 33 homes. A surface car park. Design work in 2023 suggests capacity for 33 homes.
<b>COA 5: West Croydon Station area</b>				
123	CLP allocation	271	0.6	Proposed for 291 homes in 2022. CLP 2018 says 40-88.

Ref	Status	Homes	Area (ha)	Comments
203	CLP allocation	109	1.9	<b>CLP 2018 says 79-455 homes.</b> Station area.
40	New site (2022)	76	0.3	Bus station.
184	CLP allocation	66	0.3	Close to the station.
<b>COA 6: Mid-Croydon</b>				
194	CLP allocation	820	1.8	<b>Proposed for 874 homes in 2022.</b> Large complex site.
242	CLP allocation	158	0.1	Deleted in 2022. Currently offices. Still no known developer interest but delivery by 2029. Design work 2023 suggests 62.
47	New site (2022)	18	0.1	Within conservation area.
231	<b>Omission site</b>	38	0.2	Now included within Site 194.
<b>COA 7: Fairfield</b>				
34	New site (2022)	352	1.6	<b>Proposed for 626 homes in 2022.</b> Support for conversion.
245	CLP allocation	133	0.2	CLP 2018 says 30-85 homes. Opposite station. Post 2034.
294	Permitted	93	0.1	Previously assumed for fewer homes.
192	CLP allocation	54	0.3	<b>Proposed for 66 homes in 2022.</b> CLP 2018 says 35-101.
182	<b>Omission site</b>	-	0.2	Proposed for 33 homes in 2022. Currently offices.
<b>COA 8: South east</b>				
New 3	New site (2023)	447	0.7	Currently a hotel with proposal for a mix of uses.
New 1	New site (2023)	364	0.3	Has planning permission. Currently offices.
5	New site (2022)	76	0.2	Currently offices.
<b>COA 9: South</b>				
190	Permitted	357	0.4	Currently clear / car parking.
32	Permitted	230	0.2	Deleted in 2022. Currently clear / car parking.
41	New site (2022)	224	0.3	Proposed for 158 homes 2022. Comprises offices.
952	New site (2022)	37	0.1	<b>Proposed for 121 homes in early 2024</b> (a scheme refused by the Council and at appeal). To deliver by 2027.
222	<b>Omission site</b>	-	0.6	Proposed for 158 homes in 2022. Multi-story car park.
<b>COA 10: West</b>				
374	CLP allocation	21	0.1	Within a conservation area.
375	CLP allocation	45	0.9	Deleted in 2022. <b>CLP 2018 says 128-368 homes by 2026</b> , whilst now assumed to deliver post 2034.
<b>COA 11: North</b>				
133	New site (2022)	284	1.1	Residential estate <b>proposed for 505 homes in 2022</b> , then 372 homes, now 284 homes. Delivery also brought forward.
196	Permitted	20	0.1	Delivery post 2034, contrary to CLP 2018 (pre 2021).
<b>Purley Way 1: Valley Park</b>				
348	CLP allocation	685	3.0	Proposed to deliver by 2029.
8	Permitted	95	0.4	Proposed for 65 homes in 2022.
314	<b>Omission site</b>	-	6.8	Proposed for 976 homes in 2022
147	<b>Omission site</b>	-	6.6	Proposed for 590 homes in 2022
334	<b>Omission site</b>	-	2.4	Was not assigned a housing figure in 2022.

Ref	Status	Homes	Area (ha)	Comments
<b>Purley Way 2: Waddon Marsh</b>				
125	New site (2022)	632	2.8	Broadly no change since 2022 to Waddon Marsh proposals.
48	CLP allocation	331	2.6	As above. CLP 2018 says 17 homes.
332	CLP allocation	265	1.5	As above
355	CLP allocation	260	1.4	As above. Note delivery timetable pushed back.
316	CLP allocation	184	1.0	As above
146	New site (2022)	148	1.0	As above. Note delivery timetable pushed back.
349	CLP allocation	146	1.0	As above
351	CLP allocation	124	0.7	As above
144	New site (2022)	74	0.4	As above
946	<b>Omission site</b>	-	2.7	Proposed for 385 homes in 2022. Whilst all of the sites above are adjacent, this is a separate site some way distant.
N/a	<b>Omission site</b>	-	2.8	Redevelopment of the gas works is discussed in the Purley Way Masterplan, but is not an option at the current time
<b>Purley Way 3: Five Ways</b>				
25	CLP allocation	1034	3.8	Few changes since 2022 to Five Ways proposals.
110	New site (2022)	168	0.7	As above
16	Permitted	266	3.6	Proposed for 126 homes in 2022. A partial greenfield site also proposed to deliver a new secondary school.
132	New site (2022)	111	0.5	As above. Delivery timetable pushed back.
153	New site (2022)	91	0.4	As above.
350	<b>Omission site</b>	-	1.6	CLP 2018 says up to 260 homes.
<b>Purley Way 4: Waddon Way</b>				
137	New site (2022)	659	3.5	Few changes since 2022 to Waddon Way proposals.
11	CLP allocation	152	1.0	As above. Proposed to deliver by 2029.
143	New site (2022)	84	0.3	As above.
135	New site (2022)	70	1.0	As above.
-	<b>Omission site</b>	-	1.7	Land adjacent to the north of the Waddon Way cluster, including the Bowls Club, was also flagged in 2022.
<b>Addington</b>				
44	<b>Omission site</b>	179	1.7	CLP allocation; 376 homes in 2022; now proposed for health.
1	<b>Omission site</b>	46	0.4	Proposed for 46 homes in 2022. Greenfield amenity land.
<b>Addiscombe</b>				
68	CLP allocation	19	0.2	Previously capacity of 12.
3	<b>Omission site</b>	-	0.7	Ruled out in 2022 as comprises a nursing home.
<b>Broad Green and Selhurst 1: Northern cluster (Thornton Heath Local Centre)</b>				
407	Permitted	101	0.2	Deleted in 2022. CLP 2018 proposed 7-25 homes.
248	CLP allocation	11	0.1	Still no known developer interest.
<b>Broad Green and Selhurst 2: Central cluster (Croydon University Hospital)</b>				
499	CLP allocation	345	8.2	<b>Proposed for 372 in 2022.</b> Delivery timetable has been pushed back (development subject to healthcare re-provision).

Ref	Status	Homes	Area (ha)	Comments
103	Permitted	143	0.8	Has planning permission for a hotel, but proposed for housing and to deliver by 2029. Capacity boosted from 118 in May 2024 to reflect the latest design (cookie-cutter) work.
<b>Broad Green and Selhurst 3: Southern cluster (Broad Green Local Centre)</b>				
201	CLP allocation	216	1.2	Proposed to deliver a primary school.
404	Permitted	79	0.7	CLP 2018 allocation and then deleted in 2022. Comprises employment land but proposed for residential.
396	Permitted	72	0.3	Proposed for 39 homes in 2022.
337	CLP allocation	45	0.7	Deleted in 2022. <b>CLP 2018 says 32-184 homes.</b> Policy notes viability challenges. Proposed to deliver by 2029.
417	CLP allocation	11	0.1	<b>Proposed for 24 homes in 2022.</b> CLP 2018 says 23-64.
<b>Broad Green and Selhurst 4: Elsewhere</b>				
13	New site (2022)	57	0.4	Previously proposed for mixed use, now residential. Currently an industrial / commercial site.
22	New site (2022)	16	0.1	Car park in a residential area suggests that the site could be challenging, but it has been a focus of design work in 2023.
471	CLP allocation	11	0.2	Still recorded as no developer interest.
78	CLP allocation	8	0.0	Delivery timescale has been pushed back.
416	<b>Omission site</b>	-	0.8	Proposed for 40 homes in 2022; CLP 2018 says 36-136.
468	<b>Omission site</b>	-	0.3	Proposed for 30 homes in 2022. CLP 2018 says delivery by 2026. Comprises a fenced off grass area behind shops.
20	<b>Omission site</b>	-	0.1	Proposed for 16 homes in 2022. Comprises supported HMO.
<b>Coulsdon</b>				
945	CLP allocation	39	0.3	<b>Proposed for 66 homes in 2022.</b> Delivery timetable pushed back (by 13 years in total).
<b>Crystal Palace and Upper Norwood</b>				
357	CLP allocation	135	1.5	No developer interest. Delivery has always been long term.
126	New site (2022)	27	2.4	<b>Proposed for 72 homes in 2022.</b> Includes school provision.
58	New site (2022)	22	0.4	<b>Proposed for 72 homes in 2022.</b>
59	<b>Omission site</b>	-	0.3	Proposed for 16 homes in 2022. Appears a complex site.
<b>Kenley and Old Coulsdon</b>				
937	<b>Omission site</b>	12	0.2	CLP allocation. Design work 2023 suggested 22 homes capacity, then supported for 12 by 2029. Underused / derelict site with poor accessibility.
<b>Norbury</b>				
951	<b>Omission site</b>	24	0.0	Proposed for 24 homes in 2022. Comprises high street shops with historic character (proposal was to retain).
<b>Purley 1: District Centre</b>				
347	CLP allocation	420	3.8	<b>Proposed for 479 homes in 2022.</b> CLP 2018 says 172-990 homes by 2026 (now delivery post 2034).
61	CLP allocation	139	0.6	<b>Proposed for 182 homes in 2022.</b> CLP 2018 says 21-119. Delivery timescale has been brought forward.
30	CLP allocation	179	0.7	Proposed for 118 homes in 2022. CLP 2018 says 30-171.
35	Permitted	114	0.4	Delivery timescale has been pushed back.
683	CLP allocation	60	0.6	<b>Proposed for 99 homes in 2022.</b> CLP 2018 says up to 91.

Ref	Status	Homes	Area (ha)	Comments
<b>Purley 2: Reedham<sup>14</sup></b>				
490	CLP allocation	52	1.0	Proposed for 36 homes in 2022. To deliver a school.
64	New site (2022)	52	0.3	Proposed for 26 homes in 2022. Delivery pushed back.
410	<b>Omission site</b>	-	0.2	CLP allocation; was 19 homes pre-2029 in early 2024.
<b>Purley 3: Purley Oaks</b>				
405	CLP allocation	50	0.7	<b>Proposed for 99 homes in 2022.</b> Now residential only.
324	CLP allocation	G+T	1.1	No change.
<b>Purley 4: Elsewhere</b>				
411	CLP allocation	8	0.1	No known developer interest but delivery by 2034.
<b>Sanderstead</b>				
79	New site (2022)	62	0.7	Waitrose with no known developer interest.
306	CLP allocation	41	0.5	Application still expected soon. Delivery by 2029.
71	New site (2022)	34	0.6	Application still expected soon. Delivery by 2029.
<b>Selsdon</b>				
948	Permitted	26	0.1	Delivery by 2029.
85	<b>Omission site</b>	-	0.9	Proposed for 86 homes in 2022 (mixed use regeneration).
<b>Shirley</b>				
128	CLP allocation	123	1.4	Proposed for 91 homes in 2022. Delivery brought forward.
504	CLP allocation	24	0.7	Locally listed building to be converted.
87	New site (2022)	9	0.1	Proposed for 18 homes in 2022. Delivery pushed back.
502	<b>Omission site</b>	-	2.9	CLP 2018 says 90 homes by 2027. Low PTAL in Green Belt.
<b>South Croydon</b>				
114	New site (2022)	8	0.1	Comprises garages and amenity land.
54	<b>Omission site</b>	-	0.6	CLP 2018 says 42 homes by 2021. A cleared site.
101	<b>Omission site</b>	-	0.4	Proposed for 41 homes in 2022. Comprises a restaurant.
<b>South Norwood and Woodside</b>				
New 2	New site (2023)	260	2.5	Council housing estate. Delivery by 2029.
486	CLP allocation	22	0.2	Deleted in 2022, now proposed to deliver by 2029.
51	<b>Omission site</b>	-	0.7	Proposed for 102 homes in 2022 (delivery by 2027). Amenity land and car park associated with tower blocks.
<b>Thornton Heath</b>				
136	CLP allocation	124	0.7	CLP 2018 says 25-55 homes. Within the district centre.
326	Permitted	66	0.4	Proposed to deliver by 2029.
400	CLP allocation	47	0.3	Deleted in 2022. Delivery by 2029. CLP 2018 says 12-42.
105	New site (2022)	22	0.3	Delivery timetable has been brought forward.
284	CLP allocation	18	0.2	CLP 2018 says 7-23 homes.
106	New site (2022)	18	0.2	Comprises a community centre, to be re-provided.
149	<b>Omission site</b>	-	0.9	Proposed for 118 homes in 2022 (45 to 254 at I+Os stage).

<sup>14</sup> At all three sites the capacity of sites has been boosted taking account of design work completed in 2023.

## 5.4 Sub-area scenarios

5.4.1 Discussion has so far focused on A) ‘top down’ considerations with a bearing on reasonable scenarios for boosting housing supply; and B) ‘bottom-up’ consideration of site options. The next step is to consider each of the Borough’s sub-areas in turn, exploring options for boosting housing supply in more detail.

N.B. to recap, ‘boosting housing supply’ specifically means boosting supply relative to the emerging proposed approach, in light of stretching potential top-down housing target figures. Also, to reiterate, whilst the focus is on options for boosting supply, some options for reducing supply are also considered.

5.4.2 Each of the 35 sub-areas introduced in Table 5.1 are considered in turn below.

### Croydon Opportunity Area

5.4.3 As discussed in Section 5.2, attention focuses on the North End Quarter (NEQ) Transformation Area, but there is also a need for ongoing scrutiny of the Brighton Mainline and East Croydon Transformation Area, the Office Retention Area and other part of the Croydon Opportunity Area. These sub-areas are considered in turn below. Also, by way of introduction, Figure 5.7 is taken from the Tall Building Study (2024) and shows broad variation in growth constraint and opportunity across the Croydon OA. For example, it shows a clear inverse relationship between current locations of tall buildings and areas of constraint, which are primarily areas subject to historic environment constraint. It also notably highlights the NEQ as a key are of opportunity, albeit there is historic environment constraint.

Figure 5.7: Constraint and opportunity across the Croydon OA (from the TBS, 2024)



Fig 107 Figure ground

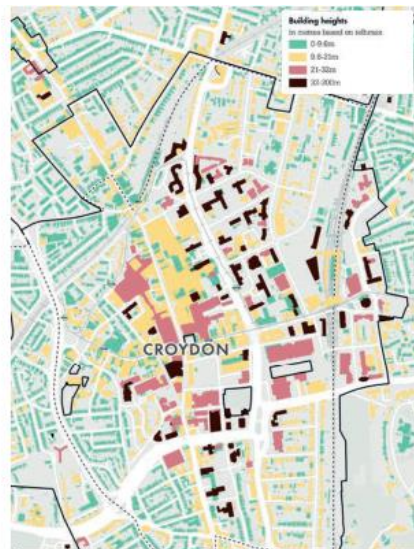


Fig 108 Existing building heights

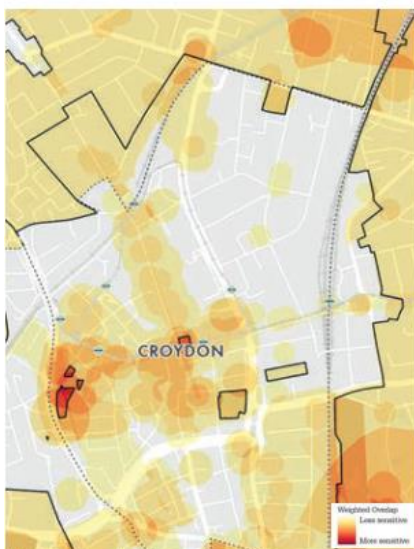


Fig 109 Weighted levels of sensitivity

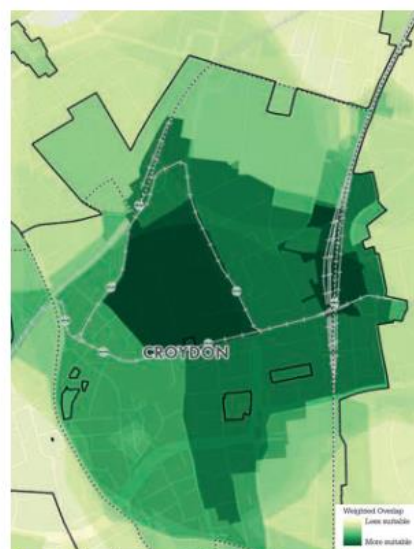


Fig 110 Weighted levels of suitability

### North End Quarter Transformation Area

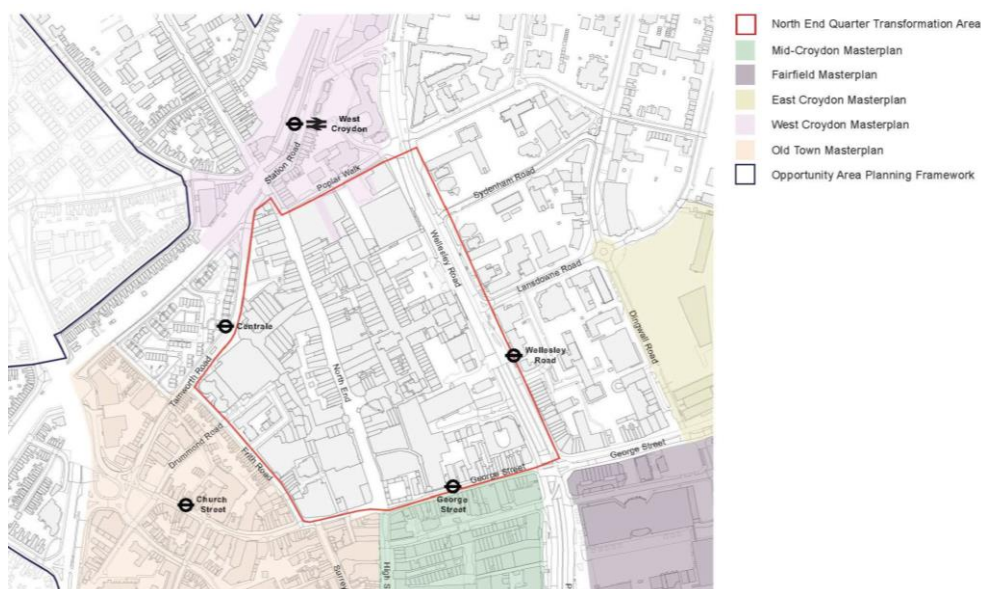
5.4.4 Supporting successful transformation of the North End Quarter is clearly a key objective for the Local Plan. There is a considerable back story– including three comprehensive planning consents for redevelopment of the Whitgift Centre (including Compulsory Purchase Orders) over the last ten years – and the situation has moved on considerably since 2022. In particular, the new proposal for the **Whitgift Shopping Centre** is to boost support for homes, and the adjacent **Centrale Shopping Centre** (which opened only in 2004) is now also proposed for mixed use redevelopment. Wide-ranging strategic considerations include:

- **Place-making** – clearly there is a need to retain the renowned retail role of the area whilst supporting a greater diversity of uses, in line with *Croydon Future of Destination Retail (2020)*, which found: *“There are strong opportunities for positive changes, and Croydon has the right ingredients. With clear... objectives and processes in place, the area can be remodelled to become a pioneering inclusive, resilient, and unique destination for all, which revives central Croydon’s bold and visionary heritage...”*
- **Historic environment** – North End separates the Whitgift Centre to the east and Centrale to the west. It is Croydon’s main pedestrianised shopping area and a conservation area. Listed buildings (including the Grade I listed almshouses) are found only at the southern extent of this area, but North End (along with George Street) retains many 19th and early 20th century buildings that reflect Croydon’s past prosperity. A number of frontages are of high quality and protected as part of the conservation area designation, and a number of buildings are also locally listed. The relationship between the Victorian shopping streets and post-war modernist development around Wellesley Road is also locally important.
- **East - west links** – the Whitgift Centre is a barrier to movement, as is Wellesley Road, which separates NEQ from East Croydon. Also, the town centre has 2,000 parking spaces more than the next closest Metropolitan Centre, which serves to highlight a clear opportunity to make the area less car dominated.
- **Delivery** – there has historically been heavy reliance on large scale, comprehensive developments within the town centre to deliver change, but such schemes are challenging to deliver. As such, it is crucially important that policies are in place to enable development to be delivered in a phased, flexible and manageable way, allowing for uncertain development viability and unforeseen issues.

5.4.5 A focus on housing delivery is not a new idea; for example, *Croydon Future of Destination Retail (2020)* stated: *“Mixed-use will characterise the area, but also individual streets and blocks, horizontally and vertically. The area will host public life amenities at different levels, including podiums and rooftops.”* However, there is now added emphasis on homes, including with a view to ensuring a scheme that delivers. The emerging proposed approach is to support 1,519 homes across the two shopping centres (Sites 393 and New 1), plus there is another small site supported for 76 homes (Site 220), but there is also a need to consider additional housing growth, informed by ongoing masterplanning.

5.4.6 In **conclusion**, it is reasonable to explore a higher housing growth option, as a means of boosting housing supply borough-wide and also potentially as a means of realising NEQ-specific objectives. A reasonable estimate is boosting supply by 500 homes, but further higher growth options are not out of the question.

**Figure 5.9: The North End Quarter (rough extent) in the wider context**

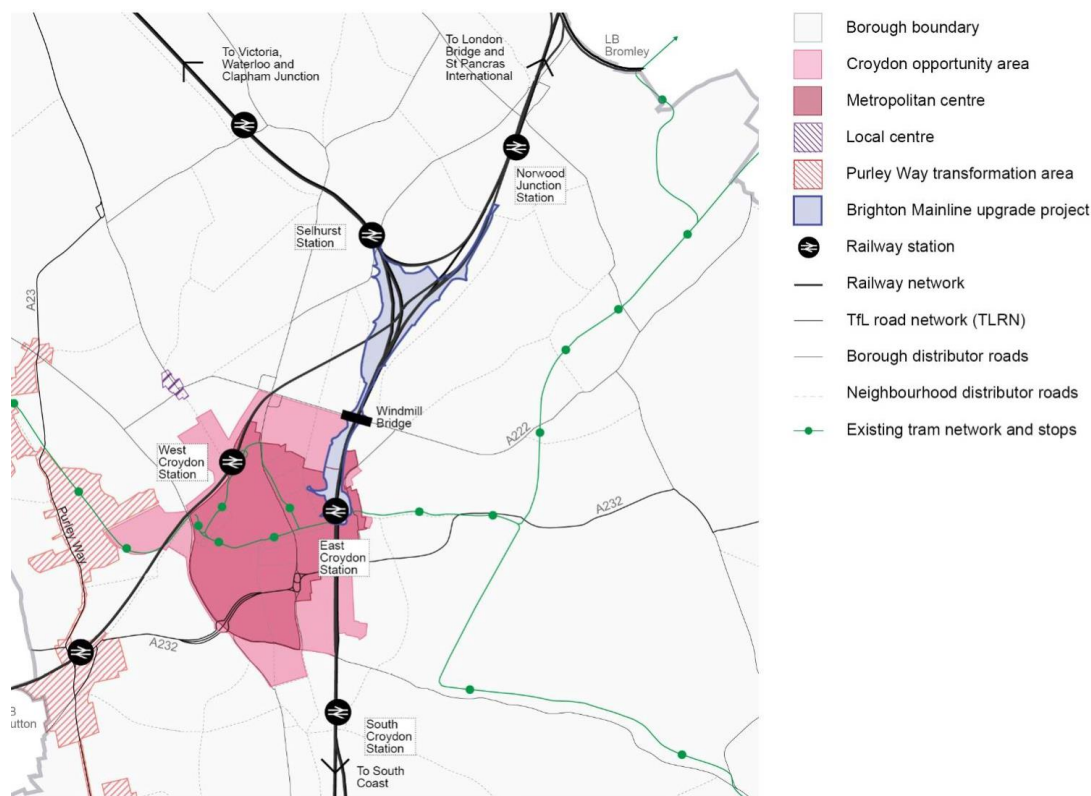




### Brighton Mainline and East Croydon Transformation Area

5.4.7 The Transformation Area has already been introduced above, and Figure 5.9 provides further context, showing the area covered by the Brighton Mainline upgrade project, which includes East Croydon Station at its southern extent, with the northern extent comprising the Selhurst Triangle.

**Figure 5.9: East Croydon Station and the Brighton Mainline in the wider context**



5.4.8 Certainty regarding funding and the timing of upgrade works and associated development has decreased since the 2022 publication stage, e.g. in light of [Network North](#) proposals. This serves to reduce the case for exploring options that would see an additional emphasis on housing delivery as part of the development alongside upgrade works. With regards to the East Croydon Station itself (Site 45), the previous SA Report (2022) dismissed the option of assuming any homes here, and that remains the case at the current time (there is clear support for a public square on the existing station site if / when the station is relocated).

5.4.9 The two non-consented proposed allocations directly impacted by the upgrade works are: Site 21, which is directly adjacent to the current station and currently cleared; and Site 199, which comprises a builders yard located to the north of the station. Both sites are currently phased to deliver post 2034, to avoid conflicts with upgrade works, which reduces any argument for considering higher growth options.

5.4.10 Focusing on Site 199, this is a 1.8 ha site that is expected to deliver only 107 homes, but this is a less well-connected site, and marks a transitional area between the Metropolitan Centre and the surrounding residential area (with a Grade II\* listed church nearby). Having said this, the residential area falls within the Croydon Opportunity Area, and it is noted that the CLP 2018 proposal to support a mixed use development to include “light industrial workshops and studio spaces” has now been revised to a mixed use development “comprising employment ground floor use with residential above”.

5.4.11 In **conclusion**, there is no reasonable option for significantly boosting housing supply beyond the emerging proposed approach. Also see discussion of nearby sites in the Office Retention Area and Fairfield (including sites considered under the East Croydon / Brighton Mainline heading in 2022).

### The Office Retention Area

5.4.12 Policy SP3 of CLP 2018 designates an Office Retention Area (ORA) surrounding East Croydon Station, and the current proposal is to retain this designation. Within the ORA mixed use developments must include office floor space proportionate to Croydon’s role as an Edge of London Office Centre.

- 5.4.13 The designation primarily covers the area between East Croydon Station and Wellesley Road and to the north of George Street (stretching as far north as the edge of the Metropolitan Centre, to the east of West Croydon Station). However, the designation also extends slightly to the east of East Croydon Station.
- 5.4.14 Beginning with land to the **east of East Croydon Station**, the first point to note is that two previous allocations from 2022 are now completed or nearing completion, namely Site 138 and Site 174, which together deliver just short of 600 homes. Site 50 is then under construction for 120 homes. This leaves just one non-permitted proposed allocation, namely Site 33, which is a small site (0.1 ha) proposed for 76 homes. Finally, there is one omission site, namely Site 175, which was previously proposed for 195 homes. This is a fairly large site (0.7 ha) and is very close to East Croydon Station, but it is currently in use for offices, and the adjacent NLA Tower, which is a local landmark, is presumably a constraint.
- 5.4.15 With regards to the Office Retention Area to the **west of East Croydon Station**, there is a total of twelve allocations, of which just three are permitted, hence this is an important area to consider, with a view to potentially boosting housing supply. With regards to the permitted sites, it is noted that one (Site 142; located adjacent to Wellesley Road) is permitted for 794 homes, including a 68 storey tower, having previously been proposed for up to 441 homes. Also, another (Site 186) was recently permitted for 199 homes (with no offices), having previously been proposed for up to 141 homes. The other permitted site in this area is Site 172, which is the northern section of the gateway site known as Ruskin Square, which in total is delivering over 600 homes (see planning permission [23/04130/NMA](#)). Also, another site was recently completed (Site 187) delivering 133 homes (1,654 dph) in comparison to a capacity of up to 44 homes in CLP 2018. As such, it is clear that there is a trend towards boosting housing supply, whether that be via taller buildings and/or support for housing at the expense of support for office floorspace.
- 5.4.16 Taking the non-permitted sites in turn:
- Sites 218 and 236 – are two well-known 1960s office towers of architectural merit fronting Wellesley Road, at the western extent of the Office Retention Area, namely Lunar House and Apollo House. The current assumed number of homes is not at the top end of what has been considered in the past, but there is no case for assuming that additional homes is a reasonable option to explore further. Capacity across these two sites was modestly boosted by a total of 44 homes late in the process (May 2024).
  - Site 950 – is another sensitive site, in that it is a locally listed modernist building located at the junction of Wellesley Road and George Street, at the south west extent of the Office Retention Area. It is a 0.7 ha site proposed for 135 homes, having previously been proposed for up to 255 homes.
  - Site 234 – stands out as a large site (0.9 ha) that is now proposed for 199 homes having been proposed for notably more (342 homes) in 2022. However, this site currently includes a 24 story office tower, and is in close proximity to East Croydon Station, which perhaps limits calls to support additional homes.
  - The remaining proposed allocations are all smaller, namely Sites 42, 148, 311, 489 and 493. It is not possible to pinpoint any of these as associated with a particular case for boosting housing supply.
- 5.4.17 Finally, there are two omission sites listed in Table 5.1, namely Site 37 and Site 200. Both are located adjacent to Ruskin Square, which is a permitted 'gateway' site delivering over 600 homes plus significant new office space. However, the former is a small site comprising a surface car park that was proposed for only 33 homes in 2022, and the latter comprises a recently refurbished multi-storey car park.
- 5.4.18 In **conclusion**, there is no reasonable option for significantly boosting housing supply over-and-above the emerging proposed approach. Attention focuses on the non-permitted sites to the west of the area, and it is recognised that the ORA overall is relatively unconstrained (no conservation area or listed buildings) with good access to both train stations and the tram network, plus there is a long term opportunity to better link North End Quarter and East Croydon Station via this area, reducing the extent to which Wellesley Road is a barrier to movement. However, on the other hand, there has been a recent trend in this area towards permitting schemes involving a quantum of new homes over-and-above the policy intention and, on balance, there is ongoing support for the Office Retention Area designation, mindful of the ELR (2020) conclusion: *"In essence, accommodating new office employment in the CMC continues to have a rationale rooted in regeneration and sustainability."* In 2022 attention focused on three sites closely linked to East Croydon Station as potential locations for boosting housing supply, but two of these sites are now omission sites (Sites 37 and 200) and the third (Site 199) cannot come forward ahead of the rail upgrade works.<sup>15</sup>

<sup>15</sup> The Office Retention Area is perhaps the key sub-area for discussion whereby there is a need to consider the possibility of a reasonable lower growth scenario, essentially involving boosting support for new office floorspace at the expense of residential floorspace. However, there is currently no clear basis for defining, appraising and consulting on a lower growth scenario.

**Elsewhere within the Croydon Opportunity Area**

- 5.4.19 Beginning with the **West Croydon Station** area, attention does focus on the cluster of four non-permitted allocations here, given transport connectivity and proximity to North End Quarter. However, there are historic environment constraints, and the area has recently seen considerable change with two new residential towers (including previous allocation Site 211, which includes a 25 storey tower).
- 5.4.20 In particular, attention potentially focuses on Site 203, which includes the station itself. The proposed capacity of 109 homes is at the low end of the previously identified range (79 to 455 homes). However, the proposed scheme includes: *“Remodelling of station and redevelopment to provide an improved transport interchange, cycle hub, retail & office units with residential development above.”*
- 5.4.21 The other key site to consider is Site 123, which is now proposed for 271 homes having been proposed for 291 homes in 2022. However, it is proposed for up to 88 homes in CLP 2018. Heritage is a constraint here, namely the setting of the Wellesley Road (North) Conservation Area and locally listed buildings.
- 5.4.22 The final two sites are smaller, namely Site 40 and Site 184. The former is a bus station, which must be retained, plus heritage is a constraint to development, with a need to conserve the settings of Croydon Quaker Meeting House and the Adult School Hall, plus a Grade I listed church is nearby. The latter is a constrained site on account of the railway on one side and residential roads on the other two sides.
- 5.4.23 Finally, it is important to note that, of the eight extensions to the Croydon OA Tall Buildings Inner Zone (within which buildings can come forward involving a height of up to 33m before being considered a tall building, and tall buildings up to 93m are potentially suitable), the extension to include West Croydon Station is one of the most significant (alongside the extension along George Street). See Figure 5.10.
- 5.4.24 In **conclusion**, there is no reasonable option for significantly boosting housing supply beyond the emerging proposed approach. However, there is a need for ongoing scrutiny of the approach to growth here in light of latest understanding of proposals / options for adjacent North End Quarter and also given the latest evidence on the potential for tall / taller buildings.

**Figure 5.10:** An extract from the *Tall Buildings Study (2024)* showing proposed extensions to the COA inner zone

**12.7 Key areas of change**

271 This study puts forward recommended revisions to the tall building boundaries currently included in the Croydon OAPF. With reference to Fig 120, changes to the more central Inner Zone are outlined below:

Inner Zone changes	Explanation for change
1. Extend east of East Croydon Station to include the landmark and locally listed One Croydon/ IILA Tower, and the consented City Link site immediately to its south.	Extremely close to East Croydon Station, the locally listed IILA Tower rises comfortably over the Outer Zone upper threshold of 48m, as does the consented adjacent development on the City Link site. The boundary is drawn tightly around the IILA Tower to help protect the setting of this landmark building.
2. Extend northward up to the bend in Cherry Orchard Road.	This extension includes a number of recently built apartment buildings which rise to approximately 20 storeys.
3. Extend to include the northern end of Dingwall Road.	Characterised by modern commercial buildings typically 10-11 storeys so almost all of them would already be considered tall even within the Inner Zone.
4. Extend northern end of Wellesley Road to incorporate the bus station and Delta Point.	The adjacent Pinnacle development changes the context of this part of Croydon. Delta Point already rises to 14 storeys and the bus station site might present opportunities in the longer term. The setting of St Michael's Church will be a key consideration and constraint however.
5. Extend south to incorporate the existing I Heale Tower.	Built in 1964, this is one of Croydon's most prominent landmarks and remains one of the town's tallest buildings.
6. Include a new sub-area reflecting the redevelopment of the former Taberner House and the existing cluster of tall buildings on the southern end of High Street.	A number of very tall buildings, the tallest of which rises to 35 storeys. This is now a prominent cluster of tall buildings at the southern end of the town centre.
7. Extend along the south side of George Street to include opportunity sites.	This prominent corner, at the intersection between George Street, Wellesley Road and Park Lane marks perhaps the epicentre of the town.
8. Extend south alongside the west side of the tall blocks south between George Street and Barclay Road.	This extension brings in a number of major site allocations in the heart of the town centre.

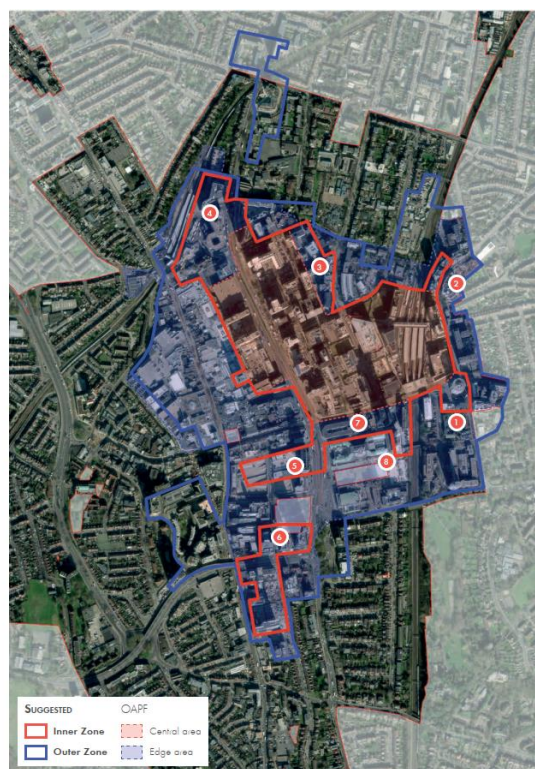


Fig 120 Suggested new tall building zones in central Croydon, cross-references with currently adopted OAPF areas

5.4.25 Next there is a need to consider the **Mid-Croydon and Fairfield** areas (see Figure 5.9):

- Mid-Croydon – there are three proposed allocations here, of which Site 194 is the stand-out site, as a large and complex site now proposed for 820 homes having previously been proposed for 874 homes. It links closely to North End Quarter, but there is little reason to suggest any particular opportunity to boost housing supply beyond the emerging proposed approach, including noting the adjacent Grade 2\* listed clock tower is adjacent. The other two sites (Site 47 and Site 242) are both very small.
- Fairfield – firstly, there is a need to note one recently completed site, namely previous allocation Site 31, which has delivered 544 homes including a 49 storey tower. This is a figure much higher than the 159 homes anticipated in CLP 2018, plus the site is reduced in extent. There is then one permitted site for 93 homes (Site 294), leaving three non-permitted sites, of which Site 34 is the stand-out large site. This site is proposed for 352 homes, which is significantly fewer than the 626 homes proposed in 2022 (also, it is noted that the proposal at the I&Os stage was for 814 to 2,098 homes). However, it is noted that the proposal now includes support for retention/conversion, as opposed to demolition. Also of note is Site 245, as it is located directly opposite East Croydon Station; however, the proposal is already to support a higher density scheme (133 homes on a 0.2 ha site) than the CLP 2018 proposal (up to 85 homes), and this is a site that is likely not able to deliver until post 2034. The final proposed allocation is then Site 192, which is a 0.3 ha site proposed for 54 homes, having been proposed for 66 homes in 2022. Table 5.1 also lists one omission site here, but this is a small site and currently comprises offices.

5.4.26 In **conclusion**, there is no reasonable option for significantly boosting housing supply beyond the emerging proposed approach. However, there is a need for ongoing consideration of: Mid-Croydon's links to the North End Quarter (albeit this area mostly falls within the Central Croydon Conservation Area); and Fairfield's links to East Croydon Station (albeit recalling that this is a civic / cultural area).

5.4.27 Finally, the following sites are located **elsewhere in the Croydon Opportunity Area**:

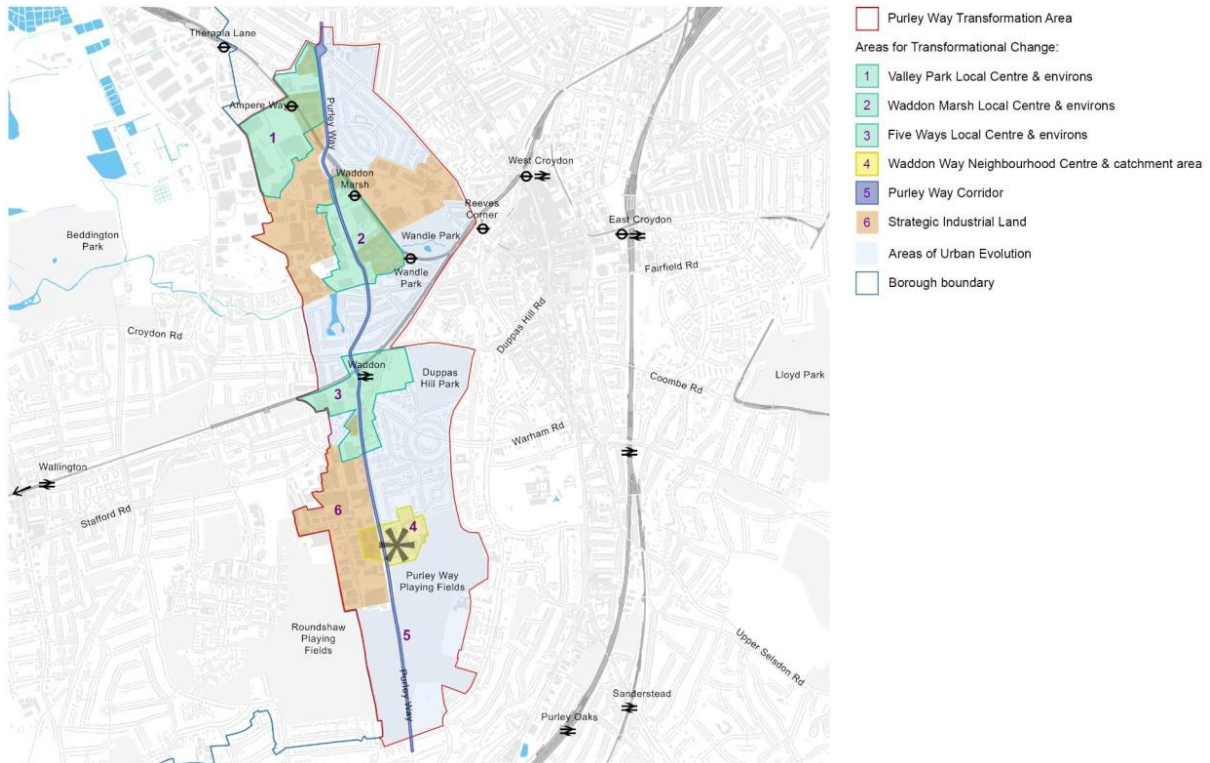
- South east – this area links very closely to East Croydon Station, but there is a need to account for the quick transition to low rise residential neighbourhoods. Beginning with Site 5, this was a new site proposed in 2022, and currently comprises offices located directly opposite the station. It is proposed to deliver a residential scheme (plus town centre uses), but there is no known developer interest, hence delivery is anticipated post 2034. The other two proposed allocations are then new proposed sites, i.e. sites not previously proposed for allocation in 2022. One of these has planning permission, namely Site New 1, leaving Site New 3, which is currently a hotel and proposed for a mix of uses with 447 homes.
- South – two sites are permitted, namely Site 32 and Site 190, with both sites currently cleared and together set to deliver almost 600 homes. The other larger site is then Site 41, which comprises offices and is proposed for 224 homes (previously 158 homes). Site 952 is then the final proposed allocation. It is a small site (0.1 ha) proposed to deliver 37 homes. It is located at the southern extent of Croydon High Street and currently comprises an early 20<sup>th</sup> Century building with a degree of character, with a Grade II\* listed building adjacent but one, albeit the intervening building is a modern building. It was previously proposed for 121 homes in line with a planning application, but that was rejected at appeal.
- West – there are two sites here, namely Site 374 and Site 375. The former is a small site in a conservation area proposed for just 21 homes. The latter was deleted in 2022 but is now proposed for 45 homes to deliver post 2034 (in contrast to CLP 2018 which says that up to 368 homes by 2026).
- North – Site 196 is small site permitted for 20 homes, but not expected to deliver until post 2034 (with CLP 2018 having anticipated delivery by 2021). Site 133 is then a 1.1 ha residential estate closely associated with the Wellesley Road (North) Conservation Area. It is proposed to deliver a net increase of 284 homes, with the proposal in 2022 having been to deliver a net increase of 505 homes.

5.4.28 In **conclusion**, there are no clear options to significantly boost housing supply. Site 952 and Site 133 are of note, but the former has heritage constraint and the latter is a housing estate subject to [detailed work](#).

## Purley Way Transformation Area

5.4.29 The transformation area has already been introduced above (Section 5.2), including by explaining the backstory of wide-ranging scenarios having been published for consultation in 2019, followed by masterplanning work that led to a preferred scenario involving ~7,500 homes (in the plan period) in 2022, and then subsequent loss of a key site (IKEA). As discussed, public transport accessibility is a key barrier to higher growth scenarios, but there is a need to ensure 'no stone left unturned', as part of efforts to boost housing supply, hence sub-areas and individual site options are discussed below.

Figure 5.11: Overview of the Purley Way Transformation Area



5.4.30 The vision for the area involves four new neighbourhoods, retention and intensification of the three areas of SIL, a focus on enhancing the A23 Purley Way corridor itself, other wide ranging transport and wider infrastructure upgrades and urban evolution elsewhere in the transformation area, including protection and enhancement of the strategic green and blue infrastructure associated with the River Wandle corridor.

5.4.31 Set out below is a discussion of how latest proposals vary to those at the I+Os stage, followed by a concluding discussion on reasonable growth scenarios for the area.

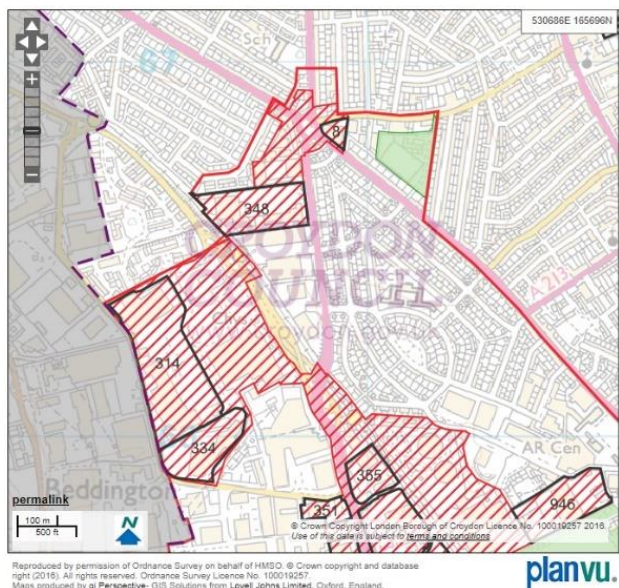
N.B. **maps** presented below show allocations from the Issues and Options stage.

**Valley Park**

5.4.32 This is the northern extent of the Masterplan Area, stretching from the Lombard roundabout, south along Purley Way to the tram line. The transformation area comprises land between Purley Way and the tram line, plus land to the west of the tram line, with a residential neighbourhood to the east of Purley Way.

5.4.33 Important context comes from the CLP 2018, which established policy in support of a new Local Centre at Valley Park (DM36.2) and growth alongside enhancements to Lombard Roundabout (DM36.3).

5.4.34 Focusing on the Lombard Roundabout, the first point to note is that a 96 home residential-led scheme has recently come forward at the southern edge of the roundabout, on land formally designated as SIL. At the eastern edge of the roundabout, Site 8 was proposed for 13-33 homes at the I+Os stage, and 65 homes in 2022, but is now permitted for 95 homes.

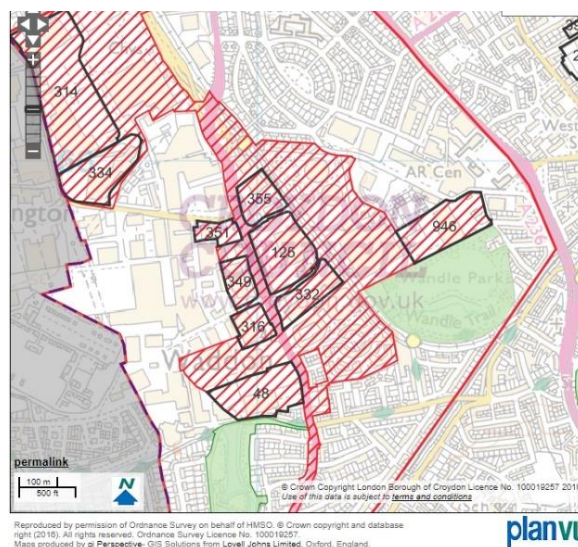


- 5.4.35 Moving to the south, land between Purley Way and the tram line comprises a small remaining area of SIL, and then Site 348, which was proposed for 128-482 homes at the I+Os stage, is now proposed for 685 homes to deliver by 2029, as part of a mixed use scheme associated with a new town/local centre.
- 5.4.36 Moving to the southwest, the entire area of land within the TA, as defined at the I&Os stage, falls within the land identified for a new Local Centre ('Valley Park') by CLP 2018. There were two proposed allocations at the I&Os stage, namely Sites 314 and Site 334, and then a third allocation was added at the 2022 publication stage, namely Site 147 (located to the east of Site 314), which comprises IKEA. Together these sites were proposed to deliver over 1,500 homes; however, they are all now omission sites, including as the IKEA site is not currently available (it is also subject to flood risk).
- 5.4.37 Overall, the proposal in 2022 was to deliver a new Local Centre ('Valley Park') centred on the tram stop at Ampere Way, with the local centre stretching either side of the tramline (as opposed to being focused to the west, as per the CLP 2018 proposal), integrating closely with an area of SIL, and with the extensive Beddington SIL in LB Sutton to the west. However, there is now a need to review the approach.
- 5.4.38 In **conclusion**, there is a clear need for ongoing scrutiny of the strategy for this area in order to ensure achievement of the long term vision. However, there is currently no clear potential to assume redevelopment of any of the three adjacent omission sites. The vision is as follows:

*"Valley Park is a gateway into Beddington industrial zone and currently accommodates a hub for leisure and big box retail. There is potential to consolidate these uses and mitigate large areas of car parking which currently make this area less pedestrian and cycle friendly. The area benefits from existing connectivity with Croydon Town Centre via tram links and has capacity to accommodate a variety of innovative housing models including self-build, custom-build, intergenerational, and community-led housing, along with intensification of industrial sites. The area's industrial heritage, including the Ikea chimneys (Local Designated Landmarks) are key contributors to its sense of place."*

#### Waddon Marsh

- 5.4.39 This area comprises a cluster of allocations either side of Purley Way, extending east as far as the tram line, which together will deliver a new town centre. An important issue here is flood risk, with flood risk zone 2 significantly intersecting a number of the sites, particularly the two northern-most sites.
- 5.4.40 The cluster comprised seven sites at the I+Os stage, and the latest proposal (unchanged from 2022) involves nine sites, with the two additional sites filling the two gaps that can be seen on the map between the sites west of Purley Way.
- 5.4.41 Focusing on the seven sites retained from the I+Os stage, the latest proposal is to increase the capacity of all seven. In most cases the proposal is to support a capacity modestly above the upper range figure identified at the I+Os stage; however, Site 125 is an outlier, with the latest proposal for 632 homes a very significant increase on the 38 to 141 homes range from the I+Os stage. 33% of this site intersects fluvial flood risk zone 2.
- 5.4.42 For completeness, the other proposed allocations are: Site 48 (331 homes); Site 332 (265 homes); Site 355 (260 homes); Site 316 (184 homes); Site 146 (148 homes); Site 349 (146 homes); Site 351 (124 homes); and Site 144 (74 homes).
- 5.4.43 There is then one notable omission site, namely Site 946 (Stubbs Mead), which was proposed for 385 homes in 2022. However, it comprises designated SIL, is a South London Waste Plan safeguarded waste site and almost entirely comprises flood risk zone 2 (also a small area of flood risk zone 3). The Purley Way Masterplan explained: *"The park-facing southern part of both Stubbs Mead and Turners Way Gas Works [adjacent to the west of Stubbs Mead]... could be appropriate for mixed use residential development, however the sites are SIL designated, along with a safeguard placed on part of the site for a waste facility as part of the South London Waste Plan."*



5.4.44 As a final point, it is worth noting that to the south east of the main cluster is Woodall Court, which is a recent scheme involving residential co-location with B8 uses, with the SIL designation retained (which also involved deculverting of the River Wandle).

5.4.45 In **conclusion**, proposals for this area are broadly unchanged from 2022, which serves as a reason to suggest no reasonable higher growth option or otherwise any reasonable alternative. The vision is:

*“Waddon Marsh is primarily characterised by big box retail plots with large car parks which flank both sides of the Purley Way (A23). The area benefits from existing connectivity with Croydon Town Centre via tram links as well as proximity to two historically rich and high quality green spaces – Wandle Park and Waddon Ponds. There is opportunity to strengthen the retail and employment offer by consolidating into a local centre replacing car parking with active frontages to accommodate community uses, a high quality public realm and a variety of innovative housing models, co-located with retail, leisure and industrial uses.”*

### Five Ways

5.4.46 This area extends from Waddon Station south to Five Ways roundabout plus land to the south of the roundabout, including a small area of SIL.

5.4.47 Context comes from CLP 2018 (DM49.1), which proposed a new Local Centre at ‘Waddon’, centred on the roundabout.

5.4.48 At the I&Os stage the proposal was to deliver 421 - 1,637 homes across four sites (16, 25, 110 and 350), along with a new Local Centre.

5.4.49 The latest proposal involves three of the four sites from the I+Os stage (Site 350 is no longer available),<sup>16</sup> plus two additional modest sites.

5.4.50 Site 25 is by far the largest. The proposal at the I+Os stage was for 251 - 1,028 homes, and the latest proposal (since 2022) is for 1,034 homes.

5.4.51 Also, it is important to note that one of the two new sites since the I+Os stage (Site 153) comprises a small isolated SIL, adjacent to the Five Ways roundabout. The proposal is for a scheme involving 91 homes and town centre uses, with consideration given to the adjacent Grade II listed tithe barn.

5.4.52 Finally, there is one omission site, namely Site 350, which was a proposed allocation for up to 660 homes in CLP 2018 and at the I+Os stage. However, in addition to being unavailable, this site is relatively distant from Waddon Station, and this area does not benefit from tram links.

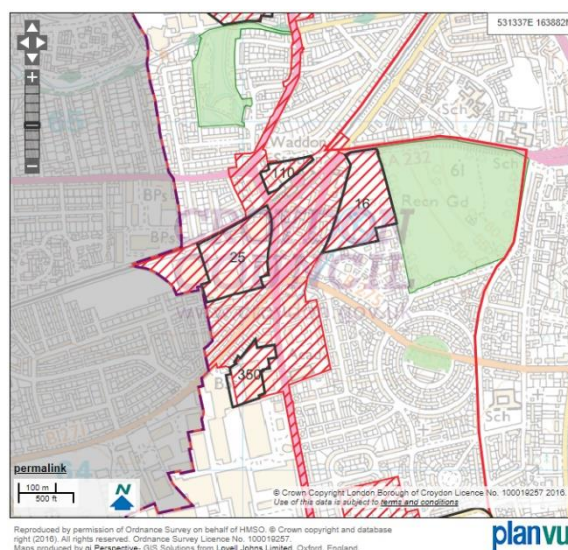
5.4.53 In **conclusion**, proposals for this area are broadly unchanged from 2022, which serves as a reason to suggest no reasonable higher growth option or otherwise any reasonable alternative. The vision is:

*“Fiveways is currently dominated by a convergence of main vehicle routes which has resulted in insensitive transitions between character areas, and a lack of sense of place. The area does benefit from its proximity to Waddon Station which gives opportunity for increased density, as part of a new local centre for both existing and new residential communities. The centre could include the co-location of a variety of innovative housing models with retail, community and leisure uses, whilst celebrating the Waddon Hotel and Old Tithe Barn heritage assets.”*

### Waddon Way

5.4.54 This is the southern-most of the proposed growth areas, with the I&Os document identifying one modest allocation (Site 11) for 35 to 94 homes, as well as allocating Site 152 for leisure facilities.

5.4.55 The most recent proposal involves three additional proposed allocations, all adjacent to Site 11, with the combined proposal for 965 homes, linked to a potential Waddon Way Neighbourhood Centre. With regards to Site 152 (leisure uses), this was proposed for allocation in 2022 but is no longer allocated.

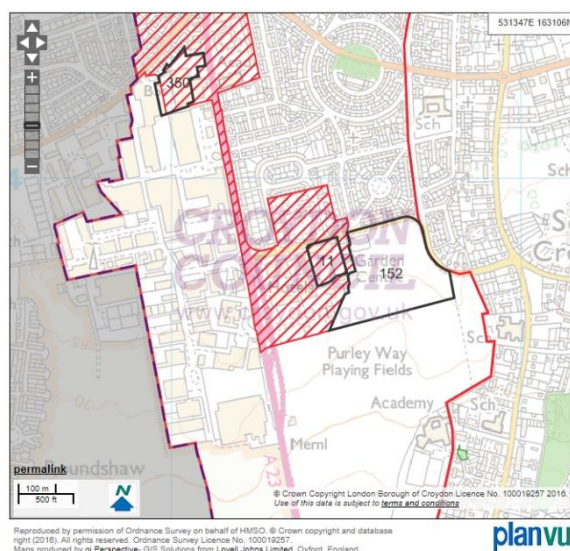


<sup>16</sup> Site 16 was notably proposed for 126 homes in CLP 2018 but then permitted at appeal for 266 homes.

5.4.56 Focusing on Site 11, which is the only retained allocation from the I+Os stage, the new proposed capacity of 152 homes is notably higher than the previously proposed capacity.

5.4.57 In **conclusion**, proposals for this area are broadly unchanged from 2022, which serves as a reason to suggest no reasonable higher growth option. It is also important to recognise that this area is relatively poorly connected, although work may be undertaken to explore the option of tram connectivity. The vision is:

*“Waddon Way is the southern gateway into Purley Way transformation area which accommodates a range industrial, residential, leisure and recreational uses, including key local assets such as Croydon Airport and Purley Way Playing Fields. The convergence of multiple uses within the area presents a prime opportunity to provide a retail/leisure destination, co-located with family housing. The existing historical landmarks in this area should be celebrated and enhanced.”*



#### Overall conclusion on the Purley Way

5.4.58 The current proposal is to allocate 20 sites to deliver ~ 5,600 homes, with the only significant change since 2022 being a reduced scale / ambition of growth at Waddon Marsh (IKEA site not available).

5.4.59 There are theoretical arguments for exploring a more ambitious growth strategy, including with a view to supporting major transport infrastructure upgrades, to include options for significantly improved tram connectivity. However, the overriding consideration is that transport infrastructure constrains growth, as well as community infrastructure (e.g. secondary school capacity). Transport infrastructure concerns are particularly acute, because there is a need to address traffic along the Purley Way, which suffers from heavy traffic, air pollution and a poor environment, with a number of identified 'pinch points'.

5.4.60 For this reason, the current plan document explains: *“It is common ground with TfL that there is sufficient overall sustainable transport capacity to support 4,000 additional homes in the area... Growth beyond 4,000 homes could require a range of additional improvements to highway and public transport capacity.”* 13 of the 20 proposed allocations are flagged as expected to come forward first within the 4,000 capacity.

5.4.61 There are also potentially transport infrastructure challenges that could constrain growth at levels below 4,000 homes, with the Partial Review document explaining:

*“... TfL has estimated that there is sufficient capacity on the Wimbledon branch of the existing tram network to support 2,000 additional homes in the area... Beyond this number, capacity on the existing tram network would need to be increased, either by longer trams or greater frequency, or both.”*

5.4.62 There is feasibly the possibility of revisiting the visioning and masterplanning work for the Purley Way, potentially with a view to seeking to develop the area as something of a new community linked to Croydon Metropolitan Centre, with a strong focus on self-containment / maximising trip internalisation. Also, the possibility of a major retirement community has been suggested as another means of making the most of the area despite public transport accessibility constraints. However, ultimately there would be a need for much further work before any such options could be 'worked up' for inclusion in the Partial Review.

5.4.63 In this light, and as per the conclusion reached in 2022, there is no reasonable higher growth scenario for the Purley Way Transformation Area, i.e. no reasonable option involving significantly boosting housing supply over-and-above the emerging proposed approach.

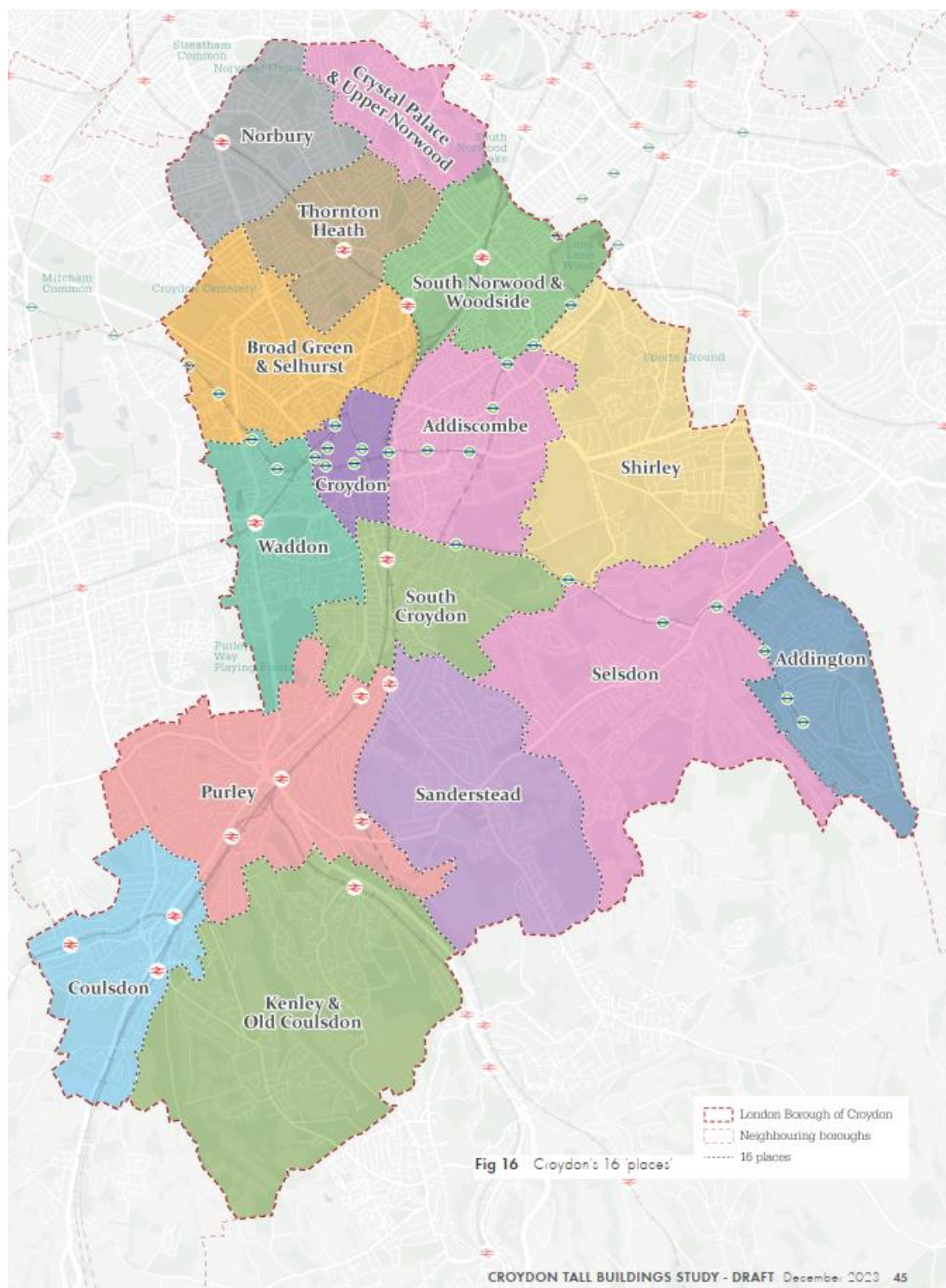
5.4.64 With regards to the possibility of lower growth, whilst there are no significant 'suitability' arguments for lower growth, there is a need for ongoing scrutiny of delivery assumptions, i.e. the number of homes that will deliver in the period and when within the plan period certain sites are likely to deliver.



### Allocations elsewhere

5.4.65 The aim of this section is to consider all other site options listed in Table 5.1 by sub-area. Rather than considering sub-areas in alphabetical order, they are considered in broad order of growth opportunity.

**Figure 5.12: The 16 sub-areas ('Croydon Places') as established by CLP 2018**



### Purley

5.4.66 This area is a key focus of growth but is subject to a range of issues and constraints, including associated with the River Wandle valley (including flood risk and heritage). There are three clusters of sites:

- Purley District Centre – one previous allocation has now completed (Site 130; 106 homes) and another is permitted (Site 35; 114 homes). There are then four non-permitted sites for a total of ~800 homes, all of which are CLP 2018 allocations.

Of the four non-permitted allocations, three are associated with a reduced proposed capacity relative to the 2022 stage, reflecting recent design work (also noting an adjacent local heritage asset in the case of Site 683). One of these sites is notably large, namely Site 347, which is now proposed for 420 homes, in contrast to CLP 2018, which supports up to 990 homes. This site is currently Tesco extra and falls within a Tall Building Zone (Tall Buildings Study, 2023), but flood risk zone 3 is a constraint.

The final non-permitted site is then Site 30, which comprises Purley Leisure Centre, which would be re-provided. Capacity is increased relative to 2022, noting that the site falls within a **Tall Building Zone**.

- Reedham – two of the three modest allocations from 2022 are unchanged, namely Site 64 and Site 490, and at both sites capacity has been modestly boosted on the basis of design work. Site 490 will deliver a primary school, and both sites are in proximity to Reedham Station. The one omission site is then Site 410, which was an allocation until late in the process. It is located in proximity to the station, but is a small site, which had previously been supported for 12 homes, hence need not be considered further.
- Purley Oaks – the two allocations are unchanged, namely Site 324 and Site 405, although the proposal is to significantly reduce capacity at the latter site, from 99 homes to 50 homes, in light of design work. The site is located in close proximity to Purley Oaks station but is affected by flood risk.
- Elsewhere – Site 411 is proposed for 8 homes to deliver post 2034 (no known developer interest).

5.4.67 In **conclusion**, there is no reasonable option for significantly boosting housing supply. The emerging proposed approach sees significant growth directed to Purley, and there is limited case for questioning the detailed design work completed for the proposed allocations, including noting flood risk affecting certain of the sites. Also, there is a need to consider the [Purley Strategic Regeneration Framework](#) (2021).

#### Broad Green & Selhurst

5.4.68 Attention focuses on:

- Broad Green Local Centre and land along London Road to the south, in close proximity to West Croydon Station. The Local Centre is described as ‘important’ by the Tall Buildings Study including on account of relatively low sensitivity (although it is important to recall that this is a *local* centre); and
- Croydon University Hospital, located further north along London Road.

5.4.69 Another local centre is also located further north along London Road, namely Thornton Heath Local Centre, but this is less well-connected. Elsewhere in this area PTAL is relatively low (although Selhurst Station is at the eastern extent of the area) and there is notable relative deprivation.

5.4.70 Taking the clusters of allocations in turn:

- Northern cluster (Thornton Heath Local Centre) – one permitted site for 101 homes (Site 407), notably 25 homes in CLP 2018 and then not allocated in 2022. The other site option is very small (Site 248).
- Central cluster – beginning with Site 103, this is permitted for a hotel but allocated for 143 homes. Site 499 is a key site, namely Croydon University Hospital, where the proposal is for 345 homes subject to healthcare re-provision. The site was proposed for 372 in 2022, and delivery has been pushed back. This area is a defined **Tall Building Zone** within the Tall Building Study (2023).
- Southern cluster (south of Broad Green Local Centre) – this is also a defined **Tall Building Zone**. Firstly there are two permitted sites, namely Site 404 (79 homes; currently comprises employment land but proposed for residential only; CLP 2018 allocation but deleted in 2022); and Site 396 (permitted for 72 homes but previously proposed for 39 homes in 2022). Non-permitted site are:
  - Site 201 – a CLP 2018 allocation set to deliver 216 homes and a primary school.
  - Site 337 – a CLP 2018 allocation for up to 184 homes, which was deleted in 2022 and is now supported for 45 homes following design work and proposed to deliver by 2029. Policy notes viability challenges.
  - Site 417 – CLP 2018 allocation for up to 64 homes; now supported for 11 homes following design work.

The Tall Buildings Study strikes a note of caution: “... a suburban location, generally characterised by low prevailing building heights with relatively low levels of [PTAL]. Care will therefore need to be taken to [take] account of this context and [respond] positively to the existing townscape character.”

- Elsewhere – there are four other proposed allocations, all of which are non-permitted, and three of which are very small (Site 22, Site 78 and Site 471). Site 13 is then 0.4 ha and proposed for 57 homes. It comprises a commercial site now proposed for residential (previously been proposed for mixed use).

5.4.71 Table 5.1 also lists three omission sites, of which one is of particular note, namely Site 416, which was proposed for 40 homes in 2022 and is allocated in CLP 2018 for up to 136 homes. However, this is a very irregular-shaped site adjacent to Croydon cemetery, which is MOL, SINC and a local heritage area.

5.4.72 In **conclusion**, there is no reasonable option for significantly boosting housing supply. Attention focuses on larger sites 499 and 201, but both sites are associated with distinct issues. There are also two sites with notably reduced capacities, but this is a reflection of recent design work.

#### Thornton Heath

5.4.73 Attention here focuses on Thornton Heath District Centre, for which the Tall Buildings Study finds: *“Sensitivity and suitability analysis undertaken reveals Thornton Heath District Centre as one of the most suitable of the district centres across the borough, whilst also being one of the least sensitive.”* The study goes on to define a **Tall Buildings Zone**. However, there is a degree of heritage constraint, with a High Street Local Heritage Area which contains distinctive architectural styles from the late 19th to 20th century.

5.4.74 There are six allocations here proposed to deliver a total of 295 homes, of which one is permitted for 66 homes (Site 326), with CLP 2018 having anticipated up to 145 homes.

5.4.75 Of the five non-permitted allocations, the stand-out large site is Site 136, which is a district centre site for 124 homes (CLP 2018 says up to 55 homes). The other site of note is Site 400, which is a CLP 2018 allocation deleted in 2022 but now proposed for 47 homes by 2029. It is in a less accessible location.

5.4.76 Site 106 is also of note as a small site that must deliver a replacement community centre. It is located close to a neighbourhood centre, and also close to another smaller proposed allocation (Site 284). The remaining site (Site 105) is a small site located in close proximity to the district centre.

5.4.77 There is one omission site, namely Site 149, which was proposed for 118 homes in 2022 and up to 254 homes at the I&O stage. This is a district centre site comprising shops / town centre uses on the ground floor with two levels of flats above (plus parking to the rear) but is deemed no longer developable.

5.4.78 In **conclusion**, there is no reasonable option for significantly boosting housing supply. There is presumably a need for ongoing consideration of district centre regeneration / intensification.

#### Addington

5.4.79 Both allocations from 2022 are now removed, namely: Site 1, which comprises amenity greenspace and was previously proposed for 46 homes; and Site 44, which was proposed for 376 homes in 2022 and then 179 homes in early 2024. Focusing on Site 44, there is now a pending planning application for an NHS diagnostics centre without any associated housing (as discussed in Section 5.3).

5.4.80 Both of these sites are associated with New Addington, which is one of the most deprived areas in Croydon (despite very good transport connectivity). The Tall Buildings Study (2023) defines a **Tall Buildings Zone**; however, there is no clear case for assuming a higher growth strategy aimed at achieving regeneration objectives, given the specific reasons for not allocating these two sites.

5.4.81 Both the Interim SA Report (2019) and the previous SA Report (2022) also discussed the option of **Green Belt** release, and this remains an option. Specifically, Lodge Lane comprises Council owned land at the western edge of New Addington, including the eastern half of Addington Court Golf Club. Transport connectivity is strong, given the adjacent tram line; and development could integrate well with New Addington. However, there is a clear concern from a Green Belt perspective, as the landscape gap to Selsdon would be reduced to c.200m. The landscape parcel as a whole, between Selsdon and New Addington, is judged to contribute significantly to Green Belt purposes; however, the proposed scheme would involve only the eastern half of the parcel. There are also biodiversity and potentially landscape sensitivities associated with the valley / valley sides to the southwest.<sup>17</sup>

<sup>17</sup> It is also noted that land directly to the north is available. This site benefits from being adjacent to the Addington Village bus/tram interchange, but mostly comprises a SINC, and is clearly sensitive in Green Belt terms.

- 5.4.82 In **conclusion**, the only reasonable option for significantly boosting housing supply beyond the emerging proposed approach is the option of Green Belt release. However, there is also a need for ongoing scrutiny of wider growth options given regeneration objectives and also strong transport connectivity, both in terms of a tram connectivity and proximity to Biggin Hill Strategic Outer London Development Centre (SOLDC).

#### Coulsdon

- 5.4.83 This is the next sub-area for consideration given a district centre and a defined **Tall Building Zone**; however, there is only one small non-permitted proposed allocation. By way of context, Coulsdon is located at the south west extent of the Borough, closely associated with the railway line (with a station), the A23 and a large SIL. There is a degree of relative deprivation.
- 5.4.84 There were two proposed allocations in 2022, but one is now complete, namely Site 372, which has delivered 157 homes (CLP 2018 identifies no housing capacity). The non-permitted allocation is Site 945, which is now proposed for 39 homes (previously 66 homes). The reduced scale of growth reflects recent design work, and this is not an identified Tall Building Zone, but there is perhaps a case for higher growth given very good accessibility credentials (although, on the other hand, the proposal is also to deliver retail and car parking, recognising that the site currently comprises a supermarket).
- 5.4.85 In **conclusion**, there is no reasonable option for significantly boosting housing supply. Attention focuses on Site 945, but there is limited basis for questioning the detailed design work that has been completed.

#### Norbury

- 5.4.86 This is the final sub-area for consideration with a defined **Tall Building Zone**, and there is a district centre; however, there are no proposed allocations. By way of context, this area comprises the north west extent of the Borough and is mostly associated with fairly good PTAL.
- 5.4.87 There are now no proposed allocations here, with Site 951 from 2022 now no longer supported. It comprises high street shops with historic character (proposal was to retain) and was previously proposed for 22 homes. It is located within the district centre, and in close proximity to the rail station.
- 5.4.88 In **conclusion**, there is no reasonable option for significantly boosting housing supply. Site 951 appears suitable, but clearly is not developable on the basis of latest understanding. There is also a need for ongoing scrutiny of the defined Tall Building Zone, to the south of the District Centre, where there are currently no allocations. Growth here could contribute to a strategy for delivering growth and associated enhancements along the London Road in combination with growth at: the three local centres to the south; Croydon University Hospital; West Croydon Station; and North End Quarter.

#### Sanderstead

- 5.4.89 Site 306 is a CLP 2018 allocation now proposed for a 41 home residential scheme, in contrast to an 8 to 24 home mixed use scheme. It is within a local centre but has low PTAL. The other two allocations - Site 71 and Site 79 - do not feature in CLP 2018. Site 79 is notably some way distant from a rail station, but it is associated with a local centre. It comprises a supermarket with no current developer interest.
- 5.4.90 Both the Interim SA Report (2019) and the previous SA Report (2022) also discussed the option of **Green Belt** release to deliver an urban extension to Sanderstead, and this remains an option at the current time. Specifically, Mitchley Hill, Sanderstead performs fairly poorly in transport accessibility terms relative to the New Addington Green Belt option discussed above, but better in Green Belt terms, with the Council's assessment explaining "*it is in effect completing a development begun in the interwar period that was never completed due to the onset of World War II.*" This is, however, steeply sloping land and there is a need to consider whether it could alternatively be suitable for an enhanced green infrastructure role.<sup>18</sup>

<sup>18</sup> One other site is of note because a representation was received from the site promoter at the Issues and Options stage and again at the 2022 publication stage, namely Site 531 from the Council's assessment, known as Mitchley Avenue South. However, the Council's assessment sets out clear reasons for ruling this site out, including: "*Site 531, also on Mitchley Avenue, would only integrate well with the existing built form if it were a small linear development along Mitchley Avenue (and therefore, not an urban extension), or if it were undertaken as part of the development of all the sites identified along Mitchley Avenue and Mitchley Hill.*" The site does benefit from being closer to Riddlesdown Station than the shortlisted Mitchley Hill site (discussed above), but there are clear sensitivities around the edges of the site, namely public rights of way, Mitchley wood and mature hedgerows/small areas of woodland shown to be priority habitat by the national dataset. A cul-de-sac from Mitchley Avenue might be envisaged, with a considerable amount of the site given over to green space and habitat creation (including the southern raised part of the site), but such a scheme might be modest in scale, such that it does not warrant further consideration here.

- 5.4.91 It is also important to note that the promoter of this site responded to the consultation, pointing out that the assumed capacity figure in the Issues and Options document (680 to 780 homes) was not correct. The site is in the region of 10ha in size, and so capacity is assumed here to be circa 350 homes.
- 5.4.92 In **conclusion**, the only reasonable option for significantly boosting housing supply beyond the emerging proposed approach is the option of Green Belt release.

#### Selsdon

- 5.4.93 Selsdon is located at south east extent of the Borough and includes significant areas of Green Belt. The Tall Buildings Study (2023) explains:

*“Selsdon is a street-based small district centre. The commercial high street buildings are generally of a domestic scale and character, typically three storeys... The immediate residential neighbourhoods around the centre are located tightly adjacent to the commercial uses... Local trees are currently the tallest structures in the local townscape... This small centre is not considered appropriate for tall buildings.”*

- 5.4.94 The one proposed allocation (Site 948) has planning permission for 26 homes. A second site was proposed in 2022 (Site 85) but is now an omission site. It was proposed for a mixed use regeneration scheme within the neighbourhood centre at the eastern extent of the sub-area, involving 86 homes, but the site is no longer seen to be developable. It had previously been suggested for 6 to 41 homes at the I+Os stage, and the site does benefit from accessibility to the tram line (PTAL 3).
- 5.4.95 Both the Interim SA Report (2019) and the previous SA Report (2022) also discussed the option of **Green Belt** release to deliver an urban extension to Selsdon, and this remains an option at the current time. Specifically, Gravel Hill, Selsdon – comprises land between the northern edge of Selsdon and Gravel Hill, forming the southern part of a wider landscape parcel that stretches north beyond Gravel Hill, and is judged to make a ‘moderate to significant’ contribution to Green Belt purposes. Further considerations include: adjacent Grade II listed Heathfield, which is associated with a designated view cone that crosses the site and the high density of nearby woodlands, including associated with former Addington Park. The Issues and Options consultation document suggested a capacity of 1,300 to 1,540 homes; however, this site is now judged to perform poorly relative to the two sites Green Belt sites discussed above.
- 5.4.96 In **conclusion**, the only reasonable option for significantly boosting housing supply beyond the emerging proposed approach is the option of Green Belt release. However, this option is of questionable reasonableness, in the context of wider strategic considerations, as discussed further below. There is also a need for ongoing considerations of opportunities around regenerating the neighbourhood centre.

#### Addiscombe

- 5.4.97 Located to the east of the Croydon OA, much of the Addiscombe is relatively affluent, and the area benefits from a district centre, tram links and strategic open space. However, the Tall Buildings Study explains:

*“Addiscombe is a single sided high street-based district centre with a residential hinterland tightly bordering the commercial uses... Most retail and commercial uses in the centre occupy low-scale domestic style buildings, with a strong prevailing two storey character... The few taller buildings are exceptions with little discernible change in urban grain between the centre and its hinterland. Whilst there are few identified heritage assets within the centre itself, there is a conservation area and locally listed buildings to the south... Given this constrained context and the street-based nature of the centre, Addiscombe is not considered an appropriate location for tall buildings.”*

- 5.4.98 As per 2022, there is only one proposed allocation, which is a vacant industrial site located close to the Croydon OA. The proposed capacity is now 19 homes, having previously been 12 homes in 2022, and with CLP 2018 having anticipated up to 57 homes. This is an example of a site where the capacity has been the focus of detailed work to consider the appropriate capacity, and there is no clear basis for exploring the matter further through appraisal of reasonable alternatives, albeit noting that the site has previously been considered for a significantly higher capacity than the current proposed approach.
- 5.4.99 In **conclusion**, there is no reasonable option for significantly boosting housing supply.

### South Norwood and Woodside

- 5.4.100 This is the northeast extent of the Borough. The Tall Buildings Study (2024) explains: *“South Norwood district centre falls entirely within the South Norwood Conservation Area... Tall buildings are not therefore considered an appropriate form of development under the tall building policy... There are some tall buildings within South Norwood which might be considered a precedent. However, any such proposal would need to be considered on its merits, including the potential impact on the... Conservation Area.”*
- 5.4.101 The proposal in 2022 was for one proposed allocation (Site 51; 102 homes to be delivered by 2027), but this is now an omission site. It comprises amenity land and a car park associated with tower blocks. It is located adjacent to the district centre and within a conservation area.
- 5.4.102 The latest proposal is for two allocations, namely: Site 486, which is a CLP 2018 allocation deleted in 2022 but now proposed to deliver 22 homes; and Site New 2, which comprises a housing estate proposed to deliver 260 homes (net) by 2029 and which is a **Tall Building Zone**.
- 5.4.103 Finally, Site 140 is an omission site adjacent to a tram stop but comprising MOL.
- 5.4.104 In **conclusion**, there is no reasonable option for significantly boosting housing supply.

### Crystal Palace & Upper Norwood

- 5.4.105 This is the northern extent of the Borough. The Tall Buildings Study (2024) explains: *“The analysis... soon reveals the historically sensitive townscape of the area which is almost entirely covered by a conservation area... Whilst a vibrant and important district centre... Crystal Palace is not seen as a suitable location for new tall buildings in view of its townscape value and character.”*
- 5.4.106 The stand-out large site is Site 357, which is located within the district centre and within the Upper Norwood Triangle Conservation Area. The proposal is for a 135 home mixed use scheme (unchanged from 2022), with CLP 2018 having proposed 39 to 223 homes.
- 5.4.107 The two other sites are both associated with notably reduced capacities following detailed design work completed in 2023 (using a ‘cookie cutter’ methodology): Site 126 – was proposed for 72 homes, now 27 homes. PTAL rating is 2, i.e. quite low; and Site 58 – was proposed 72 homes, now 22 homes.
- 5.4.108 In **conclusion**, there is no reasonable option for significantly boosting housing supply. There is limited strategic case for questioning the detailed design work completed for either of the proposed allocations.

### Kenley and Old Coulsdon

- 5.4.109 There is only one site option here, namely Site 937, which is now an omission site, but had previously been supported for 12 homes, in line with a planning application, plus it is noted that the CLP 2018 previously supported a mixed use scheme to include a community use. This is a poorly connected part of the Borough, distant from road and rail corridors.
- 5.4.110 In **conclusion**, there is no reasonable option for significantly boosting housing supply.

### Shirley

- 5.4.111 Located at the eastern extent of the Borough, and mostly associated with low PTAL, although there is a local centre. The proposal in 2022 was for four allocations, although the latest proposal is for three.
- 5.4.112 Two of these are small sites, namely: Site 504 – is closely associated with a designated SINC (a cemetery) and would involve conversion of a locally listed pumping station for 24 homes (CLP 2018 states up to 68 homes; and Site 87 – is proposed for 9 homes, having been proposed for 18 homes in 2022 and up to 25 homes at the I&O stage. The scheme must deliver a replacement community centre.
- 5.4.113 The final site is then larger (Site 128), now proposed for 123 homes having been proposed for 91 homes in 2022. It is described by CLP 2018 as a ‘cleared site’ but includes significant mature vegetation.
- 5.4.114 The one omission site (Site 502) is located in the Green belt but the CLP 2018 allocation (90 homes) assumes that development could occur without Green Belt release. A SINC is adjacent and PTAL is very low, hence there is little case for questioning the decision to delete the allocation.
- 5.4.115 In **conclusion**, there is no reasonable option for significantly boosting housing supply.

South Croydon

- 5.4.116 This area benefits from rail connectivity and two local centres, but there is limited development opportunity.
- 5.4.117 The proposal in 2022 was for three allocations, although the latest proposal is for just one, namely Site 114, which is proposed for 8 homes (versus up to 50 homes at the I+Os stage). One of the omission sites (Site 54) is a CLP 2018 allocation for 42 homes, and was recorded as permitted in 2022 (it is cleared), but it is within flood risk zone 3. The other omission site (Site 101; 22 homes in 2022) is also in flood zone 3.
- 5.4.118 In **conclusion**, there is no reasonable option for significantly boosting housing supply. However, there is a need for ongoing scrutiny of growth options noting relatively good PTAL and given that previously proposed locations for housing growth are now ruled out on account of flood risk.

Conclusion on sub-areas 'elsewhere' (i.e. outside the Croydon OA and Purley Way)

- 5.4.119 As per 2022, it remains appropriate to consider the possibility of Green Belt release as a means of boosting housing supply (see further discussion below).
- 5.4.120 With regards to boosting supply in the urban areas, attention focuses on Coulsdon, Purley and potentially also previously proposed neighbourhood / district centre regeneration sites at Selsdon and Thornton Heath. However, on balance, it is not possible to identify any reasonable higher growth scenario(s).
- 5.4.121 There is also clearly a need for ongoing scrutiny of non-allocated land within identified Tall Building Zones, perhaps most notably the zone located adjacent to the south of Norbury District Centre. Related to this, there is a need for ongoing consideration of coordinated growth along London Road, between North End Quarter and Norbury, via West Croydon Station, three local centres and West Croydon Hospital.
- 5.4.122 With regards to lower growth, there is a need for ongoing scrutiny of detailed design considerations and constraints affecting sites (notably flood risk and historic environment), but arguments for lower growth are reduced on account of the detailed work on site capacities that has been undertaken since 2022, which overall has led to a significant reduction in supply. Also, arguments are potentially reduced on account of the deletion of the previously proposed intensification areas (discussed below).

Figure 5.13: An example of analysis from the Tall Buildings Study (2024)

24.2 Thornton Heath tall building thresholds

24.21 The Thornton Heath area south of the centre is identified as a location considered potentially appropriate for tall buildings:

**Threshold of tall in Thornton Heath**

24.22 Casting a VuCity laser beam at the equivalent height of 6 residential storeys demonstrates that only existing large and bulky buildings in the vicinity of the station are taller than that threshold, and these are substantially taller than other buildings in the Thornton Heath area.

24.23 The definition of tall for Thornton Heath is the London Plan default definition of 21 metres measured from the ground to the top of the building (Growth and Characterization LPG). See Fig 227.

**Upper threshold heights for tall buildings in Thornton Heath**

24.24 The upper threshold for tall buildings within the area potentially appropriate for tall buildings in Thornton Heath is 39 metres measured from the ground to the top of the building. This takes account of taller developments in the immediate vicinity of the railway station, some of which are site allocations and present major regeneration opportunity. See Fig 228.

Is this area appropriate for tall buildings?	YES
Minimum threshold	Upper threshold
21 metres measured from the ground to the top of the building	39 metres measured from the ground to the top of the building



Fig 227 View demonstrating the minimum threshold with green datum line set at approximately 21m (equivalent to 6 storeys)



Fig 228 View demonstrating the upper threshold with green datum line set at approximately 39m (equivalent to 12 storeys)



Fig 229 Area potentially appropriate for tall buildings



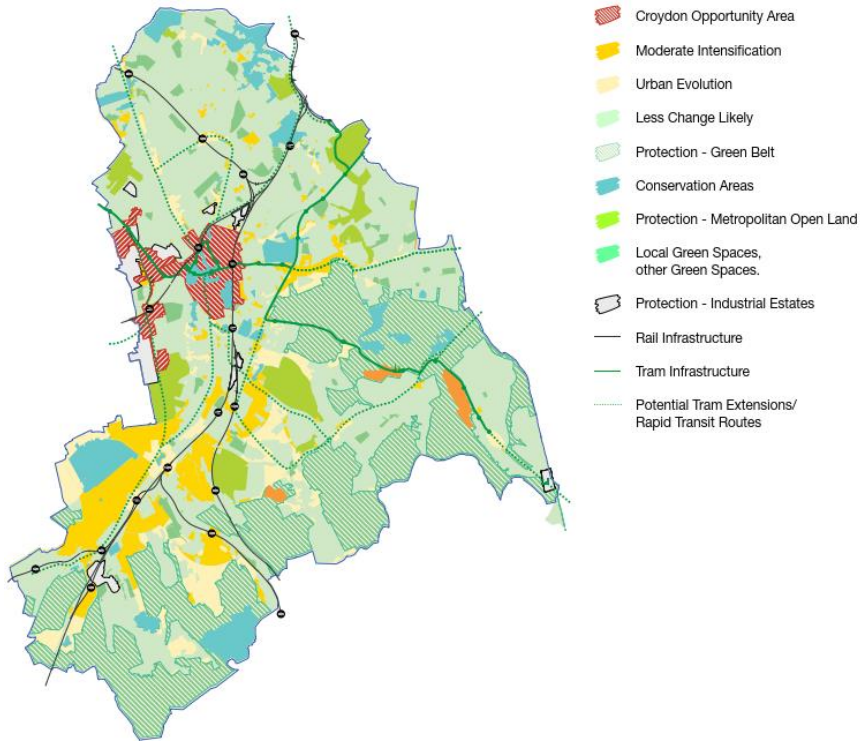
Fig 230 Area potentially appropriate for tall buildings

## Conclusion on sub-area scenarios

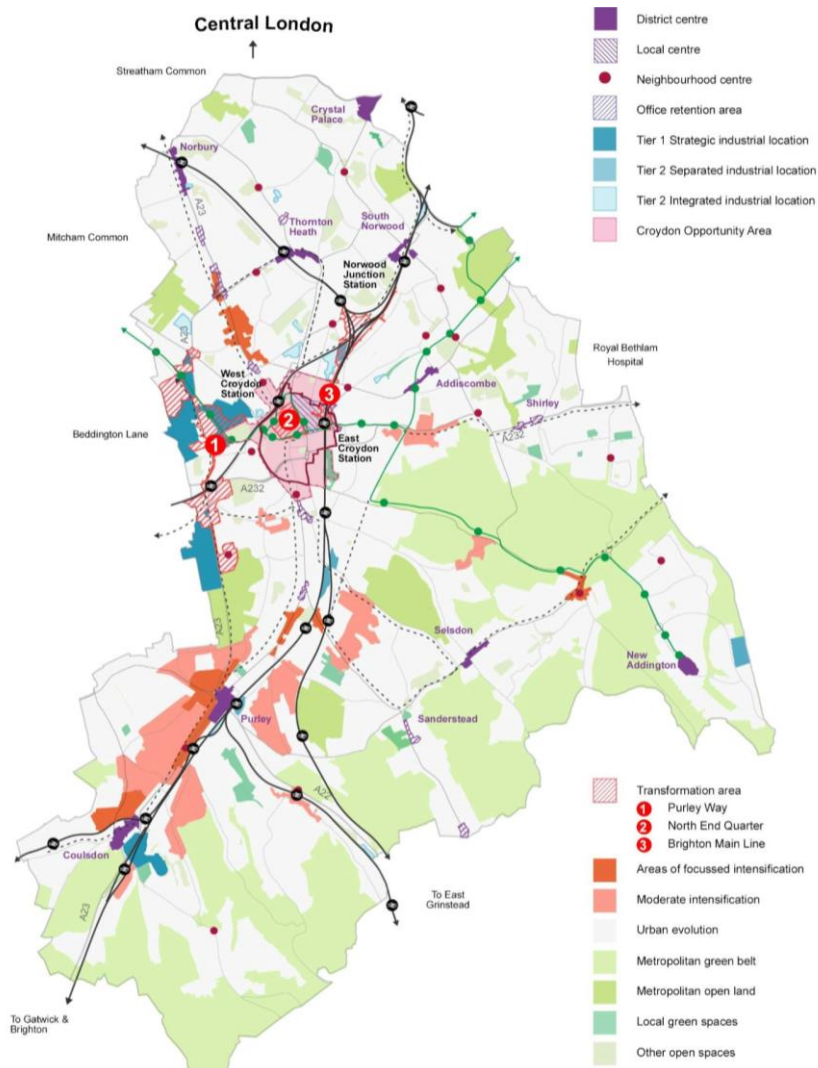
- 5.4.123 To reiterate, this section has focused on exploring potentially reasonable scenarios involving boosting housing supply over-and-above the emerging proposed approach (or 'higher growth' scenarios).
- 5.4.124 A clear focus is on exploring a higher growth scenario for **North End Quarter**, albeit what can be achieved is limited whilst masterplanning is ongoing. With regards to the other two transformation areas: **Brighton Mainline and East Croydon** was judged to be associated with reasonable growth scenarios in 2022, but there is no longer any case for exploring higher growth given uncertainty regarding funding of, and timing for, the rail and station upgrade works; and **Purley Way** is not associated with any reasonable higher growth scenario due to transport and other delivery constraints (as per the conclusion in 2022).
- 5.4.125 With regards to the **Croydon Opportunity Area outside of the transformation areas**, attention focuses on areas well linked to North End Quarter, including the West Croydon Station Area, and also the western part of the Office Retention Area (ORA) given an aspiration to better link North End Quarter and East Croydon Station. However, on balance, it is not clear that there is a reasonable higher growth scenario. Within the ORA as a whole there is a need for ongoing consideration of long term spatial strategy, noting the number of new homes recently delivered, committed and proposed through the current allocations.
- 5.4.126 With regards to part of the Borough **outside of the Croydon Opportunity Area**, the first point to consider is the possibility of **Green Belt** release. Whilst the emerging proposed approach is to *not* support any Green Belt release (unchanged from 2022), it is appropriate to explore the possibility of Green Belt release as a reasonable alternative (as per the conclusion reached in 2022). This is because it could feasibly be an effective means of boosting housing supply, particularly with a focus on family and affordable housing. Whilst officers are of the view that it is *not* possible to demonstrate the 'exceptional circumstances' necessary to justify Green Belt release (mindful that Green Belt release is particularly difficult to justify in the London context, as it is arguably a strategic matter for the London Plan), it remains reasonable to test.
- 5.4.127 The previous SA Report (2022) presented a stand-alone section on shortlisting Green Belt site options, with reference to officer-led work at the Issues and Options stage, including assessment of 52 submitted sites, and as reported in a paper entitled *Proposed urban extensions on Green Belt land – site selection analysis*. Within this current report the discussion is presented above, under sub-area headings, but the conclusion is unchanged, namely that a shortlist of three options can be identified (see Figure 5.14), of which one performs sequentially poorly. On balance, from the shortlist, it is judged reasonable to appraise and consult upon a scenario involving ~2,500 homes from the two better performing sites (as per 2022).
- 5.4.128 Finally, with regards to **suburban areas**, attention focuses on a number of sites and clusters; however, on balance, it is not clear that there is a scenario involving significantly boosting housing supply. Purley and Coulsdon are associated with a strategic case for higher growth in order to realise strategic transport objectives (rail metroisation, tram extension, bus services), but there are constraints to growth. At Thornton Heath District Centre there is a need for ongoing consideration of regeneration and intensification, given good transport connectivity and limited constraint, but no developable scheme currently exists. Similarly, but on a smaller scale, ongoing consideration should be given to the possibility of regeneration of Selsdon Neighbourhood Centre, including noting the relative proximity of a tram stop. Finally, it is noted that two small sites at Reedham (Purley) and Kenley and Coulsdon were removed from the plan very late in the process. Removal of the latter site will mean no allocations at Kenley and Coulsdon, but both sites are small (30 homes in combination) hence need not be considered further.
- 5.4.129 There is also clearly a need for ongoing scrutiny of non-allocated land within identified Tall Building Zones, perhaps most notably the zone located adjacent to the south of Norbury District Centre. Related to this, there is a need for ongoing consideration of coordinated growth along London Road, between North End Quarter and Norbury, via West Croydon Station, three local centres and West Croydon Hospital.
- 5.4.130 For numerous of these suburban areas, further context is deletion of areas of focused and/or moderate intensification (see Figure 5.15), which would have served to encourage additional homes via **windfall** developments. However, this does not serve as a strong reason for exploring the possibility of boosting housing supply from any of the proposed allocations.
- 5.4.131 See further discussion of windfall below. One key point to note from Figure 5.15 though is around the potential to spatially target windfall development in line with transport and accessibility objectives.



**Figure 5.14:** Strategic Option 3 from the I+Os stage, showing the shortlisted GB sites at that time (dark orange)



**Figure 5.15:** The key diagram from the 2022 publication stage, showing previously proposed intensification areas



## 5.5 The reasonable growth scenarios

5.5.1 The discussion above has served to identify a need to further explore the possibility of boosting housing supply (i.e. delivering a quantum of homes significantly above the emerging proposed approach) via:

- Increased support for windfall / suburban intensification (see further discussion in Box 5.3);
- Support for additional homes in the North End Quarter (ballpark figure ~500 additional homes); and/or
- Green Belt release (~2,500 homes assumed from two shortlisted sites).

### **Box 5.3: Defining a reasonable higher growth scenario in respect of windfall / suburban intensification**

As discussed in Section 5.2, the emerging preferred approach to windfall supply is to assume 9,794 homes over the plan period. This assumes windfall at a rate of 641 dpa for the final 12 years of the plan period, despite recent rates having been ~1,050 per annum. Whilst setting policy so as to enable continuation of recent rates of windfall (~1,050 per annum) is 'unreasonable', it is fair to consider setting policy so as to enable windfall at a rate of perhaps 750 dpa, which would boost housing supply by in the region of 1,500 homes over the plan period.

With regards to the nature of the policy support that would be set out in the Partial Review, it is beyond the scope of this report to define this with any precision, but it is fair to assume a degree of spatial targeting. The approach to spatial targeting ('intensification areas') at the Issues and Options stage (2019) and at the previous Publication stage (2022) was somewhat complicated; however, the underpinning principal was not, namely support for intensification where A) the urban character is one of houses in large plots (as understood from the Borough Character Appraisal, 2015); B) there is good accessibility and public transport connectivity, taking account of proximity to a centre, proximity to a secondary school and PTAL; and C) there are no clear constraints to growth, particularly heritage designations. It is fair to assume that a similar approach would be applied.

5.5.2 The emerging proposed approach involves a total supply of 39,786 homes over the plan period, which is a figure about 17% above the Council's proposed housing requirement, which is 34,145 homes. 17% is a reasonable 'supply buffer' in the context numerous supply components that are uncertain ('delivery risk') and given the Government's recent proposal that London boroughs must deliver over 95% of their housing requirement or else face the presumption in favour of sustainable development (discussed below).

5.5.3 The 34,145 home requirement is calculated on the basis of the London Plan target to 2029, which is 2,079 dpa, and then the identified capacity figure from the London SHLAA (2017) for the subsequent eleven years of the plan period, which involves considerable 'step down' to 1,214 dpa. This is in the context of average delivery of 2,126 dpa over the past four monitoring years, although expected completions for the current monitoring year (2023/24) are lower, at 1,608 homes.

5.5.4 This approach aligns with paragraph 4.1.11 of the London Plan, as discussed in Section 5.2. However, paragraph 4.1.11 also makes reference to the need to account for "any local evidence of identified capacity" when setting a housing requirement for the period post 2029, which opens the door to exploring scenarios involving setting the housing requirement above 34,145 (e.g. this is the approach taken by the emerging Enfield Local Plan).<sup>19</sup> Also, as discussed in Section 5.2, it is not uncommon to simply roll forward the London Plan target post 2029 if there is capacity, e.g. see Ealing, Harrow, Lewisham and Wandsworth.

5.5.5 In this light and given that housing need is likely to be in excess of 34,145 homes (plus there is a need to factor-in specific needs, including for affordable, family and specialist housing),<sup>20</sup> there is a case for exploring scenarios that would involve setting the housing requirement above 34,145 homes.

5.5.6 However, the case for exploring higher growth scenarios is limited given the forthcoming London Plan Review and the fact that Local Plans must be reviewed every five years. As such, it is only reasonable to explore scenarios involving a housing requirement *modestly* above 34,145. Another factor is unmet housing need from neighbouring Tandridge District, but this is a strategic matter for the London Plan.

<sup>19</sup> An officers report to Full Council (6<sup>th</sup> March 2024) explains: "As the London Plan evidence would see a significant drop off in urban capacity beyond this, the ELP then proposes to exceed the urban capacity derived housing figures for the period post 2029, to better meet local needs for more family housing and more affordable homes."

<sup>20</sup> The SHMA (2023) explains that the Government's standard method identifies housing need as 3,929 dpa (which theoretically equates to 78,500 homes over the plan period). However, on the other hand, the SHMA also considers an alternative methodology for calculating housing need, which serves to suggest that need may equate to 1,341 homes per annum.

5.5.7 On balance **five reasonable growth scenarios** are defined for appraisal – see Table 5.2. These comprise the emerging proposed approach and four higher growth scenarios involving boosting supply by between 1,500 and 3,000 homes. Boosting supply by 3,000 homes would certainly allow for a housing requirement modestly above 34,145, and there could also be potential for this under one or more of the other scenarios.

5.5.8 However, it is beyond the scope of this current work to state exactly what the housing requirement would be set at, under each scenario. This is because a decision would need to be made accounting for the importance of a robust supply buffer, also being mindful of the Government's [proposal](#) that across London the 'presumption in favour of sustainable development' will apply (for applications on previously developed land) where the local authority scores below 95% on the Housing Delivery Test (HDT).

5.5.9 In summary the reasonable alternative growth scenarios are as follows:<sup>21</sup>

- Scenario 1 – the emerging proposed approach (housing requirement = 34,145)
- Scenario 2 – boost windfall (housing requirement *potentially* > 34,145)
- Scenario 3 – boost windfall and NEQ (housing requirement *potentially* > 34,145)
- Scenario 4 – Green Belt release (housing requirement *potentially* > 34,145)
- Scenario 5 – Green Belt release and boost NEQ (housing requirement > 34,145)

**Table 5.3:** The reasonable growth scenarios (N.B. constant supply components greyed-out)

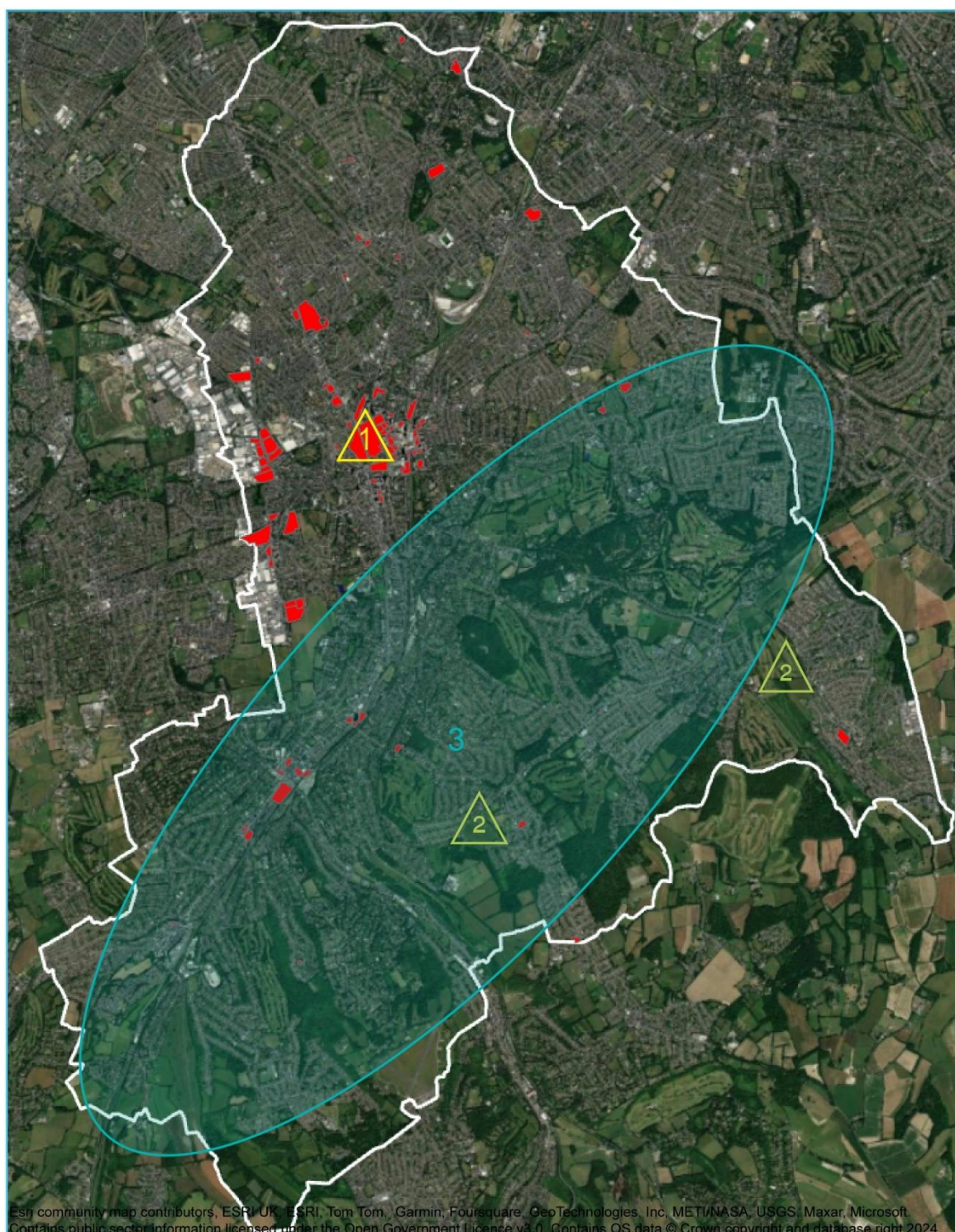
Supply component		Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
Completions		8,505	8,505	8,505	8,505	8,505
Permissions (not allocated)		2,532	2,532	2,532	2,532	2,532
Allocations	North End Quarter	1,594	1,594	<b>2,100</b>	1,594	<b>2,100</b>
	Elsewhere in the COA	8,550	8,550	8,550	8,550	8,550
	Purley Way	5,579	5,579	5,579	5,579	5,579
	Urban elsewhere	3,232	3,232	3,232	3,232	3,232
	Green Belt sites (x2)	-	-	-	<b>2,500</b>	<b>2,500</b>
Windfall		9,794	<b>11,300</b>	<b>11,300</b>	9,794	9,794
<b>Total supply</b>		<b>39,786</b>	<b>41,292</b>	<b>41,798</b>	<b>42,286</b>	<b>42,792</b>
<b>% above 34,145</b>		<b>17%</b>	<b>21%</b>	<b>23%</b>	<b>24%</b>	<b>25%</b>

5.5.10 Finally, Figure 5.16 aims to visually depict the five scenarios, highlighting:

- The allocations that are held constant across the scenarios.
- The North End Quarter which sees a boost to housing supply under Scenarios 3 and 5.
- The two shortlisted Green Belt sites assumed to deliver ~2,500 homes under Scenarios 4 and 5.
- A broad indication of the suburban area that would see a boost to windfall under Scenarios 2 and 3.

<sup>21</sup> To be clear, these are the 'reasonable alternatives' at the current time, and are defined for appraisal in order to reflect a central requirement of the SA process, which is for the SA Report to present an appraisal of "the plan and reasonable alternatives". The reasonable alternatives (growth scenarios) reflect the latest evidence and so are tailored to informing the current consultation. They supersede the reasonable alternatives defined, appraised and subjected to consultation in 2021/22.

**Figure 5.16:** The proposed allocations plus shortlisted options for boosting housing supply that are combined in order to form reasonable growth scenarios 2, 3, 4 and 5



### 1) Boost NEQ

2) **Green Belt release** (N.B. the identified sites are somewhat indicative; in practice there would be a need for further work to explore options)

3) **Boost windfall** (N.B. there is no certainty around spatial targeting, but there would likely be a degree of focus on suburban areas where the existing built form is less dense)

## 6 Growth scenarios appraisal

### 6.1 Introduction

6.1.1 The aim of this section is to present an appraisal of the reasonable growth scenarios.

### 6.2 Appraisal findings

6.2.1 Appraisal findings are presented across 13 sections below, with each dealing with a specific sustainability topic. Under each topic the aim is to: 1) rank the scenarios in order of preference; and 2) categorise the performance of each scenario in terms of significant effects (**red** / **amber** / **light green** / **green**).<sup>22</sup>

6.2.2 Further points on methodology

- Systematic appraisal – conclusions on significant effects and relative performance are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within SEA Regulations (including Schedules 1 and 2), and the Planning Practice Guidance.
- Concise appraisal – every effort is made to predict effects accurately. However, this is inherently challenging given the high level nature of the scenarios, the wide ranging nature of issues / receptors and an understanding of the baseline (now and in the future under a 'no plan' scenario) that is inherently limited. There is a need to set out the thought process that leads to appraisal conclusions, but in doing so a balance must be struck with the objective of ensuring a concise and engaging appraisal.

#### Air quality

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	5	4	3	2

6.2.3 In 2022 the GLA prepared a [report](#) for LB Croydon on air quality, and by way of introduction explained:

- Air pollution in London leads to thousands of premature deaths and costs the economy ~£3.7bn a year.
- NO<sub>2</sub> and PM<sub>2.5</sub> are the key pollutants of concern and are linked to a variety of adverse health impacts.
- Air pollution disproportionately affects the poorest and most vulnerable. Groups that are particularly susceptible include children, older people, pregnant women and those with cardiovascular disease. Those who spend time in polluted areas, near busy roads or in traffic for long periods are at greater risk.

6.2.4 The report explains that the rate of mortality attributable to PM<sub>2.5</sub> and NO<sub>2</sub> in LB Croydon is below the London average, but nonetheless high. The report also explains that there are 187 Air Quality Focus Areas in London, of which five are located in LB Croydon (see Appendix II). In summary:

- Wellesley Road through the town centre
- Thornton Heath
- Purley
- Two along the London Road (A212 / A23) heading northwest out of the Borough.

6.2.5 In order to address poor air quality there is a need to minimise car movements and particularly car movements through known air pollution and traffic hotspots. There is also a need to avoid decisions that result in people spending more time in areas with poor air quality (particularly vulnerable groups).

<sup>22</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- 6.2.6 Beginning with the question of whether or not to support additional housing growth within the **North End Quarter**, this is clearly a highly accessible part of the Borough, such that development would be car free. In the context of a Borough where Public Transport Accessibility Level (PTAL) varies greatly (see Appendix II), there is a clear transport and air quality case for maximising housing growth in Croydon Metropolitan Centre in order to minimise pressure for housing growth where PTAL is much lower. A further consideration is the potential to support additional investment in the public realm, including potentially measures to improve east-west connections between NEQ and East Croydon Station including addressing Wellesley Road which is a barrier to movement and a problematic source of air pollution. A final consideration is air and noise pollution from Wellesley Road being a constraint to residential development, but this could likely be mitigated through design.
- 6.2.7 It follows that there is a degree of concern with the scenarios that would see a boost to housing supply via additional policy support for small sites **windfall** ('suburban intensification') or **Green Belt** release. With regards to the former, the concern is that a lack of spatial targeting could lead to a prevalence of new homes in locations that are relatively poorly connected in transport terms, and another consideration is recent adjustments to the Council's preferred policy approach to car-parking, with increased support for onsite parking in the least well connected parts of the Borough (relative to 2022; see discussion in Part 2). With regards to the latter (Green Belt release), the larger of the two shortlisted Green Belt sites is located adjacent to a tram stop and close a district centre, and the smaller site is within fairly easy walking distance of an overground station and close to a local centre. New Addington is also located on the national cycle network (NCN 21), and there are opportunities to improve the network linking to the Croydon Metropolitan Centre (also, there is an aspiration to deliver a tram depot at New Addington). However, the over-riding consideration is that there would be a strong element of car dependency amongst new residents, including high rates of car trips to Croydon Metropolitan Centre.
- 6.2.8 Finally, with regards to **Scenario 1**, there are a number of proposed allocations adjacent to the Strategic Road Network; and there are significant air, noise and wider environmental quality issues (and opportunities) associated with the Purley Way Transformation Area. It is also the case that there are a number of allocations in locations that are poorly connected in transport terms, and a degree of growth directed to Air Quality Focus Areas, or locations that could lead to traffic through one or more Air Quality Focus Areas. It is potentially the case that adjustments made to the approach to growth via allocations since 2022 are overall a 'positive' in terms of air quality (see Table 5.1, which aims to flag changes since 2022), but this is uncertain and likely of limited significance. The pros and cons of Scenario 1 are explored in further detail in Part 2 of this report.
- 6.2.9 In **conclusion**, it is difficult to place the scenarios in an order of preference, because whilst there is support for boosting housing supply at NEQ, the assumption is that this would occur in combination with a boost to housing supply via either additional windfall or Green Belt release. On balance, it is considered appropriate to flag Scenario 1 as best performing and to highlight a particular concern ('limited or uncertain negative effects') with scenarios involving a boost to housing supply via added policy support for windfall.

## Biodiversity

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
 <b>1</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>

- 6.2.10 The Borough is associated with a dense network of Sites of Importance for Nature Conservation (SINCs), and a priority issue is both to protect this network of locally designated sites (including mindful of the potential for indirect impacts, e.g. recreational pressure) and to enhance the network.
- 6.2.11 With regards to enhancement, efforts must be focused both on the sites themselves and also functional connectivity between the sites, mindful that they are not distributed randomly, but rather are associated with clear patterns at landscape scales, often correlated with topography, historic land uses and historic settlement. There is also a need to consider the national and regional (London Plan) context to biodiversity enhancement efforts, including the Environment Act (2021), which requires a strategic approach to securing biodiversity net gain under a framework set out in a Local Nature Recovery Strategy (LNRS). A LNRS is not yet in place, but there is nonetheless a need to ensure a strategic approach to nature recovery.

6.2.12 In this light, there are concerns with all three of the higher growth scenarios over-and-above Scenario 1:

- **Windfall** – a key concern is loss of mature gardens, including mature trees. This is a significant issue London-wide (e.g. see a report prepared by the London Wildlife Trust [here](#)), and gardens across suburban Croydon are potentially significant in the London context. There could well be a correlation between areas with mature / valued gardens and SINC's / biodiversity priority areas.


For example (and notably), previously identified areas for intensification at the northern edge of Selsdon are surrounded by woodland SINC's. Furthermore, the large rear gardens here clearly contain mature trees such that they are largely indistinct from the adjacent woodlands when viewed on satellite imagery.

- **NEQ** – work completed to date has included a focus on realising targeted biodiversity objectives (i.e. objectives tailored to the local situation, mindful that there are no SINC's in proximity to either area). As such, there is a concern that higher densities could conflict with biodiversity / greenspace objectives, albeit there is uncertainty as higher densities could be achieved via taller buildings, and could feasibly lead to enhanced development viability and, in turn, more funding for biodiversity (e.g. green roofs).
- **Green Belt** – both of the sites in question have limited onsite sensitivity but are associated with wooded valleys, such that onsite habitat creation could prove well targeted. Of the two sites, the New Addington site is likely more sensitive, as the northern section of the site (which comprises part of a golf course) is associated with mature trees; however, this is mainly historic field boundaries around the perimeter. With regards to the Sanderstead site, significant woodland including Mitchley Wood SINC is nearby.

6.2.13 Finally, with regards to **Scenario 1**, there are a range of issues associated with certain site allocations. For example, a number of proposed allocations are adjacent or close to a SINC. Furthermore, there are significant biodiversity issues and opportunities associated with transformation of the Purley Way, particularly to the north (River Wandle) and to the south (rising land towards Roundshaw Down). However, overall there is confidence that Scenario 1 would involve taking a suitability proactive approach to avoiding conflicts with biodiversity objectives through site selection / spatial strategy. See discussion in Part 2.

6.2.14 In **conclusion**, there are clear concerns with both boosting windfall and Green Belt release, given the specific context of Croydon Borough (N.B. it is not the case that higher growth *automatically* gives rise to concerns from a biodiversity perspective, as lower growth only serves to displace growth to elsewhere). With regards to boosting NEQ, whilst there is a degree of concern, there is also a case for maximising development density in an area overall subject to limited sensitivity in the Croydon and wider context.

### Climate change adaptation

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
	2	2	2	2

6.2.15 Whilst climate change adaptation objectives have wide ranging implications for the Partial Review, the key matter for consideration here is avoiding areas of flood risk, and fluvial flood risk in particular (it is more challenging to differentiate scenarios in terms of surface water flood risk, given available evidence).

6.2.16 Beginning with **Scenario 1**, a number of the proposed allocations intersect the flood risk zone, but concerns are notably reduced relative to 2022 (the previous publication stage). There is a clear need to take a sequential approach to avoiding flood risk; however, it is not uncommon for proposed locations for residential-led intensification or regeneration to intersect the fluvial flood risk zone, including because it is often areas within river valleys where there is good transport connectivity and low intensity previously developed land, e.g. industrial areas. Furthermore, it is important to recognise that there are a wide range of well-established approaches and methods for mitigating flood risk through master planning, design and other measures at the development management stage. Matters are explored further in Part 2.

6.2.17 With regards to the higher growth scenarios:

- **NEQ** – is subject to limited flood risk constraint. The Central Shopping Centre site was one of four sites subjected to additional testing through [SFRA](#) in 2023, with the conclusion that whilst flood risk is limited, there is an element of surface water flood risk to account for. This was the conclusion for all four sites.

- **Windfall** – it is difficult to draw strong conclusions, as there is little certainty regarding locations for growth. However, it is noted that two of the previously proposed focused intensification areas (Purley and Purley Oaks) significantly intersected flood zone 3 associated with the River Wandle.
- **Green Belt** – both of the sites are associated with steeply sloping valley sides, with significant surface water flood risk corridors affecting roads along the valley bottoms. Focusing on the larger site at New Addington, a clear surface water flood channels follows Featherbed Lane and ‘downstream’ passes through Addington Village, and then further downstream becomes a fluvial flood risk channel that passes through West Wickham and Hayes, before meeting the River Ravensbourne at Bromley. However, there would be excellent potential to design-in high quality Sustainable Drainage Systems (SuDS).

6.2.18 In **conclusion**, whilst the equivalent appraisal in 2022 flagged ‘limited or uncertain’ negative effects across the scenarios, the situation has improved following adjustments made to the approach to growth at the allocations that are a constant across all scenarios. It is appropriate to flag a degree of concern with the higher growth scenarios over Scenario 1, but this is potentially somewhat marginal.

### Climate change mitigation

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
2	2	1	2	1

- 6.2.19 The focus of discussion here is minimising per-capita emissions from the built environment, given that matters relating to per capita transport emissions are discussed below under ‘Transportation’.
- 6.2.20 A key consideration is that higher density development can give rise to opportunities to design-in and deliver new heat networks, linking heat sources (e.g. waste heat from industry or tube-train breaking, or ambient heat from the ground or water sources, captured via heat pumps) and heat users (e.g. offices and residential areas), which together could balance heat supply and demand across a 24 hour period. For example, London Borough of Lewisham has recently completed work to explore the potential for delivery of a fifth generation heat network as part of the regeneration of Catford town centre.
- 6.2.21 In this light, there could well be an opportunity associated with the higher growth at **NEQ**, given the mix of uses that would be delivered onsite (i.e. residential, retail, offices, leisure).
- 6.2.22 With regards to **Green Belt**, it could well be that strong development viability associated with greenfield development supports an ambitious approach to built environment decarbonisation, particularly at the larger New Addington site, likely in the form of greenhouse gas emissions standards that exceed the minimum requirements set by the Building Regulations; however, there is no certainty at this stage.
- 6.2.23 With regards to boosting **windfall**, residential intensification can provide an opportunity to improve thermal efficiency, deliver rooftop solar PV and replace boilers with heat pumps (the three key considerations when seeking to manage operational, or ‘in use’ built environment emissions). However, there is also a need to be mindful of non-operational emissions, including the embodied carbon within building materials and emissions associated with demolition and construction. The extent to which additional suburban intensification would be achieved via reuse of existing buildings versus new build is unclear.
- 6.2.24 Finally, with regards to **Scenario 1**, the proposal is for three transformation areas, other areas for high density development in the Croydon Opportunity Area and also several other notable growth clusters (see Section 5.4). However, it is not clear that heat network opportunities are set to be fully realised (opportunities are identified at both Purley and Coulsdon, but with limited detail). It is important to recognise that this is a fast moving policy area (e.g. new combined heat and power (CHP) is now rarely a low carbon solution) and latest understanding is that heat networks are challenging to viably deliver.
- 6.2.25 In **conclusion**, there is support for boosting growth at NEQ, whilst the other scenarios are judged to perform broadly on a par. With regards to effect significance, on one hand climate change is a global issue such that local actions have limited significance. However, on the other hand, climate change mitigation is a national, regional and local priority. There is a need to take a highly proactive approach through local plans and, in this context, it is appropriate to flag a risk of opportunities not being realised.



## Communities

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	2	2	★ 1	★ 1

- 6.2.26 A key consideration is schools capacity, and, in this respect, it is fair to highlight a particular opportunity associated with **Green Belt** release, as the New Addington site would certainly be able to deliver new capacity alongside housing. It could also be that the scheme could deliver or fund targeted community infrastructure to the benefit of the local community, which experiences significant relative deprivation. The northern part of the site comprises part of a golf course that is currently accessible only to golfers; however, a clear sensitivity relates to the southern part of the site, which comprises North Down Recreation Ground. This is a historical recreation ground associated with the New Addington Estate, but historical satellite imagery serves to suggest it is potentially underused (outside of the large children's play area, which is clearly valued). The website for the open space is [here](#), but it is not reviewed in the Open Spaces Study (2023). The 2019 Natural Capital Accounting Report found parks in New Addington to be 'under provided'.
- 6.2.27 Conversely, increased support for **windfall** could well lead to increased pressure on school facilities.
- 6.2.28 A further consideration is the need to support the objectives for the **NEQ**, including as set out in *Croydon Future of Destination Retail* (2020). On balance there is tentative support for additional housing, even if this were to be at the expense of some car parking space, given good potential to align with the vision for the North End Quarter as a central feature within the wider Croydon OA:
- "With a regenerated and revitalised North End/Retail Core at its heart, the Croydon Metropolitan Centre will develop as a unique mixed-use destination in the borough and the region, with retail, office, arts and culture (including a diverse evening/night-time economy), leisure and sports, entertainment, learning and workspace activity. It will also be a strategic commercial centre in South London."*
- 6.2.29 With regards to **Scenario 1**, there are a number of proposed allocations associated with community facilities as discussed further in Part 2. There are also wide ranging other matters for discussion in Part 2, including relating to relative deprivation (Croydon is the most deprived of the six 'southern region' London boroughs, with 18% of super output areas among the 20% most deprived nationally) and issues of particular relevance to groups with protected characteristics under the Equality Act.
- 6.2.30 In **conclusion**, it is difficult to differentiate between the scenarios with any certainty. However, on balance, it is appropriate to flag a concern with boosting windfall. This primarily relates to concerns around strategic infrastructure planning, but it is also recognised that widespread community concerns, including in respect of local character, were raised with the previously proposed intensification areas in 2022. There is a degree of sensitivity with the Green Belt site at New Addington, but matters could be addressed through masterplanning, and the likelihood is that a development scheme could deliver a net community benefit.

## Economy and employment

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
2	★ 1	★ 1	★ 1	★ 1

- 6.2.31 The growth scenarios vary only in respect of residential development, and there is no reason to suggest that any of the three higher growth scenarios would constrain or conflict with the achievement of employment land or wider economic objectives.
- 6.2.32 There is broadly a case for supporting housing growth in Croydon, as a well-connected location where residents act as a workforce for key employment growth areas across London and the South East.

- 6.2.33 With regards to boosting growth at the **NEQ**, it could well be that this aligns with wider objectives for the Croydon Opportunity Area, as discussed in Section 5.4, but there is little reason to suggest a significant opportunity specifically in respect of ‘economy and employment’ objectives. There is also an argument that new and expanded family housing via additional support for **windfall** development or **Green Belt** release could help to ensure a suitably skilled workforce locally, thereby minimising the need for in-commuting. However, again, benefits would likely be quite marginal. Another factor is that New Addington benefits from proximity to Biggin Hill, where the Bromley Local Plan supports significant jobs growth.
- 6.2.34 Another important factor is supporting SME housebuilders. This is an important issue in the Croydon context, as evidenced from Figure 5.3 (above) and high rates of building during lockdowns in 2020/21.
- 6.2.35 In **conclusion**, whilst the equivalent appraisal in 2022 found the growth scenarios to perform broadly on a par, it is now considered appropriate to flag support for higher growth (albeit likely quite marginal). With regards to effect significance, wide-ranging land supply components that feature as constants under all of four scenarios are supported, as is the proposed approach to protecting and intensifying designated industrial land including SIL. However, there are also potentially certain tensions, e.g. around the proposed mix of residential and industrial uses along the Purley Way; also protecting office space.

### Health

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
=	=	=	=	=

- 6.2.36 One important consideration is ensuring access to **health facilities**, with a concern that additional windfall development could lead to health infrastructure capacity issues in some areas, but there is little reason to suggest that this would be a significant issue. Also, capacity at / access to health facilities is understood to be a constraint in Croydon Metropolitan Centre. However, it is difficult to conclude that this is a particular constraint to higher growth at NEW, as there could be good potential to deliver new or upgraded facilities.
- 6.2.37 With regards to the existing and new proposed allocations that feature in Scenario 1 and all other scenarios, it is noted that site specific policy is set to include a considerable focus on identifying sites with the potential to deliver new facilities (subject to discussions with providers), although there are also certain issues and potential tensions, e.g. in respect of the proposed allocation in New Addington District Centre.
- 6.2.38 Aside from access to health facilities, another important consideration is access to **green and blue infrastructure**, and access to private or shared garden spaces. In this respect Green Belt release clearly has a degree of merit, as a high proportion of the new homes would have private gardens. With regards to windfall development, on one hand there would undoubtedly be loss of garden space; however, on the other hand, a high proportion of the new homes delivered would likely have some access to garden space.
- 6.2.39 In **conclusion**, whilst there is an argument in favour of Green Belt release this is uncertain and potentially marginal, so the scenarios are judged to perform on a par overall. With regards to effect significance, numerous aspects of the plan are broadly supported, as discussed further in Part 2.


### Historic environment

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
	3	5	2	4

- 6.2.40 There is an immediate concern with taller buildings at North End Quarter (**NEQ**), which is closely associated with the Central Croydon Conservation Area. In particular, taller buildings could impact the setting of historic buildings / facades along North End, albeit few are nationally listed (see Section 5.4).

- 6.2.41 With regards to Green Belt, neither of the sites in question are located in close proximity to a nationally designated asset, although the Addington Village Conservation Area (also Addington Palace Registered Park and Garden, which is Grade II listed) is located a short distance to the north of the New Addington urban extension site that, it is assumed, would feature under Scenarios 4 and 5.
- 6.2.42 With regards to **windfall**, whilst there is no certainty regarding which areas would see growth in practice, there are certain parts of the Borough where early 20<sup>th</sup> century detached and semi-detached homes in large plots are associated with historic character (perhaps increasingly so, as time goes by) and which could come into contention as locations for suburban intensification. One key area for consideration is the series of housing estates in the vicinity of rail stations in the southwest of the Borough, given a river valley topography which is a major influence on historic built form. Perhaps most notable is the Webb Estate Conservation Area, which is located on raised land to the west of the Purley/Reedham transport corridor, and where the intensification area previously proposed in 2022 extended to include housing estates on two sides. These two housing estates do not contain any listed buildings, but pre-date WWI and so are presumably associated with historic character. Looking more widely across the previously proposed intensification areas in the southwest of the Borough, these included only three Grade II listed, but other assets were adjacent. Also notable in 2022 was the lack of a proposed intensification area to the southeast of Purley station / east of Reedham station, presumably reflecting the rising topography and, in turn, townscape / landscape factors (with land rising quite steeply to Foxley Wood, although there are no listed buildings, and this land is mostly undeveloped on the pre-1914 OS map). Two other areas of sensitivity previously identified as suitable for suburban intensification are: Addiscombe (the previously identified intensification area contains one Grade II listed former farm cottage, but the estate in question is post WWII); and Selsdon (the previously identified intensification area is a sensitive location between locally listed estates, including the Heathfield Estate; however, this is a heavily wooded area, which would presumably help with visual screening). A number of other housing areas date from pre-WWI and are not designated conservation areas but are not associated with homes in large plots suited to intensification.
- 6.2.43 Finally, with regards to **Scenario 1**, there are relatively few instances outside of the Croydon Opportunity Area (which is a very specific context) of an existing or new proposed allocation intersecting or in proximity to a listed building, conservation area or other designated asset/area, and issues are quite concentrated, e.g. Purley. It is also noted that site-specific policy includes a significant focus on avoiding and mitigating historic environment impacts (e.g. listed buildings are covered by numerous site specific policies) and a number of sensitive sites have a reduced capacity relative to the 2022 publication stage (see Section 5.4).
- 6.2.44 In **conclusion**, in addition to NEQ, there is clearly a degree of concern in respect of windfall, although significance is uncertain, particularly once account is taken of the reduced emphasis on spatial targeting (concentration) relative to the 2022 publication stage. It is understood that Historic England did not raise concerns regarding the proposed approach to windfall at the 2022 publication stage (nor increased support for windfall, as explored through the appraisal of growth scenario in the SA Report).

## Housing

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
5	4	3	2	1 

- 6.2.45 There is a clear need to rank the alternatives in order of total growth quantum because (as discussed in Section 5.4), whilst Scenario 1 aligns with the guidance set out in the London Plan, there is a case to be made for higher growth with a view to more fully providing for housing needs, both in terms of market housing (including with a view to a good mix of homes, to include family homes) and affordable housing.
- 6.2.46 Under Scenario 5 the additional **supply** would certainly allow the Council to commit to a higher housing **requirement**. With regards to Scenarios 2, 3 and 4, the additional supply could potentially enable the Council to commit to a higher housing requirement, but it is difficult to be certain (as discussed in Section 5.5). Regardless, there is generally support for boosting supply over-and-above Scenario 1.

- 6.2.47 Aside from the matter of total supply and the likely housing requirement under each of the scenarios, there is a need to consider the nature and location of growth. In this respect, there is clear support for **Green Belt** release, which would deliver family housing. There would also likely be additional family housing under a scenario involving additional support for **windfall**, if implementation is well managed, e.g. with single homes on large plots redeveloped to provide several smaller family homes. The current plan document explains: *“There has been a steady decline in the number of new homes being delivered with 3 or more bedrooms... From April 2020 to March 2022, 16% of homes had 3 or more bedrooms... [which] does not match the [SHMA’s] finding that 60% of new homes should be larger homes.”*
- 6.2.48 Also, windfall development serves to meet very locally arising housing needs and is a proven low risk approach to delivering high rates of housing in the Borough (although the latest proposal to boost support for car parking in parts of the Borough with lower PTAL could impact on development viability). However, many windfall sites fall below the threshold size for requiring affordable housing.
- 6.2.49 In **conclusion**, whilst there is a clear need to rank the scenarios according to total quantum, there is also support for Green Belt release from a ‘housing’ perspective. New flats in NEQ would be a positive from a housing perspective, but there would be little potential to deliver family housing, delivering the policy quota of affordable housing could prove challenging and there is also a need to consider high delivery risk.

### Land and soils

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	3	2	5	4

- 6.2.50 There is clear support for boosting supply from **NEQ**, because higher density development in the Croydon OA would reduce the pressure for greenfield development (**Green Belt**) and/or loss of gardens (**windfall**).
- 6.2.51 With regards to the assumed Green Belt sites, the nationally available agricultural land quality dataset (which is very low resolution) suggests that both sites comprise land that is ‘grade 3’ quality. Also, adjacent land has been surveyed in detail in both cases. Specifically, at New Addington adjacent land has been surveyed and been found to be grade 2 quality (i.e. land that is best and most versatile, BMV); and, at Sanderstead, adjacent land is grade 3b quality (i.e. not BMV). The Sanderstead site is in agricultural use.
- 6.2.52 In **conclusion**, there is support for higher densities at NEQ and concerns regarding Green Belt release (loss of agricultural land, including land that may be BMV) and windfall (loss of gardens).

### Landscape and townscape

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	2	3	4	5

- 6.2.53 Both of the shortlisted **Green Belt** sites under Scenarios 4 and 5 contribute to Green Belt purposes and are also likely to be associated with a degree of wider landscape value, e.g. accounting for their contribution to the character of wooded valleys. In the case of the Sanderstead site, there is a footpath along one edge of the site, and clear views of the site from Mitchley Hill. In the case of the New Addington site, there is a notable absence of public footpaths, but this land is presumably highly visible from trams and undoubtedly contributes to the setting of New Addington within rolling downland (although potentially the Fieldway estate more so than the earlier New Addington estate, which was constructed from 1935).
- 6.2.54 With regards to **windfall**, there are clearly implications for suburban character, and there is also a need to consider the links between suburban areas and surrounding wooded hillsides, e.g. in the Coulsdon area, given views to and from high ground. However, these matters have already been discussed above.

- 6.2.55 With regards to **NEQ**, there are no particular concerns regarding an increased risk of impacts to any of the designated Croydon Panoramas, but it is important to note that only the eastern extent of NEQ (adjacent to Wellesley Road), falls within the Tall Buildings Inner Zone, as defined by the TBS (2024).
- 6.2.56 In **conclusion**, there is a need to consider the risk of impacts to sensitive landscape gaps and the characteristic valley landscapes of the south of the Borough, which gives rise to concern in respect of Green Belt release. However, limited Green Belt release could potentially be delivered as part of a long term strategy for protecting and enhancing the Borough’s Green Belt, including in line with the emerging Local Nature Recover Strategy. There is also a degree of concern around building heights in the NEQ, and a degree of concern with boosting support for windfall given implications for suburban character.

## Transport

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
★ 1	5	4	3	2

- 6.2.57 Transport issues/opportunities have already been discussed above under Air quality, with a headline conclusion being that there is not support for **Green Belt** release or additional **windfall**, albeit one of the shortlisted Green Belt sites is adjacent to a tram line and potentially associated with a cycle infrastructure opportunity. With regards to **NEQ**, there is clear support for higher densities from a transport perspective, given very high accessibility levels and also given the potential to support wider Croydon OA objectives.
- 6.2.58 Focusing on windfall, a key consideration is the change of context since 2022. Specifically, there is less potential to assume a spatially targeted approach with support for suburban intensification in the most accessible areas. The close correlation between previously identified intensification areas and the rail and tram network is clear from Figure 5.14 above, and there is also a need to consider identified public and active travel improvement corridors, with work ongoing to place these in priority order (although it is clearly a ‘chicken and egg’ situation, in that good connectivity is needed to support housing growth along a corridor, but housing growth can support improved connectivity). The key point to note is that there is clear potential for spatially targeted growth to align with transport objectives and deliver investment.
- 6.2.59 Maintaining a focus on windfall, it is also important to note that the latest proposal is for increased support for car parking as part of new developments in areas with the lowest PTAL. This is potentially a pragmatic response to a situation whereby some suburban areas have both low levels of PTAL and limited ability to walk/cycle due to poor infrastructure (including roads with no pavements) and steep topography. However, it does serve to highlight that windfall development will often be associated with high car dependency.
- 6.2.60 With regards to **Scenario 1**, the strategy is somewhat transport-led, noting the focus of Brighton Mainline, the wider Croydon OA including NEQ, Purley Way (with a range of existing issues but potentially an opportunity for growth to unlock transport upgrades), Purley (which has a good train service) and other district and local centres (with identified opportunities to support walking/cycling and public transport, e.g. the A235 corridor). However, there are a range of issues and potential tensions (see Part 2).
- 6.2.61 In **conclusion**, the order of preference and conclusions on significant effects are *as per* under ‘air quality’.

## Water

Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
=	=	=	=	=

- 6.2.62 A key consideration for Local Plans is capacity at wastewater treatment works (WwTW), which in the Croydon context means considering capacity at Beddington WwTW (in LB Sutton), Crossness WwTW (in LB Bexley) and Long Reach WwTW within Dartford Borough.

- 6.2.63 It is understood that no major concerns were raised through consultation in 2022. However, there are known to be significant concerns with capacity at Long Reach WwTW, as discussed within a recent [Catchment Strategic Plan](#) prepared by Thames Water. The Long Reach works serves the east of the Borough including New Addington, but it is difficult to conclude any significant concerns.
- 6.2.64 There is similarly a Catchment Strategic Plan for Crossness WwTW (see below), but this is Europe's second largest WwTW catchment and LB Croydon is at the very edge of the catchment.
- 6.2.65 In **conclusion**, wastewater treatment work capacity is high on the agenda nationally at the current time, hence there is a need to avoid risks of capacity breaches as far as possible. This can mean directing growth to locations served by WwTW with existing capacity, as opposed to relying on capacity upgrades, which can be subject to delays. However, no concerns have been raised regarding capacity being a constraint to growth with a bearing on the quantum of new homes supported through the Partial Review. With regards to the spatial approach to growth, there is no clear basis for differentiating the options.

## 6.3 Appraisal summary

- 6.3.1 The table below presents an overview of the appraisal findings presented across the 13 sections above.
- 6.3.2 The summary table shows Scenario 1 (the emerging preferred scenario) to perform best in terms of the greatest number of objectives, and it is also predicted fewest negative effects. However, it does not *necessarily* follow that Scenario 1 is best performing or 'most sustainable' overall, recognising that no assumptions are made regarding the degree of importance (or 'weight') that should be assigned to each of the sustainability topics. For example, if particular weight were to be attributed to housing objectives, including in respect of meeting needs for affordable and family housing, then there could potentially be overall support for one of the alternative scenarios. It is for the plan-maker (LB Croydon) to assign weight and trade-off between the competing objectives in order to reach an overall conclusion on which of the scenarios best reflects the plan objectives / sustainable development.
- 6.3.3 The following bullet points provide further summary conclusions:
- **Air quality and transport** – there is a clear concern with additional support for windfall development, particularly if not spatially targeted, albeit the assumption is a modest boost relative to the equivalent assumption in 2022. There is support for maximising growth at North End Quarter (NEQ) as a highly accessible area relative to alternative potential locations for growth in the Borough and more widely, plus there are opportunities to improve connectivity across the Croydon OA and reduce car dominance.
  - **Biodiversity** – whilst it is not always appropriate to simply conclude that higher growth options give rise to greater concern from a biodiversity perspective, in the Croydon context it is fair to flag concerns with higher growth achieved via either increased suburban intensification or Green Belt release.
  - **Climate change adaptation** – there is a degree of added concern regarding flood risk under the higher growth scenarios, noting the topography in the southern part of the Borough, but concerns are limited.
  - **Climate change mitigation** – higher growth at NEQ might help to secure a heat network for the area. The 'amber' score for all scenarios reflects the ambition needed to achieve the local 2030 net zero target.
  - **Communities** – high rates of windfall development can put a strain on infrastructure and also give rise to wider community concerns. Another factor is greenspace constraining the New Addington GB site.
  - **Economy and employment** – there is support for higher growth, but this is fairly marginal. A successful NEQ scheme is of larger-than-local significance, and windfall development is important for SME builders.
  - **Health** – it is not possible to meaningfully differentiate between the scenarios. There is support for the package of allocations that are a constant across the scenarios (appraised in Part 2 of this report).
  - **Historic environment** – increased density to include taller buildings in NEQ gives rise to a potentially significant concern from this perspective. Suburban historic character is another consideration.
  - **Housing** – there is a case for boosting housing supply over-and-above the emerging proposed approach if there is capacity to do so. Matters are discussed in detail in Section 5 of this report.
  - **Land and soils** – there is support for maximising housing supply from NEQ, whilst there is a need to avoid Green Belt release, which could well result in the loss of best and most versatile agricultural land.

- **Landscape** – there are clear concerns with Green Belt release, given the two shortlisted sites in question, and more generally the context of the southern part of the Borough (a series of valleys).
- **Water** – wastewater treatment is typically a key matter for consideration, but there are no clear concerns. There will be a need for ongoing liaison with the Environment Agency and Thames Water.

**Table 6.1: Appraisal summary**

Topic	Rank of preference (number) and significant effects (shading) <sup>23</sup>				
	Scenario 1 The preferred scenario	Scenario 2 Windfall	Scenario 3 Windfall NEQ	Scenario 4 GB release	Scenario 5 GB release NEQ
Air quality	★1	5	4	3	2
Biodiversity	★1	2	2	2	2
Climate change adaptation	★1	2	2	2	2
Climate change mitigation	2	2	★1	2	★1
Communities	★1	2	2	★1	★1
Economy and employment	2	★1	★1	★1	★1
Health	=	=	=	=	=
Historic environment	★1	3	5	2	4
Housing	5	4	3	2	★1
Land and soils	★1	3	2	5	4
Landscape	★1	2	3	4	5
Transport	★1	5	4	3	2
Water	=	=	=	=	=

<sup>23</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

# 7 The preferred growth scenario

## Introduction

7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the growth scenarios is best, or 'most sustainable' overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of LBC Officers to the appraisal.

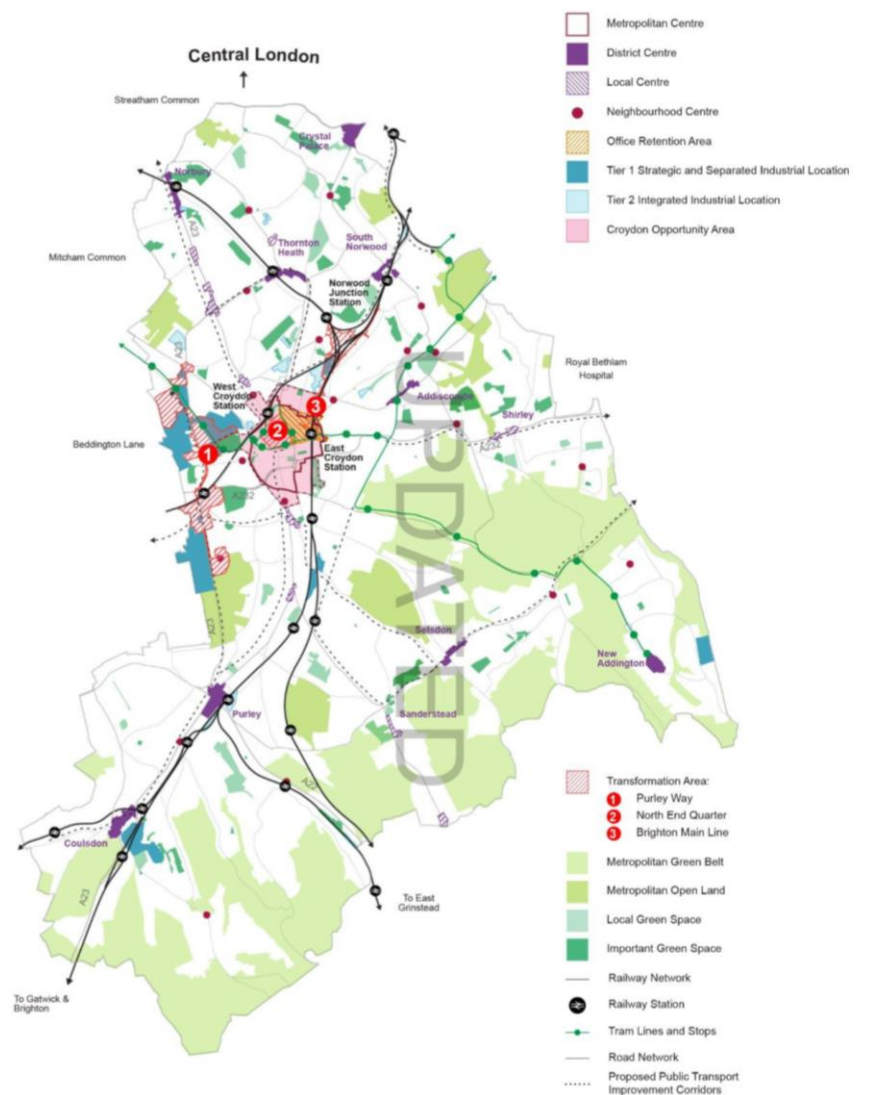
## Officers reasons for selecting the preferred scenario

7.1.2 The following statement explains Officers' reasons for supporting **Growth Scenario 1**:

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

It is recognised that higher growth scenarios would help to meet housing needs more fully, including need for affordable and family housing. This is an important consideration. However, a higher growth strategy would risk departing from the London Plan, which balances housing needs and capacity across London. In particular, given the forthcoming London Plan Review there are no exceptional circumstances to justify the release of Green Belt for housing. With regards to windfall development, the Borough will continue to deliver windfall in line with the London Plan target, but there are concerns with higher windfall given implications for the Borough's suburban areas, particularly in terms of character, traffic and infrastructure capacity. With regards to boosting supply from the North End Quarter, this is a detailed matter that will need to be revisited in light of masterplanning, including with a focus on heritage issues and impacts.

**Figure 7.1: The proposed Local Plan Partial Review Key Diagram**





## **Part 2: What are the appraisal findings at this stage?**

## 8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an appraisal the CLP Partial Review as a whole.

8.1.2 In practice, this means:

- expanding on the appraisal of Growth Scenario 1 presented in Section 6;
- appraising proposed new thematic policies and proposed adjustments to CLP 2018 policies; and
- being mindful of aspects of CLP 2018 that are not proposed to be changed.

### Overview of the Partial Review

8.1.3 The plan as a whole (i.e. CLP 2018 plus proposed changes through the Partial Review) comprises 11 strategic policies, each associated with a series of development management policies. All of the strategic policies are proposed to be significantly changed, and hence are discussed in the appraisal below, namely:

**SP1** Growth strategy; **SP2** Homes; **SP3** Employment; **SP4** Employment; **SP5** Design, character & heritage; **SP6** Environment & climate change; **SP7** Green grid; **SP8** Transport and communication; **SP9** Place policies; **SP10** North End Quarter Transformation Area; **SP11** Purley Way Transformation Area.

8.1.4 With regards to **development management policies**, the majority of these are proposed to be significantly amended, and several are new proposed policies (i.e. do not appear in CLP 2018).

8.1.5 It is also important to be clear that:

- Policy SP1 presents the proposed **housing requirement** and broad spatial strategy.
- The policy is supported by a **Key Diagram** (Figure 7.1, above), which aims to summarise the strategy.
- Proposed **allocations** are presented under Policy SP9 with added detail in a supporting appendix.
- The proposed housing **supply trajectory** is also presented in an appendix.

8.1.6 Finally, it is important to note that not all **tracked changes** within the document represent substantive changes to policy. Many reflect factual updates and, as part of this, it is important to note that of the ~55 deleted allocations the majority are deleted because they have now been completed. Also, some of the tracked changes showing new and deleted text in fact indicate text that has simply been moved.

### Appraisal methodology

8.1.7 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the Partial Review, as a whole, before reaching an overall conclusion on significant effects. Specifically, in accordance with the SEA Regulations, the aim is to “identify, describe and evaluate” significant effects.

8.1.8 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations, and the Planning Practice Guidance. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the Partial Review. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how the Partial Review will be implemented ‘on the ground’ and the effect on particular receptors.

N.B. there is not a focus on seeking to up-date the appraisal of CLP 2018, as presented within the SA documents that were published as part of consultations ahead of plan adoption. One reason for this is that the CLP 2018 appraisal was undertaken under a ‘framework’ that differs significantly to the framework used as the basis for the appraisal presented below, namely the framework of 13 topic headings.

# 9 Appraisal of the Partial Review

## 9.1 Introduction

9.1.1 The aim of this section is to present an appraisal of the Partial Review under the 13 SA topics.

## 9.2 Air quality

### Appraisal discussion

9.2.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that the proposed broad strategy performs well, in air quality terms, relative to reasonable alternatives. There is support for the proposed focus of growth at North End Quarter, although there is a case for supporting a greater concentration of growth here; and there is also potentially support for the proposed approach to windfall, although the lack of spatial targeting via 'intensification areas' generates a degree of concern.

9.2.2 Aside from the matters that are a focus of the appraisal in Section 6, a key consideration is the approach to growth within the **Purley Way Transformation Area**. There is support for transformational change along the corridor, to address the current car dominated and poor quality urban realm, and also potentially to deliver significant transport infrastructure upgrades. However, site availability is a barrier to realising aspirational objectives, and there is a 'chicken and egg' situation in that transport connectivity also serves to limit growth, i.e. there is a need to avoid growth ahead of transport upgrades.

9.2.3 Within the Purley Way, the proposed growth strategy for Waddon Way is of particular note, as this part of the Transformation Area is less well-connected by public transport, and new homes will not be within easy walking distance of a district centre. The I&Os document identified one modest allocation (Site 11) for 35 to 94 homes, whilst the proposal is now for 965 homes. The strategy is mostly unchanged from 2022.

9.2.4 With regards to specific **proposed allocations**, it seems clear that PTAL has been a key factor when assigning capacities to sites. However, a number of proposed reductions to site capacities (relative to 2022) can be questioned from a PTAL perspective, notably at Purley and New Addington. Conversely, Site 128 at Shirley is proposed for around 25% more homes despite being within the lowest PTAL zone.

9.2.5 Another consideration is reduced supply from sites at **Purley**, along with deletion of the previously proposed areas for focused and moderate intensification (which covered much of the suburban areas around the district centre). There is an Air Quality Focus Area affecting the district centre, but also an identified opportunity to improve the public realm and street environment. The following vision is of note: *"Purley District Centre will be an inclusive place to dwell and socialise, with the High Street providing space for outdoor sitting, strolling and events. Its existing open spaces... will be safeguarded and new development will help transform hostile main roads into urban streets... and more space to people."*

9.2.6 Another consideration is sites in proximity to a **main road or railway line**, being mindful of noise pollution as well as air pollution. In this respect there is a need to consider proposals within the Croydon OA to support residential or mixed use redevelopment or refurbishment of current office buildings. For example, Site 245 (George Street) is proposed for 133 homes, which is a notable increase on CLP 2018 (although site specific policy requires acoustic measures). West Croydon Station and Bus Station are also of note.

9.2.7 A further consideration is the proposed redevelopment of car parking land. Over 30 sites include significant car parking, either as part of the current use or as the current primary use, around half of which are new proposed allocations. These sites are located both within the Purley Way Transformation Area and within the Croydon OA, which are both areas associated with a need to reduce car dominance. As discussed in Section 5.4, the Croydon OA has very high levels of car parking.

### Appraisal conclusion

9.2.8 The plan performs well in numerous respects but there are also a range of tensions with air quality objectives and the potential for adjustments to the plan to improve its 'air quality' performance can be envisaged (albeit not without knock-on implications for other objectives). The 2022 SA Report recommended further consideration of air quality issues along the Purley Way, but it has transpired that there is very limited room for manoeuvre. On balance, an overall **neutral effect** is predicted (as per 2022).

## 9.3 Biodiversity

### Appraisal discussion

- 9.3.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that the proposed broad strategy performs notably well relative to reasonable alternatives, essentially because the alternatives would involve higher growth in a Borough that is sensitive in biodiversity terms. The appraisal in Section 6 focuses on the North End Quarter, windfall and Green Belt release and, in each case, there is support for the emerging proposed approach over the higher growth alternative (albeit this is marginal in the case of North End Quarter, i.e. there is a case for supporting additional growth here).
- 9.3.2 Aside from the matters that are a focus of the appraisal in Section 6, there are a range of issues associated with certain **proposed allocations**. In particular, a number are adjacent or close to a SINC. However, what is apparent is a notably improved situation since the previous publication stage (2022), with five previously proposed allocations adjacent to a SINC now removed, namely Site 502 (Shirley), Site 416 (Broad Green and Selhurst), Site 946 (Waddon Marsh) and Site 59 (Crystal Palace and Upper Norwood).
- 9.3.3 The six remaining allocations adjacent to a SINC are:
- Site 34 (Croydon OA) – now proposed for significantly fewer homes relative to 2022.
  - Site 16 (Five Ways, Purley Way) – now permitted for significantly more homes relative to 2022.
  - Site 357 (Crystal Palace and Upper Norwood) – a site for 135 homes with delivery post 2034.
  - 504 (Shirley) – conversion of a locally listed building for 24 homes.
  - 87 (Shirley) – now proposed for 9 homes, having previously been proposed for 18 homes.
  - Site 48 (Waddon Marsh) – is proposed for 331 homes (unchanged from 2022), having previously been proposed for 17 homes in CLP 2018. This site is adjacent to Waddon Ponds, which was historically associated with a large mill. The site proforma does not note this as an issue; however, the policy for the Transformation Area as a whole does include a strong focus on biodiversity.
- 9.3.4 Focusing on the **Purley Way** as a whole, it is clear that there are significant biodiversity issues and opportunities, particularly to the north (River Wandle) and to the south (rising land towards Roundshaw Down). There is limited detail in area-wide policy (see above), but supporting text explains:
- “The council supports the continued development of the Wandle River Regional Park concept and will work with... stakeholders to play its part in delivering the Wandle Valley Area Green Grid Framework... As part of this commitment, the council will manage Wandle Park and Waddon Ponds and look for opportunities to connect these with other open spaces and de-culvert stretches of the River Wandle as and when development opportunities arise to secure connectivity, flood risk and biodiversity...”*
- 9.3.5 With regards to the more thematic **strategic policies**, the following are of note:
- Policy SP1 (Growth in Croydon) – is proposed to include a new requirement for: “An enhanced Green Grid with creating a biodiversity network contributing towards better health and well-being of the residents and help address climate change.”
  - Policy SP7 (Green Grid) – is also proposed to be significantly bolstered, with a clear table identifying spatial priorities, namely priority areas; green spaces to link together; key opportunities; and linking routes. There is also a clear focus on links to transport and health objectives, via a policy criterion:
- 9.3.6 Finally, there is a need to note the following new and significantly amended **DM policies**:
- Policy DM26 (Metropolitan Open Land and Local Green Spaces) – sets out that the Council will protect and safeguard the extent of the Borough’s green spaces. DM26.4 is a new policy which identifies 26 green spaces in Croydon for Local Green Space (LGS) protection. In addition, there are 76 other green spaces proposed to be protected as Important Green Spaces (DM26A).
  - Policy DM27 (Protecting and enhancing our biodiversity and Urban Greening) – includes a new focus on the urban greening factor, building on the London Plan. It sets out that:
 

“To secure urban greening a borough specific [UGF]... identifies the appropriate amount of urban greening developments required for new build developments with 5 units or more as follows...”

### Appraisal conclusion

- 9.3.7 Relative to CLP 2018 there is a considerable new focus on matters relating to biodiversity, green infrastructure and urban greening through revised borough-wide thematic and site specific development management policies. Also, relative to the 2022 publication stage, a total of five of the site allocations previously identified as potentially sensitive in biodiversity terms (due to an adjacent SINC) have been removed from the plan. However, there is a need to carefully consider the potential for a high growth strategy for the Purley Way to achieve a biodiversity net gain, given the river valley sensitives. On balance, a **neutral effect** is predicted, noting that Natural England had no comments on the plan in 2022.

## 9.4 Climate change adaptation

### Appraisal discussion

- 9.4.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that the proposed broad strategy performs well relative to reasonable alternatives.

- 9.4.2 Aside from the matters that are a focus of the appraisal in Section 6, a key issue is certain **proposed allocations** affected by fluvial flood risk. However, what is apparent is a notably improved situation since the previous publication stage (2022). Key locations are:

- Waddon Marsh – which has been discussed above, under Biodiversity. Flood risk zone 2 significantly intersects a number of the sites, and almost entirely covering the two northern-most sites. The cluster as a whole comprised seven sites at the I+Os stage, and the latest proposal involves 11 sites, plus site capacities have been significantly increased. Most notably, at Site 125 the latest proposal is for 632 homes (unchanged from 2022), which is a very significant increase on the 38 to 141 homes range from the I+Os stage. 33% of this site intersects fluvial flood risk zone 2.

However, it is important to note deletion of Site 946 (Stubbs Mead) since 2022, which is not only affected by flood risk but also comprises designated SIL and is a South London Waste Plan safeguarded site.

- Purley / Purley Oaks – is a key focus of growth but is strongly associated with the River Wandle valley. There are three clusters of sites, as discussed in Section 5.4. The key sites within flood risk zone 3 are: Site 347 - is now proposed for fewer homes (and significantly fewer than in CLP 2018); and Site 405 – the new proposed capacity is ~50% that from 2022 and ~25% that in CLP 2018.

- 9.4.3 Also, it is important to note that two of the three previously proposed allocations in South Croydon (which links closely to Purley Oaks) have been removed, in light of flood risk. See discussion in Section 5.4.

- 9.4.4 With regards to **DM policies**, no significant changes are proposed to CLP 2018, in line with the following key finding set out in the Level 1 Strategic Flood Risk Assessment (SFRA, 2021): *“The existing flood risk and surface water management policies within the Croydon Local Plan are sufficient to enable future development proposals to be assessed to ensure they adequately address any identified flood risk issues.”*

- 9.4.5 Finally, it is noted that comprehensive updates were made to the Flood Risk Planning Practice Guidance in August 2022, including in respect of surface water flood risk, which is a significant issue locally. One consideration, in this regard, is the new proposed approach to not identifying intensification areas to guide windfall, which could potentially have assisted with planning for Sustainable Drainage Systems (SuDS).

### Appraisal conclusion

- 9.4.6 A number of proposed allocations intersect the flood risk zone. However, in each case development will deliver benefits, which could serve to justify development in a flood risk zone, whether that be: A) the potential to realise a particular site specific opportunity; B) the potential to contribute to achievement of strategic objectives for a centre, neighbourhood or sub-area (e.g. Purley Way and Purley); and/or C) the potential to contribute to strategic objectives for the Borough, including in respect of meeting housing needs in the context of limited supply options. Furthermore, there are a range of site specific and scheme masterplanning and design factors affecting flood risk, as explored through the Level 2 SFRA (2021 and 2024) and which can be further explored through a Flood Risk Assessment (FRA) at the planning application stage. Also, it is noted that a number of important changes have been made since the 2022 publication stage that potentially serve to reduce concerns regarding development in the flood risk zone. It will be for the Environment Agency to comment in detail through the current consultation; however, at this stage, it is appropriate to flag a **negative effect** of limited or uncertain significance.

## 9.5 Climate change mitigation

### Appraisal discussion

- 9.5.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that there is a case for supporting higher growth via higher density redevelopment of the North End Quarter, particularly with a view to securing a heat network. Also, a clear conclusion of the appraisal in Section 6 is the need for urgent action given the stretching nature of the target of achieving borough-wide net zero by 2030.
- 9.5.2 Aside from the matters that are a focus of the appraisal in Section 6, there is a need to consider other aspects of the proposed strategy, particularly with a view to considering: A) the extent to which development is located and concentrated (also with a fine grained use mix) with a view to potentially delivering one or more heat networks; B) the extent to which development is directed to more viable locations / sites with a view to enabling an ambitious approach to built environment decarbonisation (notably in terms of exceeding the minimum requirements set out in Building Regulations); and C) the extent to which there is a focus on refurbishing and reusing existing buildings ahead of demolition.
- 9.5.3 With regards to (A), namely realising opportunities to deliver new **heat networks**, there is an established opportunity associated with the Purley Way, given the possibility of utilising waste heat from the nearby Beddington Energy Recovery Facility. However, there is a need to question whether the reduced scale of ambition for the Waddon Way area serves to reduce the opportunity in practice. Elsewhere, the plan references Purley and Coulsdon as potentially suitable for a heat network (or 'district heating'), but the latest proposed approach involves a reduced scale of growth, and allocations are somewhat piecemeal, which calls into question the potential to realise the opportunity in practice. Finally, it is noted that there are still some references in the plan to CHP, which should be reviewed in light of dramatically changed views on CHP due to decarbonisation of the national grid since the time of CLP 2018.
- 9.5.4 With regards to (B), namely directing growth to areas with strong **viability**, it is difficult to draw any strong conclusions. However, it is fair to question reduced support for suburban windfall (at least relative to the recent trend of delivering over 1,000 homes per annum via small sites windfall). Clearly the prioritisation of other policy asks – most notably affordable housing – also has a bearing on the potential to viably deliver net zero development, or otherwise development to a standard beyond Building Regulations.
- 9.5.5 With regards to (C), there is thought to be some added emphasis on refurbishment and reuse of buildings, in line with **whole lifecycle carbon** and circular economy principles. However, this is not entirely clear, with there seemingly considerable flexibility at a number of allocations. One example is Site 236 (Apollo House, Wellesley Road), which is a prominent modernist office building in Croydon Metropolitan Centre. New policy wording states: *“Conversion should be considered in the redevelopment to increase sustainability of the site and due to the notable architecture of the building.”* It should be noted that the need to strike a sensible balance, in terms of seeking to avoid demolition in order to minimise embodied / embedded built environment greenhouse gas emissions, has recently been explored in a prominent legal [case](#) involving the Marks and Spencer store on Oxford Street.
- 9.5.6 Finally, there is a need to consider **Policy SP6** (Environment and Climate Change), which is proposed for limited updates, which is perhaps surprising given the Council's declaration of a climate emergency in 2019 (along with a 2030 net zero target date) and also given the fast paced nature of built environment decarbonisation policy-making nationally and within London in particular. For example, it should be noted that 18 London Boroughs – not including LB Croydon – published a joint evidence base [study](#) in 2023 that compares and contrasts the two broad alternative approaches that can be taken to setting local policy in respect of operational (or 'in use') built environment greenhouse gas emissions. Furthermore, several of these boroughs have subsequently published Draft Local Plans that aim to take the more ambitious of the two approaches, which involves measuring 'absolute energy use' from developments, in contrast to the default Building Regulations approach, involving calculating performance relative to a Target Emissions Rate (TER). It is well-established that the Buildings Regulations method is complicated and has other drawbacks relative to the 'absolute energy-based' approach of assessing, reporting and monitoring building performance. However, a Written Ministerial Statement was recently published that explains:

*“Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures: [A] That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework. [B] The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER)...”*

### Appraisal conclusion

- 9.5.7 Whilst the 2022 SA Report concluded 'neutral effects' it is now considered appropriate to flag a **negative effect** of 'limited or uncertain' significance, essentially to reflect: the increasingly stretching nature of the Borough's 2030 net zero target; uncertainty around the potential to realise heat network opportunities in practice; and the extent of work that has been undertaken nationally, and within London in particular, around policy (and strategy) approaches to minimising built environment greenhouse gas emissions (both operational and embedded). Also, whilst the focus of this section has been on built environment decarbonisation, there is also a need to note the decision to remove the previously proposed intensification areas that sought to direct windfall development to areas with higher PTAL. The 2022 SA Report recommended that consideration be given to undertaking further proportionate work, ahead of plan finalisation, to ensure that built environment decarbonisation opportunities will be fully realised (as opposed to leaving key decisions to later stages of the planning process, when options can be constrained or foreclosed) and this recommendation also holds true at the current time.

## 9.6 Communities

### Appraisal discussion

- 9.6.1 There are a wide range of issues / opportunities that could potentially be a focus of discussion here. Focusing on a select range of key issues, the appraisal in **Section 6** finds that the proposed broad strategy performs well relative to the option of higher growth via increased support for windfall, but that there is a case to be made for higher growth via Green Belt release, from a communities perspective. With regards to the North End Quarter, there is support for the emerging proposed approach, but it could transpire that additional housing growth would help to secure delivery and ensure that opportunities are fully realised.

- 9.6.2 Aside from the matters that are a focus of the appraisal in Section 6, key aspects of the strategy include:

- **Brighton Main Line / East Croydon** – as discussed in Section 5, there is much uncertainty regarding deliverability / delivery timescales, but there has nonetheless been a considerable amount of work undertaken to consider how to masterplan development associated with the upgrade works in order to realise opportunities. Perhaps the key consideration is the proposal to deliver a new station square over the railway line, without any associated housing. Supporting text explains:

“The station re-location presents the opportunity to create a high quality transport interchange that is uniquely ‘Croydon’ in character and that creates strong connections... To do so, the streets and spaces connecting the station to its surrounding environment will need to encourage more people walking and cycling and provide the opportunity for seamless interchange with other modes of transport. Significant opportunity exists to set this interchange function within an exemplary station environment, with a high quality public realm integrated with its surrounding street and open space network.”

- **North End Quarter** – “will build on its history as an education, commercial and social hub, to be an attractive destination to live, work and visit with a vibrant public and cultural offer alongside retail, leisure and commercial development.” It is clear that there is a major opportunity, with a key consideration being the degree to which new housing is supported alongside town centre uses and employment.
- **Office Retention Area** – is located between North End Quarter and East Croydon, and so has an important role to play in terms of better linking these two key hubs within the Croydon OA, including reducing the extent to which Wellesley Road acts as a barrier to movement.
- **Purley Way** – “will be transformed from a hostile and divisive road in to a green city street. It will integrate developments with important retail and industrial areas and existing communities in Broad Green & Selhurst and Waddon. Three new local centres and one neighbourhood centre will be delivered, with roles complementary to Croydon Metropolitan Centre, Purley Town Centre, the Beddington Lane industrial area, and other places in Croydon and Sutton.”

Challenges are focused on: integrating new communities and SIL (including from a perspective of maintaining employment opportunities in SIL); the risk of continued high levels of traffic, including HGV traffic; and ensuring new communities have good access to a district centre. Certain key sites in the north of the area are no longer available, relative to the 2022 publication stage, and so there will be a need for ongoing consideration of the extent to which the vision for the area as a whole can be realised.

- **District, Local and Neighbourhood Centres** – “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...” A number of adjustments have been made to site capacities in light of detailed design work, which is likely a ‘positive’ from a communities perspective overall. However, fewer homes can mean less funds available for infrastructure delivery, place-making and design measures. There are also notable regeneration sites supported in Thornton Heath and Selsdon (Forestdale) that were proposed for allocation in 2022 but are now removed.

- **Schools capacity** – is clearly a key issue for any local plan. Supporting text explains:

“Projections suggest that two new primary schools may be required, one to serve the Croydon Opportunity Area and another in the Purley/Coulsdon area after 2026. Two sites have been allocated to meet this projected need; Allocation 201 and Allocation 490. Any long-term future need for primary school places in the south of the borough will be taken into account in the review of this plan. Currently, the growth in the Purley Way Transformation Area is not projected to create a need for additional primary school places... To safeguard against a future rise in demand for primary school places, a site has been allocated in the Purley Way Transformation Area for a new 2FE primary school. Pupil projections suggest that the borough currently has enough secondary school places to meet the demand from the proposed housing numbers for the next 5-10 years...”

9.6.3 Other area and **site-specific considerations** include:

- Broad Green and Selhurst – Site 499 Croydon University Hospital is a key 8.2 ha site proposed for 345 homes, which is notably more than the current allocation (also the proposal at the I+Os stage) for 77 to 290 homes. The proposal is for: Residential development subject to the adequate reprovision of the existing health care use.” In contrast, CLP 2018 says: “*Consolidation of the hospital uses on a smaller area of the site with enabling residential development on remaining part subject to there being no loss of services provided by the hospital in terms of both quantity and quality.*”
- Crystal Palace & Upper Norwood – Site 126 is a new proposed allocation since the I+Os stage. The site currently comprises a school, and the proposal is for education facilities and 27 homes (with the proposal for 72 homes in 2022). Also, within the district centre, Site 357 is proposed for a 135 home mixed use scheme (CLP 2018 supports 39 to 223 homes), but in the long term (post 2034).
- New Addington – as discussed in Section 5.4, a site in the district centre was previously proposed to deliver a mixed use scheme but there is now a pending planning application for a diagnostics centre.
- Norbury / Thornton Heath – Site 106 is a new proposed allocation currently comprising a community centre. The proposal is for a mixed use residential and community (to retain equivalent floor space or functionality of the community use), to include 18 homes (unchanged from 2022).
- Sanderstead – Site 306, within the local centre, is a retained allocation from CLP 2018 proposed for a 41 home residential scheme, with the CLP 2018 allocation for a mixed use scheme of up to 24 homes.
- Selsdon – the proposal in 2022 was for: “Residential development incorporating a new shopping parade with retail, finance, and food & drink.” However, this is now an omission site.
- Shirley – Site 87 comprises Shirley Community Centre and was proposed for an 18 home mixed use scheme in 2022 but is now proposed for a 9 home residential development “*subject to the adequate reprovision of the existing community use.*”
- Thornton Heath – Site 136 is within the district centre and proposed for a 124 home mixed use scheme (unchanged from 2022; CLP 2018 says 55 homes), but no longer with a requirement for employment.

9.6.4 Regarding borough-wide **thematic policies**, perhaps a primary point to note is changes to Policy SP2 (Housing) and its supporting DM policies, which are a focus of discussion below. With regards to Policy SP5 (Community Facilities), there are no significant proposed changes. Finally, it is important to note Policy DM1A (Estate Renewal), which is a new policy in response to a situation whereby:

*“A number of... housing estates were developed in the early to mid 20th Century, and have been constructed using design and construction principals of different eras. While some assets perform their function well, and will continue to do so, some are starting to come to the end of their lifespan, and have a range of issues that need addressing.”*

9.6.5 Regina Road Estate is a new proposed allocation, following support for redevelopment through a residents ballot, and the Tall Buildings Study (2024) also identifies a Tall Building Zone here.



### Appraisal conclusion

- 9.6.6 Having taken careful account of both the proposed spatial strategy and thematic policies (borough-wide, area-specific and site specific, also mindful of existing CLP 2018 policies that are not proposed for change) it is fair to predict **positive effects**, albeit with a degree of uncertainty given a number of proposed allocations associated with existing community uses that will need careful consideration through the development management process. Perhaps the key point to note is that the three new Transformation Areas are all strongly supported from a communities perspective (which is not to say that the policy approach at each should not be the subject of further scrutiny with a view to making adjustments aimed at maximising community benefits ahead of plan finalisation, most notably with respect to the Purley Way).

## 9.7 Economy and employment

### Appraisal discussion

- 9.7.1 The appraisal in **Section 6** finds that the proposed broad strategy performs well in absolute terms, but that there is a case to be made for supporting a higher growth strategy, whether that be via additional housing growth at North End Quarter, additional policy support for windfall or Green Belt release.
- 9.7.2 The appraisal in Section 6 does not focus on the Purley Way or the approach to growth at allocations other than within the North End Quarter, but these are key factors with a bearing on the performance of the Partial Review in respect of 'economy and employment' objectives.
- 9.7.3 Beginning with **office floorspace**, the Employment Land Review (ELR, 2020) forecasts a need for an additional 30,500m<sup>2</sup> floorspace in the plan period, or 33,000m<sup>2</sup> if account is also taken of need for R&D space. The ELR explains that this "represents a potentially significant requirement for office space" but is a major departure from the 97,000m<sup>2</sup> figure within CLP 2018, which is "stretching" and assumes "very high growth". The CLP 2018 figure was arrived at on the basis of assumptions regarding the distribution of demand for office space across South London that are no longer supported, including on the basis of evidence relating to planning consents for major office schemes not being implemented. The general trend over recent years (para 7.5 of the ELR) has been one of limited new office development ("*three significant deliveries of high-quality stock over the last decade which includes the Council headquarters*"). The ELR (2020) goes on to suggest a more recent trend of lack of supply leading to decreasing rates of vacancy, plus there is increasing demand for grade B / affordable office space; however, on the other hand, there is also a need to consider trends since 2020 (discussed below).
- 9.7.4 The ELR also discusses the spatial distribution of demand for office floorspace, ultimately concluding that the 33,000m<sup>2</sup> could be delivered entirely within Croydon Metropolitan Centre, which is a departure from CLP 2018. The ELR goes on to discuss the importance of retaining the existing Office Retention Area surrounding East Croydon Station, and also taking steps to stimulate office development.
- 9.7.5 In light of these introductory points on the context to planning for office space, the conclusion is that the Partial Review appears to perform suitably well, but that it is difficult to reach clear conclusions, due to a complex situation whereby numerous allocations – particularly within the Office Retention Area – are proposed for mixed use schemes whereby there is uncertainty regarding the level of office floorspace. It is recommended that further (proportionate) work is undertaken to clarify the situation.
- 9.7.6 With regards to **industrial land**, the first point to note is that the Borough has existing strengths and a strategic role to play in respect of B8 warehousing. The need figure of 78,000m<sup>2</sup> is a minimum, and translates as need for 12-21 ha of land, which is clearly highly challenging. With regards to light industrial land, the situation is "complex". Whilst Croydon not a major location for manufacturing, light industrial units (particularly smaller) are seeing high demand across a wide range of "*sectors associated with higher value, good quality jobs, and which are essential to London's economy.*" On balance, the ELR recommends continuation of the existing 'no net loss' approach, as part of which redevelopment (potentially mixed use) to secure an intensification of employment space will be important.
- 9.7.7 With regards to the performance of the Partial Review, the simple fact is that the Partial Review does not propose any significant new industrial land. This gives rise to the strong possibility of a significant unmet need. However, the Partial Review is strongly supportive of protecting existing industrial land (in the context of a situation whereby industrial land in London inevitably comes under pressure for more high value uses) and also intensifying existing industrial land, particularly within the Purley Way TA.

- 9.7.8 Outside of the Purley Way industrial land is quite widely dispersed across numerous pockets borough-wide, which gives rise to a challenge in terms of retention and intensification. However, the proposal to retain the current four tiers of designation is supported by the ELR, which seeks to emphasise the importance of the Council intervening in support of successful intensification, e.g. case study locations.
- 9.7.9 There is overall limited focus on mixed use intensification, at least relative to some other London Boroughs. This warrants being a focus of ongoing consideration (and clarity through a topic paper would be welcomed, as per the situation in respect of office space), but is tentatively supported given the inherent challenges and complexities involved with mixed use redevelopment / intensification of industrial land.
- 9.7.10 Other area and **site-specific considerations** include:
- Purley Way – it is within the Valley Park area that the proposed new community will integrate most closely with SIL, with the extensive Beddington SIL in LB Sutton to the west. Also, within the Five Ways area, it is important to note that one of the two new sites since the I+Os stage (Site 153) comprises a small isolated SIL, adjacent to the Five Ways roundabout. The proposal is for a scheme involving 91 homes and town centre uses. It is recommended that there should be a clear vision for the future of industrial uses along the Purley Way, with a focus on explaining how the nature of industrial uses (e.g. heavy industry versus light industry versus storage and distribution) is likely to change over time.
  - Broad Green & Selhurst – Site 13 is of note as a vacant industrial site closely associated with Thornton Heath, with the proposal for a mixed use scheme to include industrial/warehousing.
  - Thornton Heath – Site 136 is proposed for a 124 home mixed use scheme, with the CLP allocation (also the I+Os proposal) for 25 to 55 homes, and the proposal is to remove the requirement for employment.
- 9.7.11 With regards to **DM policy**, there are numerous matters that could potentially be discussed here, but a key issue is affordable workspace, which is a focus of the London Plan but not currently the Partial Review. Further consideration should be given to a policy setting out expectations in the Croydon context in respect of employment developments and intensification schemes providing a proportion of space as affordable workspace, potentially targeted at creative and cultural sectors and/or small and medium enterprises.

#### Appraisal conclusion

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

## 9.8 Health

#### Appraisal discussion

- 9.8.1 The appraisal presented in **Section 6** finds that the preferred broad strategy performs well, and that there is no clear case to be made for any of the higher growth reasonable alternatives.
- 9.8.2 One important consideration is ensuring access to **health facilities**, with site specific policy set to include a considerable focus on identifying sites with the potential to deliver new facilities (subject to further discussions with providers), although there are also certain issues and potential tensions, e.g. proposed redevelopment at Croydon University Hospital (discussed above). The proposed allocation at New Addington is a site where there is now an urgent need to decide whether the site can both deliver a health facility and deliver significant new homes (as anticipated by CLP 2018).
- 9.8.3 Aside from access to health facilities, another important consideration is design quality and space standards, with the proposal being to supplement **Policy SP2** (Homes) to include new policy criteria on:

- Shared spaced – “Development will need to demonstrate the design of both private and communally shared spaces... successfully meet the needs of all residents, including families...”
- Internal and external spaces – “which contribute positively to resident’s health and wellbeing, whilst offering places for activity, shared experiences and retreat...”
- Design and layout that supports independent living – assigned a policy criterion.
- Wider design considerations – “designed to the highest quality; be functional, accessible, adaptable, sustainable, in compliance with all relevant standards and applied neutrally across all tenures...”
- Accessible - all developments should “provide accessible and adaptable dwellings... At least 10% of all affordable homes built to meet M4 (3) wheelchair user dwellings and the remainder should meet M4 (2) accessible and adaptable dwellings standards.”

9.8.4 Changes to Policy SP2 are supplemented by changes to **DM policies**, notably:

- New Policy DM 1A (Amenity standards for residential developments) – sets out minimum requirements, with supporting text explaining: *“Amenity space is an important and essential element of a residential development, providing an outdoor space that is practical and can be used as a utility, social and recreation area. The health and wellbeing of local residents is a key consideration on the quantum of outdoor space, child’s play space and communal open space to be provided for developments.”*
- New Policy DM2A (Large scale purpose built shared living) – sets out the facilities that each private unit shall include or have exclusive access to, including living space separate from the communal facilities.

9.8.5 Access to green and blue infrastructure is also a key consideration here. In this respect, the primary point to note is **Policy SP7** (Green Grid), which includes a new focus on the north of the Borough within the supporting text: *“In the north of the borough where there are less green spaces the improvement of biodiversity is more of a challenge but it can be achieved through the existing parks, back gardens and pockets of green in places such as roads.”* Within the policy itself, there is a new focus on Local Green Spaces and Important Green Spaces.

9.8.6 With regards to **site allocations**, the following are of particular note:

- Site: 44 – is the aforementioned site at New Addington.
- Site New 2 – is a new proposed site for estate regeneration, following a successful residents ballot.
- Site 133 – currently comprises various low rise residential blocks and associated parking and amenity land, and the proposal is to deliver a 284 home redevelopment (previously proposed for 505 homes).
- Site 34 – is a large new proposed allocation within the Croydon OA that currently includes public realm.
- Numerous sites – are discussed as potential locations for a health facility. For example, Site 945 was previously earmarked as a potential site for a health centre, but that is no longer anticipated.

#### Appraisal conclusion

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

## 9.9 Historic environment

### Appraisal discussion

- 9.9.1 The appraisal in **Section 6** shows the preferred broad strategy to perform well relative to reasonable alternatives. With regards to North End Quarter, the emerging preferred approach involves additional homes relative to the proposal in 2022, which does create a tension with historic environment objectives, and so there is a clear concern with the option of yet higher housing growth. With regards to windfall development, a higher growth strategy would likely necessitate spatial targeting at areas close to transport hubs and with low density residential character, and when this approach was taken in 2022 the appraisal at that time did flag some historic environment concerns (albeit of potentially of limited significance).
- 9.9.2 Other considerations not a focus of the appraisal in Section 6 include:
- Mid Croydon – is strongly associated with the Central Croydon Conservation Area, as well as Queen’s Gardens open space. Site 194 is a large and constrained site (the Grade II\* listed clock tower is adjacent, and the view cone intersects the site), where the proposal is for 820 homes, which is a notable increase on the equivalent figure from CLP 2018 (88 to 504 homes).
  - Southern part of Croydon OA – this area lies to the east of the River Wandle floodplain and the Laud Street local heritage area, and to the west of a residential conservation area. There are four sites, one of which (Site 190) is consented for 357 homes, which is a figure notably higher than the CLP 2018 capacity figure (56 to 162 homes). Two other sites (41 and 952) are both new allocations of note, including due to proximity to listed buildings, including (in the case of Site 952) a Grade II\* listed building. The capacity of Site 952 was reduced significantly in May 2024.
  - Western part of Croydon OA – Site 374 is a small site in the Old Town, and within a conservation area. The proposal is to support 21 homes, a slight decrease on the 23 to 64 range from CLP 2018.
  - Purley Way – is a historic transport corridor, plus there is a need to consider the heritage value of the River Wandle corridor. In the Five Ways area, one of the two new sites since the I+Os stage (Site 153) is adjacent to Grade II listed tithe barn. This could represent a heritage opportunity, given existing uses.
  - Purley – Site 683 is adjacent to the designated local heritage area. It is proposed for 60 homes, which is a reduction on the 99 homes proposed in 2022.
  - Broad Green & Selhurst – Site 416 is now an omission site. It is closely associated with Croydon cemetery - a local heritage area - although redevelopment could have represented an opportunity.
  - Coulsdon – Site 372 is now completed for 157 homes (a notable departure from the CLP 2018 allocation). It is adjacent to the Surrey Iron Railway embankment Scheduled Monument.
  - Crystal Palace & Upper Norwood – the stand-out large site is Site 357, which is located within the district centre and within the Upper Norwood Triangle Conservation Area. The proposal is for a 135 home mixed use scheme, with CLP 2018 having proposed 39 to 223 homes.
  - Norbury – Site 951 is now an omission site. The previous policy stated: “The buildings fronting on to London Road contribute to the Local Heritage Area and should be retained and converted...”
  - Selsdon – Site 948 is an existing allocation for 11 homes, with the new proposal for 26 homes to reflect planning consent. It is described as a disused art deco dance hall, last used as a car repair garage.
  - Shirley – Site 504 comprises a locally listed building, with the current proposed capacity of 24 homes below the range set out in CLP 2018 (26 to 68 homes). New site specific policy is proposed: “*The locally listed building should be converted in a sensitive manner that responds to its special interest. Development in the grounds would need to demonstrate that it can be accommodated in a manner that responds to the locally listed building and preserves or enhances its setting.*”
  - South Norwood and Woodside – Site 51 is now an omission site, having been proposed for 102 homes in 2022. It is within a conservation area, but appears to have limited sensitivity.
- 9.9.3 With regards to borough-wide **thematic policies**, there are limited significant implications for the historic environment, i.e. policy is mostly quite standard (recalling the Government’s current proposal to publish national development management policies. However, relative to CLP 2018 there are some substantial changes to Policy DM10 (Design and character), including a new proposed focus on “*reflecting and maintaining the local character of the area including any heritage assets having regard to... The heritage assets and natural features of the surrounding area and the Place of Croydon in which it is located.*”

### Appraisal conclusion

- 9.9.4 The historic environment is a key consideration for one of the proposed Transformation Areas, namely the North End Quarter, and also an important consideration for the Purley Way. It is also a key consideration for several of the district and local centres that are a focus of growth, plus numerous of the proposed allocations elsewhere (including within the Croydon OA) have a degree of historic environment constraint. However, there will typically be the potential to avoid or sufficiently mitigate impacts through careful design (in line with the design-led, character-based approach as set out in Chapter 3 of the London Plan). Many site allocations reference the need to account for historic environment constraints, including with a good degree of specificity that leads to confidence. Overall, it is fair to predict a **positive effect**, albeit with a degree of uncertainty ahead of receiving the views of Historic England through the current consultation.

## 9.10 Housing

### Appraisal discussion

- 9.10.1 The appraisal in **Section 6** concludes that the proposed broad strategy performs well in absolute terms, but that there is a clear case for a higher growth scenario, in order to meet housing needs more fully. In particular, there is support for higher growth scenarios that would direct growth so as to maximise delivery of family and affordable housing and, as part of this, consideration could be given to Green Belt release.
- 9.10.2 Another key consideration is **deliverability** of the proposed housing requirement, which is 34,145 homes over the plan period, and which breaks down as a requirement for 2,079 dpa over the early years of the plan period years to 2029 and then 1,214 dpa for the subsequent eleven years to 2040. The total identified supply is 39,786, such that there is a supply buffer of 17%, which is quite high in the national context. However, it is not necessarily high in the London context, where there are the inherent uncertainties around the number of homes that will be delivered at complex proposed allocations in practice (e.g. see discussion of the Wandsworth supply buffer in Section 5.2). Delivery risk / uncertainty is evident from the changes to sites and site capacities that has occurred over the years (as discussed in Section 5.4) and the need for criteria to be met at certain sites before they can be developed, e.g. in respect of re-providing community infrastructure. Another consideration is certainty regarding windfall development in the absence of identified intensification areas, although there are few concerns with the proposed approach of delivering 641 dpa from small sites / windfall, in the context of recent delivery of over 1,000 dpa.
- 9.10.3 Having said this, it is important to be clear that the matter of defining an appropriate supply buffer is far from an exact science, and that it is also common for planning applications to be submitted involving much higher numbers of homes than previously anticipated in policy. For example Site 31 has recently been completed and delivered 573 homes (including a 49 storey tower), which is a figure much higher than the 159 homes anticipated in CLP 2018 (plus the site is reduced in extent).
- 9.10.4 A related matter for scrutiny is assumptions made regarding the **delivery timescales** for site allocations, with it again being the case that significant adjustments have been made to many sites over the years. However, overall there is confidence that a suitably precautionary approach has been taken, with sites proposed to deliver in the early years of the plan mostly being those with planning permission, and those sites currently recorded as having “no known developer interest” mostly assumed to deliver post 2034. Further confidence in the housing trajectory is then generated once account is taken of the fact that there would be the potential to boost supply for the latter years of the plan period through a Local Plan Review (or another Partial Review) informed by a new London Plan.
- 9.10.5 Focusing on **affordable housing**, the supporting text to Policy S2 increases the ambition of CLP 2018 (specifically, see [paragraph 4.4](#)) from a target of 30% to 50% affordable housing to be delivered by new residential development over the plan period. This is in line with the London Plan.
- 9.10.6 Of the affordable housing that is delivered, 70% should be rented homes, with this further broken down as 40% Social Rent and the remaining 30% delivered as London Affordable Rent. The other 30% of all new affordable homes should be intermediate affordable housing. Importantly, whilst the Partial Review acknowledges **First Homes** as a Government initiative to increase affordable housing ownership, First Homes are not supported as an affordable housing product in the Borough. This is on the basis of SHMA analysis, which concludes that First Homes at a 30% discount are still not affordable across the Borough. Even with a 50% discount it is marginal whether First Homes would be affordable to individuals and households in several areas of the Borough.

- 9.10.7 With regards to the need for **family housing**, this has already been discussed as a key issue. There is a need to deliver new family housing, but also address the redevelopment of larger homes. The latter issue is a focus of Policy DM1, which aims to ensure that any loss of three bed (or more) homes should - as a minimum - be replaced by an equivalent quantity of three bed homes within schemes.
- 9.10.8 Further considerations include: a new focus in Policy SP2 on supporting a range of housing delivery methods, including self-build, custom-build and community-led housing.

#### Appraisal conclusion

- 9.10.9 The appraisal in Section 6 concludes a positive effect of 'limited or uncertain significance'. However, after having accounted for proposed development management policies, particularly in respect of affordable housing and family housing, it is possible to predict a **significant positive effect** (as per 2022). Nonetheless, there is a clear need for ongoing scrutiny of the housing requirement for the period beyond 2029, which is currently proposed to be 1,214 dwellings per annum (dpa). This is significantly below recent rates of delivery (above 2,000 dpa) and housing need is likely to be significantly higher. There is also a need to consider the national context in terms of the NPPF's focus on "significantly boosting the supply of homes" and the Government's current consultation (March 2023) on "Strengthening planning policy for brownfield development", which proposes "*a change to national planning policy that would expect local planning authorities to give significant weight to the benefits of delivering as many homes as possible, and to be flexible in applying policies or guidance on the internal layout of developments especially for proposals on brownfield land.*" There is also a current focus nationally on boosting rates of housing in London (see the London Plan Review Report of Expert Advisers, 2024) and there is significant unmet housing need arising from neighbouring districts in Surrey, most notably Tandridge District.

## 9.11 Land and soils

#### Appraisal discussion

- 9.11.1 The appraisal in **Section 6** raises few concerns, and there is limited potential to elaborate further here. Whilst the proposal is to develop some small areas of amenity land, there is no proposed loss of greenfield land within the Green Belt, or MOL.
- 9.11.2 A further consideration is Site 946 (Stubbs Mead), which was proposed for allocation in 2022 but is now an omission site. This is a South London Waste Plan safeguarded waste site.
- 9.11.3 A final consideration is the potential to make further use of brownfield land within the Purley Way, subject to transport infrastructure upgrades and wider issues being address. For example, the Purley Way Masterplan explored options for the Gas Works site, and the site is discussed in Section 5.3, above.

#### Appraisal conclusion

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

## 9.12 Landscape

#### Appraisal discussion

- 9.12.1 The appraisal in **Section 6** shows the preferred broad strategy to perform well relative to reasonable alternatives. The plan also potentially performs well relative to 2022 as the proposal is to remove the previously proposed intensification areas that would have served to concentrate windfall development. However, this is uncertain, as the windfall assumption is broadly unchanged, a more dispersed windfall could have similar implications for townscape and landscape character in the Borough's suburban areas.
- 9.12.2 Also of note are proposed changes to **Policy SP4** (Urban Design, Heritage and Local Character), including in respect of tall buildings, with a new proposed focus on "*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.*" **Policy DM15** (Tall and large buildings and high density developments) also includes a notable new policy criterion stating: "*Rigorous testing [of wind, sunlight, and wider microclimate conditions] will need to be carried out to assess potential impacts at the earliest possible opportunity in order to assess the suitability of development... Development should drive improvements to any problematic areas to create a safe, comfortable and inviting public realm.*"

- 9.12.3 There are also notable changes to **Policy DM10** (Design and character), including a new proposed focus on “*reflecting and maintaining the local character of the area including any heritage assets having regard to... The heritage assets and natural features of the surrounding area and the Place of Croydon in which it is located.*” Finally, there are also notable changes to DM10.3 which has added specification regarding the provision of landscaping as part of an overall design that enables the development to respect the character of the existing area, integrating with surrounding buildings.

#### Appraisal conclusion

- 9.12.4 A key consideration is policy support for, and spatial targeting of, small sites windfall in the Borough’s suburban areas. There is a notable adjustment to the proposed approach relative to 2022, with the removal of the previously proposed intensification areas, but it is difficult to conclude what the effect of this will be for townscape and landscape character. Another key change since 2022 is the definition of Tall Building Zones, in line with the London Plan requirement, and informed by the Tall Buildings Study (2024). Definition of these zones has only had a modest impact on proposed allocations; however, other sites may become available within the defined zones and be proposed for taller buildings in the future. Finally, there is strong support – from a townscape / landscape perspective – for the detailed work on design-led site capacities that has been undertaken since 2022, including applying a ‘cookie-cutter’ methodology, whereby exemplar schemes are overlaid on site boundaries. However, this has led to an overall reduction in supply across the site allocations that must be scrutinised in light of wider objectives, including making the best use of land in the best connected / most accessible locations. Overall a **positive effect** of limited or uncertain significance is predicted (in contrast to a predicted neutral effect in 2022).

## 9.13 Transport

#### Appraisal discussion

- 9.13.1 Key issues are introduced in **Section 6**, where the conclusion of the appraisal is that the proposed broad strategy performs well relative to reasonable alternatives. There is support for the proposed focus of growth at North End Quarter, although there is a case for supporting a greater concentration of growth here; and there is also potentially support for the proposed approach to windfall, although the lack of spatial targeting via ‘intensification areas’ generates a degree of concern.
- 9.13.2 Aside from the matters that are a focus of the appraisal in Section 6, a key consideration is the approach to growth within the **Purley Way Transformation Area**. This is a very challenging area for growth from a transport perspective, as there is a considerable opportunity but also a need to avoid housing growth coming forward ahead of supporting transport and community infrastructure. Growth in the Purley Way must also be considered in combination with growth to the south at Purley and also Coulsdon beyond. In these areas there is likely to be an overall reduced quantum of growth relative to 2022, and there is a need to question whether growth is coming forward in a suitably coordinated way suited to making the most of transport infrastructure investment opportunities.
- 9.13.3 A further consideration are the proposed significant changes to Policy SP8, notably:
- A new focus on East Croydon station – “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. This enhancement should support the establishment of *cycle hubs, pedestrian, bus and tram connections at East Croydon Station*, including safeguarding land.”
  - Revised support for trams – for example, support for “potential development of a tram depot in New Addington or other locations in the borough.”
  - Notable changes to supporting DM policies, including: new Policy DM28 (Ensuring a safe and effective highway network during development construction); changes to Policy DM29 (Promoting sustainable travel and reducing congestion); and changes to Policy DM30 (Car and cycle parking in development).
- 9.13.4 Focusing on **car parking**, there is a new proposed approach that is supportive of car parking as part of new developments in areas with the lowest PTAL. This is potentially a pragmatic response to a situation whereby some suburban areas have both low levels of PTAL and limited ability to walk/cycle due to poor infrastructure (including roads with no pavements) and steep topography. However, there is a need for ongoing scrutiny from a perspective of seeking to minimise car dependency within the Borough.

### Appraisal conclusion

- 9.13.5 The proposed spatial strategy is ‘sustainable transport-led’ to a large extent, and certain of the interventions supported by the Local plan are of larger-than-local significance, most notably Brighton Mainline (although delivery certainty here has reduced since 2022). However, there remain a wide range of challenges and uncertainties, notably in respect of the Purley Way Transformation Area and at Purley. Also, there is a need for ongoing scrutiny of the potential for windfall development to come forward in line with transport objectives, including recalling the Borough’s 2030 net zero commitment. Overall the conclusion is a **positive effect** of limited or uncertain significance (as per 2022).

## 9.14 Water

### Appraisal discussion

- 9.14.1 Key issues are introduced in Section 6, particularly capacity at wastewater treatment works (WwTW). However, the conclusion is that there are unlikely to be any significant constraints to growth locally, either in respect of total growth quantum or spatial strategy / site selection.
- 9.14.2 A further consideration is Sustainable Drainage Systems (SUDS) measures, which are important from both a flood risk and water quality perspective. New proposed supporting text within the Broad Green and Selhurst section of the Partial Review notably explains:

*“Developers will need to liaise with the Council Local Lead Flooding Authority team and the Environmental Agency, to investigate the suitability of SUDS... due to the geological characteristic, to reduce the risk of groundwater flood risk. The Council will continue to work with Thames Water... and other stakeholders, to... enhance the ecological status of Norbury Brook, in line with the Water Framework directive.”*

- 9.14.3 With regards to thematic policy, there are limited proposed changes; for example, the proposed requirement within Policy SP6 (Sustainable Design and Construction) for all new-build residential development to meet a minimum water efficiency standard of 110 litres/person/day is unchanged. In this respect, it is noted that a commitment to achieve at least 105 litres per person per day is becoming increasingly common, and some water companies now target 100 l/p/d.
- 9.14.4 Finally, proposed changes to Policy SP7 (Green Grid) are of note. Specifically, a new policy criterion requires: *“Through green infrastructure respond to climate change – through carbon sequestration and storage, temperature regulation, storm water regulation and air purification...”* This policy criterion is presented under the ‘biodiversity’ heading, which might be reviewed.

### Appraisal conclusion

- 9.14.5 Wastewater treatment work capacity is high on the agenda nationally at the current time, hence there is a need to avoid risks of capacity breaches as far as possible. This can mean directing growth to locations with existing capacity, as opposed to relying on capacity upgrades. However, no concerns have been raised regarding capacity being a significant constraint to growth with a bearing on the quantum of new homes supported though the Partial Review, or the spatial strategy. As such, a **neutral effect** is predicted.

## 9.15 Conclusions

- 9.15.1 In conclusion, the appraisal predicts a **significant positive effect** in respect of housing objectives (although there is a need to give ongoing consideration to options that would involving boosting supply). A **limited or uncertain positive effect** is then predicted under the communities, economy, health, historic environment, landscape and transport headings (recalling that the baseline situation is one whereby development continues but in a less plan-led fashion). A **neutral effect** is then predicted under the air quality, biodiversity, land/soils and water headings. Finally, a **limited or uncertain negative effect** is predicted under two headings, namely: climate change adaption (ahead of the EA further reviewing several development sites that intersect a flood risk zone); and climate change mitigation (given the highly stretching target of achieving net zero greenhouse gas emissions borough-wide by 2030).
- 9.15.2 There will be the potential to make improvements to the plan through the forthcoming examination in public. Improvements to the plan might seek to further bolster positive effects identified through this appraisal, and there will certainly be the potential to further explore tensions with sustainability objectives.



9.15.3 A small number of specific recommendations are discussed. However, it is inherently difficult to make specific recommendations because actioning them will inevitably have implications that are difficult to foresee and account for here. For example, it would be very easy to recommend further detailed policy in respect of net zero development, following the best practice examples that are emerging nationally and across London in particular, but this would have cost/viability implications such that there could be a need to accept trade-offs – i.e. less stringent policy in respect of one or more wider objectives (e.g. affordable housing) – and/or there would be a need to undertake detailed work with time and resource implications.

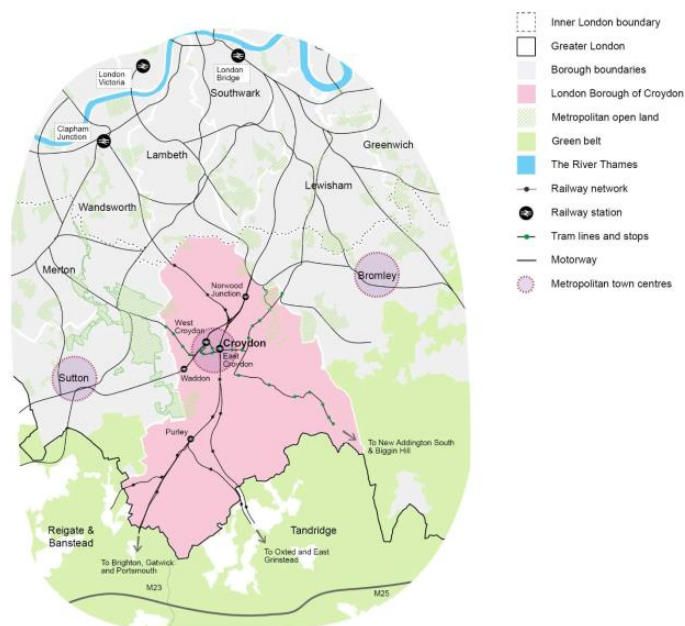
Cumulative effects

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

- **Adopted CLP 2018** – an immediate consideration is the effect of the Partial Review in combination with those aspects of CLP 2018 that are not a focus of the Partial Review. However, such considerations are limited, because the spatial strategy is entirely revisited, albeit there are certain aspects of the spatial strategy proposals through the Partial Review that are only a modest adjustment on the strategy set out in CLP 2018 (e.g. the strategy for the Croydon Opportunity Area outside of the Transformation Areas).
- **Housing** – as well as contributing to London’s housing needs, there is a need to recognise that the Croydon housing market area has historically been seen as closely linked to that of Tandridge District. The Tandridge Local Plan was recently found to be unsound, hence there is unmet housing need.
- **Transport infrastructure** – aside from the headline matter of the Brighton Mainline, the Borough also shares other strategic transport corridors with neighbouring areas. In respect of the tram network, the focus on the Croydon OA, the Purley Way and district/local centres on the network amounts to a proactive approach to supporting patronage and, in turn, investment in network improvements. There is also a need for an ongoing focus on road corridors associated with district/local centres and other growth locations, perhaps most notably the London Road linking to LB Lambeth to the north.
- **Employment** – Croydon is a regionally important centre of employment, particularly in terms of office space within the Croydon OA and SIL along Purley Way. Both matters require ongoing scrutiny, and there is also a need to consider key employment areas close to the Borough boundary, notably Beddington to the west and Biggin Hill to the south east.
- **Landscape scale net gain** – there is a need to focus efforts on achieving conservation and ‘net gain’ objectives, in respect of biodiversity and wider ecosystem services, at functional landscape scales, perhaps most notably the River Wandle corridor, which extends northwest from Croydon into LB Sutton.

9.15.5 The figures below serve to highlight a selection of sub-regional geographies.

Figure 9.1: Croydon in the South East London and East Surrey context



## **Part 3: What are the next steps?**

## 10 Plan finalisation

- 10.1.1 Once the period for representations on the Partial Review / SA Report has finished the intention is to submit the plan for examination in public (see decision [here](#)) alongside a summary of the main issues raised through the Regulation 19 publication period. The Council will also submit the SA Report.
- 10.1.2 At Examination the Inspector(s) will consider representations on the Partial Review (alongside the SA Report) before identifying modifications necessary for soundness. 'Mods' will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.3 Once found to be 'sound' the Partial Review will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

## 11 Monitoring

- 11.1.1 The SA Report must present "measures envisaged concerning monitoring".
- 11.1.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Air quality – it will be important to consider adjustments to the air quality monitoring regime in response to the growth strategy, e.g. accounting for growth in the suburbs alongside support for car parking.
  - Biodiversity – there will be a need to establish a regime for ensuring that decision making in respect of biodiversity net gain as part of planning applications is undertaken under a strategic spatial framework – informed by the forthcoming Local Nature Recovery Strategy – and then monitor effectiveness. Within the Purley Way TA specifically, project-specific green and blue infrastructure measures could be monitored to ensure that the 'sum of parts' aligns with the vision for a River Wandle Regional Park.
  - Climate change adaptation – it would be useful to monitor not only the number of homes that come forward in a flood risk zone, but also the nature of the schemes / mitigation measures implemented.
  - Climate change mitigation – built environment decarbonisation is a rapidly evolving policy area, and so it will be important to monitor the sufficiency of policy, potentially with a view to preparing supplementary planning guidance, in order to ensure that opportunities are fully realised, including in respect of heat networks. With regards to transport emissions: car parking at windfall sites could be a focus.
  - Communities and health – it would be useful to monitor how existing community uses on sites proposed for allocation are re-provided, for example onsite, versus in the local area, versus further afield. It could also be useful to monitor the process of identifying sites suited to delivering new health infrastructure.
  - Within the North End Quarter there will be a need to be mindful of ongoing changes to retail trends and understanding of best practice in respect of reimagining town centres and high streets.
  - Economy and employment – the evolution of the Office Retention Area certainly warrants monitoring, reporting and evaluation. Within the Purley Way TA there is a case for monitoring of business satisfaction within SILs, plus there is a need to consider potential business / community conflicts, e.g. traffic.
  - Historic environment – Historic England are well-placed to recommend monitoring measures that may be proportionate and achievable. Clearly the North End Quarter could be a focus of efforts.
  - Housing – in addition to close monitoring of affordable housing 'products', there is also a clear case for monitoring family housing, both losses and new delivery. A simple metric that could helpfully inform ongoing evaluation of 'suburban intensification' is the proportion of homes on small sites with gardens.
  - Landscape – there could be merit to monitoring shifting character in suburban areas over time, with a view to avoiding cumulative impacts to townscape, landscape and the setting of heritage assets.
  - Transport – understanding of strategic transport infrastructure issues and opportunities changes significantly over time (including on account of changes to available funding), and this understanding can have very significant implications for spatial strategy. In particular, there is a need to maintain a watching brief in respect of evolving evidence around transport issues and opportunity associated with the Purley Way TA, with a view to ensuring that the growth opportunity along this key corridor is fully realised in the context of net zero and other objectives.

# Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
<b>Introduction</b>		What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>	
<b>Part 2</b>	What are the SA findings at this current stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>	
<b>Part 3</b>	What happens next?	<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>	

Table B: Interpreting Schedule 2 and linking the interpretation to our report structure

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available online.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'SA framework', and this is presented within Section 3 ('What's the scope of the SA').
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	Key issues highlighted through context and baseline review are also presented within Appendix II.
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review and explains how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3.  With regards to explaining "how... considerations have been taken into account", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Partial Review as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents some specific recommendations, but more important is that the Council takes steps to address the predicted negative effects and tensions with sustainability objectives, balancing competing issues and objectives.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios.  Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal.  Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside the proposed / pre-submission version of the plan, in order to inform representations and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	An Interim SA Report was published for consultation as part of the Issues and Options consultation in 2019, and an SA Report was published alongside a full draft plan in 2022. These reports informed subsequent plan-making.  This SA Report will be taken into account when finalising the plan post submission (as discussed in Section 10).

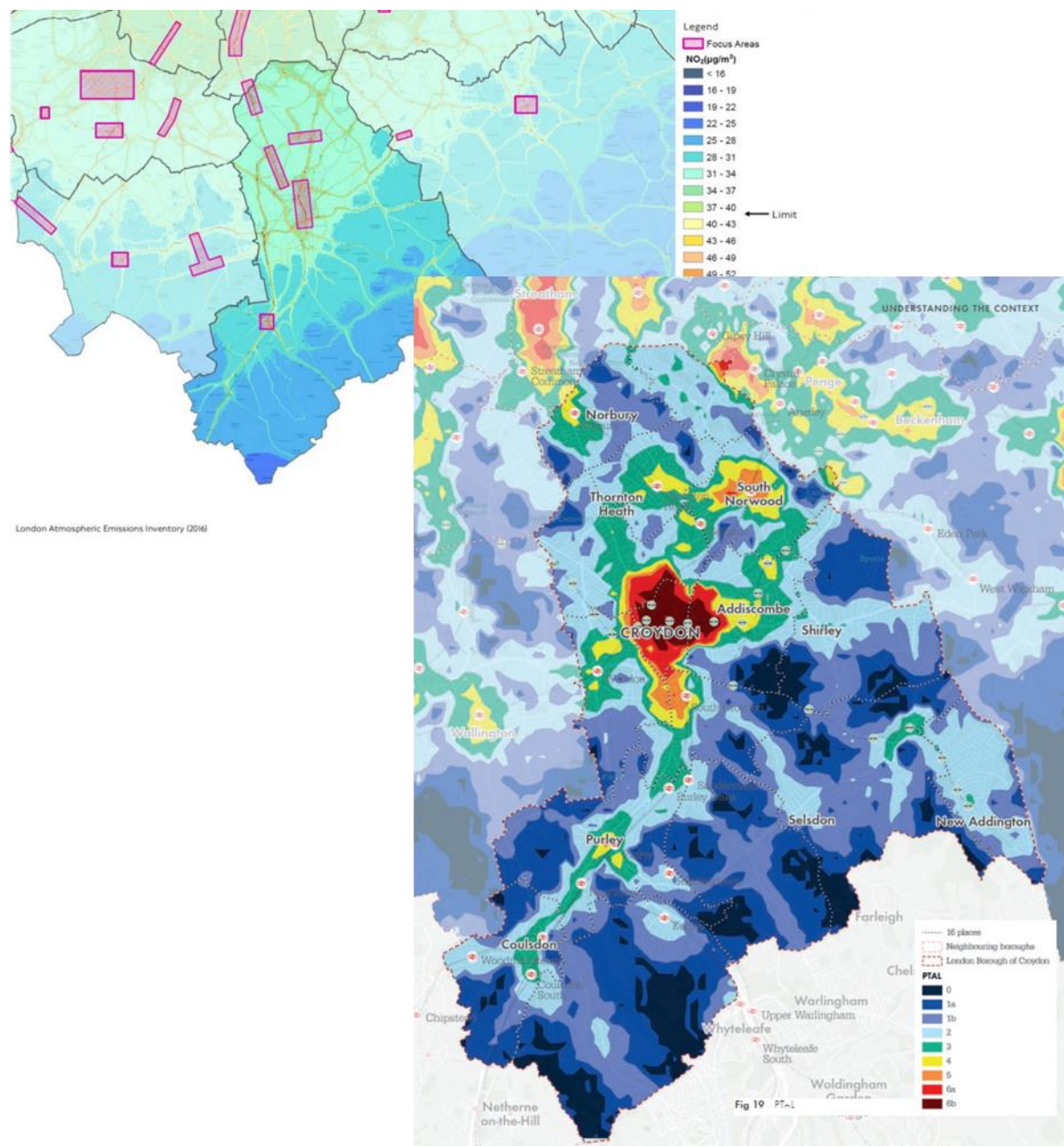
# Appendix II: The SA Scope

## Introduction

This appendix supplements Section 3 by presenting information from the Scoping Report (2019). Specifically, the aim here is to present discussion of key issues under select headings alongside key maps. This is with a view to avoiding having to include high level introductory text and maps in the appraisal sections (Sections 6 and 9).

## Air quality

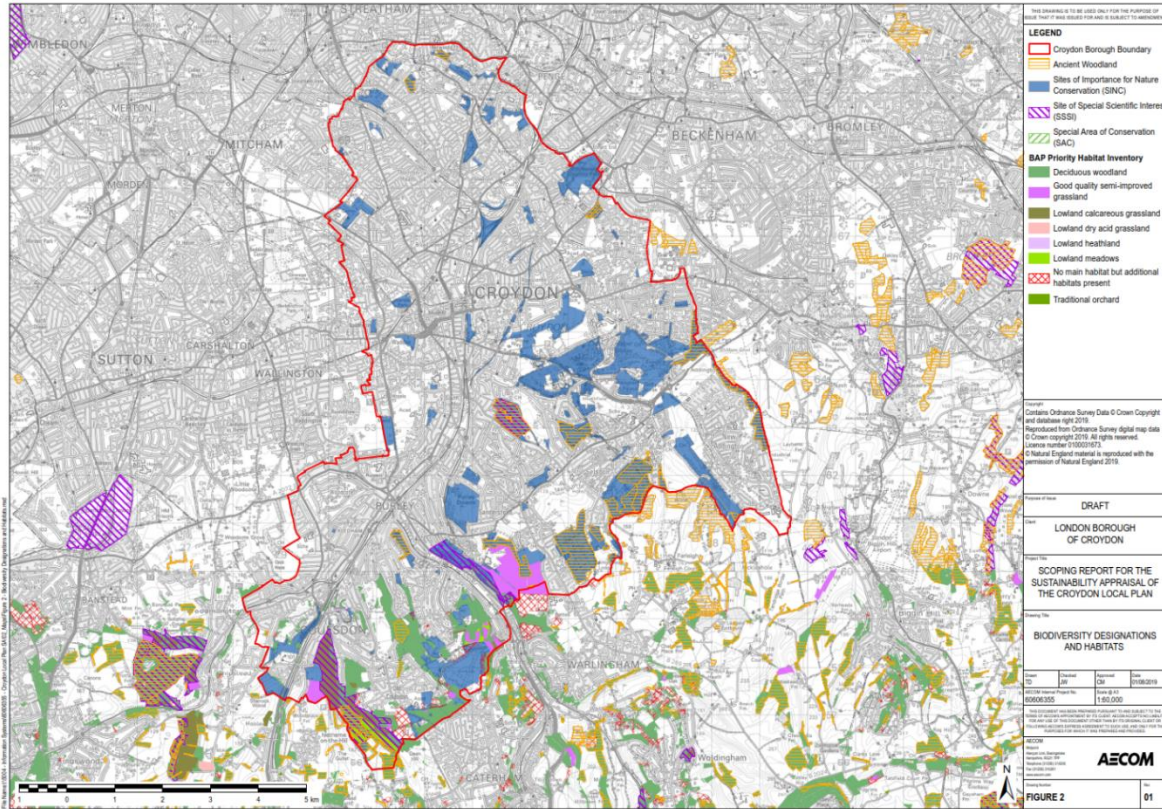
Figure A: Air Quality Focus Areas (2016) (source: the [GLA](#)) and PTAL (source: Tall Buildings Study, 2024)



## Biodiversity

The Borough contains a variety of biodiversity designations at a range of scales, namely: 3 Sites of Special Scientific Interest (SSSIs); 86 Sites of Importance for Nature Conservation (SINCs) of local importance and 13 SINCs of Metropolitan importance; and a variety of Biodiversity Action Plan habitats distributed throughout the plan area. There are no Special Protection Areas, Special Areas of Conservation or Ramsar sites.

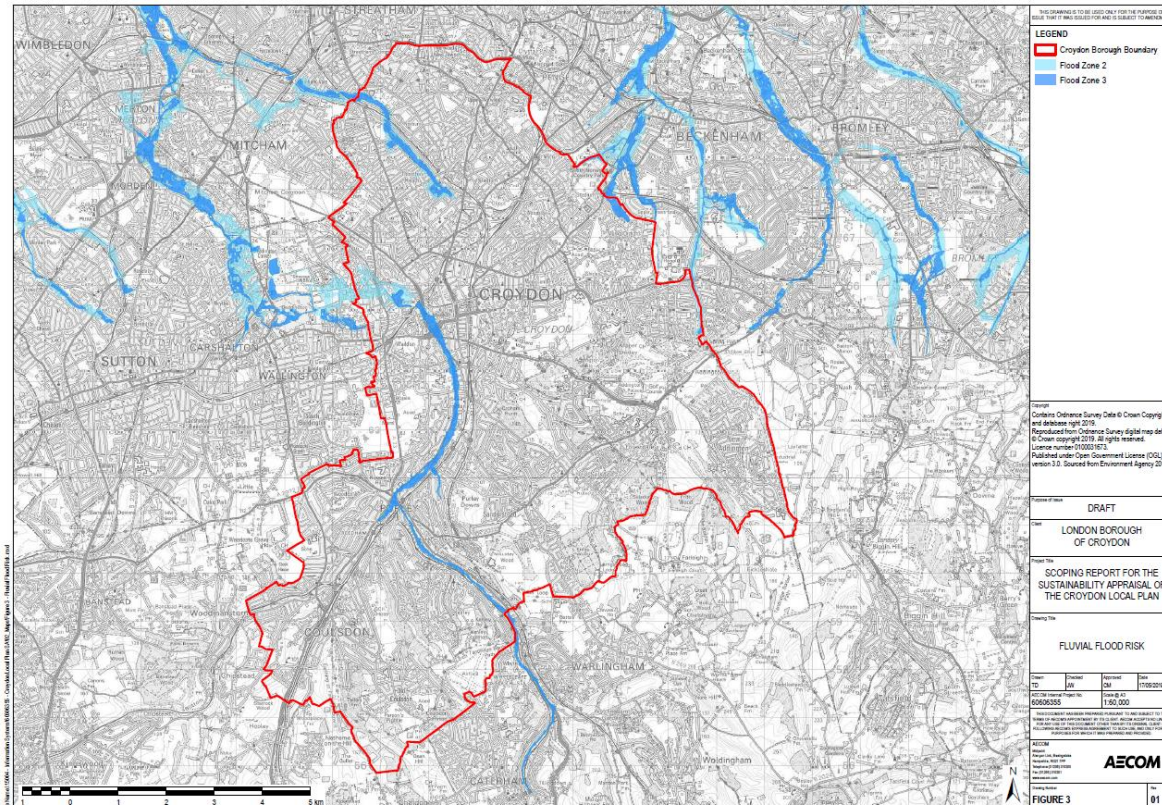
Figure B: Select biodiversity designations



### Climate change adaptation

The figure below shows fluvial flood risk (N.B. the figure is slightly out of date, but shows the broad spatial picture). Surface water flood risk is more widespread, including along dry valleys in the south of the Borough. Groundwater flood risk is present in the Borough, with particularly vulnerability in the Borough’s west and south.

Figure C: Fluvial flood risk



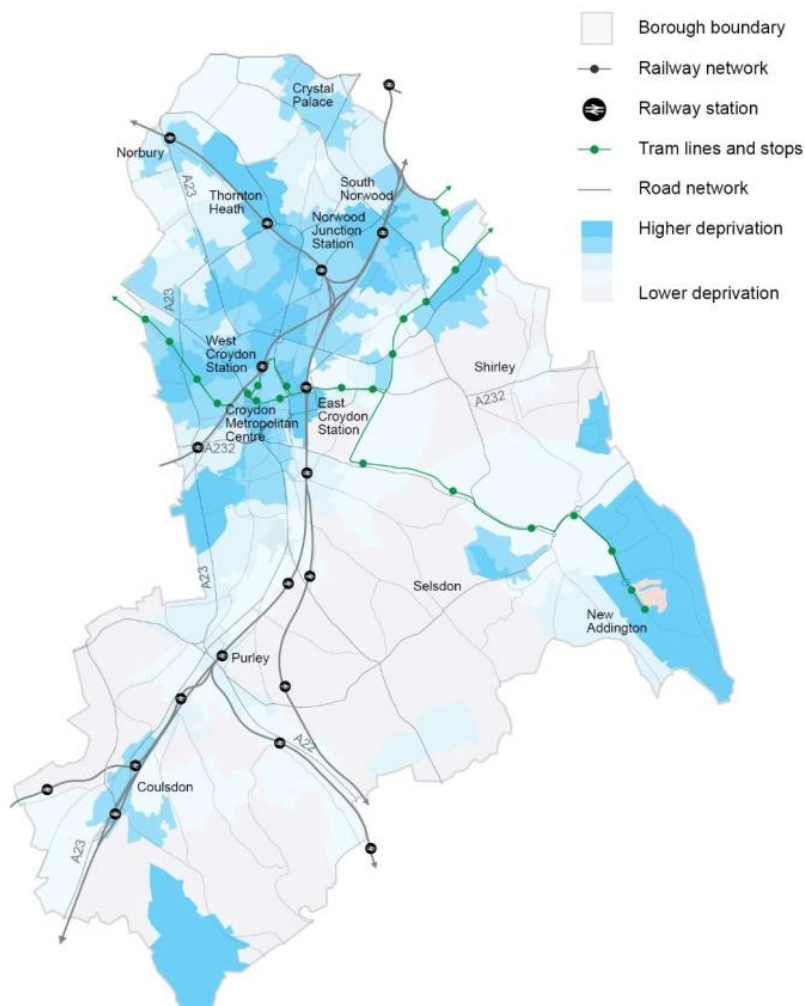


## Communities

The majority of more deprived wards are in the north of the Borough, closer to central London, and majority of least deprived in the south towards the urban fringe. This suggests a nuanced range of community needs.

The Borough currently has a youthful population which is growing rapidly, though there are indications that the age profile is beginning to shift and the population starting to age.

Figure D: Areas of relative deprivation, showing a clear spatial pattern



## Economy and employment

Croydon is both a key employment destination and a major commuter hub with strong travel to work relationships with the City of London, Westminster and Canary Wharf evident.

There is a more self-contained travel to work pattern for inbound commuting, suggesting that residents have a range of employment options both within and beyond the Borough.

Educational attainment is relatively poor in relation to average attainment within London, particularly with regard to the number of residents achieving Level 4 qualifications or above.

## Health

There are a range of green or open spaces within the Borough, though these are not necessarily well linked within a green infrastructure network and fewer of these spaces appear accessible to residents in the more densely urbanised north.

Health outcomes overall broadly reflect those of the wider London region and are generally stronger than outcomes for England as a whole. Nevertheless, there is notable disparity of health outcomes within the Borough itself and life expectancies at birth could vary by up to ten years.

## Heritage

There is a variety of designated heritage assets present within the Borough, including 8 Scheduled Monuments, 3 Conservation Areas and 166 statutorily listed buildings. Locally listed features comprise 25 Local Heritage Areas and over 1,000 locally listed buildings and structures.

There are 14 designated heritage assets identified by Historic England as being at risk ranging from public houses to churches to an entire conservation area. Finally, the Greater London Historic Environment Record indicates a huge range of over 4,000 non-designated assets within the plan area.

Figure E: Select historic environment designations



## Land use and soils

Green Belt covers 25.6% of the Borough. Around 100ha of Green Belt land was released through the adopted Local Plan, although the study which informed this found no further suitable sites for release meaning new evidence would likely be necessary to support any future Green Belt release.

There could potentially be substantial capacity for new development on brownfield sites within the Borough and it will be important to maximise the potential of these over the plan period.

The majority of land in the Borough is urban or non-agricultural use. Even undeveloped land outside the urban area is predominantly non-agricultural, supporting uses such as parks, playing fields, golf courses and woodland.

There are no identified minerals deposits in the Borough, though there is one aggregates rail depot at Purley supplying essential building aggregates for construction.

## Landscape

There are broad differences in character between the north and south of the Borough, with the largely flat landform of the north supporting a dense pattern of development, whilst the built form of the south is informed by hills, ridgelines and valleys, supporting suburban development surrounded by grassland and woodland.

Croydon falls predominantly across two National Character Areas (NCAs) reflecting a notional north/south divergence in character. The northern areas of the Borough are within the north east portion of the Thames Lower Basin Lowlands NCA, an area which “is highly urban in character” and is characterised by being “densely populated” and the presence of “numerous major road and rail networks [which] criss-cross the area”.

The south of Borough is less densely populated and is within the North Downs NCA, characterised by “*more urban-fringe influence and modern development associated with the land fringing Croydon, Purley and south London*”.

The 2015 Borough Character Appraisal identifies a “*dense and tightly knit*” urban form in the north, though one which includes “*verdant areas ... on the hill top and slopes*”, whilst the south is characterised by “*attractive wooded steep sided valleys with suburban residential areas on the hillsides*” supporting “*sweeping panoramas*”.

Pockets of open space are pepper-potted throughout the Borough, such as Purley Downs, Croham Hurst and Farthing Downs. These help break up the urban fabric and inject green space into the built area. Areas of higher ground, such as Farthing Downs, provide localised views.

## Transport

Although public transport provision and use in Croydon is high relative to the rest of England, it is comparatively low in relation to Greater London, which is a more appropriate scale of comparison.

A range of factors, including densification of development around transport hubs, the Ultra Low Emissions Zone and improved suburban rail services could increase demand for public transport into central London.

There is relatively low take up of walking and cycling as travel to work options. In the south of the Borough the topography is a factor alongside issues around walking and cycling infrastructure.

There could be potential for congestion to increase over time should modal shift fail to be widely adopted, with potential for disincentivising bus use through associated delays to bus services.

## Water

Croydon is supplied by Thames Water for both potable and waste water services and is partly within each of the London, East Surrey and Sutton Water Resource Zones (WRZs).

Croydon is located within an area of water stress where demand is high and supply subject to constraints.

There are a number of Source Protection Zones (SPZs) in the Borough, meaning development in some locations could have potential to contaminate water supplies without mitigation.

As discussed in Sections 6 and 9, a key issue is capacity at wastewater treatment works (WwTWs).

Figure F: Front covers of recent Thames Water Strategic Plans

